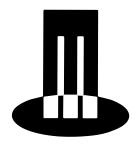
Peer Review of Historic Heritage Management Plan and Conservation Management Plan for Tarwyn Park and Iron Tank BYLONG COAL PROJECT Hansen Bailey Response to PAC Review Report ENVIRONMENTAL CONSULTANTS



19 December 2017

Mr Nathan Cooper
Principal
Hansen Bailey Pty Ltd
C/- ncooper@hansenbailey.com.au

Dear Nathan

I refer to my previous comments on earlier drafts of the Conservation Management Plan (CMP) for the Tarwyn Park Farm Complex and the Bylong Historical Heritage Management Plan (HHMP), both prepared for Hansen Bailey Pty Ltd by AECOM. In response to your request for a peer review of both documents, I have now reviewed the latest drafts and offer the following comments.

Tarwyn Park and Iron Tank Final Draft CMP, Revision 4, dated 14 December 2017

A succinct Executive Summary provides readers with relevant background of the subject property in the context of the Bylong Coal Project, the statutory requirements and an outline of the CMP's format and content. The Plan has been prepared in accordance with the methodology recommended in the Burra Charter, the *NSW Heritage Manual*, *The Conservation Plan* by James Semple Kerr and the Heritage Council's checklist for such documents.

The introduction in Chapter 1 sets out the background, the Project, objectives, current heritage listings, the methodology employed along with terminology and nomenclature used, identification of the report's authors, consultations carried out, copyright and intellectual property issues, limitations and acknowledgment of those who provided information or other assistance.

Documentary evidence on the history of Tarwyn Park and Iron Tank is analysed in Chapter 2, covering the evolution of the subject property from first European settlement to the present day and covering its various development phases.

Chapter 3 analyses the physical evidence of the subject property and identifies the setting, views and vistas, landscape features and built elements.

In Chapter 4 a comparative analysis is provided, along with discussion of relevant historical themes and consideration of the Heritage Council's inclusion and exclusion guidelines for the assessment of heritage values against the seven criteria.

Chapter 5 provides an assessment of heritage significance, leading to a statement of cultural significance for the property as a whole and a schedule of significant elements.

Priority conservation works are identified in Chapter 6.

Relevant issues, opportunities and constraints arising from significance and statutory requirements are discussed in Chapter 7.

Analysis of these in the context of the assessed significance of the property and its component elements leads to the development of the conservation policies in Chapter 8 which appear to cover well the matters relevant to the property and the management of its heritage values.

An extensive list of references is provided and three appendices include a detailed site history by historian Dr Terry Kass who has considerable knowledge and experience of the cultural history of central western NSW, schedules of the significance and condition of site components and a table of the other places with which the authors compared Tarwyn Park and Iron Tank. This comparative analysis includes buildings of similar age and/or architectural style listed on the SHR or on LEP schedules.

In my opinion, this final draft CMP is a well laid-out, well-illustrated and comprehensive conservation management document which has been prepared in accordance with the relevant methodology, rigorously assesses significance using appropriate criteria and guidelines, analyses the relevant issues, provides clear conservation management policies and identifies priority works. The references and appendices provide useful sources and background material. The CMP will meet its objective of providing a framework for the conservation and management of the Tarwyn Park and Iron Tank properties.

I see no reason why this final draft CMP should not be forwarded to the Office of Environment and Heritage and other relevant authorities for comment and consideration of endorsement.

Bylong HHMP, Revision 3, dated 8 December 2017

The introduction to this draft document sets out the background to the Bylong Coal Project and the relevant regulatory requirements and consultations, clearly states the purpose of the HHMP and refers to related plans and baseline data. It is cross-referenced to the draft CMP for Tarwyn Park and Iron Tank, indicating appropriate structures and policies for CMPs for a number of other properties affected by the Project.

The second chapter sets out the procedures and management measures considered necessary for the historic heritage assets within the Project area. Provisions are included for the conservation management of places, archival recording, test and salvage archaeological excavation, movable heritage, the treatment of salvaged items, human and horse remains. Measures are recommended for managing subsidence, blasting, vibration and visual impacts and interpretation of heritage values.

In the third chapter, protocols are established for dealing with unexpected finds, new sites, skeletal remains and horse remains. These appear to cover all eventualities and spell out the statutory requirements for each case.

The fourth chapter deals with compliance in regards to relevant statutory controls and management of incidents during the life of the Project, including impact prevention and mitigation.

The fifth chapter deals with Reporting, Auditing, Reviewing, identifying the period of the Project and responsibilities.

A comprehensive set of References is provided.

Appendix A includes the assessments of heritage significance of all historical heritage items within and directly adjacent to the Project boundary. These well-illustrated assessments have been made against the Heritage Council criteria and provide a sound basis for draft State Heritage Inventory database entries.

Appendix B is an assessment of the heritage significance of the Bylong Landscape Conservation Area and sensibly adopts a Cultural Landscape Management Approach for the area. The history of natural and cultural attributes are well analysed and a table measures the area against a number of comparable precincts and areas listed on the State Heritage Register (SHR). There is a comprehensive and robust assessment of the area's values against the standard criteria using the inclusion and exclusion guidelines, concluding that the Bylong Landscape Conservation Area is of State significance as measured against a number of the assessment criteria.

In my opinion the draft HHMP is a well-illustrated, comprehensive, plain English report with thorough analyses of data and rigorous assessments of heritage values. The report addresses the concerns raised by the Planning Assessment Commission (PAC) following their review of the State Significant development (SSD) application and will provide those responsible for the management of the historic heritage of the Project area with sound guidance. I see no reason why it should not be forwarded to the Office of Environment and Heritage and other relevant authorities for comment and consideration of endorsement.

Yours sincerely

C. Betteridge

Chris Betteridge BSc, MSc (Museum Studies, AMA, MICOMOS

Director

Betteridge Consulting Pty Ltd