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Mr Anthony Ko
Department of Planning, Industry & Environment
GPO Box 39
SYDNEY NSW 2001

By email: Anthony.Ko@planning.nsw.gov.au

Dear Mr Ko

RE: Notice of Exhibition – Snowy 2.0, Main Works, Snowy Valleys, Monaro Regional (SSI – 9687)

I refer to your email dated 19 September 2019 inviting comments and advice from the Heritage Council of NSW for the above State Significant Development application for the Snowy 2.0 Main Works. The proposal involves the development of an underground pumped hydro power station and ancillary infrastructure.

The Summary Environmental Impact Statement and Environmental Impact Statement (EIS) prepared by Snowy 2.0 and EMM Creating Opportunities, dated September 2019 including Appendices P.2 (Historic Heritage), B (Detailed maps and plans) and S (Landscape and visual assessment) have been reviewed and the following comments are provided:

Appendix P.2 identifies four State Heritage Register (SHR) listed items in the Cooma Monaro, Snowy River and Tumut Shires, comprising Old Adaminaby and Lake Eucumbene, including relics and movable objects (SHR No 01794), Currango Homestead (SHR No 00983), Kiandra Courthouse/Chalet (SHR No 00994) and Matthews Cottage (SHR No 00998). It is noted all four items are outside the disturbance footprint of the project and there will be negligible impact on these items.

The construction activities will, however, impact on other historical items, landscapes and historical archaeological deposits located within the disturbance area.

The Historic Heritage Appendix (HHA) is supported by a thematic study which discusses relevant industries and historical development of the study area. Many of these areas were subject to investigation as part of the Exploratory Works phase of this project. Survey and salvage excavation formed part of the Exploratory phase of works in Lobs Hole (Ravine), the mining complex and associated village and this affects some of the heritage sites discussed in the HHA.

The way the HHA has been structured emphasises already known heritage items in existing registers with heritage significance (as a local or state level). There are tables which list these and while they identify relevant associated historic themes, they do not link to historical research discussed in earlier chapters. Section 8 discusses significance for each of the survey areas discussed. It also identifies where the Exploratory or Early works package has impacted significant sites and those have been subject to archaeological investigation

The results of the Early Works for the Snowy Package were not supplied to the Heritage Council of NSW to assist our assessment. The reports should be provided for inclusion in the Heritage Council of NSW library.

The Overview of Significant rankings for items e.g. Table 66 for Lobs Hole Ravine, provides an 'archaeological ranking' which appears to confuse the significance of the item and its archaeological potential (likelihood to survive) and it is unclear why the ranking was included. The 'ranking assessment may have confused the requirements for assessing significance in NSW as explained in the 2008 Heritage Council of NSW guideline *'Level of Heritage Significance'*. Nevertheless, the HHA has attempted to relate the findings of the survey with a significance assessment, although without detailed site-specific research underpinning each in the document. This is summarised in the Significance Tables in Section 8, with a concluding statement for each of local or state significance, which is consistent with Heritage Council assessment processes.

The main area within the Snowy project where impacts are proposed coincides with locally significant historical archaeological sites located in the Lobs Hole Ravine. The HHA acknowledges the considerable impact which has occurred to the Lobs Hole Ravine, a former copper mine complex and associated village. Previous impact has occurred through the Exploratory works undertaken for the Snowy 2.0 scheme, already undertaken. The current works package considers all of these heritage sites to provide a clearer understanding of the overall cumulative impact of the Snowy 2.0 project to this overall cultural landscape (p454).

Table 115 outlines which of the heritage items with archaeological research potential and values have been affected by the Exploratory Works and assumes impacts within the works zone will be complete (although two areas will be avoided). Most of the items within the Lobs Hole area and Lobs Hole Mining areas that require mitigation for the current program are within 'Struggle Street' as listed in Table 115. A few additional items are identified in Gooandra Fire Trail (Mining items) and within the Tantangara Dam – pastoral items and Nungar Creek Trail.

The project has advised avoidance is possible to some sites and recommends processes to avoid significant heritage items which will be avoided during works including R20 (Washington Hotel archaeological site) and R118 (Ravine Cemetery). This approach is supported. Where additional works are required to archaeological sites of significance which cannot be further avoided by the project archaeological mitigation is appropriate where it complies with Heritage Council of NSW guidelines. The following conditions would be appropriate to support archaeological mitigation of these sites as follows:

Historical Archaeological Management:

- a) *The Applicant shall nominate a suitably qualified and experienced historical archaeologist to manage the historical archaeological program according the following conditions. This person must fulfil the Heritage Council's Excavation Director Criteria for the excavation of locally significant archaeological sites.*
- b) *Archaeological Research Design and Excavation Methodology shall be prepared to guide the archaeological program and prepared according to Heritage Council of NSW guidelines. This document shall be submitted for comments to the Heritage Council of NSW prior to approval by the Department of Planning, Industry and Environment (DPIE).*
- c) *A Final archaeological excavation report shall be prepared within 12 months of the completion of archaeological works. It should include details of any significant artefacts recovered, where they are located and details of their ongoing conservation and protection*

in perpetuity by the land owner. Copies of the final excavation report shall be provided to the Department of Planning, Industry and Environment (DPIE), the Heritage Council of NSW and to the relevant Council's local studies unit.

As a project commitment, it may be appropriate to include a further condition to ensure there are appropriate protection mechanisms in place during works to identify, protect and avoid the R20 (Washington Hotel) and R118 (Ravine Cemetery) during works.

It is appropriate to point out that designated survey marks, including trigonometrical markers are likely still directly linked into the NSW Cadastre and cannot be simply removed without appropriate replacement. Further liaison with the Surveyor General may be required to determine whether additional management under *Surveying and Spatial Information Act 2002* is required, separate to heritage requirements.

If you have any questions regarding the above advice please contact Shikha Jhaldiyal, Senior Heritage Assessment Officer, at the Heritage NSW, Department of Premier and Cabinet, on 9873 8545 or Shikha.Jhaldiyal@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rajeev Maini', with a horizontal line underneath.

Rajeev Maini
Senior Team Leader
Regional Heritage Assessment South
Heritage NSW, Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
4 November 2019