

23 September 2021

Chris Schultz  
Superintendent Environment  
Illawarra Metallurgical Coal

By email: Chris.Schultz1@South32.net

Dear Mr Schultz,

**National Trust submission relating to the Bulli Seam Operations Project**

The National Trust of Australia (NSW) would like to acknowledge the proactive contact from South32 and your request for feedback. We understand that the Appin Mine operates under Project Approval 08\_0150 for the Bulli Seam Operations Project and its project approval required consultation on the Heritage Management Plan (HMP). We thank you for the opportunity to review the documents related to this project and provide feedback.

The documents that we have briefly reviewed are:

- Appin Mine Heritage Management Plan – South32, 2021 (including appendices – Conservation Management Plan and Statement of Heritage Impact for Mountbatten Group, Niche Environment and Heritage);
- Non-Aboriginal Heritage Assessment. A report to ICHPL - Michael Pearson Heritage Management Consultants Pty Ltd, 2009; and
- Bulli Seam Operations Aboriginal Cultural Heritage Assessment, Biosis Research, 2009.

This letter details our specific comments and feedback.

**Heritage Management Plan and Supporting Technical Studies**

We understand that the Heritage Management Plan (HMP) has prepared to guide your programs and procedures for the management of Aboriginal and Non-Aboriginal heritage in the BSO Project study area. Subsequent management plans will be prepared for each Extraction Plan and surface works at later stages.

The Heritage Management Plan adequately details the requirements for internal staff and contractors and, somewhat uncommonly, is simple to read, straightforward and a clear explanation of South 32's heritage procedures, requirements and obligations.

The HMP is supported by the more technical studies listed above (Non-Aboriginal Heritage Assessment and the Aboriginal Cultural Heritage Assessment). These two technical studies contain a solid analysis of the project area and provide detailed guidelines, policies and recommendations for the project. We are concerned that only some of these guidelines, policies and recommendations have been carried through to the HMP. The HMP would benefit from the very reasonable and good recommendations being incorporated in full.

In particular, the recommendation for a full Aboriginal Heritage Management Plan for the project area prior to works starting should be implemented, it was a clear recommendation and the project would benefit from its implementation. We would also recommend that, as well as incorporating the two technical study's recommendations and policies into the HMP, there is a requirement for later Extraction Plan HMPs to reference and incorporate these recommendations and policies.



## **Mountbatten Conservation Management Plan and Statement**

We note that the Conservation Management Plan (CMP) for the Mountbatten group of buildings states in its introduction that the stable building has been misidentified in earlier reports as a Chapel. Confusingly, the latter Statement of Heritage Impact (SOHI) for the stabilisation and repair of this building calls it a Chapel at times and a Stable at other times.

We recommend that this discrepancy should be resolved before works begin and that a detailed fabric analysis of the building be undertaken to determine its use and function. In particular, this fabric analysis should be undertaken as a priority to aid the preparation of a detailed works specification. The proposed works as set out in the SOHI are well intentioned but more detail is needed on how to undertake such works in an appropriate manner for a historic structure (for example, appropriate mortar mixes, appropriate replacement timber types and roof form etc). This should be prepared by a heritage professional with specific expertise in the repair and stabilisation of historic structures of this age and materials to ensure it is a successful and worthwhile stabilisation project.

Please do not hesitate to contact us should you wish to discuss this feedback in more detail.

Yours sincerely,

Jane Alexander  
Manager, Advocacy