



Heritage Council

of New South Wales

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Dear Mr Mooney

**RE: ENVIRONMENTAL ASSESSMENT – DRAYTON SOUTH COAL PROJECT
(prepared by Hansen Bailey for Anglo American Metallurgical Coal Pty Ltd,
November 2012)**

Reference is made to your email seeking the Heritage Branch's comment on the Environmental Assessment prepared for the Drayton South Coal Project.

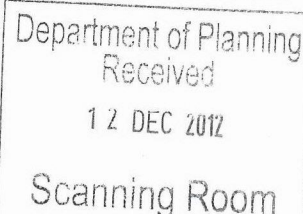
The Heritage Branch notes that Section 8.10 and Appendix L deal with issues of non-Aboriginal heritage and it is also noted that the one Director General Requirement (DGR) for the project, in relation to non-Aboriginal heritage, is as follows:

“assessment of potential impacts on non-Aboriginal heritage values of the locality related to its settlement by Europeans and its pastoral history”

It is also noted that the heritage impact assessment, undertaken by AECOM Australia, indicates that the scope of the assessment included:

- “Addressing the Director-General’s Environmental Assessment Requirements relating to non-Aboriginal heritage, issued on 3 August 2011;
- Review of previous archaeological and historical studies conducted within the study area to assess the current status of non-Aboriginal heritage and to understand the development of the area;
- Locating and recording non-Aboriginal sites within the study area to assist in developing suitable heritage management recommendations and nominate areas of potential constraints;
- Assess the heritage significance of sites in accordance with the Heritage Office guidelines *Assessing Heritage Significance* (2001); and
- Presenting recommendations for the management and/or mitigation of the Project’s impact on the heritage sites and archaeological resource identified” (p1).

The Environmental Assessment states that, as part of the non-Aboriginal heritage impact assessment, historical and archival research and a field survey have been undertaken to identify all known or potential heritage items within or adjacent to the project site. These items are to be historically related to the European settlement or agricultural use of the land since the early nineteenth century.



The assessment, undertaken by AECOM Australia, identified ten known or potential heritage sites within or adjacent to the project site. Of the ten identified, two potentially locally significant items were located within the project site:

- A post-and-rail fence; and
- Nissen Hut with stockyard.

It was noted in the assessment that these items would be directly impacted by the project and would be removed. Prior to demolition, a photographic archival recording would be made for the two items and scaled drawings of the Nissen Hut would be undertaken.

The non-Aboriginal heritage assessment also identified five heritage items already included on statutory heritage lists that are located outside but adjacent to the project site:

- Plashett Homestead (Muswellbrook Local Environmental Plan 2009);
- Edderton Homestead (Muswellbrook Local Environmental Plan 2009);
- Arrowfield Cottage (Singleton Local Environmental Plan 1996);
- Strowan Homestead (Singleton Local Environmental Plan 1996); and
- Woodlands Homestead (Muswellbrook Local Environmental Plan 2009).

Finally, three other potential heritage items (currently not statutorily listed) were identified outside but adjacent to the project site:

- Bowfield Homestead;
- Randwick Homestead; and
- Stockyard.

According to the assessment, the items identified outside but adjacent to the project site will be indirectly impacted by the project. During construction and operation, the project will visually affect the setting of the heritage items and may also affect the structural integrity of the items due to the ground vibration and pressure effects of blasting.

It was noted in the assessment that, prior to the project being undertaken, a non-aboriginal heritage management plan will be carried out to manage the heritage items and mitigate any adverse impacts as a result of the project. This will involve listing and mapping the identified heritage items; carrying out a significance assessment for each item; writing a Statement of Significance for each item; outlining the management and mitigation measure for visual and blasting impacts; and identifying appropriate procedures for managing any unexpected finds discovered during the project.

Having considered the Environmental Assessment and non-Aboriginal heritage assessment, the following comments are made about matters of non-Aboriginal cultural heritage:

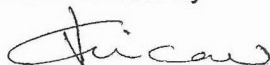
- The Heritage Branch is satisfied that the thorough research already undertaken, coupled with the field survey, is a sufficient investigation of any known or potential non-Aboriginal heritage sites within or adjacent to the project site;
- Although the DGR for non-Aboriginal heritage is brief in nature, it is considered that the Environmental Assessment has adequately addressed the requirement;

- It is recommended that, prior to the project being undertaken, the non-Aboriginal heritage management plan be developed in consultation with Muswellbrook Shire Council and Singleton Council in order to manage the heritage items of local significance appropriately;
- It is recommended that consultation be undertaken with Muswellbrook Shire Council and Singleton Council about the inclusion of the identified (but currently unlisted) heritage items on local environmental plans. In particular, discussion should be had regarding the fence and Nissen Hut and Stockyard prior to demolition;
- Should any of the items be found to be of State Significance it is recommended that further consultation be undertaken with the NSW Heritage Council on the management of any impacts to those items prior to consent being issued;
- Should the demolition of the fence and Nissen Hut and Stockyard proceed and a photographic archival recording undertaken, it is recommended that this be prepared in accordance with the Heritage Council's publications '*How to Prepare Archival Records of Heritage Items*' (1998) and '*Photographic Recording Of Heritage Items Using Film or Digital Capture*' (2006). Copies of the recordings should be lodged with the Heritage Branch, Muswellbrook Shire Council and Singleton Council;
- As part of the non-Aboriginal heritage management plan, it is recommended that the significance assessments and Statements of Significance for each item be undertaken by suitably qualified and experienced heritage consultants;
- During the project operation, it is recommended that ongoing assessment and monitoring of the structural integrity of the identified heritage items should be undertaken;
- As recommended in the non-Aboriginal heritage assessment, additional tree screening and plantings should be used to mitigate the adverse visual impact of the project on the heritage items adjacent to the project site; and
- The non-Aboriginal heritage assessment makes no reference to potential archaeological sites within the project area. The non-Aboriginal heritage management plan should outline the methodology for how archaeological sites will be managed if discovered during the project construction and operation.

Please be advised that these are preliminary comments only and a full merit assessment of this project has not yet been undertaken.

The Heritage Branch would be happy to review any further documentation that may address any likely heritage impacts. If you have any further enquiries regarding this matter, please contact Lucy Moore at the Heritage Branch on (02) 9873 8535.

Yours sincerely



10/12/2012

Vincent Sicari

Manager

Conservation Team

Office of Environment and Heritage

AS DELEGATE OF THE NSW HERITAGE COUNCIL