

Drayton South Coal Project, Review of Anglo American Justification Report

Report, March 2014



Report Register


The following report register documents the development and issue of the report entitled, Drayton South Coal Project, Review of the Anglo American Justification Report, undertaken by GML Heritage Pty Ltd in accordance with its quality management system.

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1.0 Introduction

1.1 Key Findings

GML Heritage has reviewed the Drayton South Coal Project Justification report with regard to non-Aboriginal heritage and found the following.

1. The Director General's Requirement for non-Aboriginal heritage requires 'assessment of potential impacts on non-Aboriginal heritage values of the locality related to its settlement by Europeans and its pastoral history'.¹
2. Historic properties in the vicinity of the Drayton South Coal Project including Strowan and Arrowfield (Coolmore Australia) and Woodlands Stud (Darley Australia) are statutory listed heritage items.
3. Some provisions in the applicable local and regional statutory planning controls as they relate to the listed heritage items have not been adequately addressed or considered in the Anglo American non-Aboriginal heritage assessment work to date.
4. Mussellbrook—Jerrys Plains is listed on the Register of the National Trust (NSW) as a Landscape Conservation Area.
5. Generally, AECOM (Dr Lampard), Dr Richard Lamb and GML Heritage, are in agreement regarding the cultural heritage significance of the historic properties.
6. Dr Lampard concurs with GML that the historic properties are of State significance and would be likely to meet the threshold for listing on the State Heritage Register if they were nominated. Further, she contends that the Coolmore cultural landscape is potentially of National significance.²
7. The non-Aboriginal heritage assessments prepared for the proponent have repeatedly overlooked the requirement for a comprehensive assessment of heritage values (including the cultural landscape associated with settlement and pastoralism). This is and remains a significant omission in the current body of technical documentation prepared as part of the environmental assessment for the Drayton South Coal Project.
8. In the absence of a comprehensive and adequate heritage assessment of the historic cultural landscape associated with settlement, pastoralism and the thoroughbred industry, such a statement fails to address and recognise the potential adverse and enduring impacts on the heritage values of Coolmore and Woodlands specifically.
9. Considerable attention has been directed toward assessing the potential visual impact, however, this is only one aspect of heritage impact arising from the Drayton South Coal Project.

¹ Director General's Requirements, 3 August 2011.

² Anglo American Justification Report, Appendix 4 Drayton South Historic Heritage Advice-PAC Review, AECOM, Section 4.1.2 Cultural Heritage of the Landscape, p 19 of 40.

10. The construction of the visual bund will likely result in material adverse impacts on the historic cultural landscape. It will fundamentally and irreparably change the nature of the landscape and the historic functional relationships that have been inscribed over successive generations of human modification and use.
11. Several other underlying and potentially adverse impacts on other attributes of cultural significance and heritage values have yet to be considered adequately and comprehensively. This is regarded as a significant oversight in the current significance and impact assessment process for non-Aboriginal heritage.
12. Without a comprehensive and adequate assessment of the heritage significance and values of cultural landscapes associated with Coolmore and Woodlands under the State and National listing criteria the extent and level of heritage impacts cannot be stated with any certainty.

1.2 Background

GML Heritage (GML) has been commissioned by Coolmore Australia and Darley Australia to undertake a review of non-Aboriginal cultural heritage as presented the Drayton South Coal Project Justification report, prepared by the Anglo American Metallurgical Coal Pty Ltd, February 2014.

The Anglo American Metallurgical Coal Pty Ltd is the proponent for the Drayton South Coal Project (Project Application 11_0062). The project application seeks approval for the establishment of a new open cut and highwall mining operation. The Drayton South Coal Project is to be located to the south-west of the existing Drayton coal mine with an operational life of 27 years.

The project application was submitted under Part 3A of the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act 1979). Under Part 3A (now repealed) the Minister for Planning and Infrastructure is the consent authority. Under Section 23D of the EP&A Act 1979, the Minister has delegated the determination to the Planning Assessment Commission (PAC). In December 2013 the PAC, chaired by Gabrielle Kibble (AO) released the Planning Assessment Commission Review Report on the Drayton South Coal Project. The Commission concluded that the current project proposal should not proceed.

At the time of writing the Director-General's assessment report is still to be issued. In preparing the assessment report the Director-General must have regard to the Environmental Assessment, Preferred Project Report and the PAC Report.

This report provides a critical review of matters related to non-Aboriginal cultural heritage issues as documented in Anglo American Justification Report.

Generally, this report relies upon the concept and definition of 'cultural significance' in accordance with the Australian ICOMOS Charter for Places of Cultural Significance (The Burra Charter).

Under the Burra Charter, cultural significance is defined as 'aesthetic, historic, scientific, social or spiritual value for past, present or future generations'.³ The Burra Charter is a non-statutory guideline, however, it is the professionally accepted standard for heritage practice in Australia and its principles, processes and practice are enshrined in Australia's heritage planning statutes.

³ Peter Marquis-Kyle and Meredith Walker, *The Illustrated Burra Charter*, Australia ICOMOS, 2004,

1.3 Previous Reports

GML has previously prepared heritage advice for the HTBA and its members including Coolmore Australia and Darley Australia. The advice has included:

- Drayton South Coal Project Heritage Report, October 2013; and
- Drayton South Coal Project Presentation to the Planning Assessment Commission Public Hearing, Denman Memorial Hall, 10 October 2013.

1.4 Author's Qualifications and Experience

Sharon Veale is a Partner and Chief Executive Officer of GML Heritage Pty Ltd (GML), Heritage Consultants, with postgraduate qualifications in Public History and Urban Planning.

Sharon has over 15 years' experience in cultural heritage planning, assessment, and management, with specific expertise in the identification and assessment of historical landscapes. She is an active researcher and has published broadly in cultural heritage. Since 2010, Sharon has been the course leader and lecturer in Heritage Planning at the University of NSW.

Prior to joining GML, Sharon was the Research Historian at the NSW National Parks and Wildlife Service between 1996 and 2006. Working in that position, in 2001 she authored, *Remembering Country: History and Memories of Towarri National Park*, which explored the history and memories associated with the former pastoral landscapes now conserved within Towarri National Park. She has prepared innumerable land use histories and heritage management plans and assessments for several historic landscapes now within the NSW reserve system including: Culgoa National Park; Goobang National Park; and Wianamatta Regional Park. More recently, she has worked on planning studies for historic urban landscapes including an area of 'National Significance' comprised of Elizabeth Farm and Experiment Farm, in Harris Park, for Parramatta City Council. She has also prepared a heritage assessment of the Newmarket Stables, Randwick. She is currently Project Director for the Conservation Management Plan for the Royal Botanic Gardens, Sydney, and is providing heritage advice to the master planning team for Centennial Park, Sydney.

1.5 Heritage Listings

Within and in the vicinity of the proposed Drayton South Coal project are statutory and non-statutory listed heritage items. These items are variously identified as being of State, 'Regional' and Local significance.

The homestead known as 'Strowan' was formerly listed on the Register of the National Estate (RNE). The RNE was closed in 2007 following the repeal of sections of the *Environment Protection and Biodiversity and Conservation Act 1999* (Commonwealth). Items formerly listed on the RNE are now maintained by the Department of Environment and Heritage as the Australia Heritage Database. The Australia Heritage Database is a publicly accessible and searchable archive.

The table below provides an overview of the statutory and non-statutory heritage listed items in the vicinity of the Drayton South Coal Project.

Property Name	Heritage Listing	Location	Heritage Significance
Woodlands Stud	<i>Hunter Regional Environmental Plan</i>	Golden Highway, Denman	Regional

	<i>1989 (Heritage) Muswellbrook Local Environmental Plan 2009</i>		State
Arrowfield Estate	<i>Singleton Local Environmental Plan 2013</i>	The Golden Highway Jerrys Plains	Local
Kelvinside and outbuildings	<i>Hunter Regional Environmental Plan 1989 (Heritage)</i>	Rouchel Road	Regional
Segenhoe and Outbuildings	<i>Hunter Regional Environmental Plan 1989 (Heritage)</i>	Segenhoe Road Scone	State
Strowan	<i>Singleton Local Environmental Plan 2013</i> Australian Heritage Database (non- statutory archive)	The Golden Highway Jerrys Plains	Local
Mussellbrook-Jerrys Plains	Register of the National Trust (NSW) (non-statutory register)	Landscape Conservation Area	Not specified

Under the provisions of the statutory planning instruments for the Hunter Region, and the Local Government Areas of Muswellbrook and Singleton the consent authority is required consider the effect of the proposed development on the significance of the item or the area concerned. In addition the consent authority may require prior to granting consent to any proposed development require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed activity would affect the heritage significance of the listed heritage item.

The *Hunter Regional Environment Plan 1989 (Heritage)* requires that development consent shall not be granted unless an assessment of the extent to which carrying out the development would affect the heritage significance of the item and its site and whether the setting of an item, and in particular, whether any stylistic, horticultural or archaeological features of the setting should be retained.

1.6 Statements of Significance

1.6.1 Introduction

This section includes some of the existing statements of cultural heritage significance associated with the heritage listings in the vicinity of the Drayton Coal Project.

Given the limited time within which this report has been prepared, the statements of significance from the Council Heritage Studies which relate to the heritage items in Schedule 5 of the Local Environmental Plans for Singleton and Muswellbrook Heritage Studies have been accessed.

1.6.2 Statement of Significance—Strowan (Coolmore)

Australian Places Inventory

Built in 1860 to the designs of Oswald Lewis (son of Mortimer Lewis). An attractive unspoilt transitional country house with particularly fine hallway and general detail. It has been continuously occupied by the descendants of the first owner, George Bowman, a well-known pastoralist family.⁴

1.6.3 Statement of Significance—Kelvinside (Darley)

Australian Places Inventory

An impressive example of a Federation Boom style homestead in intact condition, complete with outbuildings, in a notable setting. The homestead has a surrounding verandah with elaborate cast ironwork and is widened to form a fine piazza. The interior retains most of the original fixtures in excellent condition and displays a high standard of construction. The leadlighting is particularly notable, featuring Australian motifs. The fireplaces and plasterwork are noteworthy and add to the significance of the interiors. The significant outbuildings include a large kitchen block, timber meathouse and stables, all contemporary with the homestead.⁵

1.6.4 Statement of Significance Landscape Conservation Area

Register of the National Trust (NSW)

The lush cultivated alluvial flats of the central Hunter and lower Goulburn Rivers present a magnificent view, with the wide valley floor of majestic scale bounded by low hills to the east and west and the rugged escarpment of Wollemi National Park to the south (aesthetic).

This area contains many of the high quality properties and large pastoral estates which contribute to the great rural wealth of the Hunter Valley (social).

1.7 Summary of Heritage Listings

Generally, the statutory listings and statements of significance are focussed on the architectural and aesthetic qualities of the homesteads, rather than the broader historical cultural landscape setting. This reflects an early and continuing bias in heritage practice towards the assessment of built heritage or individual items with little regard to the functional systems or historical land uses such as pastoralism that generated and supported the development of homesteads and other built structures and features.

The National Trust Register Landscape Conservation Area Listing is the exception. The National Trust listing assesses the values and significant qualities associated with natural and cultural landscape comprised of the escarpment, valley, rolling hills and alluvial flats occupied in part by the large rural pastoral estates.

Notwithstanding the focus of the listings, the applicable regional and local statutory planning instruments and the heritage provisions therein, provide for the assessment, conservation,

⁴ Australian Heritage Places Register, formerly Register of the National Estate, <<http://www.heritage.gov.au/cgi-bin/ahpi/record.pl?RNE1395>>, accessed 5 October 2013.

⁵ Australian Heritage Places Register, formerly Register of the National Estate, <<http://www.heritage.gov.au/cgi-bin/ahpi/record.pl?RNE14360>>, accessed 5 October 2013

appreciation and understanding of heritage items, areas, townscapes, landscapes, character, setting and views.

It is noted that in the Anglo American non-Aboriginal heritage assessment work to date, some of the existing provisions and requirements within the local and regional statutory planning controls, as they relate to the listed heritage in the vicinity, have not been adequately addressed or considered.

1.8 Drayton South Non-Aboriginal Heritage Impact Assessment

The non-Aboriginal heritage impact assessment for the Drayton South Coal Project was prepared by AECOM, 27 June 2012.

The following historic homesteads were considered in the AECOM report are located in the vicinity of the Drayton South Coal Project.

Heritage Item	Level of Significance as assessed by AECOM
Strowan	National (Singleton LEP)
Arrowfield	Local (Singleton LEP)
Woodlands Stud	State (Hunter REP Listed)
Randwick	Not assessed

The Justification Report states that the AECOM assessment was prepared to assess and determine the impacts on non-Aboriginal heritage items within and adjacent to the Drayton South Coal Project and to recommend measures to mitigate and manage these impacts as necessary.⁶

The Director General's requirement (DGR) for non-Aboriginal heritage for the Drayton South Coal Project states:

*Assessment of potential impacts on non-Aboriginal heritage values of the locality related to its settlement by Europeans and its pastoral history.*⁷

It is noted in the Justification Report that the proposed Drayton South mine project will directly impact upon two items of local heritage significance, namely, a fence, and a Nissan Hut with stockyard. Further, the Justification Report states that listed heritage items located outside of the proposed mine disturbance area such as the historic homesteads (listed above) will not be impacted. In section 4.8 of the Justification Report it is noted that any project approval will require a non-Aboriginal heritage management plan so as to ensure the appropriate management of any potential impacts.

In the non-Aboriginal impact assessment prepared by AECOM, the key requirement implicit in the DGR cited above was not addressed.

In October 2013 the key finding of the heritage advice provided by GML Heritage to the Hunter Thoroughbred Breeders Association (HTBA) and its members was that the AECOM did not

⁶ 140218 Drayton South Justification Report Master Final, Assessed Impacts of the Project, p11.

⁷ Director General's Requirements, 3 August 2011.

adequately assess the potential impacts on the historic cultural landscape values associated with settlement by Europeans and its pastoral history.

The Anglo American Justification Report has sought further advice and clarification from AECOM in response to this matter. AECOM's advice authored by Dr Susan Lampard is included in Appendix 4 of the Justification Report. Further analysis of the heritage advice provided by AECOM for the Justification Report pertaining to the impacts on the significant historic cultural landscape is outlined in the following sections of this report.

2.0 Anglo American Justification Report Review

2.1 Introduction

This section of the report provides an analysis and review of the non-Aboriginal heritage sections included in the Anglo American Justification Report. The key sections in the Anglo American Justification report include Section 4.8; Sections 3.2 and 5.5.2 Richard Lamb and Associates Report; Section 4.1.2 Cultural Heritage of the Landscape; and Section 4.8 Cultural Landscape and Heritage.

2.2 Cultural Landscape Heritage Values

2.2.1 Appendix 4 Drayton South Historic Heritage Advice-PAC Review

2.2.2 Expert Concurrence regarding Potential Heritage Values and Listings

The Anglo American Justification Report provides comment on the submission to the PAC prepared by GML. In the Justification Report it is noted that the PAC ‘materially rely’ upon the submission made by GML, in particular that the cultural landscapes associated with the Coolmore and Darley (Woodlands) Studs have heritage significance.

In response to this finding, Dr Susan Lampard, the main author of the AECOM Non-Aboriginal Assessment Report, has provided further advice to Anglo American regarding the heritage values associated with the cultural landscapes of Coolmore and Darley Horse Studs and the potential of and processes for listing on the State Heritage Register (SHR) and the National Heritage List (NHL).

Dr Lampard concurs with GML that the properties are of State significance and are likely to be listed on the State Heritage Register if they were nominated. Further, she contends that the Coolmore cultural landscape is potentially of National significance.⁸

It should be noted that AECOM, GML Heritage, and Dr Richard Lamb are in agreement regarding the potential cultural heritage value of the properties.

The Justification Report observes that the historic cultural landscapes associated with the studs are not presently listed. Nor have they been nominated to the State Heritage Register under the *Heritage Act 1977* (NSW), or listed on the National Heritage List under the *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth).

Whilst this observation is correct, it fails to recognise that the homesteads are already on Regional and Local statutory heritage lists. Moreover, it fails to recognise that the local and regional statutory planning controls provide for conservation of listed heritage items and require the assessment of impacts on the significance of the listed heritage items and the broader setting.

Moreover, Dr Lampard makes no reference to the National Trust Landscape Conservation Area Listing dating from January 1985. The National Trust Register is a non-statutory listing,

⁸ Anglo American Justification Report, Appendix 4 Drayton South Historic Heritage Advice-PAC Review, AECOM, Section 4.1.2 Cultural Heritage of the Landscape, p 19.

nevertheless, inclusion on the Register does provide formal evidence of the long standing professional and community regard for the cultural value and significance of the landscape.

There is general agreement between heritage consultants that the Coolmore and Darley properties have significant heritage value.

Despite this the non-Aboriginal heritage assessments prepared for the proponent have repeatedly overlooked the requirement for a comprehensive assessment of heritage values and the potential impacts on cultural heritage significance. This is and remains a significant omission in the current body of technical documentation prepared as part of the environmental assessment for the Drayton South Coal project.

2.2.3 Heritage Impacts

Dr Lampard's advice includes discussion regarding the potential heritage impacts on Coolmore and Woodlands Horse Studs. Dr Lampard states that if Coolmore was to be listed on the State Heritage Register and potentially on the National Heritage List, the proponent would be required to consider the potential impacts of the project on the adjacent heritage items, including any potential impacts arising on the cultural landscapes.⁹

Notwithstanding this, in Dr Lampard's view modelling and studies undertaken to date for the project demonstrate that it is able to comply with all relevant environmental criteria and standards. The only concern of note is the potential visual impacts on the cultural landscapes of Coolmore and Woodlands.¹⁰

In the absence of a comprehensive assessment of the heritage significance and values of cultural landscapes associated with Coolmore and Woodlands under the State and National listing criteria the extent and level of heritage impacts cannot be stated with any certainty.

As such, to state that the only concern is related to potential visual impacts overlooks the fact that appropriate curtilages for the cultural landscapes associated with Coolmore and Woodlands have not been identified, assessed or determined. Moreover, the potential impacts on the significance of attributes such as underlying geological patterning, the natural topography, the vegetation and the setting, as they relate to and underpin the historic, aesthetic, scientific, social and spiritual significance of the cultural landscape and its setting have not been assessed.

The potential visual impact is only one aspect of heritage impact arising from the Drayton South Coal Project. Several other underlying and potentially adverse impacts on other attributes of cultural significance and heritage values have yet to be considered adequately and comprehensively and as such remain overlooked. This is regarded as a significant oversight in the current significance and impact assessment process for non-Aboriginal heritage.

⁹ Under the *Heritage Act 1975* (NSW) the extent to which the proposal would affect the significance of a SHR listed item is required to be considered. At National level, places on the NHL require approval under the EPBC Act 1999 prior to any action that could have a significant impact on the national heritage values of the listed place. At national level, a significant impact is defined as one that is 'notable, of consequence with regard to the context or intensity'. The 'sensitivity, value and quality of the environment which is to be impacted, combined with the duration, magnitude and extent of the impacts' are factors that are considered when determining whether or not an impact is likely to be significant.⁹ In short, impacts would need to be considered with regard to cultural significance at State level and heritage values at National level. Such impacts are considered with regard to all aspects of cultural significance and all listed heritage values.

¹⁰ Anglo American Justification Report, Appendix 4 Drayton South Historic Heritage Advice-PAC Review, AECOM, Section 4.0 'Impact to Potentially Listed Items'.

2.3 Historic Land Use

The heritage values associated with the historic and continuing land uses within and surrounding the Drayton South Coal Project related to pastoralism and the thoroughbred horse racing industry are discussed in the Anglo American Justification Report.

The PAC found that the greater and more significant risk was that the thoroughbred breeding operations on the sites would be discontinued. Further, the PAC found that without the continuation of the historic land use that the evolution of the cultural landscape would lose its significance and the continued use and maintenance of built heritage would no longer be assured.¹¹

In response to this finding, the Anglo American Justification Report states that the cultural landscape issues are addressed (see section 4.1.2 and Appendix 4). The report concludes that it is unlikely that either Coolmore or Woodlands would cease to be used given the significant amount of investment in physical infrastructure.

In the absence of a comprehensive and adequate heritage assessment of the historic cultural landscape associated with settlement, pastoralism and the thoroughbred industry, such a statement fails to address and recognise the potential adverse and enduring impacts on the heritage values of the Coolmore and Woodlands specifically. Furthermore, it fails to appreciate and acknowledge how interconnected the history and heritage values of those places are in relation to the continually evolving cultural landscape, and the associated aesthetic, scientific, spiritual and contemporary social values.

2.4 Scenic and Landscape Values

In Section 6.4.2 of the Justification Report the loss of scenic and landscape values is addressed.

The Justification Report states that the proposed visual bund which is to be constructed to screen the proposed mining activities will result in a visual impact during construction, but that once rehabilitated the visual impact will be low. The intention of the bund is to construct and vegetate it in such a way that it appears 'natural' and therefore not able to be distinguished from the surrounding landforms and vegetation. Further, the Justification Report claims that the importance of the landscape values to Coolmore and Woodlands Studs is 'rhetorical hyperbole'.

The Justification Report demonstrates little understanding or appreciation of the significant aesthetic values associated with historic settlement patterns, pastoral activity, or the thoroughbred industry as it is expressed across the landscape.

Such qualities and other scenic values were identified by the National Trust (NSW) in January 1985 as part of Landscape Conservation Area. One of the original proposers of the National Trust Landscape Conservation Area was the former Director of the Heritage Division, Mr Reece McDougall. The Landscape Conservation Area covers approximately seventy percent of the proposed Drayton South mine project area and provides persuasive evidence of the significant cultural values associated with the landscape.

¹¹ Anglo American Justification Report, 4.8 Cultural Landscape and Heritage, p 75.

2.5 Visual Impacts

2.5.1 Visual Values

In the Justification Report considerable attention is paid to visual impacts. The PAC sought specialist independent advice from Dr Richard Lamb on visual and related amenity issues. Dr Richard Lamb is a visual and landscape heritage consultant and principal of Richard Lamb and Associates.

The Justification Report refutes the advice provided by Dr Lamb, finding that the scope of his report extends beyond 'visual and amenity issues' to address cultural heritage and 'image'.

Dr Lamb identifies three different categories or classes of visual impact. Together, these categories can be interpreted to reflect some of the potential tangible and intangible cultural heritage values attributed to the cultural landscape of the Coolmore and Woodlands properties.

The Anglo American Justification Report comments with respect to Dr Lamb's advice regarding dynamic visual imagery, memory, iconography of place, and picturesque scenery, that any impacts to such qualities relate to the 'mental picture' rather than 'actual views'.¹²

This observation by Anglo American is correct. Yet the 'mental picture' demonstrates that heritage values extend beyond 'views' into a complex array of feelings and values that relate to aesthetics, history, memory, and contemporary social attachments. Such values are broadly referred to as 'intangible values. Historic, social, sensory, aesthetic spiritual values are the subject of specific heritage assessment listing criteria at local, State and National levels.

In the current non-Aboriginal heritage assessments these intangible heritage values have not been adequately assessed, nor have the potential impacts on any such values.

2.5.2 Houston Visual Bund

The design and construction of the Houston visual bund generates much debate in the Justification Report.

Dr Lampard in her advice recommends that the revised Project (Option 4A) will not have a visual impact on the cultural landscape of the Woodlands Stud. She also states that the revised project will only have an initial impact on the Coolmore Stud, including views to Strowan Homestead but that revegetation will over time reduce the visual impact of the Houston Bund and ultimately not detract from the cultural landscape setting.

Given the generally agreed level of significance attributed to the cultural landscapes of Woodlands and Coolmore the recommendation in Dr Lampard's report is somewhat incongruous.

The recommendation only addresses the impact on the visual setting and views to the properties of Woodlands and Coolmore. This effectively focuses the assessment and debate regarding impact to 'what one can see' rather than other heritage values connected to 'seeing'. According to the Australia ICOMOS Guidelines to the Burra Charter aesthetic value is one of the key attributes of cultural significance. Aesthetic values relate to aspects of sensory perception. This may include

¹² Anglo American Justification Report Section 3.2.2 p 14.

form, scale, colour, texture, material of the fabric, the smells and sounds associated with the place and its use.¹³

It is clear from the non-Aboriginal heritage assessments undertaken for Anglo American that the aesthetic values have not been assessed comprehensively, therefore it follows that the potential impacts cannot be fully understood or determined.

The construction of the visual bund will in my view result in material adverse impacts on the historic cultural landscape. It will fundamentally and irreparably change the nature of the landscape and the historic functional relationships that have been inscribed over successive generations of human modification and use. 'Mimicry' of the natural landform and vegetation patterns as is proposed does not address or ameliorate the permanent adverse impact on the historic cultural landscape setting, aesthetic and social values and views to and from Woodlands and Coolmore.

2.6 Conclusion

This review of the Anglo American Justification Report has found that in response to the PAC Review of the Drayton South Coal Project the proponent has sought further advice regarding the potential heritage values and impacts arising on the cultural landscapes of Coolmore and Woodlands.

It is noted that some additional non-Aboriginal heritage issues raised by the PAC review have been considered in the Justification Report, yet the fact remains that an adequate and comprehensive non-Aboriginal heritage assessment that considers the cultural landscape values of both the area proposed to be impacted and the listed heritage items in the vicinity is still outstanding.

Only once such an assessment has been undertaken, in accordance with the listing criteria at State and National levels, the level and extent of the cultural heritage significance and heritage values may be adequately understood. Furthermore, as soon as a comprehensive assessment is completed the known and potential heritage impacts arising from the Drayton South Coal Project may be more methodically assessed.

In conclusion, this review by GML Heritage has found that despite the findings of Anglo America's own heritage consultants and relevant supporting information being readily available in the public domain, the key requirement of the DGR for non-Aboriginal heritage with regard to the 'potential impacts on non-Aboriginal heritage values of the locality related to its settlement by Europeans and its pastoral history for the non-Aboriginal Heritage' has not been comprehensively or adequately addressed in the environmental assessment for the Drayton South Coal Project.

¹³ Australia ICOMOS Guidelines to the Burra Charter: cultural significance.