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Hexham Depot Modification
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Prepared by: Jake Ferguson
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Jacobs Group (Australia) Pty Limited

Level 7, 177 Pacific Highway
North Sydney, NSW 2060
PO Box 632
North Sydney, NSW 2059
Australia

T +61 2 9928 2100
F +61 2 9928 2444
www.jacobs.com

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Executive summary

This report presents the results of a Statement of Heritage Impact assessment for the development of a depot, warehouse and wagon storage (the Modification Proposal) to support the ongoing operations of the Hexham Long Term Train Support Facility (Hexham LTTSF Project)

The assessment has been prepared to ensure Aurizon Holdings Ltd does not impact on any known or potential heritage items when carrying out construction of the turning circle. This report has been prepared to satisfy the requirements of the Heritage Act 1977 and follows the Statements of Heritage Impact guidelines published by the (former) Department of Urban Affairs and Planning (1996, 2002). It aims to fulfil the Secretary's Environmental Assessment Requirements (SEARs) issued by the DPE for the modification and determine if further archaeological or heritage assessment is required to support preparation of an Environmental Impact Statement (EIS).

There are no historical heritage items or areas of potential within the site. No further archaeological investigation or historical heritage assessment work is required for the Modification Proposal.

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Acronyms and abbreviations

CHL Commonwealth Heritage List

DECCW The (former) Department of Environment, Climate Change and Water NSW

DPIE Department of Planning Industry and Environment

EPBC Environmental Protection & Biodiversity Act 1999

EIS Environmental Impact Statement

EP&A Environmental Planning and Assessment Act 1979

Heritage Act The Heritage Act 1977

Km kilometres

LEP Local Environmental Plan

LGA Local Government Area

M Metres

NHL National Heritage List

NPW National Parks and Wildlife

NSW New South Wales

SHR New South Wales State Heritage Register

1. Introduction

This Due Diligence Report has been prepared for the development of a depot, warehouse and wagon storage (the Modification Proposal) to support the ongoing operations of the Hexham Long Term Train Support Facility (Hexham LTTSF Project), Hexham (the Hexham LTTSF Site).

The Modification Proposal is to be undertaken as a modification (under Part 5, Section 5.2 of the Environmental Planning and Assessment Act 1979 (EP&A Act)) to the Hexham LTTSF Approval (MP07_0171).

This report has been prepared in accordance with the following, identified within the DPIE letter (dated 17/09/2021):

- The Secretary's Environmental Assessment Requirements (SEARs) issued for SSI-6090 Mod 1 (previously MP 07_0171 MOD 1)
- The relevant industry specific SEARs applicable to warehouse development.

Jacobs Group (Australia) Pty Ltd (Jacobs) was commissioned by Aurizon Holdings Ltd (Aurizon) to provide an assessment of the non-Aboriginal heritage values of a property at Hexham, a suburb of Newcastle in NSW. Aurizon has proposed development of a depot, warehouse and wagon storage (the Modification Proposal) to support the ongoing operations of the Hexham Long Term Train Support Facility (Hexham LTTSF Project).

This report has been prepared to satisfy the requirements of the *Heritage Act 1977* (Heritage Act) and follows the Statements of Heritage Impact guideline published by the (former) Department of Urban Affairs and Planning in 1996, revised in 2002 (NSW Heritage Office 2002; NSW Office of Environment and Heritage 1996). This will ensure that Aurizon avoids any potential impacts on non-Aboriginal heritage items. It also aims to determine if further heritage or archaeological assessment would be required to support preparation of an Environmental Impact Statement (EIS).

Secretary's Environmental Assessment Requirements (SEARs) for the proposed modification were issued by the Department of Planning and Environment (DP&E) on 19 December 2018. Heritage was identified as a key issue by the DP&E. This report aims to satisfy the following SEAR that relates to the management of non-Aboriginal heritage items.

11.1 The Proponent must identify and assess any direct and/or indirect impact (including cumulative impacts to the heritage significance of:...

(c) environmental heritage, as defined under the Heritage Act 1977...

This Statement of Heritage Impact (SoHI) will form part of the detailed environmental assessment submission and support the modification application to MP07_0171 (now SSI-6090).

1.1 Key Terms

Table 1-1 identifies the key terms which are relevant to this report.

Table 1-1. Key Terms

Term	Description
The Modification Proposal	The depot, warehouse, wagon storage and associated development for which approval is sought, as SSI-6090 – Mod 2.
Hexham LTTSF Project	The Hexham Long Term Train Stabling Facility (and associated development) approved under MP 07_0117, now SSI 6090 (inc. Mod 1).
The Hexham LTTSF Project Site	Area on which the Hexham LTTSF is located and the surrounds assessed under the MP 07_0117, now SSI 6090 (inc. Mod 1).
The Site	The area where the Modification Proposal works are to be undertaken. This area signifies the area to be directly impacted/disturbed by the Modification Proposal.

2. Site Description

The LTTSF site is located at Maitland Road, Hexham within the Newcastle Local Government Area approximately 16km north-west of Newcastle CBD. The Hexham LTTSF site has a total area of 255ha with the LTTSF Project developed on a 38ha portion of the site parallel to (and to the west of) the Great Northern Railway (GNR). The LTTSF site is located within an industrial setting with only a small number of dwellings within the local vicinity of the site. The site's locational context is shown at Figure 2-1.

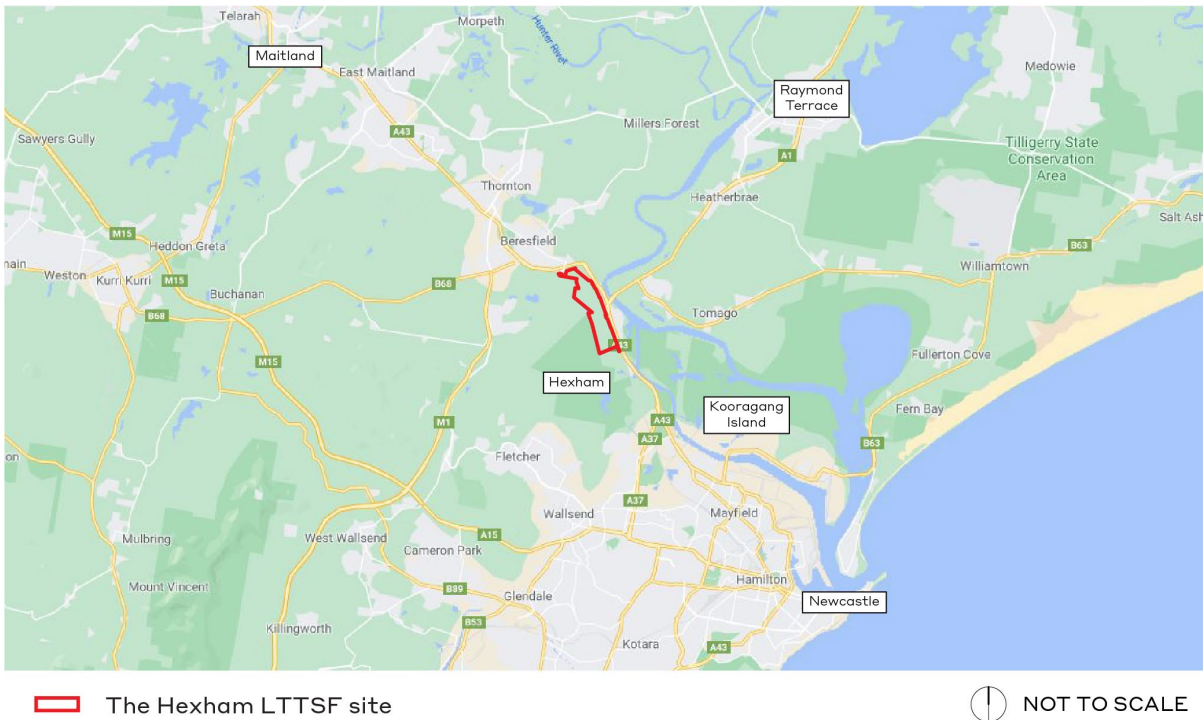


Figure 2-1. The Hexham LTTSF

2.1 LTTSF Site Description

The Modification Proposal are fully contained within Lot 104 DP1189565 which is owned by Aurizon. The Hexham LTTSF Project Site covers multiple lots which are not affected by the Modification Proposal. The location of the Site in the context of the Hexham LTTSF Project Site is provided within Figure 2-2 and Figure 2-3.



Figure 2-2. Site context (consideration of previous approvals)

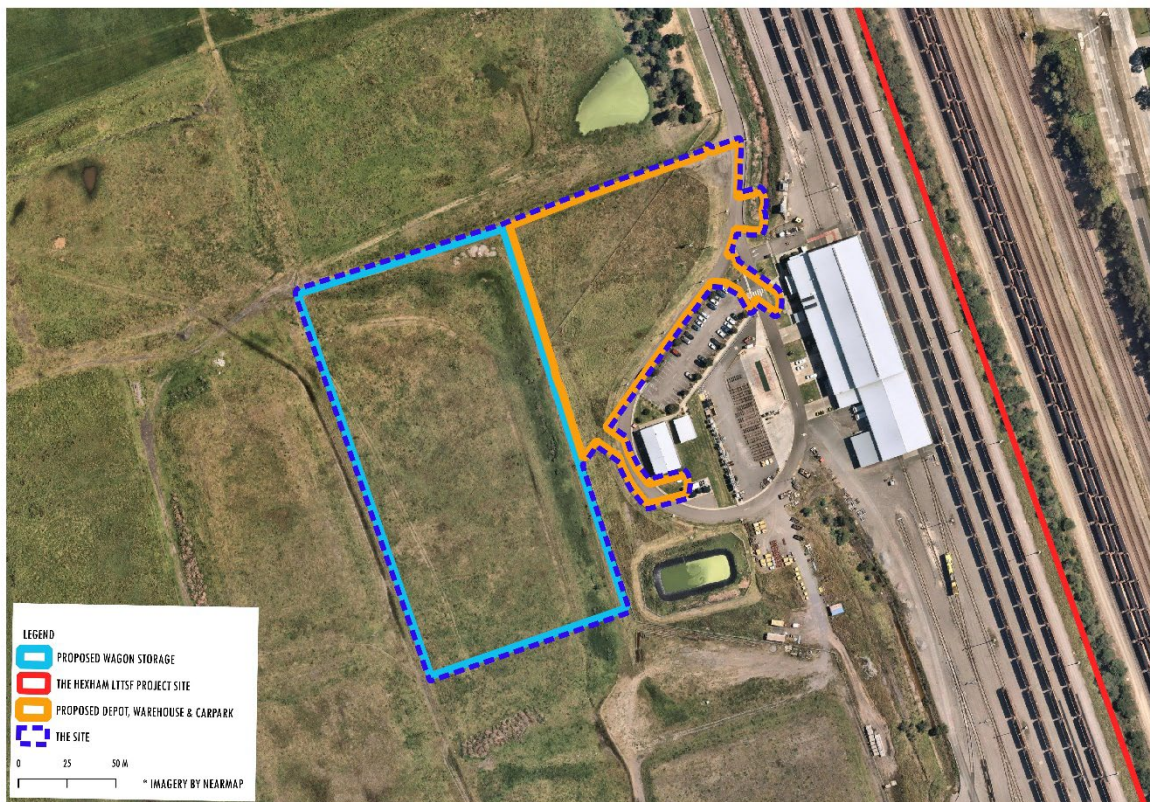


Figure 2-3. Site Location

2.2 Modification Proposal description

The Modification Proposal is to be located within the Hexham LTTSF site (identified within the Hexham LTTSF Project) at a location previously cleared and disturbed by historical coal handling activities and the LTTSF Project construction.

The Modification Proposal includes the development of a depot, warehouse, wagon storage and associated development to support the ongoing operations of the Hexham LTTSF Project.

An overview of the Modification Proposal is as follows:

- Site preparation and earthworks
- Construction of the following elements:
 - A warehouse for the storage of rail maintenance equipment.
 - A depot for office staff and train crew.
 - Ancillary staff and visitor car park connected to the private roadway (existing main access road).
- Rail wagon storage area located on the western portion of the site
- Ancillary infrastructure (hardstand, water management, landscaping, lighting etc)
- Connection to utilities.

The depot and warehouse would be operated 24 hours per day, 7 days a week.

3. Legislative Context

3.1 Environmental Planning & Assessment Act 199 (EP&A Act)

The *Environmental Planning and Assessment Act 1979* (EP&A Act) provides the framework for environmental planning and assessment in NSW. It includes a requirement for impacts, or likely impacts, upon non-Aboriginal cultural heritage to be assessed as part of a project's environmental approval, and for Local Government Areas (LGAs) to prepare Local Environment Plans (LEPs) and Development Control Plans (DCPs) to provide guidance on the level of environmental assessment required. Division 5.1 of the EP&A Act applies to projects designated as SSI. This influences the way in which other legislation, including the Heritage Act is applied.

3.2 State Environmental Planning Policy (Infrastructure) 2007

The *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) aims to facilitate the effective delivery of infrastructure across the State. There are several divisions and clauses in the ISEPP that refer to heritage matters. Clause 14 states that where a development may be carried out without consent (determined by Clause 94), and that development is likely to have an impact that is not minor or inconsequential on a local heritage item (other than a local heritage item that is also a State heritage item) or a heritage conservation area then:

'(2) A public authority, or a person acting on behalf of a public authority, must not carry out development to which this clause applies unless the authority, or the person has:

(a) had an assessment of the impact prepared, and

(b) given written notice of the intention to carry out the development, with a copy of the assessment, to the council for the area in which the heritage item or heritage conservation area (or the relevant part of such an area) is located, and

(c) taken into consideration any response to the notice that is received from the council within 21 days after the notice is given.'

This heritage impact assessment aims to satisfy the requirements of Clause 14 subclause (2)(a).

3.3 Heritage Act of New South Wales (NSW) 1977

The Heritage Act provides several mechanisms by which items and places of heritage significance may be protected. The Heritage Act is designed to protect both listed heritage items, such as standing structures, and potential archaeological remains or relics. Different parts of the Heritage Act deal with these different situations.

Approvals under Part 4 or an excavation permit under s139 of the Heritage Act are not required for an approved project under Division 5.2 of the EP&A Act, however, this assessment follows the intent of the Heritage Act and the conditions of the approval which are based upon the Heritage Act requirements.

3.3.1 State Heritage Register

The Heritage Council of NSW maintains the State Heritage Register (SHR). Only those items which are of state level heritage significance in NSW are listed on the SHR. Listing on the SHR controls activities such as alteration, damage, demolition and development.

Approved projects to which Division 5.2 applies do not require approval under Part 4 of the Heritage Act (e.g., a Section 60 approval) for items on the SHR. However, Division 5.2 projects must outline proposed heritage management and mitigation measures.

3.3.2 Archaeological Relics

Part 6 Division 9 of the Heritage Act protects archaeological 'relics' from being 'exposed, moved, damaged or destroyed' by the disturbance or excavation of land. This protection extends to the situation where a person

has Statement of Heritage Impact 1 'reasonable cause to suspect' that archaeological remains may be affected by the disturbance or excavation of the land. It applies to all land in NSW that is not included in the SHR. A 'relic' is defined by the Heritage Act as:

"Any deposit, object of material evidence which relates to the settlement of the area that comprises NSW, not being Aboriginal settlement, and has local or state significance."

Section 139 of the Heritage Act requires any person who knows or has reasonable cause to suspect that their proposed works will expose or disturb a 'relic' to first obtain an Excavation Permit from the Heritage Council of NSW (pursuant to Section 140) unless there is an applicable exception (pursuant to Section 139(4)). In cases where a Section 139 permit is not required for projects assessed under Part 5.1 of the EP&A Act, works would need to be conducted in accordance with the intent of the Heritage Act.

Section 146 of the Heritage Act requires any person who is aware or believes that they have discovered or located a relic must notify the Heritage Council of NSW providing details of the location and other information required.

3.3.3 Works

The Heritage Act identifies 'works' as a category separate to relics. Although there is no formal definition, 'works' generally refer to past evidence of infrastructure which may even be buried, and so therefore 'archaeological' in nature and with the potential to provide information that contributes to our knowledge. Unlike a 'relic', exposure of a 'work' does not trigger reporting obligations under the Act. However, good environmental practice recognises the archaeological potential of such discoveries and the need to balance these against the requirements of development. Good heritage management practice includes a comprehensive Unexpected Finds Protocol to be implemented during construction.

3.4 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) includes 'national heritage' as a matter of National Environmental Significance and protects listed places to the fullest extent under the Constitution. It also establishes the National Heritage List (NHL) and the Commonwealth Heritage List (CHL).

The following is a description of each of the heritage lists and the protection afforded places listed on them.

3.4.1 Commonwealth Heritage List

The CHL is established under the EPBC Act. The CHL is a list of properties owned by the Commonwealth that have been assessed as having significant heritage value. Any proposed actions on CHL places must be assessed for their impact on the heritage values of the place in accordance with Actions on, or impacting upon, Commonwealth land, and actions by Commonwealth agencies (Significant Impact Guidelines 1.2). The guidelines require the proponent to carry out a self-assessment process to decide whether or not the action is likely to have a significant impact on the environment, including the heritage value of places. If an action is likely to have a significant impact an EPBC Act referral must be prepared and submitted to the Minister for approval.

3.4.2 National Heritage List

The NHL is a list of places with outstanding heritage value to Australia, including places overseas. Any proposed actions on NHL places must be assessed for their impact on the heritage values of the place in accordance with Management of National Environmental Significance (Significant Impact Guidelines 1.1). The guidelines require the proponent to carry out a self-assessment process to decide whether or not the action is likely to have a significant impact on a matter of National Environmental Significance, including the national heritage value of places. If an action is likely to have a significant impact an EPBC Act referral must be prepared and submitted to the Minister for approval.

3.4.3 Register of the National Estate

The Register of the National Estate (RNE) was formerly compiled as a record of Australia's cultural and Aboriginal heritage places worth keeping for the future. The RNE was frozen on 19 February 2007, which

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means that no new places have been added or removed since that time. From February 2012 all references to the RNE were removed from the EPBC Act. The RNE is maintained on a non-statutory basis as a publicly available archive.

4. Environmental Context

4.1 Landform

The subject area is located approximately 2km west of the Hunter River and is within Hexham Swamp. Hexham Swamp covers over 900 hectares and is the largest freshwater swamp on the north coast of NSW (NSW National Parks and Wildlife Service 2008). The Hexham LTTSF study area is located southwest of the Aurizon buildings and is accessed via unsealed roads.

4.2 Geology and Geomorphology

Hexham is located in the Sydney Basin, bounded to the north by the New England Fold Belt, and the Lachlan Fold Belt to the south. The underlying geology of the site, as can be viewed in Figure 3.1, is comprised of Triassic, Permian and Quaternary deposits. The Narrabeen group is made up by Triassic deposits, with the Newcastle Coal Measures dominating as the Permian deposits. These areas are characterised by alternating siltstone and sandstone layers, with coal, shale, tuff and conglomerates also present (Matthei 1995).

Within the greater Hunter Valley, soils are typically duplex with discernible soil horizons that relate to weathering of the parent rock. In the Hunter Valley, these soils typically comprise fine grained sand, slit, and clay fluvial deposits. This alluvium is derived from erosion of Bringelly Shale. Although the study area has been disturbed it can be assumed that these soil horizons were previously present across the study area.

4.3 Climate and Vegetation

The climate of the study area typically ranges from a minimum average temperature of 1 degree Celsius, to a maximum average of 43 degrees Celsius (Aurizon Operations Ltd 2018). It is typically warm, or warm to hot with humid summers and cool to mild winters. Annual rainfall is an average of 1155mm.

Hexham Swamp is the largest freshwater swamp on the north coast of NSW (NSW National Parks and Wildlife Service 2008). In the 1970 the swamp contained 11 of the 14 types of coastal wetland types found in NSW (NSW National Parks and Wildlife Service 2008:9). Vegetation patterns of the area are relatively unknown prior to European settlement, however in 1978 the swamp was described as four main zones:

- The south-east zone - predominantly saltmarsh and mangroves. Dominated by grey mangrove, red samphire (*Sarcocornia quinqueflora*), saltwater couch, and paspalum
- The central portion - predominantly a reed community dominated by *Fimbristylis ferruginea* with minor areas of the common reed (*Phragmites australis*)
- The upper reaches – described as freshwater meadows and seasonal freshwater swamps. Most diverse area and is dominated by cumbungi (*Typha australis*) and many other freshwater species, for example, water hyacinth (*Eichhornia crassipes*)
- To the north-west - freshwater grassy swamps consisting of submerged aquatic plants, reeds, paspalum, *Eleocharis spp.* and other agricultural fodder plant

Hexham Swamp currently appears to be dominated by one single community, the reed *Phragmites*.

5. Historical Context

Europeans arrived in the Hunter Valley in 1804 when an outpost was positioned on the mouth of the Hunter River. The original purpose of the outpost was to serve as punishment for prisoners who had reoffended after coming to Sydney.

5.1 General Historic Background

Hexham was built as a result of the laying of a road between Newcastle and Maitland. It provided a rest stop for travellers going up and down the Hunter River. The area was described as 'inferior country [with] improvable lands on the margins of the Swamps' (Hartley 1995:11). It was an area which provided relief for travelling passengers. In the 1850's an account by James Askew describe the presence of a thriving village:

The road passed through the principal part of Hexham. In the middle of this village there is a neat wooden chapel, and a short distance from it a small school, and about half-a-dozen houses scattered over the distance of nearly a mile among the fields. There were grazing paddocks covered with rich herbage, fields covered with stubble, nearly a yard high, the remains of the last crop. In others, rich crops of Indian corn enlivened the scene. (Askew 1857:298-230).

The region was heavily used for agriculture and dairy farming from the 1830's, with Hexham often described as being 'in the centre of an agricultural and grazing country' (Department of Lands 1942). In 1900 there were over 16 farms in operation.

The coal industry began emerging in 1857 with the construction of John Eales' railway (now referred to as the Minmi to Hexham Railway). The railway allowed coal from the Minmi mines to be transported to the Hunter River at Hexham. Its construction and route have been described by Ron Preston as:

The main line headed out across the great Hexham Swamp, a wetland famous for its birdlife and aquatic flora, but also noted for its black snakes and mosquitoes...the earthworks were simple – just an earth embankment, wide enough to carry the tracks and high enough to keep the rails above the peak water level. Culverts at intervals allowed water to flow from one side to the other. (Preston 1990:13)

The railway's original route left the mine at Minmi and travelled northwards for half a mile before turning northeast for four miles, it crossed the swamplands to Hexham before turning east about half a mile before the Hunter. The railway was built predominantly on swampy ground and most of the tracks had to be built up with sand to elevate it. The railway expanded in the early 20th century and was subsequently renamed as the Richmond Vale Railway.

In 1955 a coal washery was constructed in the study area. A coal washery procedure takes:

...crushed coal [this is] elevated into distributing troughs, which divided it amongst three pulsating washing machines or bashes, the shale and 'brass' falling through gratings in these machines and being carried away by sluice, while the cleaned coal was thrown forward by the water onto screens for separation into blacksmith's nuts and fine coal for coking after further crushing (Edwards 1981).

The washery resulted in new network lines to be constructed to aid in the service of the new operations. The procedure is described by Brian Andrews:

Three sidings for storing unwashed coal were constructed on the northern end of the Coal Preparation Plant. After the wagons had dumped their loads, they were reloaded with washed coal as they passed through the Coal Preparation Plant. The washed coal sidings consisted of Statement of Heritage Impact 1 two full sidings and one for the storage of empty wagons. These sidings were constructed at the southern end of the plant while a dead-end shunt and a service road connected these sidings through the plant to the Hexham Exchange Sidings (Brown's Siding). After the full wagons had been lowered from the Coal Preparation Plant, they were made into trains with the use of capstans which pulled the wagons together... a train ... was worked ... almost daily over the Richmond Vale Railway until the closure of the line beyond Stockrington in July 1967. (Andrews 2017:119)

The washery reject was disposed on site in emplacements adjacent to the preparation plant. These emplacements were constructed horizontally, and the tailing were dewatered in tailings ponds. When the tailings ponds were filled and drained they were covered with coarse reject and the new platform was used as a temporary coal stockpile until an area was required for the next lift in the emplacement (Longworth & McKenzie Limited and Johnstone Environmental Technology Pty. Ltd 1987:45).

The coal that was processed at the site was owned by the company J. & A. Brown which later merged with Abermain Seaham Collieries Ltd in 1930, becoming J. & A. Brown and Abermain Seaham Collieries Ltd (JABAS) (Jay 1994:127). The company became the largest producer of coal in Australia with an output of over 1.5 million tons of coal a year (EJE Heritage 2012:29). In 1987 the Richmond Main Colliery ceased mining and the Richmond Vale Railway closed. Demolition of the Coal Preparation Plant began in March 1989 and sidings and coal wagons were gradually removed. Part of the site was sold to Newcastle Rail Terminals in 1997, and then sold again to QR National in 2006 (EJE Heritage 2012:35).

5.2 Heritage Database Searches

Heritage items and places are recorded on statutory and non-statutory registers held at the federal, State and local level, depending on their level of significance. Federally managed heritage includes the National Heritage List (NHL) and the Commonwealth Heritage List (CHL), both administered by the EPBC Act. The NHL comprises natural, Aboriginal and non-Aboriginal items of National heritage significance, while the CHL contains natural, Aboriginal and non-Aboriginal items of National, State and local heritage significance either located on Commonwealth land or owned by the Commonwealth. Items on the NHL and CHL, as well as World Heritage items in Australia, are recorded on the Australian Heritage Database, currently administered by the Federal Department of Environment and Energy.

State heritage places and items are registered on the State Heritage Register, created by the Heritage Act. The SHR is a searchable online database that records all State heritage items and places and their curtilages. Associated with the SHR is the State Heritage Inventory (SHI), an online database that records some local heritage items and items owned by State statutory authorities. Section 170 of the Heritage Act requires all statutory authorities to advise DPIE of their heritage assets for recording on the SHI.

Items of local heritage significance are recorded in Local Environmental Plan (LEP) for the relevant Local Government Area (LGA).

5.2.1 World, National and Commonwealth Heritage

A search of the Australian Heritage Database was undertaken on 15 January 2022. No items were identified during the search.

5.2.2 State Heritage

A search of the SHR was undertaken on 15 January 2022. No items of State heritage significance were identified within the confines of the site.

5.2.3 Local Heritage

The *Newcastle Local Environmental Plan 2003* includes a number of heritage items in the vicinity of the site, these are listed below in Table 5-1. None of these items are within 500 metres of the site and none have been considered further in this assessment.

Table 5-1. Local heritage Items in vicinity of the LTTSF site

Suburb	Item Name	Address	ID
Hexham	Oak Factory	189 Maitland Road	1178
Hexham	Hannel Family Vault	398B Maitland Road	1179
Hexham	Hexham Shipbuilding Yards	404 Maitland Road	1180
Hexham	Hexham Bridge	Pacific Highway	1187
Hexham	Goninans Administration Building	230 Old Maitland Road	1186

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Hexham	J & A Brown's Hexham Workshops	100 Old Maitland Road	1183
Hexham	Former Hexham Public School	227 Old Maitland Road	1185
Hexham	Former Glen Lovett Hall	187 Old Maitland Road	1184

6. Previous Heritage Assessments

A review of previous heritage assessments was completed to inform the site inspection in January 2019. Two previous assessments of the site were found to be directly relevant to the current study. These are summarised in the following subsections.

6.1 EJE Heritage (2012)

The 2012 report was commissioned by QR National to examine the area for historical heritage items, including potential archaeological sites. The report provides an in-depth overview of the history of the land, focusing heavily on the coal facility that was in place from 1859 until 1987. Following a literature review a site survey was completed which identified several historical buildings in the area – all of which are located to the north of the study area. The Control Cabin, Bath House, Coal Preparation Plant Conveyor Belt (Support Footings and Coal Stockpile), Dairy Farm Milking Shed and associated machine Hit and Silos, and Hetton Bellbird Weighbridge Hut were all documented as present. All these buildings were vandalised and neglected, with many areas destroyed. These buildings however are not within the boundaries of the LTTSF site.

6.2 Austral Archaeology Pty Ltd (2014)

In 2014 Austral Archaeology Pty Ltd (Austral) was engaged by Aurizon to prepare an historical archaeological assessment and research design to fulfil *Minister's Conditions of Approval (MCoA)* for the Hexham LTTSF Project. The report provides a detailed history of the Hexham LTTSF Project Site, largely based on the information sourced by EJE Heritage (2012), an analysis of the potential for historical archaeological relics and the results of a comprehensive archaeological survey. Historical features and potential features were identified during the study:

- Balloon Loop Siding
- Coal Preparation Plant footings, and the
- Conveyor supports

Despite the presence of these historical features, Austral concluded that the southern portion of the Hexham had undergone varying degrees of landscaping and, as a result, contained no archaeological (subsurface) sites or potential. The only area of archaeological sensitivity was found to the north of the site where various structures were built at Brown's Crossing. An Archaeological Research Design (ARD) for further archaeological investigation of this area was subsequently prepared and included as part of the assessment.

6.3 Conclusion

The site has been used for agriculture, dairy farming, and coal processing since the mid-1800's. Coal processing is understood to have been the dominant industry that impacted the study area, with coal processing and washery procedures active from 1955 until 1987. The large presence and processing of coal within the LTTSF site has resulted in the destruction of the original landform and removal of any potential for historical heritage or archaeology within the current site.

7. Site Visit

7.1 Timing and personnel

An inspection of the Site was undertaken by Jacobs archaeologists Clare Leever and Jake Ferguson on 21 December 2021 with Aurizon representative, Harry Egan.

7.2 Site context

The weather on the day of the survey was hot and dry with minimal cloud cover. The general landscape was dry yet lush. The area surrounding the study area is used as pastoral land which is reflected in the grazed vegetation. The site was accessed via an unformed road which bounds the site on its western side. The land is used as pastoral land for dairy cattle and is heavily eroded due to agriculture and rain. Erosion can be seen on various slopes and drainage sections within the site.

No previously recorded heritage objects are located within the site. No heritage items, built heritage or areas of archaeological potential were identified during the site visit. The study area was used as a coal production facility and a washery for over 30 years, as a result, the original landscape has been significantly modified. The site was previously assessed to have a no potential for the presence of historical archaeological material, and this was confirmed by the site visit.

8. Statement of Heritage Impact

Given the absence of any historical heritage items, including potential archaeological relics, within the site, the impact of the proposed works on non-Aboriginal heritage is considered to be nil. The proposed wagon storage area and proposed depot, warehouse, and carpark construction footprints present no potential harm to historical heritage.

9. Conclusion

Based upon the potential impacts of the Modification Proposal and the previously established mitigation measures (most recent within the Mod 1) no additional mitigation measures are considered necessary. The relevant mitigation measures established as part of the Hexham LTTSF Project (MP 07_0117 – now SSI 6090 Mod 1) would be implemented as relevant for the Modification Proposal.

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