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By email: ipcn@ipcn.nsw.gov.au

cc: *Mr David Gainsford*
Deputy Secretary, Development Assessment, Department of Planning and Environment
Atticus Fleming AM
A/Coordinator General, Environment and Heritage, Department of Planning and Environment

Glendell Continued Operations Project (SSD 9349) and Mount Owen Continued Operations (SSD 5850) Modification

Dear Mr Barry

I refer to the request from the Independent Planning Commission of 6 April 2022 for supplementary comment regarding evidence presented at the Glendell Mine Extension hearing.

The Heritage Council's position, and that of Heritage NSW, has been summarised in a letter from Mr Atticus Fleming (A/Coordinator General, Environment and Heritage, Department of Planning and Environment) of 6 June 2022.

However, I would like to provide the precise wording prepared by me in response to the Commission's request. That wording is in the attached table.

Kind regards

Frank Howarth AM PSM
Chair, Heritage Council of NSW
1 July 2022

Clarification of Heritage Council statements in IPC Meeting 28 March 2022

IPC comment	Location	HC Chair Response
Mr Howarth's suggestion...that the heritage values of the Ravensworth Homestead complex may be of national significance in addition to being of state significance.	Independent Planning Commission (IPC) letter, p.1. Transcript page 8, lines 9 to 16	I can't see anywhere where Tim Smith OAM, Heritage NSW or I, as Chair of the Heritage Council of NSW, used the words "nationally significant". Rather we argued that when everything is considered it's an extremely rare set of factors. This should not be taken to mean that we think it qualifies for listing on the National Heritage Register, rather that when similar homesteads/landscapes/history are looked at across Australia, Ravensworth would be important. Tim Smith OAM, Heritage NSW, added more to this.
Mr Howarth's suggestion that the Ravensworth Homestead is <i>'probably close to unique'</i> .	IPC letter, page 1 Transcript page 8, lines 22 to 23;	My comment as Chair specifically refers to the H-pattern of the homestead, which I believe to be close to unique.
Mr Howarth's submission regarding the significance of the European heritage aspects of the Ravensworth Homestead complex.	IPC letter, page 2 Transcript page 10, lines 7 to 15;	My words in the transcript speak for themselves.
Mr Howarth's submission...that the proposed relocation would diminish or eliminate the current state significance of the heritage values of the complex to a point where it may not meet the threshold for local listing.	IPC letter, page 2 Transcript page 14, lines 23 to 27	I think this is consistent with what the Council has said all along. The revised Statement of Significance included within the Expanded Analysis of the Ravensworth Homestead Complex prepared by Lucas Stapleton Johnson & Partners for Mt Owen Glencore indicate in several areas the significance of the immediate landscape setting, complex of buildings and archaeology of the site. For example, they say: "The Ravensworth Homestead Complex is important as an archaeological landscape containing an 1820s colonial house and associated outbuildings which were modified throughout the 19th and 20th centuries, and the archaeology of the estate. The homestead buildings, the remnant 19th-century farm and garden layout built by assigned convicts all provide evidence of this landscape and its history. This can testify to the way in which this early occupation by Surgeon James Bowman with expansion of the wool industry into the Upper Hunter Valley, aided by assigned convicts, irrevocably changed the lives of Aboriginal people, and modified the landscape of the Hunter Valley. (p71). Moving the house and a small number of associate buildings only would reduce the overall significance, as would the loss of immediate landscape connection. The moving of the buildings may result in a level of re-construction that also reduces significance.
At the 28 March 2022 meeting, Mr Howarth of the Heritage Council stated at page 14, lines 23 to 27 that: <i>'Our view is that either relocation would diminish its significance so much that it would be highly unlikely to meet the threshold for state listing. It may meet the threshold for local listing. In the nearby move within Broke, I doubt that it would even meet that because just too much of its key elements of</i>	IPC letter, page 4 Transcript page 14, lines 23 to 27	See my comments (Frank Howarth) above re the likely reduced significance.

IPC comment	Location	HC Chair Response
<p><i>significance either diminished or eliminated [sic]</i>'.</p> <p>Mr Howarth's submission does not appear to relate to the structural engineering aspects of the relocation, rather it suggests that even if any relocation of buildings is entirely successful from a structural engineering perspective, the fact of relocation in and of itself would lead to the potential diminution or elimination of the Ravensworth Homestead complex's heritage values.</p> <p>On the basis of Mr Howarth's submission, it would follow that the appropriate time for considering the listing is while the complex still retains state heritage values and before those values are potentially diminished or eliminated by relocation.</p> <p>Accordingly, the Panel requests that the Department, as part of its whole-of-government assessment of the applications on behalf of the Commission, obtain clarification from the Heritage Council as to whether the currently delayed recommendation to list the complex on the State Heritage Register (per the footnote to [17] in the Assessment Report) is to be revived and if not, why not.</p>		<p>With respect to potential recommendation to list on the State Heritage Register, the Minutes of the 6 April 2021 meeting of the Heritage Council p4 indicate that if the IPC finds against the mine expansion, the Council will proceed with a nomination to recommend the listing of Ravensworth to the Minister responsible for heritage.</p>