

Reply to: Georgina Woods
Lock the Gate Alliance

8 March 2022

Dianne Leeson
NSW IPC Panel chair, Glendell Continued Operations panel

CC: Adrian Pilton, Prof Snow Barlow and IPC Chair, Mary O'Kane

Dear Ms Leeson,

Re request that the IPC consider the questions below prior to meeting with DPE at 9.30am on Thursday 10 March 2022

In response to a call for papers in the Legislative Council, papers relating to the Glendell Continued Operations Project were received by the NSW Parliament on Wednesday 22 December 2021 from the Department of Premier and Cabinet, of which Heritage NSW is part.

Lock the Gate Alliance has reviewed these documents and believes that they contain information of importance to the Commission's consideration of the Glendell Continuation Project. Notably, in a Ministerial briefing, Heritage NSW introduced the Ravensworth Estate in the following terms:

Ravensworth is a rare and exceptionally intact colonial homestead complex and cultural landscape of state heritage significance that tells the story of shared Aboriginal and European heritage in the Hunter Valley, including early conflict, the development of pastoralism and the convict labour system. It meets all seven criteria for assessing state level significance.

The Ravensworth area has the strongest documentary evidence of any conflict site across the Hunter Valley, including the event known as the Ravensworth massacre. Although the actual site of the massacre may not be in the immediate vicinity of the homestead, the estate and homestead represent that story of settlement and conflict.

This description is at odds with the characterisation of the area provided to the Commission by the Department in its Assessment Report.

The following questions arise from reading this material:

1. **Is it DPE's understanding that Ravensworth "meets all seven criteria for assessing state level significance"?**
2. **Does DPE agree with the following statement from the Heritage Council?**

*"The proposed relocation of Ravensworth Homestead will result in the irreversible loss of its identified high and exceptional significance in the form of its intact fabric, setting, views and meaning. The cultural landscape which reinforces the Complex's state significance including in-situ archaeology, Aboriginal intangible cultural values and cultural landscape plantings will be lost. The proposed relocation options also have potential to result in loss and major damage to the significant fabric of Ravensworth Homestead."*¹

3. The Ravensworth Estate is described by Heritage NSW in a 22 February 2022 briefing as "a rare and exceptionally intact colonial homestead complex and cultural landscape of state heritage significance that tells the story of shared Aboriginal and European heritage in the Hunter Valley" and says the Estate has "the strongest documentary evidence of any conflict site across the Hunter Valley." **Does the Department think that a focus on the contested details of the specific event formerly called the Ravensworth massacre has distracted attention from the broader significance of the Ravensworth Estate as an exceptional cultural landscape of state heritage significance?**
4. Did the Department consider any cumulative impact to Aboriginal cultural heritage and heritage issues more broadly, given the wide scale landscape loss caused by the mining industry in aggregate over the last twenty years?
5. **Why didn't DPE wait for Minister Ley to determine the S10 application before completing your assessment report?**

As DPE is aware, a Section 10 application has been made under the Commonwealth *Aboriginal and Torres Strait Islander Heritage Protection Act* by the Plains Clan of the Wonnarua People. If granted, a Section 10 of the Act confers power on Minister Sussan Ley to make a declaration to preserve and protect this area should she be satisfied that it is a 'significant Aboriginal area' under threat of injury or desecration.

The Assessment Report describes the sections 9 and 10 applications as "not specific to the Project area" because the area affected is larger than the project area, but the project area is central to the application.

Given this application has not yet been resolved and has the potential to change the project or prevent it altogether, why did DPE finalise its assessment prior to the Commonwealth process being concluded? Did DPE seek advice from the

¹ Heritage Council comments on the EIS to DPIE, 11 February 2020

Commonwealth about the likely timing of the resolution of the Plains Clan's application prior to finalising its assessment?

6. **Does the Department consider that the uncertainty apparent in the huge range in estimated net economic contributions of this project, from \$1.1 billion claimed by the proponent, to negative \$94 million estimated by CIE, has bearing on its conclusion that the Ravensworth Homestead must be relocated in order to realise these uncertain benefits?**

The conclusion that Ravensworth Homestead can only retain its heritage significance by remaining *in situ* makes accurate estimation of the project benefits crucially important and also requires a weighing up of tangible and intangible, monetary and priceless impacts.

The Department cites the Burra Charter stipulation that "Relocation is generally unacceptable unless this is the sole practical means of its survival" but goes on to argue that because the mine cannot proceed without relocation, the relocation should occur ("in accordance with the Burra Charter") because NSW should not forgo the economic benefit of the project.

There is a huge range in the estimated net economic contribution of this project, from \$1.1 billion claimed by the proponent, to negative \$94 million. The Department's assessment report describes CIE's central case estimate (a \$151m benefit) as the "worst case scenario" economic contribution, but in fact this was a *central case* estimate and the worst case calculated by CIE actually predicted economic *loss* to New South Wales as a result of this project.

7. **Why did DPE elect not to include the evidence provided by the Plains Clan as to the special significance the Ravensworth Estate holds for them in its Assessment Report?² Some examples below:**

- a. Ravensworth Estate "represents [an] area where ceremonies were carried out by the Wonnarua people" and is thus "sacred to our people", including "several places" used for rituals associated with "bora" (male initiation) ceremonies or with "women's business ceremonies";
- b. "it is a spiritual place to us that must be protected so we can pass on to our children (future generations) for an understanding of our people's practices of the past";
- c. there is an "obligation ... to preserve for future generations the story line that flows through the river, creeks and tributaries of the whole area" including how "forefathers ... followed the creek lines and carried out ceremonial rituals along the route";
- d. "the area is part of a Transit route";
- e. along Bowmans Creek there are "two fish traps" and a "women's birthing place";

² See document #3 below for a reference: 'Correspondence from Sussan Ley to Don Harwin, 01 June 2021'

- f. “Our people have used the area for thousands of years”, including recently by “members of the [native title] claimant group”, and, “As such this is one of the few places in Wonnarua country that can demonstrate ongoing occupation and use by a hunter-gatherer society”;
- g. “to ensure that our cultural and heritage values are protected”; and
- h. “We have a responsibility [to] do all we can, to stop the never-ending destruction of our Country” by “uncontrolled agricultural and coal mining practices”. As such, the “area contains a landscape of ongoing conflict

8. How does DPE weigh up the risk that the heritage values of this property may be lost only for a situation to ultimately arise (sooner rather than later) where Glencore phases down its thermal coal mining faster than anticipated to align with Paris Agreement goals?

The Heritage Council has raised questions about how the loss of heritage is valued and has “expressed concerns around trading off the heritage value against a commodity that has a shorter lifespan”. There are multiple statements in the documents reviewed by Lock the Gate which note “thermal coal uncertainty” and “a lessening of demand” whereas, “the heritage values for the Homestead remaining in situ will increase over the longer term.”

Hector Abrahams raised similar concerns, emphasising “*that the Aboriginal cultural significance of the landscape is archetypal, of representative value about convict evidence, with the notion that the original site will persist as a place and outlast the mine operation over the long term.*”

9. Documents tabled in parliament indicate that Heritage NSW’s position on the impacts of this mine is not fully and fairly described in the Assessment Report.

DPE considers that Heritage NSW “*was satisfied with the information provided in the RTS regarding Aboriginal heritage and considered the values of the Project Area had been adequately assessed.*” What is the Department’s view of the following information from documents prepared by Heritage NSW and tabled in parliament:

- a. *Ravensworth is a rare and exceptionally intact colonial homestead complex and cultural landscape of state heritage significance that tells the story of shared Aboriginal and European heritage in the Hunter Valley, including early conflict, the development of pastoralism and the convict labour system. It meets all seven criteria for assessing state level significance?*
- b. *The Ravensworth area has the strongest documentary evidence of any conflict site across the Hunter Valley, including the event known as the Ravensworth massacre. Although the actual site of the massacre may not be in the immediate vicinity of the homestead, the estate and homestead represent that story of settlement and conflict?*
- c. Heritage NSW considers that the local area around Ravensworth is of “*high cultural significance*” and that “*the project’s direct and indirect impacts will*

further contribute to the cumulative impacts and loss of Aboriginal cultural heritage values and sites in the local area and the region?”

- d. Heritage NSW considers that *“when the intangible values related to the role Ravensworth Homestead and its wider cultural landscape played in frontier conflicts are re-examined, the level of significance for the Aboriginal values of the site would be likely to increase”?*
- e. A senior person at Heritage NSW described the *“dismantling and relocation of Ravensworth Homestead and diversion of Yorks Creek”* as *“an unacceptable heritage impact”?*

SUMMARY OF BACKGROUND DOCUMENTS INFORMING THESE QUESTIONS

#1: 22 Feb 2021 briefing from NSW Premier and Cabinet to the Chair of the Heritage Council

The area Glencore want to mine was described in a 22 Feb 2021 briefing from NSW Premier and Cabinet to the Chair of the Heritage Council (NC #1) of NSW as follows:

“Ravensworth is a rare and exceptionally intact colonial homestead complex and cultural landscape of state heritage significance that tells the story of shared Aboriginal and European heritage in the Hunter Valley, including early conflict, the development of pastoralism and the convict labour system. It meets all seven criteria for assessing state level significance.

“The Ravensworth area has the strongest documentary evidence of any conflict site across the Hunter Valley, including the event known as the Ravensworth massacre. Although the actual site of the massacre may not be in the immediate vicinity of the homestead, the estate and homestead represent that story of settlement and conflict.”

#2: The Heritage Council provided comments on the EIS by letter dated 11 February 2020 to DPIE

That advice stated:

“The proposed relocation of Ravensworth Homestead will result in the irreversible loss of its identified high and exceptional significance in the form of its intact fabric, setting, views and meaning. The cultural landscape which reinforces the Complex’s state significance including in-situ archaeology, Aboriginal intangible cultural values and cultural landscape plantings will be lost. The proposed relocation options also have potential to result in loss and major damage to the significant fabric of Ravensworth Homestead.”

In a statement about 'Potential State Heritage Significance':

"The site is noted to have the strongest documentary evidence of any conflict site across the Hunter Valley, demonstrating how fiercely the Wonnarua defended and valued the landscape in several violent episodes including the event known as the Ravensworth massacre."

#3: Correspondence from Sussan Ley to Don Harwin, 01 June 2021

Attached to this letter is a background document describing the Section 10 application made by the Plains Clan of the Wonnarua People.

Section 10 of the Act confers power on the Minister to make a declaration to preserve and protect an area where she is satisfied that it is a 'significant Aboriginal area' under threat of injury or desecration.

Claimed nature of particular significance

The Applicant claims that the Specified Area is of particular significance in accordance with Aboriginal tradition for the following reasons:

- *"represents an area where the conflicts occurred during the early colonisation of the Hunter Valley", including how it "contains a landscape of an open Massacre for the Wonnarua people";*
- *"represents [an] area where ceremonies were carried out by the Wonnarua people" and is thus "sacred to our people", including "several places" used for rituals associated with "bora" (male initiation) ceremonies or with "women's business ceremonies";*
- *"it is a spiritual place to us that must be protected so we can pass on to our children (future generations) for an understanding of our people's practices of the past";*
- *there is an "obligation ... to preserve for future generations the story line that flows through the river, creeks and tributaries of the whole area" including how "forefathers ... followed the creek lines and carried out ceremonial rituals along the route";*
- *"the area is part of a Transit route";*
- *along Bowmans Creek there are "two fish traps" and a "women's birthing place";*
- *"Our people have used the area for thousands of years", including recently by "members of the [native title] claimant group", and, "As such this is one of the few places in Wonnarua country that can demonstrate ongoing occupation and use by a hunter-gatherer society";*
- *"to ensure that our cultural and heritage values are protected"; and*

- *“We have a responsibility [to] do all we can, to stop the never-ending destruction of our Country” by “uncontrolled agricultural and coal mining practices”. As such, the “area contains a landscape of ongoing conflict*

#4: Heritage Council minutes - 6 October 2021

“The Council questioned how the loss of heritage is valued in the equations and financial analysis.”

“The Council questioned the detail around which options are reasonable as opposed to those that are considered feasible and expressed concerns around trading off the heritage value against a commodity that has a shorter lifespan.

“The Council suggested there may be a third hybrid option but could be considered such that mine operations could be undertaken up to a designated buffer zone ... and a decision on whether to mine the remaining coal resource reassessed in 2035. This would allow for the homestead to remain in situ and defer any decision to relocate the Homestead if there is found to be sufficient value in coal operations beyond 2035.

“The Council also noted that the impacts of climate change and thermal coal uncertainty which predicts changes in demand until around 2030, and a lessening of demand in the years following up to 2050. Whereas, the heritage values for the Homestead remaining in situ will increase over the longer term.”

#6: 17 January 2020 email from A/Senior Team Leader Alexandra Boukouvalas, Heritage NSW, DPC to Nicole Davis, Archaeologist - Hunter Central Coast Branch, BCD, DPIE

Ms Boukouvalas described the “dismantling and relocation of Ravensworth Homestead and diversion of Yorks Creek” as “an unacceptable heritage impact”.

#7: Ministerial briefing - 4 March 2021

This document includes a letter from Katrina Stankowski, Senior Team Leader, Heritage NSW, acting as “Delegate of the Heritage Council”, made the following comment regarding the significance of Ravensworth on 11 Feb 2020:

“The known archaeology and written records existing for Ravensworth relating to its Aboriginal history is an uncommon and highly significant aspect of the place, particularly regarding its history as a place associated with frontier conflict between European and Aboriginal people.

Although incidents of violent conflict between European and Aboriginal peoples are likely to have been more common, only approximately 16 of these incidents in the 1820s are well documented. Six of these incidents are associated with the Ravensworth property, including one incident popularly referred to as the Ravensworth Massacre.”

A separate letter in the same bundle, this time from Cheryl Brown from heritage NSW, also acting as “Delegate of the Heritage Council”, said:

“The Heritage Council reiterates that a precautionary principle should be adopted with respect to potential loss of Aboriginal cultural heritage.”

#9: DOC21/805326 - 6 October 2021 - ‘Summary paper Heritage Council meeting, briefing approved by Sam Kidman, Executive Director, Heritage NSW

In Table 2 | Agency Advice on the Project, in the Glendell COP AR (pg 24), DPE summarise Heritage NSW’s “key comments” thus:

“Heritage NSW confirmed it was satisfied with the information provided in the RTS regarding Aboriginal heritage and considered the values of the Project Area had been adequately assessed.”

“Heritage NSW also provided a number of recommendations to manage impacts to Aboriginal heritage which have been considered by the Department in the development of recommended conditions in Appendix I.”

In the DOC21/805326 - 6 October 2021 briefing paper however, Heritage NSW comment on “advice provided by the Aboriginal Heritage Regulation Branch of Heritage NSW (dated 30 October 2020), which “concluded that the assessment of Aboriginal cultural heritage was adequate and that appropriate measures to manage and mitigate any potential impacts on those values have been identified in the revised ACHAR.”

Heritage NSW says:

“It is worth noting that the ACH Branch response observed that the registered Aboriginal party (RAPs) considered the local area around Ravensworth to be of high cultural significance and that ‘the project’s direct and indirect impacts will further contribute to the cumulative impacts and loss of Aboriginal cultural heritage values and sites in the local area and the region.

Meanwhile, the Heritage Council has provided consistent advice to DPIE regarding the project and its impacts to wider Aboriginal cultural heritage including tangible, but particularly the intangibles values. They have stated that they believe that when the intangible values related to the role Ravensworth Homestead and it’s wider cultural landscape played in frontier conflicts are re-examined, the level of significance for the Aboriginal values of the site would be likely to increase.”

#10 Heritage Council of NSW mtg - 6 October 2021, Minutes DRAFT

Note: DPE engaged heritage expert Hector Abrahams Architects, to review the heritage impacts of the project.

“Hector Abrahams provided a summary of their expert heritage advice on the Glendell Continuing Operations Project, including advice on options to relocate Ravensworth to a

farm site or to the nearby town of Broke. It was emphasised that the Aboriginal cultural significance of the landscape is archetypal, of representative value about convict evidence, with the notion that the original site will persist as a place and outlast the mine operation over the long term.”

Key points raised by Hector Abrahams:

- *“The Aboriginal cultural significance of the landscape is archetypal, of representative value about convict evidence, with the notion that the original site will persist as a place and outlast the mine operation over the long term.”*
- *“The risk of a negative precedent impact if heritage values are lost due to any state significant development”*

In this document, the Heritage Council are recorded as having “questioned the detail around which options are reasonable as opposed to those that are considered feasible and expressed concerns around trading off the heritage value against a commodity that has a shorter life span.”

Ravensworth Meeting

Issue:	Site Meeting 22 February 2021 5.30pm.
Attendees	Attendees: Mayor and Councillors and Executive Leadership Team of Singleton Council; Frank Howarth, Chair Heritage Council of NSW; Katrina Stankowski, Senior Team Leader, North Assessments; Tempe Beaven, Senior Heritage Assessment Officer
Timeframe:	Briefing 30 minutes plus 15 minutes question time from Councillors

Talking Points

- Ravensworth is a rare and exceptionally intact colonial homestead complex and cultural landscape of state heritage significance that tells the story of shared Aboriginal and European heritage in the Hunter Valley, including early conflict, the development of pastoralism and the convict labour system. It meets all seven criteria for assessing state level heritage significance.
- While nineteenth century rural land use practices such as vegetation clearance, cultivation and grazing, have had some impact on the Aboriginal archaeological record, the tangible and intangible values of the Wonnarua landscape including cultural and environmental resources and much Aboriginal archaeology remains. The Heritage Council encourages adoption of the 'precautionary principle' with respect to potential loss of Aboriginal cultural heritage.
- The Ravensworth area has the strongest documentary evidence of any conflict site across the Hunter Valley, including the event known as the Ravensworth massacre. Although the actual site of the massacre may not be in the immediate vicinity of the homestead, the estate and homestead represent that story of settlement and conflict.
- The large pastoral estate was granted to Dr James Bowman, principal surgeon in the colony, in 1824. Located picturesquely in the landscape and responding to the topography of the Hunter region with its river valleys and alluvial plains, the siting of the intact c1832 complex of convict-built homestead buildings, together with the surrounding pastures, preserves a distinctive rural colonial landscape.
- The Heritage Council has a policy of working with proponents to achieve their objectives and economic outcomes while maintaining or enhancing heritage values. The relocation of the Ravensworth homestead as outlined in the EIS and the Response to Submissions reports would result in the loss of the intact homestead complex removing much of its significant heritage values.
- The Heritage Council preferred outcome is for the homestead to be retained in place as this will retain its heritage significance which derives not only from its aesthetics, history and rare exceptionally intact fabric and archaeology but also from its highly significant location within its Aboriginal and colonial cultural landscape and from the evidence present in its surrounds.
- Relocating buildings takes them out of their context and dislocates them from the story they tell. They become more an object for interpretation than a place of rich culture, history and heritage and are unlikely to meet the criteria for state heritage significance.
- If relocation becomes the approved option, the Heritage Council considers the relocation within the broad vicinity of the current homestead and maintaining a rural landscape provides a better solution than relocation to an urban setting.

If asked about SHR Nomination.

- On 5 December 2018, the Heritage Council considered a nomination for Ravensworth and resolved that based on the heritage significance criteria it is likely to have heritage significance at a state level and that the nomination should be progressed.

DPC Office Use:

Sensitivity label: None

Date DPC action due: Date

Date final action due: Date

- As the mine extension proposal is being considered under the State Significant Development (SSD) pathway and the Heritage Act is turned off by this process, the Heritage Council's focus has been on participating in the development assessment process.

If asked about Timeline?

- The Department of Planning Industry and Environment (DPIE) has advised Heritage NSW that the SSD is currently being evaluated and is likely to be referred to the Independent Planning Commission for determination in April 2021 (refer to Attachment A – Timeline of DPIE referrals and Heritage Council responses).

DPC final approver:	Pauline McKenzie
	Executive Director Heritage NSW Contact: [REDACTED]

Responsible Action Officer:	Steve Meredith, Regional Manager, Northern, Heritage NSW Contact: [REDACTED]
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Ravensthorpe Meeting 7 Dec 2020 6pm

Attendees: Mayor and Councillors and Executive Leadership Team of Singleton Council, Frank Howarth, Chair Heritage Council of NSW

Briefing 30 minutes plus question time from Local Councillors

Purpose

Singleton Council has expressed a desire to have the Heritage Council brief them their concerns about the proposal to relocate Ravensthorpe Homestead. The Councillors have been briefed by Glencore and the potential developers in Broke, and would be interested to hear the perspective of the Heritage Council before the council formed a view on the project and provided our response to the Response to Submissions. Council has raised a number of concerns in their submission on the project EIS regarding the homestead (refer Attachment A).

Background

Proposed State Significant Development (SSD)

An application has been lodged for the proposed Glendell Continued Operations Project (State Significant Development 18_9349), which aims to extend an existing open cut coal mine into the Ravensthorpe cultural landscape. A major component of the project would involve relocation of the Ravensthorpe homestead building from the property, diversion of the creek on which it is sited and destruction of the broader associated structures and landscape including Aboriginal and historic archaeology.

In December 2018, the Heritage Council resolved that Ravensthorpe Homestead was likely to be of state heritage significance and directed that the listing be progressed.

Listing of the site on the State Heritage Register would not prevent the SSD project from going ahead (if it is approved by DPIE) as the relevant protections under the Heritage Act are suspended by the SSD provisions of the Environmental Planning & Assessment Act 1979. The Heritage Council of NSW thus has an advisory role only. The Minister for Planning has the sole approval role.

A request for comments from the Heritage Council of NSW on the Response to Submissions (RtS) was received on 2 November 2020 and is currently being considered (Refer Attachment B).

Secretary's Environmental Assessment Requirements (SEARs)

On 31 May 2018 advice was provided on the draft SEARs for the project by the Delegate of the Heritage Council. This advice stated that the proposed relocation of the state significant heritage buildings was not considered appropriate, given the importance of the setting and may result in a catastrophic impact on the site's significance.

The SEARs relating to heritage required:

Heritage – including:

- *an assessment of the potential impacts of the development on Aboriginal heritage (cultural and archaeological), including consultation with relevant Aboriginal communities/parties and documentation of the views of these stakeholders regarding the likely impact of the development on their cultural heritage;*

- *identification of historic heritage in the vicinity of the development and an assessment of the likelihood and significance of impacts on heritage items, having regard to the relevant policies and guidelines listed in Attachment 1; and*
- *in relation to Ravensworth Homestead, the EIS must include:*
 - *a detailed heritage significance and historical archaeological assessment of the homestead, including consideration of its surrounding garden and landscape;*
 - *an analysis of all reasonable and feasible options to preserve the Homestead (including leaving in situ); and*
 - *if relocation is selected as the preferred option, please include an analysis of all feasible relocation options and how the Ravensworth Homestead Advisory Committee was involved in the decision;*

Heritage Division staff met with Glencore staff and their archaeological consultants on 26 September 2018 and provided advice on the proposed historical archaeological test excavation methodology for the site investigations to inform the EIS.

In December 2018 the Heritage Council of NSW considered a presentation by Glencore and its heritage consultants in response to the SEARs. The Council recommended that Glencore investigate options for retention of the homestead buildings and landscape in its original setting.

The Heritage Council specifically noted the importance of the landscape and setting to the Homestead's significance, including its associations with pre and post contact Aboriginal history, historical figures and its rarity and representativeness as a relatively intact pre-1850s homestead in the Hunter region.

Environmental Impact Statement (EIS)

The Environmental Impact Statement was lodged in December 2019 with the Department of Planning, Industry and Environment (DPIE) and was referred to the Heritage Council for comment. The application was reviewed by Heritage NSW and a report was prepared for the Heritage Council.

At its meeting of 5 February 2020, Heritage Council received a presentation from Mr Ian Stapleton, Mr Shane Scott and Mr Bret Jenkins representing Glencore Coal. The relocation options outlined in the presentation were developed based on historical significance of the Homestead; alternatives not practically or financially viable were discarded. The Council noted that financial viability is not a consideration under the *Heritage Act 1977* and requested other heritage significance criteria to be addressed. The Council provided comments on the EIS by letter dated 11 February 2020 to DPIE as follows.

1. *The Heritage Council endorsed the ICOMOS report, 'The Future of Our Pasts: Engaging cultural heritage in climate action' in 2019 and is committed to ensuring long term protection and conservation of our cultural heritage through the good practice, adaption and mitigation advice it provides and the actions it recommends.*

2. *The Heritage Council considers that Ravensworth Homestead and its surrounding cultural landscape is likely to be of state heritage significance for its aesthetic, historic, scientific and social values.*
3. *The proposed relocation of Ravensworth Homestead will result in the irreversible loss of its identified high and exceptional significance in the form of its intact fabric, setting, views and meaning. The cultural landscape which reinforces the Complex's state significance including in-situ archaeology, Aboriginal intangible cultural values and cultural landscape plantings will be lost. The proposed relocation options also have potential to result in loss and major damage to the significant fabric of Ravensworth Homestead.*
4. *The Heritage Council does not support the relocation of Ravensworth Homestead as either option would result in an unacceptable heritage impact. The Heritage Council considers that relocating the homestead may remove its State significant values and the relocated buildings are unlikely to meet the criteria for state heritage significance.*
5. *The Heritage Council strongly supports Ravensworth Homestead being retained in its current, highly significant location with a curtilage around its equally significant cultural landscape.*

Following this response the Department of Planning, Industry and Environment facilitated a teleconference between Heritage Council members, Glencore, LSJ and Umwelt on 16 April 2020 which provided further understanding of the issues raised and the additional detail required by the Heritage Council as part of this Response to Submissions Report.

Response to Submissions (RtS)

A request for comments from the Heritage Council of NSW on the Response to Submissions (RtS) was received on 2 November 2020 and is currently being considered (Refer Attachment A). It is noted that this RtS report contains new information in answer to those comments which has resulted in an updated Statement of Significance for Ravensworth Homestead.

Nomination to list Ravensworth on the State Heritage Register

On 7 December 2017 a nomination was lodged by Janet de Castro Lopo and Freya Hilkmeyer to list Ravensworth on the State Heritage Register under the *Heritage Act 1977*.

The public nomination was presented to the Heritage Council for preliminary consideration at its 5 December 2018 meeting. It resolved that the Aboriginal and broader shared post-contact cultural landscape values of Ravensworth, including its association with frontier conflict, the scale and nature of the European buildings, and the site's potential Aboriginal, historical and archaeological values, are likely to have heritage significance at a state level. On this basis, the Heritage Council requested that Heritage progress the nomination.

Heritage NSW commenced investigations into the listing in 2019, including attending a further site visit in February 2019 where the site including buildings and landscape were found to be remarkably intact.

Consultation was undertaken with stakeholders including the Chair of the Heritage Council, Glencore, the Department of Planning and the nominators. Glencore requested that progression of the listing to Notice of Intention stage be delayed until after the EIS was lodged.

The State Significant Development status of the mining application suspends the application of the Heritage Act approvals provisions; however, it does not prevent the listing of the site on the State Heritage Register under the Act if approved by the Minister.

Potential State Heritage Significance

Ravensworth is an exceptionally intact cultural landscape that tells the story of shared Aboriginal and European heritage in the Hunter Valley, including early conflict, the development of pastoralism and the convict labour system.

The Wonnarua landscape, centred on a series of creeks, comprises tangible and intangible values. While nineteenth century rural land use practises such as vegetation clearance, cultivation and grazing, have had some impact on the Aboriginal archaeological record, the landscape, its resources and much Aboriginal archaeology remains. The site is noted to have the strongest documentary evidence of any conflict site across the Hunter Valley, demonstrating how fiercely the Wonnarua defended and valued the landscape in several violent episodes including the event known as the Ravensworth massacre.

The large pastoral estate was granted to Dr James Bowman, principal surgeon in the colony, in 1824. Located picturesquely in the landscape and responding to the particular topography of the Hunter region with its river valleys and alluvial plains, the siting of the intact complex of convict-built homestead buildings, together with the surrounding pastures form a distinctive rural colonial landscape.

Although surrounding agricultural lands have been subdivided and gradually impacted by open cut mining since the late 1990s, the setting and significant views from the Ravensworth homestead have been largely maintained.

Revised Statement of Significance

The place forms part of the traditional lands of the Wonnarua people of the Hunter Valley and is made more meaningful by the recorded reports of interactions and conflicts between the Wonnarua and the colonists within and around the Ravensworth locality.

The Ravensworth Estate is representative of the rapid colonisation of the Hunter region in the period 1820s to 1840s and the history of the place has led to the area of Ravensworth becoming a known locality in the State of NSW, with the Ravensworth Estate and homestead complex at its centre.

Established in 1824, the Ravensworth Estate is associated with a range of significant colonial places and people including Dr. James Bowman, principal surgeon of the colony of NSW, who established the estate and is one of only a few places where, under Edward Bowman, horticultural experimentation first started in Australia. The place retains tangible evidence of the colonial period including substantial

archaeological remains, landscape features and cultural plantings and made more meaningful by the surviving c1832 homestead complex including its siting and configuration.

The Ravensworth Homestead Complex includes a rare, formally designed farmyard complex of colonial buildings including a good example of a colonial bungalow, with stonework and roof carpentry of note. As originally built, the "H" plan bungalow is a rare feature, indicating a design (potentially) by a gentleman architect.

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.

Because of the relatively modest history of development throughout the 19th and 20th century, the Place has the potential to provide information, by way of further study and archaeological investigation, into colonial building techniques, 19th century lifestyles, agricultural and horticultural practices and the working lives of convicts in a non-institutional setting, which is considered very rare (p70, Expanded Analysis of the Ravensworth Homestead Complex, Lucas Stapleton Johnson and Partners, August 2020).





**THE HON SUSSAN LEY MP
MINISTER FOR THE ENVIRONMENT
MEMBER FOR FARRER**

MS21-000799

The Hon Don Harwin MLC
Special Minister of State
Minister for the Public Service and Employee Relations,
Aboriginal Affairs, and the Arts
GPO Box 5341
SYDNEY NSW 2001

01 JUN 2021

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Dear Minister *Don*

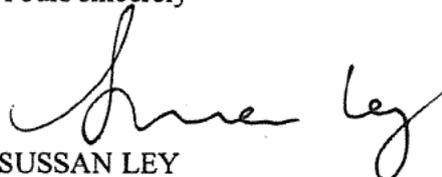
On 7 July 2020, I received an application for a declaration under section 10 of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)* (ATSIHP Act) to protect a specified area described as Ravensworth Estate, Bowmans Creek and Glennies Creek, near Camberwell, New South Wales. The application seeks to protect the specified area from the *expansion* of coal mining, that is, protection from coal mining activities that were not already existing, or approved, before 7 July 2020.

Subsection 13(2) of the ATSIHP Act requires me to consult with an appropriate state government minister before making a declaration, as to whether there is, under a law of that state, effective protection of the area from the threat of injury or desecration.

Although I have not yet decided whether to make a declaration in response to the application, I would be grateful for your views on the application and in particular for the purposes of subsection 13(2) of the ATSIHP Act whether there is, under any New South Wales law, 'effective protection' of the specified area from the 'threat of injury or desecration'. A summary of the application is enclosed.

I would be grateful to receive your response within three weeks of the date of this letter. The contact officer in the Department of Agriculture, Water and the Environment for this matter is Mr Edward Ho-Shon via (02) [REDACTED] or [REDACTED]

Yours sincerely


SUSSAN LEY

Enc Application summary

From: [Christopher Hodge](#)
To: [PMPMail](#)
Cc: [QEH HD Divisional Coordination Mailbox](#)
Subject: IM21/20404 : HTG: Sussan Ley re Ravensworth Estate
Date: Wednesday, 14 July 2021 5:21:56 PM
Attachments: [HTG Sussan Ley re Ravensworth Estate.PDF](#)

Hi PMP,

Attached correspondence for urgent draft min sig from Heritage. Due 16 July.

Heritage - please let me know if you have concerns meeting this deadline and I will discuss with the advisor. I propose this one be submitted for parallel review by Minister and Dep Sec once ED approved.

Best,

Chris

-----< Content Manager record Information >-----

Title : HTG: Sussan Ley re Ravensworth Estate
Record Number : IM21/20404
External ID :
Date Due : Wednesday, 28 July 2021 at 5:00 PM
Current action : Draft Reply for Minister's Signature (EARLY) (Responsibility of: Hodge, Chris (Mr.), Due 28/07/2021 at 5:00 PM (10 days))
Related records :
Notes :

Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)

Notice of an application for the preservation and protection of a specified area described as 'Ravenworth Estate', and including Bowmans Creek and Glennies Creek, in the Hunter Valley, New South Wales

The Applicant

The application is made by Mr Robert Lester and Mr Scott Franks as representatives of the Plains Clan of the Wonnarua People (the Applicant). Mr Lester is the Chairperson of the Plains Clan of the Wonnarua People Aboriginal Corporation.

The purpose of the application

The Applicant seeks the long-term preservation and protection of an area specified in their application. Section 10 of the Act confers power on the Minister to make a declaration to preserve and protect an area where she is satisfied that it is a 'significant Aboriginal area' under threat of injury or desecration. A 'significant Aboriginal area' is defined by section 3 of the Act as an area of land or waters that is "of particular significance to Aboriginal people in accordance with Aboriginal tradition". 'Aboriginal tradition' is defined as the "body of traditions, observances, customs and beliefs of Aboriginals generally or of a particular community or group of Aboriginals, and includes any such traditions, observances, customs or beliefs relating to particular persons, areas, objects or relationships".

Claimed nature of particular significance

The Applicant claims that the Specified Area is of particular significance in accordance with Aboriginal tradition for the following reasons:

- "represents an area where the conflicts occurred during the early colonisation of the Hunter Valley", including how it "contains a landscape of an open massacre of the Wonnarua people";
- "represents [an] area where ceremonies were carried out by the Wonnarua people" and is thus "sacred to our people", including "several places" used for rituals associated with "bora" (male initiation) ceremonies or with "women's business ceremonies";
- "it is a spiritual place to us that must be protected so we can pass on to our children (future generations) for an understanding of our people's practices of the past";
- there is an "obligation... to preserve for future generations the story line that flows through the river, creeks and tributaries of the whole area", including how "forefathers... followed the creek lines and carried out ceremonial rituals along the route";
- "the area is part of a transit route";
- along Bowmans Creek there are "two fish traps" and a "women's birthing place";
- "Our people have used the area for thousands of years", including recently by "members of the [native title] claimant group", and, "As such, this is one of the few places in Wonnarua Country that can demonstrate ongoing occupation and use by a hunter-gatherer society";
- "to ensure that our cultural and heritage values are protected"; and
- "We have a responsibility [to] do all we can, to stop the never ending destruction, of our Country" by "uncontrolled agricultural and coal mining practices". As such, the "area contains a landscape of

ongoing conflict”.

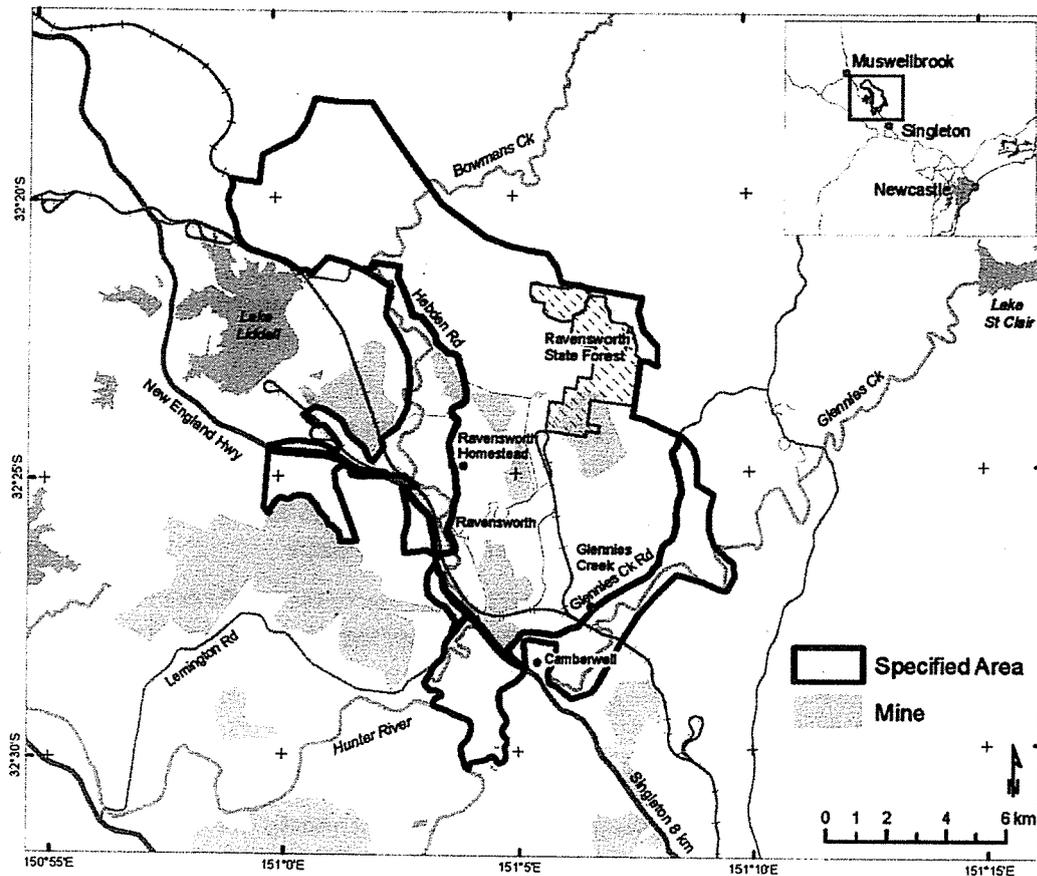
Claimed threat of injury or desecration

The Applicant claims that the Specified Area is under threat from “underground and open cut coal mining activities” plus “associated works including creek diversions that will have a major impact in altering the natural landform”.

The Specified Area

The Applicant described the Specified Area (see Figure 1 below) as “including Ravensworth Estate, [and] the original properties of the early colonisers James Bowman, Capt. Robert Lethbridge, James Glennie”. The Specified Area is located between Singleton and Muswellbrook in the Hunter Valley. The Specified Area includes portions of Bowmans Creek and Glennies Creek. The Specified Area does *not* include those parts of the New England Highway, Glennies Creek Road, and Hebden Road, that fall within its outer boundary.

Figure 1: Map showing the Specified Area of Ravensworth Estate, Bowmans Creek and Glennies Creek, NSW





HERITAGE COUNCIL OF NSW

MEETING MINUTES – 494

6 October 2021 | 09:00 AM – 3:00 PM

Via Teleconference

ATTENDANCE	
MEMBERS	
Mr Frank Howarth AM PSM	Chair
The Hon Robyn Parker	Deputy Chair
Dr Nicholas Brunton	Member
Mr Ian Clarke	Member
Mr Paul Knight	Member
Dr Brian Lindsay	Member
Ms Colleen Morris	Member
Ms Louise Thurgood	Member
Mr Brett Whitworth	Member
APOLOGIES	
Mr Dillon Kombumerri	Observer
GUEST PRESENTERS AND EXTERNAL ATTENDEES	
Mr Clay Preshaw	ED Energy and Resource Assessments, DPIE (4.1)
Mr Steve O'Donoghue	Director Resource Assessments, DPIE (4.1)
Mr Hector Abrahams	Principal, Hector Abrahams Architects (4.1)
HERITAGE NSW	
Mr Sam Kidman	Executive Director
Mr Matthew Clark	Director Heritage Strategy and Policy
Mr Tim Smith	Director Heritage Operations
Ms Katrina Stankowski	Senior Team Leader Reg Heritage Assessment (4.1)
Ms Tempe Beaven	Senior Heritage Assessment Officer (4.1)
SECRETARIAT	
Ms Olgica Lenger	Senior Team Leader Secretariat
Ms Elizabeth Thomas	Advisory Panels Co-ordinator

Item 4. Matters for consideration

Colleen Morris was excused from the meeting for the duration of the following item.

Item 4.1 Ravensworth Homestead – Glendell Mine – SSD - DPIE presentation

The Heritage Council of NSW received a report from Katrina Stankowski and a presentation from the Department of Planning, Industry and Environment (DPIE) and Hector Abrahams Architects.

Key points raised in the presentation:

- Whilst only locally listed, all stakeholders agree that the Ravensworth Homestead is of significant state heritage value.
- The key issue is that the Ravensworth cultural landscape and the estate are located in the middle of the proposed extensions to the Glendell open cut coal mine.
- DPIE has held discussions with mine owners, Glencore, regarding their Continuing Operations Project proposal which includes seven mine design options.
- An independent mine plan review was conducted by Minecraft who concluded that Glencore had identified all the feasible alternatives for the continuation of mining at Glendell and given the site's complex geology and surface constraints, the final footprint for the Project Mine Plan was sufficiently justified.
- Both Glencore and Minecraft have advised that in their view there are no economically viable options that will avoid impacting the Ravensworth Estate.
- DPIE has commissioned the centre for independent economic advice to undertake a cost benefit analysis for the project.
- Fundamental to DPIE's consideration has been the Council's previous advice to seek a balance of heritage outcomes and the option to retain the homestead in situ.
- DPIE sought independent expert heritage advice to consider the various opportunities and associated impacts to either relocate the homestead to another site on the original Bowman Land Grant or to the nearby town of Broke.
- Hector Abrahams presented the findings of this review to note that:
 - The mine operations proposal prevents preservation of the homestead and it would appear that relocation is the only way to preserve some heritage values.
 - Acknowledged the cultural landscape significance identified in the LES assessment and associated ACH values.
 - The potential negative impact that relocation could have on other historic houses by setting a precedent.
 - Recognition that the place will persist as a cultural place and outlast the mine operation over the longer term.
 - Relocating the farm site diminishes its heritage values and would not pass the threshold for viable use.
 - The option to relocate to Broke is a radical adaptive reuse and destroys all of the landscape setting. There would be some public and social benefit, however for this to be outstanding the proposal would have to be transformative for the town of Broke.
 - There may be an opportunity to focus on the land as well as the homestead and seek a future for the entire holding, not just the homestead.
 - There is an opportunity for a future masterplan to address the viability and culture of the area, noting that the EIS predicts increased population and urban development impacting the rural landscape in addition to continuing industrial land use.

The Council questioned how the loss of heritage is valued in the equations and financial analysis.

- DPIE advised that the cost benefit analysis considers various factors, including heritage, and the overall economic analysis tries to weigh up the economic analysis of the coal operations with these other factors.
- DPIE is seeking final advice on the assumptions for commercial viability to ensure these assumptions are reasonable. However all indications to date are that the assumptions provided thus far are reasonable and if required to avoid the Ravensworth Homestead if retained in situ, the mining operation would be unviable from a commercial standpoint.

The Council questioned the detail around which options are reasonable as opposed to those that are considered feasible and expressed concerns around trading off the heritage value against a commodity that has a shorter life span.

The Council suggested there may be a third hybrid option that could be considered such that mine operations could be undertaken up to a designated buffer zone (such as that referenced in the Minecraft report option of 200-300 meter buffer zone) and a decision on whether to mine the remaining coal resource reassessed in 2035. This would allow for the homestead to remain in situ and defer any decision to relocate the Homestead if there is found to be sufficient value in coal operations beyond 2035.

The Council also noted that the impacts of climate change and thermal coal uncertainty which predicts changes in demand until around 2030, and a lessening of demand in the years following up to 2050. Whereas, the heritage values for the Homestead remaining in situ will increase over the longer term.

DPIE noted that:

- Their role in assessing the project under the EPA Act and the regulatory framework is to ensure that the proponent has considered other options and feasible alternatives compared against the project objectives. DPIE's role is somewhat limited however, and any hybrid option would need to meet these objectives and be assessed in a timely manner.
- Approvals have already been given that make the landscape not pastorally viable and the opportunity to understand the heritage asset as a historic homestead and in the Burra Charter sense, are also not viable.
- A referral to IPC is targeted for the end of November 2021 and the assessment finalised by the end of 2021.
- In relation to the economic advice and project viability DPIE are seeking expert advice on this and are committed to getting best independent advice on these issues.

The Council thanked DPIE and Hector Abrahams for their presentation.

HNSW attendees were excused from the meeting at 12:40 PM for a brief interval to allow the Council time to deliberate this matter further in camera.

Actions:

1. Heritage NSW to follow up with DPIE regarding the Ravensworth Homestead and DPIE presentation at the 6 October 2021 meeting of the Heritage Council to address the following issues raised by the Council:
 1. The analysis of mining options does not provide a full analysis of an option for a 200m-300m buffer zone as proposed by Mine Craft Consulting.
 2. Request an analysis of a staged approach that would:
 - Approve a mining plan with a less than 500m buffer zone, allowing coal to be accessed south and east of the homestead.
 - Add mitigation measures from blast and vibration, including a berm or blast barrier and structural vibration supports sufficient to preserve all the buildings.

- Allow further stages to be revisited in 2030 - 35, that could access the resource on the north of the site should it prove economically viable at that time, to be valued as an option (with the relocation of the homestead)
3. Request a masterplan for the Ravensworth Cultural Landscape after mining in 2035 - 2045 with two scenarios:
- The future stages do not proceed and the land form is remediated with Ravensworth in situ
 - The second stage does proceed, Ravensworth is relocated 650m and the landform is remediated

Resolution 2021-58

The Heritage Council of NSW:

1. **Thanks** Department of Planning, Industry and Environment for their presentation on the State Significant Development (SSD) Glendell Continued Operations Project relating to Ravensworth Homestead and **notes** its contents.
2. Notwithstanding the new information provided to the Heritage Council, the Council **maintains** its view that the importance of Ravensworth Homestead includes its role in frontier conflict and **affirms** its advice of 9 December 2020 and 5 February 2020.

Moved Louise Thurgood and seconded by Dr Nicholas Brunton



**Premier
& Cabinet**

From: Alexandra Boukouvalas
Sent: Friday, 17 January 2020 12:00 PM
To: Nicole Davis <[REDACTED]>
Cc: Laura Dafter <[REDACTED]>
Subject: RE: Ravensworth Composting Facility Expansion Project - SSD 9418 - advice due out on 24 January 2019

Hi,

Thanks for this. What I am looking for is comments on the EIS that is currently on exhibition 11/12/2019 - 31/01/2020. The EIS is at <https://www.planningportal.nsw.gov.au/major-projects/project/10086>

This relates to extension of open cut mining operations within a new mining area to the north of the existing Glendell Mine. It would involve dismantling and relocation of Ravensworth Homestead and diversion of Yorks Creek. Glencore argues that the Ravensworth Massacre did not occur within the project area and that the current AHIMS record is misleading.

We are arguing that this is an unacceptable heritage impact. I'd also like to inform the Heritage Council about DPIE's feedback on this. Sorry if I haven't been clear enough!

Regards,

Alexandra Boukouvalas | A/Senior Team Leader, North East Heritage Operations
Heritage NSW, Community Engagement, Department of Premier and Cabinet
43 Bridge St, Hurstville 2220 | PO Box 1967, Hurstville BC 1481
T: (02) [REDACTED] | [REDACTED]



**Premier
& Cabinet**

From: Nicole Davis <[REDACTED]>
Sent: Friday, 17 January 2020 11:43 AM
To: Alexandra Boukouvalas <[REDACTED]>
Cc: Laura Dafter <[REDACTED]>
Subject: FW: Ravensworth Composting Facility Expansion Project - SSD 9418 - advice due out on 24 January 2019

Hi Alex,

Just in case you need extra more current info next week, I will update Laura when we chat this afternoon.

Looking for it now, it would have been me as it was approved in 2014....I'm digging away...

Cheers Nicole

Nicole Davis
Archaeologist - Hunter Central Coast Branch

Biodiversity and Conservation Division | Department of Planning, Industry and Environment
T 02 [REDACTED] | M [REDACTED] | E [REDACTED]
Level 4, 26 Honeysuckle Drive, Newcastle, NSW 2300
www.dpie.nsw.gov.au

Alexandra Boukouvalas

From: Alexandra Boukouvalas
Sent: Monday, 20 January 2020 2:46 PM
To: Gillian Goode
Subject: FW: Ravensworth Composting Facility Expansion Project - SSD 9418 - advice due out on 24 January 2019

Hi Gillian,

I hope you are well. I was wondering if you are putting together a response to the Glencore EIS that is currently on exhibition 11/12/2019 - 31/01/2020. This is the mod to extend the mine, relocate the homestead, divert the creek.

These are my prelim views, what are your thoughts?

- 1.1.1. The Aboriginal Archaeological Assessment (Appendix 22) recorded 69 sites consisting of 39 artefact scatters, 29 isolated finds and one scarred tree. At nine locations it was assessed that there are subsurface deposits.
- 1.1.2. The recorded sites were noted to be very representative of artefact sites in the upper Hunter Valley both in terms of the types of artefacts recorded and the raw materials from which the artefacts were manufactured. The exception to this is the recording of the scarred tree which is a rare site type in the upper Hunter Valley due to the widespread vegetation clearing that has taken place.
- 1.1.3. No evidence of colonial conflict or skeletal remains was identified during the survey or test excavation programs.
- 1.1.4. The assessment concludes that the proposed mining activities would impact on the scientific significance of the Aboriginal archaeology which it grades as being of little/moderate scientific significance. It does not adequately consider the cumulative impacts on such Aboriginal Archaeology in the Hunter Valley or the impact on the site as a representative Aboriginal cultural landscape.
- 1.1.5. As per above, the proposal would destroy the existing Aboriginal archaeological potential of the land as well as the known Aboriginal archaeological sites at the place and the Aboriginal cultural landscape, not least including diversion of the watercourse.
- 1.1.6. Historian Dr Mark Dunn contributes to Appendix 22 with a review of the evidence of conflict between Aboriginal people and the early settlers between 1824 and the mid 1830's. He concludes that, "A close reading of the available evidence, through newspapers, depositions and enquiries appears to show not a series of random attacks, or rampaging bands of warriors, but rather targeted attacks against individuals and isolated workers. Bowman's large estate was the site of three attacks resulting in two Europeans killed and two wounded, with one Aboriginal man wounded".
- 1.1.7. Dunn focuses on one attack by Robert Scott and a party of men which is documented to have occurred some 20 miles (32 kilometres) from a location known as Alcorn's Hut that resulted in the death of 18 Aboriginal people. Even though the exact location of this event is unknown, the plotting of a 20-mile (32 kilometre) radius from the known location of Alcorn's Hut situates this single event (often referred to as the 'Ravensworth massacre') well beyond the proposed project boundary, which lies approximately 5 miles (8 kilometres) to the north-west of the proposed project area.
- 1.1.8. While the single event cannot be determined to have occurred within the proposed project area, this is immaterial to the very significant long-term association of the Ravensworth property with this particular conflict event and with frontier violence in the Hunter Valley.

Regards,

Alexandra Boukouvalas | A/Senior Team Leader, North East Heritage Operations
Heritage NSW, Community Engagement, Department of Premier and Cabinet
43 Bridge St, Hurstville 2220 | PO Box 1967, Hurstville BC 1481
T: (02) [REDACTED]

Ravensthorpe Homestead

Issue: The proposed State Significant Development (SSD) 18_9349 **Glendell Continued Operations Project** which involves the relocation of Ravensthorpe Homestead in the Hunter Valley.

Purpose

- To provide background for the Minister regarding the meeting the Heritage Council of NSW Chair has been invited to attend on 22 February 2021 with Singleton Council regarding the proposed SSD.
- To provide copies of the responses made by the Heritage Council of NSW (or Delegate) to the Department of Planning, Infrastructure and Environment (DPIE) at the various stages of the SSD process eg. Secretary's Environmental Assessment Requirements (SEARS), Environmental Impact Statement (EIS) and Response to Submission (RtS) stages.
- To provide background and a timeline for the SSD application.

Background

- **Ravensthorpe is an exceptionally intact cultural landscape that tells the story of shared Aboriginal and European heritage in the Hunter Valley, including early conflict, the development of pastoralism and the convict labour system.**
- An application has been lodged for the Glendell Continued Operations Project (State Significant Development (SSD) 18_9349), which proposes to extend an existing open cut coal mine into the Ravensthorpe cultural landscape (see Attachments A and A1 for details of project, stages and timeframes).
- A major component of the project involves the relocation of the Ravensthorpe homestead complex from the property, diversion of the creek on which it is sited and destruction of the broader associated structures and landscape including Aboriginal and historic archaeology.
- While vegetation clearance, cultivation and grazing have had some impact on the Aboriginal archaeological record, the Wonnarua landscape, both tangible and intangible, its resources and much Aboriginal archaeology remain.
- The large pastoral estate, granted in 1824 to Dr James Bowman, principal surgeon of the colony, is located picturesquely in the landscape and responds to the topography of the Hunter region with its river valleys and alluvial plains, the siting of the intact complex of c1832 convict-built homestead buildings, together with the surrounding pastures form a distinctive rural colonial landscape.
- Although surrounding agricultural lands have been subdivided and gradually impacted by open cut mining since the late 1990s, the setting and significant views from the Ravensthorpe homestead have been largely maintained.
- On 5 December 2018, the Heritage Council considered a nomination for Ravensthorpe and resolved that the Aboriginal and broader shared post-contact cultural landscape values of Ravensthorpe, including its association with frontier conflict, the scale and nature of the European buildings, and the site's potential Aboriginal, historical and archaeological values, are likely to have heritage significance at a state level (Attachment B). On this basis, the Heritage Council requested that Heritage NSW progress the nomination.
- The Heritage Council strongly supports Ravensthorpe Homestead being retained in its original, highly significant location with a curtilage around its equally significant cultural landscape.

Consultation

- The Heritage Council (or its Delegate) has provided submissions for the application to DPIE for the draft SEARs (**Attachment C**), EIS (**Attachment D**) and RtS (**Attachment E**).
- Singleton Council has requested a briefing on the perspective of the Heritage Council about the proposed relocation of Ravensthorpe Homestead to inform their view of the project in relation to the RtS. The meeting is scheduled for the 22 February 2021 at 5.30 pm and the Chair of the Heritage Council along with representatives from Heritage NSW would attend.

- DPIE has advised Heritage NSW that the SSD is currently being evaluated and is likely to be referred to the Independent Planning Commission in April 2021. DPIE is awaiting additional information from the proponent, Glencore, and a submission from Singleton Council in relation to the RtS.
- Heritage NSW has been advised that a Section 10 application to the Commonwealth Minister under the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* has been made in relation to the Ravensworth site.

Recommendations

- Note the information in this brief.

DPC final approver	Approved: Kate Foy, Deputy Secretary - [REDACTED] 16.02.2021 Community Engagement Group, DPC
---------------------------	---

Minister Harwin's comments	Date:	Approved/Not Approved/Noted
	4.3.21	

Responsible Officer	Steve Meredith, A/Regional Manager, Northern, Heritage NSW Contact: [REDACTED]
----------------------------	---

Attachment A

Timeline for State Significant Development (SSD) 18_9349 Glendell Continued Operations Project – open cut mine

Project description

Glendell Continued Operations Project is an extension of mining at Glendell into a new mining area immediately north of the existing operation. The additional resource of approximately 140Mt ROM coal will extend the life of mining operations at Glendell to approximately 2044 and provide ongoing employment. The major components include: - realignment of a section of Hebden Road - diversion of Yorks Creek - relocation of Ravensworth Homestead - demolition/relocation of the existing Glendell Mine Infrastructure Area (MIA) and construction of a new MIA or utilisation and augmentation of the existing MIA at Liddell or the Mount Owen Mine MIA.

State Significant Development (SSD)

The State Significant Development (SSD) 18_9349 Glendell Continued Operations Project is submitted under Clause 5: Mining as defined under the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) and will require development consent under the *Environmental Planning and Assessment Act 1979* (EP&A Act). The applicant for the development application for the Project will be Glendell Tenements Pty Ltd, a 100% owned subsidiary of Glencore. A timeline for the application has been provided below. Please note that IPC timeframes are based on similar SSD determinations and are indicative only.

Secretary Environmental Assessment Requirements (SEARs) issued

The above project was lodged with the Department of Planning (now known as the Department of Planning, Infrastructure and Environment) on 16 May 2018. The Planning Secretary Environmental Assessment Requirements (SEARs) were issued in accordance with Section 4.12 (8) of the EP&A Act in relation to the Project on 12 August 2018.

Environmental Impact Statement (EIS) submitted

The Environmental Impact Assessment was placed on public exhibition from 11 December 2019 to 14 February 2020. A referral for advice on the EIS was sent to all relevant agencies.

Response to Submissions (RtS)

Part A of the Response to Submissions relating to non-heritage matters was submitted to the Department of Planning Infrastructure and Environment on 15 May 2020. The further Part B Response to Submissions that addressed specific heritage issues was submitted in August 2020.

Heritage Council (or Delegate) responses to application referrals

Description	Date referral received from DPIE	Date of response issued from HC
SEARS Request	17/05/2018	31/05/2018
EIS	4/12/2019	11/02/2020
RtS	2/11/2020	10/12/2020

Consent authority

The consent authority for this SSD application will be the Independent Planning Commission (the Commission).

Determination Process

A State significant development (SSD) application is referred in full to the consent authority only after it has been publicly exhibited and assessed by the NSW Department of Planning, Industry and Environment.

The Department provides the Commission a whole-of-government assessment report, which is published on the Department's website and the Commission's website. The Department's report is not binding on the Commission's decision.

There is no statutory requirement for the Commission to hold a public meeting before determining an application. A public meeting is a meeting to enable the Commission to hear public views on the assessment report.

The Commission may meet with the applicant, the Department (or other government agencies including the Heritage Council), the relevant local Council and other interested people before making its decision, if the Commission considers that it is necessary to do so.

A public hearing is only held if a formal request is made by the Minister for Planning and Public Spaces. A public hearing will involve the Panel seeking to address issues within the public hearing including asking clarification and related questions of the applicant, Department and others including the Heritage Council. This may require further involvement from Heritage NSW or the Heritage Council, but not the Minister.

The Commission's Final Report will contain a summary of any submissions received by the Commission in relation to the subject matter of the public hearing. The Commission's Final Report will be made publicly available on the Commission's website within a reasonable time after it has been provided to the Minister (or to a person or body directed by the Minister).

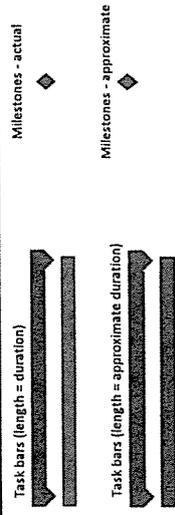
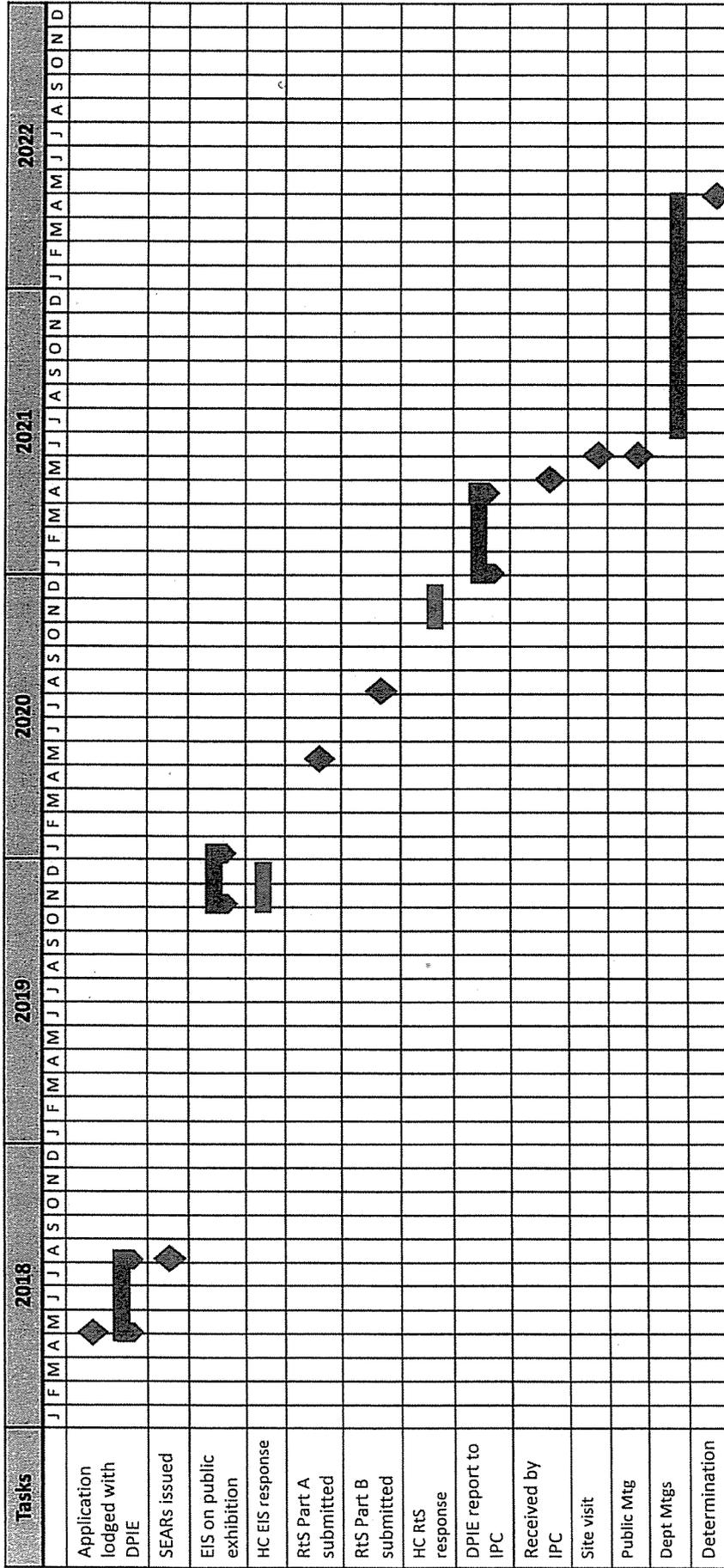
Current Status of the SSD

The Department of Planning Industry and Environment (DPIE) has advised Heritage NSW that the SSD is currently being evaluated and is likely to be referred to the Independent Planning Commission for determination in April 2021. DPIE is awaiting additional information from the proponent, Glencore, and a submission from Singleton Council in relation to the Response to Submissions. The Chair of the Heritage Council has been invited to attend a meeting at Singleton Council on 22 February 2021 to present its concerns with the application.

**See Attachment A.1 for Indicative timeline graphic – SSD9349-Glendale Continued Operations Project*

Attachment A.1

Ravensthorpe Homestead - SSD 9349 - Glendell Continued Operations Project Indicative Timeline



Attachment B

Item 2.1 from Heritage Council of NSW – Minutes of Meeting 5 December 2018

Item 2.1. Ravensworth Homestead

Dr Mark Dunn left the room for the duration of this item.

The Heritage Council of NSW received a presentation on Ravensworth Homestead from Mr Shane Scott, Glencore Coal Assets Australia, Mr Ian Stapleton, Clive Lucas Stapleton & Partners and Ms Kylie Seretis, Casey & Lowe Archaeology and Heritage followed by a

Heritage Assessment, Heritage North and Ms Alexandra Boukouvalas, Senior Heritage Operations Officer - OEH.

The Heritage Council of NSW discussed:

1. The historic, aesthetic, representative, rarity and research values of the colonial homestead and pastoral estate, as well as its strong associations with several events of frontier violence and notable colonial figures such as Dr James Bowman.
2. Potential impacts on the site's heritage significance should the homestead be relocated and landscape modified per the proposed State Significant Development.
3. The importance of the site as a shared cultural landscape. Recognition that management of Aboriginal cultural heritage should extend beyond recording of artefact locations, and that proposals for this site should also include the perspectives of the Aboriginal community who speak for Country.
4. The importance of the landscape and setting to the site's significance, noting the different layers of heritage for consideration, including its associations with pre and post contact Aboriginal history, historical figures and rarity and representativeness as a relatively intact pre-1850s homestead in the Hunter region.

Resolution 2018-77

After discussion, the Heritage Council of NSW:

1. **NOTED** the information provided in the papers;
2. **AGREED** Ravensworth Estate is likely to be of state heritage significance;
3. **ADVISED** Heritage Division to proceed with the nomination of Ravensworth Estate to the State Heritage Register;
4. **AGREED** to continue to provide advice on the approvals process, including a request for a comprehensive investigation into options for not relocating the homestead in line with approved SEARs for the Glendell Continued Operations Project; and
5. **REQUESTED** a presentation on the Environmental Impact Statement from Glencore in Q2 2019.

Moved by Ms Lisa Newell and seconded by Ms Jane Irwin.

ATTACHMENT C



Level 6, 10 Valentine Avenue
Parramatta NSW 2150
Locked Bag 5020
Parramatta NSW 2124

Telephone: 61 2 9873 8500
Facsimile: 61 2 9873 8599
heritagemailbox@environment.nsw.gov.au
www.heritage.nsw.gov.au

File No: SF18/40017
Ref No: DOC18/320036

Mr Jack Murphy
Environmental Assessment Officer
Resource Assessments
Department of Environment & Planning
GPO Box 39
SYDNEY NSW 2001

Email: [REDACTED]

Dear Mr Murphy

Secretary's Environmental Assessment Requirements (SEARs) for Glendell Continued Operations Project – Open cut coal mine, 666 Hebden Road, Ravensworth (SSD 9349)

I refer to your correspondence received on 17 May 2018 requesting advice on SEARs from the Heritage Council of NSW in relation to a proposed extension of mining at Glendell into a new mining area immediately north of the existing operation known as the Glendell Continued Operations Project.

It is noted that the major components of the proposal include: the realignment of a section of Hebden Road; the diversion of Yorks Creek; the relocation of Ravensworth Homestead; the demolition/relocation of the existing Glendell Mine Infrastructure Area (MIA) and construction of a new MIA or utilisation and augmentation of the existing MIA at Liddell or the Mount Owen Mine MIA.

It is noted that no State Heritage Register (SHR) items, under the *Heritage Act 1977*, are present within the proposed project area; however, there is a local heritage item, Ravensworth Homestead, listed as item I41 on the Singleton Local Environmental Plan (SLEP) 2013).

It is noted that Ravensworth Homestead was one of 19 places identified as a very early Homestead in a Heritage Council comparative study of Homestead Estates in the Hunter Valley (2013) and the Heritage Council NSW has recommended it for nomination on the State Heritage Register (SHR). The advice provided below is on the basis that this place is of State significance.

The accompanying report prepared by Umwelt, *Glendell Continued Operations Project, Preliminary Environmental Assessment* (PEA), outlining the background, the proposal, the planning context and key Environmental and Social issues to be assessed, dated May 2018, has been reviewed and following comments provided:

- The proposed relocation of state significant heritage items is not considered appropriate. The current context and setting of a heritage item, like Ravensworth Homestead, are significant values that contribute to the heritage significance of an item and their loss from a relocation is a major impact on its heritage values.

- The proposed relocation has the potential to result in catastrophic damage to the significant fabric of Ravensworth Homestead.
- Adaptive reuse of heritage items of buildings from the 1820s presents challenges and a new use can impact on the heritage values.
- A homestead of the era is likely to have a significant garden with early plantings and archaeology that will be lost as a result of the open cut mining activities.

Based on the above issues, it is recommended that the following SEARS be included:

1. The Environmental Impact Statement (EIS) must include a comprehensive Statement of Heritage Impacts which details all possible opportunities to keep Ravensworth Homestead in its original location.
2. The EIS must include a heritage assessment of current context and setting of Ravensworth Homestead, and identify any significant values that contribute to the heritage significance of an item whether their loss from a relocation would be a major impact on its heritage values.
3. However, if it can be demonstrated satisfactorily that relocation of the Ravensworth Homestead is the only option to ensure its preservation, the EIS must include a detailed work statement on how this relocation would be done, an analysis of where the homestead would be relocated to, timelines for relocation, a heritage significance assessment of the item in its new location and a detailed structural analysis which outlines whether the homestead is able to be relocated and what method of relocation would be best to ensure the homesteads survival during this process.
4. The EIS must outline proposed adaptive reuse ideas for the new homestead and outline whether there are any impacts from these new uses on the homestead fabric or significance.
5. The EIS must contain a heritage assessment of the existing garden and landscape immediately surrounding Ravensworth Homestead. If the EIS finds the existing garden is significant, a measured survey and recording of the garden and its features should be prepared by a suitably qualified landscape heritage consultant.
6. If significant garden features or planting are found the EIS must detail how they will be relocated or replicated at a new site.
7. The Applicant must undertake a comprehensive historical archaeological assessment prepared by a suitably qualified historical archaeologist in accordance with the Heritage Division, Office of Environment and Heritage Guidelines *Assessing Significance for Historical Archaeological Sites and 'Relics'* 2009. This assessment should identify what relics, if any, are likely to be present, assess their significance and consider the impacts from the proposal on this potential resource. Where harm is likely to occur, it is recommended that the significance of the relics be considered in determining an appropriate mitigation strategy. If harm cannot be avoided in whole or part, an appropriate Research Design and Excavation Methodology should also be prepared to guide any proposed excavations.

Please note that this advice does not relate to Aboriginal archaeological and cultural heritage values. A request for SEARs regarding Aboriginal cultural heritage and archaeology should be separately referred to the Regional Operations Planning Unit of the Office of Environment & Heritage.

In addition, the following list of documents are recommended to be included in the SEARs as policy and guideline reference material:

- **Heritage Council of NSW. Archaeological Assessments Guidelines 1996.**

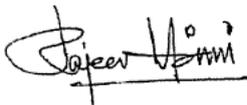
Which are located in Appendix 8.7 of Heritage Council of NSW, Local Government Guidelines March 2002

<http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/localgovernmentheritageguidelines.pdf>

- **Heritage Council of NSW. Assessing significance for historical archaeological sites and relics 2009.**
<http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/ArchSignificance.pdf>
- **Heritage Council of NSW. Criteria for the Assessment of Excavation Directors. Updated 2011.**
<http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/excavationdirectors.pdf>

If you have any questions regarding the Glendell Continued Operations Project, please contact James Quoye, Senior Heritage Assessment Officer, at the Heritage Division, Office of Environment and Heritage on (02) [REDACTED] or [REDACTED]

Yours sincerely



Rajeev Maini
Acting Director, Heritage Operations
Heritage Division
Office of Environment and Heritage
AS A DELEGATE OF NSW HERITAGE COUNCIL
31 May 2018

ATTACHMENT D



Our ref: DOC19/10190978

Ms Lauren Evans
Energy and Resource Assessment
Planning and Assessment
320 Pitt Street
SYDNEY NSW 2001

By email: [REDACTED]

Dear Ms Evans

Notice of Exhibition of application for (Glendell Continued Operations Project) (SSD 9349)

Thank you for your referral dated 4 December 2019 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal. The proposed development involves:

- Continuation of mining of existing approved reserves in the Glendell Pit
- Mining of the Glendell Pit Extension by open cut operations recovering approximately 135 Mt ROM coal down to and including the Hebden seam
- The continuation of haulage of coal to the Mount Owen ROM coal pads for processing at the Mount Owen CHPP
- Relocation of the Ravensworth Homestead
- The demolition and removal of the existing Glendell Mine Infrastructure Area (MIA), and construction of the new Glendell MIA and Heavy Vehicle Access Road
- The realignment of part of Yorks Creek and a section of Hebden Road and other infrastructure
- The rehabilitation of areas directly affected by the mining and emplacement of overburden from mining at Glendell, the MIA, Heavy Vehicle Access Road and disturbed areas associated with ancillary works.

There are no State Heritage Register (SHR) items, under the Heritage Act 1977, present within the proposed project area. However, there is a local heritage item, Ravensworth Homestead, listed as item I41 on the Singleton Local Environmental Plan (SLEP) 2013).

Ravensworth Homestead was one of 19 places identified as a very early Homestead in a Heritage Council comparative study of Homestead Estates in the Hunter Valley (2013) and the Heritage Council has recommended it for nomination on the State Heritage Register (SHR). The advice provided below is on the basis that this place and its cultural landscape (immediate and wider) is of State significance.

The Secretary's Environmental Assessment requirements (SEARs) relating to Heritage for the project require the EIS to undertake:

1. *an assessment of the potential impacts of the development on Aboriginal heritage (cultural and archaeological), including consultation with relevant Aboriginal communities/parties and documentation of the views of these stakeholders regarding the likely impact of the development on their cultural heritage;*

2. *identification of historic heritage in the vicinity of the development and an assessment of the likelihood and significance of impacts on heritage items, having regard to the relevant policies and guidelines listed in Attachment 1; and*
3. *in relation to Ravensworth Homestead, the EIS must include:*
 - *a detailed heritage significance and historical archaeological assessment of the homestead, including consideration of its surrounding garden and landscape;*
 - *an analysis of all reasonable and feasible options to preserve the Homestead (including leaving in situ); and*
 - *if relocation is selected as the preferred option, please include an analysis of all feasible relocation options and how the Ravensworth Homestead Advisory Committee was involved in the decision;*

The contents of the 'Environmental Impact Assessment', Umwelt, November 2019 and specifically, its appendices were consulted to provide comments:

- Appendix 1 'Mine Planning Options Report', Glencore Coal Assets Australia, 25 November 2019.
- Appendix 23a 'Heritage Analysis and Statement of Significance', Lucas Stapleton Johnson, November 2019;
- Appendix 23c 'Historic Archaeological Test Excavation Report and Impact Statement for the Core Estate Lands' by Casey & Lowe, November 2019;
- Appendix 23d 'Statement of Heritage Impact' by Lucas Stapleton Johnson, 25 October 2019;
- Appendix 23e 'Heritage Ravensworth Relocation Justification Report' by Glencore Coal Assets Australia, 25 November 2019;
- Appendix 23f 'Heritage Ravensworth Homestead Relocation Option Identification and Assessment'; by Glencore Coal Assets Australia, 28 November 2019;
- Appendix 23g – 'Heritage Ravensworth Farm Proposal', multiple authors;
- Appendix 23h – 'Heritage Broke Village Option', multiple authors; and
- Appendix 25 – 'Visual Assessment' by Umwelt, 25 November 2019.

Heritage Council general comments:

1. The Heritage Council endorsed the ICOMOS report, '*The Future of Our Pasts: Engaging cultural heritage in climate action*' in 2019 and is committed to ensuring long term protection and conservation of our cultural heritage through the good practice, adaption and mitigation advice it provides and the actions it recommends.
2. The Heritage Council considers that Ravensworth Homestead and its surrounding cultural landscape is likely to be of state heritage significance for its aesthetic, historic, scientific and social values.
3. The proposed relocation of Ravensworth Homestead will result in the irreversible loss of its identified high and exceptional significance in the form of its intact fabric, setting, views and meaning. The cultural landscape which reinforces the Complex's state significance including in-situ archaeology, Aboriginal intangible cultural values and cultural landscape plantings will be lost. The proposed relocation options also have potential to result in loss and major damage to the significant fabric of Ravensworth Homestead.
4. The Heritage Council does not support the relocation of Ravensworth Homestead as either option would result in an unacceptable heritage impact. The Heritage Council considers that

relocating the homestead may remove its State significant values and the relocated buildings are unlikely to meet the criteria for state heritage significance.

5. The Heritage Council strongly supports Ravensworth Homestead being retained in its current, highly significant location with a curtilage around its equally significant cultural landscape.

Heritage Council specific comments on EIS report:

1. The EIS has adequately addressed the following SEARs for the Project:
 - a) *identification of historic heritage in the vicinity of the development and an assessment of the likelihood and significance of impacts on heritage items, having regard to the relevant policies and guidelines listed in Attachment 1;*
 - This part of the SEAR has been adequately addressed in the EIS.
 - b) *in relation to Ravensworth Homestead, the EIS must include: a detailed historical archaeological assessment of the homestead, including consideration of its surrounding garden and landscape.*
 - This part of the SEARs has been adequately addressed in the EIS. Enough historical archaeological testing was completed to establish that the Ravensworth Homestead and property retains a historical archaeological resource of State significance. If the Homestead is retained as part of an amended Glendell proposal, then the archaeology would also be retained *in-situ* and undisturbed. It is considered that this part of the SEAR relating to historical archaeology has been met.
 - If the extension of the Glendell Pit is approved in its current form, then full archaeological salvage would be required as a mitigation measure as recommended by Casey & Lowe in their November 2009 report.
 - c) *...how the Ravensworth Homestead Advisory Committee was involved in the decision [for relocation of Ravensworth Homestead].*
 - This part of the SEAR has been adequately addressed in the EIS.
2. The EIS has not adequately addressed the following SEARs for the Project. It is requested that the EIS is updated with further information based on the following dot points:
 - d) *an assessment of the potential impacts of the development on Aboriginal heritage (cultural and archaeological), including consultation with relevant Aboriginal communities/parties and documentation of the views of these stakeholders regarding the likely impact of the development on their cultural heritage;*
 - The EIS has identified that the site has a very significant pre and post contact Aboriginal history. This history will be included in the SHR nomination assessment.
 - The Heritage Council notes that the EIS outlines that Aboriginal significance of the site is assessed as low-moderate based on an assessment of the scientific significance of the Aboriginal archaeology present within the Homestead area and wider estate lands. However, an interrogation of the relationship between the Homestead and Aboriginal people has not been fully investigated. The EIS focuses on specific events and their locations rather than undertaking an assessment of the wider Aboriginal cultural heritage significance related to the sites social and intangible

values as the place of contact between and the reason for conflict among Aboriginal groups and European early settlers.

- The impacts on these potentially significant values from the proposal have not been assessed.
- The Heritage Council requests that the EIS should be amended to include this information. The Heritage Council considers that when the intangible values related to the role Ravensworth Homestead and its wider cultural landscape played in frontier conflicts are re-examined, the level of significance for the Aboriginal values of the site would be likely to increase. The impact the proposal would have on those values may then be weighted more heavily.

e) *in relation to Ravensworth Homestead, the EIS must include:
a detailed heritage significance assessment of the homestead, including consideration of its surrounding garden and landscape.*

The assessment of the heritage significance of the homestead including its surrounding garden and landscape and subsequent Statement of Significance in the EIS is considered inadequate for the following reasons:

- The description of Ravensworth's connection to 'range of significant places and people' is considered inadequate. These places and people should be identified.
- The acknowledged connection of John Verge, one of Australia's pre-eminent colonial architects, with the design of the Ravensworth Homestead and Stables, referred to in both this report (HHAA, p59) and in previous studies by the authors, has not been sufficiently considered. The analysis should include a precautionary approach including a comparison of Ravensworth with other examples of work by Verge. Furthermore, the link to Verge and the MacArthur's should be referenced in the Statement of Significance.
- The EIS has a lack of definition of the curtilage or setting of Ravensworth Homestead and lacks an assessment of the cumulative impact of the works on the significance of the Core Estate Lands.
- The comparative analysis with pre 1850s Hunter homesteads is inadequate to enable an assessment of the significance of Ravensworth as the following have not been considered:
 - o The main house on the Ravensworth property (called Ravensworth) has been identified as one of very few homesteads from the initial establishment period to survive relatively unchanged in terms of its vernacular form (CHS, p57).
 - o There are 4 properties identified in the 2013 comparative study which also include a House and Primary Farmyard with five or more buildings with a single nucleus, including Bolwarra (modified by later additions), Negroa, Kinross and Abbey Green. Existing SHR items with similar features include Tocal Homestead (SHR00147) and Dunmore House (SHR01887). Direct comparisons between Ravensworth and these properties have not been made.
 - o The use of architects in the design and construction of the early homesteads is rare. It appears that Ravensworth is a rare example of this.
 - o The known archaeology and written records existing for Ravensworth relating to its Aboriginal history is an uncommon and highly significant aspect of the place, particularly regarding its history as a place associated with frontier conflict between European and Aboriginal people.

- o Although incidents of violent conflict between European and Aboriginal peoples are likely to have been more common, only approximately 16 of these incidents in the 1820s are well documented. Six of these incidents are associated with the Ravensworth property, including one incident popularly referred to as the Ravensworth Massacre. Other incidents are noted to have occurred in the vicinities of Gostwyck, Invermein and Segenhoe, and existing SHR item, Merton (SHR00159). The site with the most available documentation, and therefore the closest comparative example in this sense, is Gostwick. Direct comparisons with these properties have not been made.
- o The post contact history of interaction with Aboriginal people is also seen in documentation of places of Aboriginal employment such as Merton (SHR00159) and Caergwrle, camp sites such as Invermein, Bolwarra and Glendon, corroborree and/or ceremonial sites such as Segenhoe and Bolwarra, and sites selected with the help of Aboriginal guides such as Bolwarra, Glendon and Segenhoe. Direct comparisons between Ravensworth and these properties have not been made.
- The Casey & Lowe report completed quite extensive assessment against the NSW Heritage Criteria, which is missing from the Statement of significance and should be included as the site is likely to provide unique insights into:
 - o A newly-established frontier and contact/ interaction with Aboriginal people.
 - o Rural lifeways, including tastes and customs through the 19th to early 20th centuries.
 - o Material culture and lives of significant colonial people.
 - o Convict lives and the assignment system and how it was implemented within this landscape.
 - o Use of technology and management of water, changing transportation and economics and how they shaped life on the estate.
- f) *an analysis of all reasonable and feasible options to preserve the Homestead (including leaving in situ);*
 - The EIS has not adequately met the requirements of this SEAR as it has not provided an analysis of all reasonable and feasible options to preserve the Homestead (including leaving in situ) or an adequate justification of why Options 6, 7 and 8 are not possible to ensure that Ravensworth Homestead is not impacted by the proposed works.
- g) *if relocation is selected as the preferred option, please include an analysis of all feasible relocation options...*
 - This SEAR has not been met. The proposed options for relocation are not considered to have been appropriately met as neither option provides for the full relocation of the entirety of Ravensworth Homestead without demolition or removal of significant fabric such as the 1920s addition and the original homestead footings. Much more detailed information needs to be provided before either option can be considered.
 - There are several significant issues raised regarding the 'intact' relocation Option 1, including the unique project risks outlined by the movers, as well as the outstanding methodology and cost calculations that provide little certainty to this option.
 - Furthermore, the preferred intact relocation option will require a large amount of demolition of significant fabric which will not be relocated to the new location and the introduction of new fabric such as new footings. The current condition of Ravensworth

House and its original construction techniques also mean the buildings are not favorable to relocation.

- Insufficient information has been provided for Option 1 regarding the presence of underground mining under the recipient site and the likely blasting vibrations impacts on the relocated structures from existing adjacent mines.
- Similar issues exist for Option 2. The proposed removal of internal walls will remove original fabric, graded high significance and alter the internal layout, graded exceptional significance. The current Option 2 proposed approach to the conservation of Ravensworth Homestead including the similar approach to the outbuildings will have a severely detrimental impact to their heritage significance

The Heritage Council considers that the EIS needs much more detailed information regarding the issues raised in the above letter under point 2 (d-g).

If you have any questions regarding this advice on the EIS for the Glendell Continued Operations Project, please contact me on (02) [REDACTED] or [REDACTED]

Yours sincerely



Katrina Stankowski
Senior Team Leader, Regional Heritage Assessments North
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
11 February 2020

ATTACHMENT E



Our ref: DOC20/903023

Mr Joe Fittell
Senior Environmental Assessment Officer
Department of Planning, Industry and Environment

By email: [REDACTED]

Dear Mr Fittell

Response to Submissions of application for Glendell Continued Operations Project (SSD-9349) (Singleton Shire)

Thank you for your referral dated 2 November 2020 inviting comments from the Heritage Council of NSW on the Response to Submissions (RtS) provided by the applicant for the above State Significant Development (SSD-9349) proposal.

The Heritage Council has a policy of working with development proponents to see if there is a way of achieving acceptable economic outcomes through development while also maintaining or indeed enhancing the heritage values of the property under consideration. Early in the process for exploring expansion of the Glendell Continued Operations Project the Chair of the Heritage Council met with senior executives of Glencore and of DPIE for preliminary discussions about how the objectives of Glencore and of the Heritage Council could be met in this project. The Heritage Council believes that a balance of economic and heritage outcomes could be achieved with the Ravensworth Homestead remaining in situ.

The Heritage Council is also aware that the Aboriginal pre and post contact history of the Ravensworth Homestead is contested. Nevertheless, following recent incidents in other States involving mining and Aboriginal cultural heritage, the Heritage Council believes that a precautionary principle should be adopted around areas of contested Aboriginal history and heritage. On 11 February 2020, the Heritage Council Approvals Committee provided comments and advice on the Environmental Impact Statement (EIS) for the project. Following this response the Department of Planning, Industry and Environment facilitated a teleconference between Heritage Council members, Glencore, LSJ and Umwelt on 16 April 2020 which provided further understanding of the issues raised and the additional detail required by the Heritage Council as part of this RtS Report.

It is noted that this RtS report contains new information in answer to those comments which has resulted in an updated Statement of Significance for Ravensworth Homestead.

A detailed response to the information outlined within the RtS is contained within the attachment to this letter, however, it is reiterated that the Heritage Council considers that Ravensworth Homestead and its surrounding cultural landscape, located within the proposed open cut mining area, to be of state heritage significance for its aesthetic, historic, scientific and social values.

The Heritage Council considers that the proposed removal of Ravensworth Homestead from its original location as outlined in the EIS and RtS reports will result in the irreversible loss of

its state significance in the form of its significantly intact fabric, archaeology, Aboriginal and colonial landscape setting, and views.

The Heritage Council does not support the relocation of Ravensworth Homestead or the rationale provided in the EIS or RTS as either relocation option would also result in an unacceptable heritage impact as the loss of the intact homestead complex will remove its State significant values and the relocated buildings are unlikely to meet the criteria for state heritage significance.

The Heritage Council notes that the proposal conflicts with the revised Statement of Significance in the RTS: *'The intactness of the Main House of Ravensworth makes the place relatively rare within the context of the Hunter Region and of high significance, however the original "H plan" form of the Main House of Ravensworth makes the place extremely rare and of exceptional significance on a State level.'*

It is noted that while both options propose to re-instate the original "H plan" form of the Main House (p36), neither option provides for the full relocation of the entirety of Ravensworth Homestead. It is further noted that the RTS finds that the proposed works will have a notable heritage impact on the 'the place' and the core area of the estate and Aboriginal archaeology; and a high heritage impact on the Ravensworth Homestead Complex including some aspects of exceptional significance (p31).

In conclusion, the Heritage Council strongly supports Ravensworth Homestead being retained in its current (original), highly significant location with a curtilage around its equally significant cultural landscape and does not agree with the rationale contained within the RTS that would allow for its removal and loss of significance. The Heritage Council reiterates that a precautionary principle should be adopted with respect to potential loss of Aboriginal cultural heritage.

If you have any questions regarding this advice on the RTS for the Glendell Continued Operations Project, please contact Senior Heritage Assessment Officer Tempe Beaven on (02) [REDACTED] or via email at [REDACTED]

Yours sincerely



Cheryl Brown
Manager, Northern Region
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
9 December 2020

Encl: Heritage Council response to Response to Submissions Report for Glendell Continued Operations Project.



WEDNESDAY 6 October 2021

Item 4.1 - SSD 9349 - Glendell Continued Operations Project – DPIE Presentation - Ravensworth Homestead

PURPOSE

To provide comment on the new information presented by the Department of Planning Industry and Environment (DPIE) for the State Significant Development (SSD) Glendell Continued Operations Project relating to the removal of Ravensworth Homestead.

RECOMMENDATIONS

That the Heritage Council:

1. **Note** the presentation from DPIE.
2. **Based on the information provided provide** a response to the two questions posed by DPIE (included as part Tab 4.1A), specifically: based on the additional financial assessment, if the mine plan cannot avoid directly impacting Ravensworth Homestead including its cultural setting/landscape:
 - whether the Heritage Council has any additional advice on the proposed relocation options for the Ravensworth Homestead; and
 - whether there are any further mitigation measures which the Heritage Council would recommend that could be implemented to minimise impacts to heritage values.
3. **Provide comments to clarify** the Heritage Council's position relating to the ACH values of the Ravensworth site.
4. **Provide any additional comments** on the new information submitted in relation to the balance of economic and heritage outcomes that allow the Ravensworth Homestead to remain in situ (included as Tab 4.1B and Tab4.1C).

SUMMARY OF KEY ISSUES

- The Ravensworth Homestead Complex has been assessed to be of state heritage significance as a rich shared cultural landscape. A wealth of physical and documentary evidence testifies to the way in which this early occupation and expansion of the wool industry into the Upper Hunter Valley, aided by assigned convicts, irrevocably changed the lives of Aboriginal people and the modified landscape of the Hunter Valley.
- The proposed Glendell Continued Operations Project via open cut mining of the site, would completely alter the landscape and result in relocation of all buildings, ~~with including~~ the Ravensworth Homestead Complex, and the investigation and salvaging of the available archaeological resource within the core estate lands. If approved, the proposed relocation of the buildings under either option would result in an unacceptable heritage impact and the relocated buildings would not meet the criteria for state heritage significance.
- Listing of the site on the State Heritage Register would not prevent the SSD project from going ahead (if it is approved by DPIE) as the relevant protections under the Heritage Act are turned off by the SSD provisions of the *Environmental Planning & Assessment Act 1979*.
- On 14 September 2021, Heritage NSW received a request from DPIE (included as Tab 4.1A) for further advice from the Heritage Council ~~in consideration of~~ new information in relation to the economic viability of the mine if the Ravensworth Homestead is to remain in situ, as well as clarification of the Heritage Council position on the assessment of Aboriginal cultural values.

- The Department is ~~currently in the process of~~ assessing the additional information, including obtaining further expert advice on the heritage issues before coming to a decision recommendation on the approval of the project and forwarding that recommendation to the Independent Planning Commission (IPC).
- The determination of the Glendell Continued Operations SSD Project will rest with the IPC.

BACKGROUND

Proposed State Significant Development (SSD)

An application has been lodged for the proposed Glendell Continued Operations Project (State Significant Development 18_9349), which aims to extend an existing open cut coal mine into the Ravensworth cultural landscape. A major component of the project would involve relocation of the Ravensworth homestead building from the property, diversion of the creek on which it is sited and destruction of the broader associated structures and landscape including Aboriginal and historic archaeology.

In December 2018, the Heritage Council resolved that Ravensworth Homestead was likely to be of state heritage significance and directed that the listing be progressed.

Listing of the site on the State Heritage Register would not prevent the SSD project from going ahead (if it is approved by DPIE) as the relevant protections under the Heritage Act are suspended by the SSD provisions of the *Environmental Planning & Assessment Act 1979*. The Heritage Council's of NSW ~~thus has an role is~~ advisory role only while t. The Minister for Planning has the sole approval role.

Heritage Council advice on the proposed relocation of the Ravensworth Homestead

The Heritage Council has provided consistent advice to DPIE and to Singleton Council regarding the project and the impacts the proposed relocation of the Ravensworth Homestead would have on its heritage significance.

The last comments provided by the Heritage Council to DPIE are dated 9 December 2020 and relate to the proponents Response to Submissions (RtS) report:

*The Heritage Council has a policy of working with development proponents to see if there is a way of achieving acceptable economic outcomes through development while also maintaining or indeed enhancing the heritage values of the property under consideration. Early in the process for exploring expansion of the Glendell Continued Operations Project the Chair of the Heritage Council met with senior executives of Glencore and of DPIE for preliminary discussions about how the objectives of Glencore and of the Heritage Council could be met in this project. **The Heritage Council believes that a balance of economic and heritage outcomes could be achieved with the Ravensworth Homestead remaining in situ...***

A detailed response to the information outlined within the RtS is contained within the attachment to this letter, however, it is reiterated that the Heritage Council considers that Ravensworth Homestead and its surrounding cultural landscape, located within the proposed open cut mining area, to be of state heritage significance for its aesthetic, historic, scientific and social values.

The Heritage Council considers that the proposed removal of Ravensworth Homestead from its original location as outlined in the EIS and RtS reports will result in the irreversible loss of its state significance in the form of its significantly intact fabric, archaeology, Aboriginal and colonial landscape setting, and views.

The Heritage Council does not support the relocation of Ravensworth Homestead or the rationale provided in the EIS or RTS as either relocation option would also result in an unacceptable heritage impact as the loss of the intact homestead complex will remove its State significant values and the relocated buildings are unlikely to meet the criteria for state heritage significance.

The Heritage Council notes that the proposal conflicts with the revised Statement of Significance in the RtS: 'The intactness of the Main House of Ravensworth makes the place relatively rare within the context of the Hunter Region and of high significance, however the original "H plan" form of the Main House of Ravensworth makes the place extremely rare and of exceptional significance on a State level'.

It is noted that while both options propose to re-instate the original "H plan" form of the Main House (p36), neither option provides for the full relocation of the entirety of Ravensworth Homestead. It is further noted that the RtS finds that the proposed works will have a notable heritage impact on the 'the place' and the core area of the estate and Aboriginal archaeology; and a high heritage impact on the Ravensworth Homestead Complex including some aspects of exceptional significance (p31).

In conclusion, the Heritage Council strongly supports Ravensworth Homestead being retained in its current (original), highly significant location with a curtilage around its equally significant cultural landscape and does not agree with the rationale contained within the RtS that would allow for its removal and loss of significance. The Heritage Council reiterates that a precautionary principle should be adopted with respect to potential loss of Aboriginal cultural heritage.

Heritage Council advice on the assessment of Aboriginal cultural values

DPIE are also seeking clarification from the Heritage Council regarding the difference in opinion regarding the ACH values of the Ravensworth Homestead site/cultural landscape as expressed by in the letter to DPIE from the Aboriginal Heritage Regulation Branch of Heritage NSW (dated 30 October 2020) and the advice from Heritage Council (dated 9 December 2020) (included as part Tab 4.1A).

The advice provided by the Aboriginal Heritage Regulation Branch of Heritage NSW (dated 30 October 2020) provided a response to the Aboriginal Cultural Heritage Assessment Report (ACHAR) as assessed against the ACH guidelines required by the SEARs. This focussed on tangible aspects Aboriginal cultural heritage. The advice concluded that the assessment of Aboriginal cultural heritage was adequate and that appropriate measures to manage and mitigate any potential impacts on those values have been identified in the revised ACHAR.

It is worth noting that the ACH Branch response observed that the registered Aboriginal party (RAPs) considered the local area around Ravensworth to be of high cultural significance and that 'the project's direct and indirect impacts will further contribute to the cumulative impacts and loss of Aboriginal cultural heritage values and sites in the local area and the region'.

Meanwhile, the Heritage Council has provided consistent advice to DPIE regarding the project and its impacts to wider Aboriginal cultural heritage including tangible but particularly, the intangible values. They have stated that they believe that when the intangible values related to the role Ravensworth Homestead and its wider cultural landscape played in frontier conflicts are re-examined, the level of significance for the Aboriginal values of the site would be likely to increase.

The most recent comment from the Heritage Council of NSW on the Response to Submissions (RtS) was submitted in a letter to DPIE on 9 December 2020, is as follows: *'The Heritage Council is also aware that the Aboriginal pre and post contact history of the Ravensworth Homestead is contested. Nevertheless, following recent incidents in other States involving mining and Aboriginal cultural heritage, the Heritage Council believes that a precautionary principle should be adopted around areas of contested Aboriginal history and heritage'.*

ATTACHMENTS

Tab 4.1A Letter from DPIE - Glendell Continued Operations Project – Additional Information for Consideration by Heritage Council of NSW – 14 September 2021

Tab 4.1B Review of Glendell Continued Operations Project Mine Plan and Mine Plan Options, Mine Craft Consulting, October 2020.

Tab 4.1C Response to Minecraft Report - Glendell Continued Operations Mine, Umwelt, August 2021.

Approvals

Report prepared by: Tempe Beaven Senior Heritage Assessment Officer	Date: 15/09/2021
Report reviewed by: Katrina Stankowski, Senior Team Leader	Date: 20/09/2021
Report reviewed by: Cheryl Brown, A/Manager, ACH Regulation	Date: 20/09/2021
Approved by: Sam Kidman Executive Director	Date: <u>27/5/09/2021</u>

Item 2. Committees Update

State Heritage Register Committee (SHRC)

Robyn Parker, Chair of the State Heritage Register Committee, provided an update on key outcomes for items considered at the 5 October SHRC meeting, including a joint discussion with the Approvals Committee on the draft Heritage Design Guidelines and the Appin Massacre Cultural Landscape.

Approvals Committee (AC)

Ian Clarke, Deputy Chair of the Approvals Committee, provided an update on key outcomes for items considered at the 5 October AC meeting as well as various out of session workshops held during the past month.

Members also had a brief general discussion around the SHR listings process and owner engagement.

Item 3. Legal, Policy and Administration

Item 3.1 Heritage Act Review Update

The Heritage Council of NSW received an update from Lucy Albani and Caroline Ford on the review of the heritage legislation and provided feedback on the various suggestions being considered for inclusion in the submission currently being prepared.

The Council thanked Heritage NSW for the presentation.

Item 3.2 Heritage Design Guidelines

The Heritage Council of NSW received an update from Sarah Jane Brazil on work undertaken to finalise the draft *Heritage Design Guidelines*.

Heritage NSW reported that:

- The *Key Heritage Principles* are now referred to as the *Heritage Design Guidelines* which better captures the original intent of this guidance.
- The draft guidelines have been updated following feedback received from the Heritage Council, Approvals Committee, and the Heritage and Technical Advisory Panels during the consultation process.
- A joint session was held with the State Heritage Register Committee and Approvals Committee on 5 October to provide final feedback on the proposed guidelines and these comments are being incorporated into the final iteration of the document.
- It is anticipated that Council's approval of the *Heritage Design Guidelines* will be sought out of session by the end of October 2021, prior to being made publicly available on the website.
- Furthermore, the guidelines will be provided to all proponents when seeking initial heritage advice.

The Council discussed ways to further promote the guidelines through engagement with stakeholders as part of a broader suite of heritage information and sought to link case studies and examples to illustrate the application of the principles.

Heritage NSW reported on the strong engagement underway with other agencies such as the Greater Sydney Commission, DPIE and Transport for NSW on the application of these guidelines.

Resolution 2021-57

The Heritage Council of NSW:

1. **Notes** the comments provided from the joint session of the State Heritage Register Committee and the Approvals Committee meeting held on 5 October 2021.
2. **Approves in principle** the *Heritage Design Guidelines*, subject to amendments being ratified out of session.
3. **Thanks** Sarah Jane Brazil and David Nix for exceptional work done on the *Heritage Design Guidelines*.

Moved by Dr Nicholas Brunton and seconded by Ian Clarke

Item 4. Matters for consideration

Colleen Morris was excused from the meeting for the duration of the following item.

Item 4.1 Ravensworth Homestead – Glendell Mine – SSD - DPIE presentation

The Heritage Council of NSW received a report from Katrina Stankowski and a presentation from the Department of Planning, Industry and Environment (DPIE) and Hector Abrahams Architects.

Key points raised in DPIE's presentation:

- o Whilst only locally listed, all stakeholders agree that the Ravensworth Homestead is of significant state heritage value.
- o The key issue of concern is that the Ravensworth cultural landscape and the estate are located in the middle of the proposed extensions to the Glendell open cut coal mine.
- o Focusing on the Council's advice of 9 December 2020, DPIE discussed various mine design options with Glencore, who are the mine owners, and sought further advice from an independent mine plan review, economic advice from The Centre for International Economics (CIE) and expert heritage advice from Hector Abrahams Architects.
- o The result of these investigations is that, in the view of Glencore, -a redesign of the mine is not an option for this project, and there are no viable options that avoid impacting the Ravensworth homestead and outbuildingdEstate.

Hector Abrahams provided a summary of their expert heritage advice on the Glendell Continuing Operations Project, including advice on options to relocate Ravensworth to a farm site or to the nearby town of Broke. It was emphasised that the Aboriginal cultural significance of the landscape is archetypal, of representative value about convict evidence, with the notion that the original site will persist as a place and outlast the mine operation over the long term.

The Council discussed further details around the economic analysis and how to value loss of heritage; the approach for consideration of feasible and reasonable options; and possible alternatives in the contexts of longer term impacts of climate change and increasing heritage values of Ravensworth Homestead if it remains in situ.

Commercial in confidence – not for public release; Not for release to Colleen Morris due to conflict of interest.

Key points raised by Hector Abrahams:

- o The Continuous Operations Project proposal prevents preservation of the homestead in situ and it would appear that relocation is the only way to preserve some heritage values.
- o The Aboriginal cultural significance of the landscape is archetypal, of representative value about convict evidence, with the notion that the original site will persist as a place and outlast the mine operation over the long term.

- The risk of a negative precedent impact if heritage values are lost due to any state significant development.
- The relocation to the farm site preserves many state level values, however it does not appear to offer return to an established viable use. The long term agricultural and pastoral viability of the homestead remains an issue, regardless if it remains in situ or if it is relocated to a farm site. The proposed relocation by intact method would provide a future technological value. The size of future landholding and the implications of public policy for increased population should also be considered.
- The option to relocate to Broke is a radical adaptive reuse proposal with publicly accessible gallery use, however it destroys all landscape setting and domestic use. Public use could be considered a potential positive future value if the proposal were to play a transformative role in Broke.
- There is a need for future masterplan to address the viability and culture of the area, focussing on the land, as well as the homestead, and the opportunity to consider the future of the entire holding.

The Council questioned how the loss of heritage is valued in the equations and financial analysis.

- DPIE advised that the cost benefit analysis considers various factors, including heritage, and the overall economic analysis tries to weigh up the economic analysis of the coal operations with these other factors.
- DPIE is seeking final advice on the assumptions for commercial viability to ensure these assumptions are reasonable.

The Council questioned the detail around which options are reasonable as opposed to those that are considered feasible and expressed concerns around trading off the heritage value against a commodity that has a shorter life span.

The Council noted the independent mine plan review report references options for a 200-300 meter buffer zone around the Ravensworth Estate.

The Council proposed a hybrid option could be considered with a staged approach, whereby mine operations could be undertaken up to a designated buffer zone and a decision on whether to mine the remaining coal resource reassessed in 2035. This would allow for the homestead to remain in situ and defer any decision to relocate the homestead if there is found to be sufficient value in coal operations beyond 2035.

The Council also noted the impacts of climate change and thermal coal uncertainty which predicts changes in demand until around 2030, and a lessening of demand in the years following up to 2050. Whereas, the heritage values for the Homestead remaining in situ will further increase over the longer term.

DPIE noted that:

- Their role in assessing the project under the Environment and Protection Act (EPA) and the regulatory framework is to ensure that the proponent has considered other options and feasible alternatives compared against the project objectives. DPIE's role is somewhat limited however, and any hybrid option would need to meet these objectives and be assessed in a timely manner.
- Approvals have already been given that make the landscape not pastorally viable and the opportunity to understand the heritage asset as a historic homestead and in the Burra Charter sense, are also not viable.
- In relation to the economic advice and project viability, DPIE are committed to getting the best independent expert advice on this.

The Council thanked DPIE for presenting the options under consideration.

HNSW attendees were excused from the meeting at 12:40 PM for a brief interval to allow the Council time to deliberate this matter further in camera.

Resolution 2021-58

The Heritage Council of NSW:

1. **Thanks** Department of Planning, Industry and Environment for their presentation on the State Significant Development (SSD) Glendell Continued Operations Project relating to Ravensworth Homestead and **notes** its contents.
2. Notwithstanding the new information provided to the Heritage Council, the Council **maintains** its view that the importance of Ravensworth Homestead includes its role in frontier conflict and **affirms** its advice of 9 December 2020 and 5 February 2020.

Moved Louise Thurgood and seconded by Dr Nicholas Brunton

Colleen Morris re-joined the meeting at 1:50 PM.

Item 4.2 Communications Strategy / Plan update

The Heritage Council of NSW received a report from Jan Nye and Maruschka Loupis.

Key points raised in the presentation:

- o The *2020-21 Annual social media engagement report* was presented with key data indicating the variety and reach of various stories that celebrate heritage, drive greater community awareness and raise the profile of the Heritage Council and the work of Heritage NSW.
- o There has been a significant increase in the reach of Facebook posts since July 2021.
- o Implementation of the Communications Plan and Strategy has commenced and future reporting to Council will be on a quarterly basis.
- o The rules of engagement and the social media code of conduct have been posted and enacted on the social media platforms.
- o The proposed social media KPIs for 2021-22 were outlined to measure the effectiveness of Heritage NSW's engagement on various social media platforms.

The Council provided further feedback suggesting:

- o broadening the demographic reach of various emerging platforms to engage with younger audiences,
- o Heritage NSW undertake analysis of the social content to better understand which posts are generating the greatest interest, and
- o ways to build user content and opportunities for reposting of content with our hashtags, e.g. competitions, picture of the week, links to other news stories, Blue Plaques program.

The Council thanked the Heritage NSW communications team for the excellent work done to establish the social media platforms and noted the increased profile of heritage and improved quality of reporting.

Resolution 2021-59

The Heritage Council of NSW:

1. **Note** progress on implementation of the Communications Plan and Strategy.
2. **Agree** to adopt social media KPIs for 2021-22.