

Our ref: HMS ID 13883

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Letter uploaded to the Major Projects Planning Portal

Advice on Response to Submissions and Amendment Report– State Significant Infrastructure

Proposal: Hunter Transmission Project

Major Project reference: SSI-70610456

Received: 3 March 2026

Dear Kurtis,

Thank you for your referral seeking advice on the above State Significant Infrastructure (SSI) amendment proposal and Environmental Impact Statement (EIS) Response to Submissions (RtS).

In preparing this advice Heritage NSW has reviewed the following documents:

- Relevant sections of Hunter Transmission Project Submissions Report - prepared by EnergyCo, dated February 2026
- Relevant sections of Hunter Transmission Project Amendment Report - prepared by EnergyCo, dated February 2026
- Appendix J: Hunter Transmission Project Historic Heritage Impact Statement (HHIS) - prepared by Biosos, dated February 2026
- Appendix U: Hunter Transmission Project Amendment Report Landscape Character and Visual Impact Assessment Addendum (LCVIAA) – prepared by Iris, dated 16 February 2026

Based on our review of the above documents, and as delegate of the Heritage Council of NSW, I provide the following comments:

- The HHIS addendum has adequately addressed our requests for further information as outlined in HMS 11589.
- There are no State Heritage Register (SHR) listed items within or in close vicinity to the amended SSI visual study area as defined in the HHIS addendum.
- No potential State significant archaeological relics have been identified within the project area.

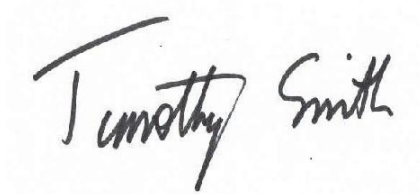
- The HHIS addendum has assessed Oakley homestead, located within the Singleton Military Area (SMA) to be of local rather than State significance. We consider the HHIS addendums revised assessment of local significance to be acceptable. We note that there is no change to the assessment of moderate indirect (visual) heritage impacts to Oakley Estate.
- The amended SSI will result in impacts to locally listed items and potential heritage items of local heritage significance that are not listed on a statutory heritage register. We recommend that relevant local councils continue to be consulted regarding the SSI and its impacts on local heritage items.
- We recommend that additional efforts be made by the proponent to access the Conservation Management Plans (CMPs) of sites Clifford Homestead Ruins, Stafford Homestead and Brick farmhouse Jarvis House to ensure appropriate heritage management of the items is considered during detailed project design.
- Heritage NSW support the proposed mitigation measures for potential historic heritage impact as outlined in Section 6 of the HHIS addendum.
- Heritage NSW support the recommendations for management and mitigation of visual impacts as recommended in the *Hunter Transmission Project Landscape character and visual impact assessment* (prepared by Iris, dated August 2025) and its addendum (the LCVIAA).

In consideration of the above points, Heritage NSW has issued recommended Draft Conditions of Approval (**Attachment A**) for environmental heritage and the preparation and implementation of a Historical Heritage Management Plan (HHMP) for the Department of Planning, Housing and Infrastructure. It is further recommended that the applicant adopt these measures within their environmental heritage management and mitigation framework to ensure that areas of potential built and archaeological heritage significance are appropriately identified and managed.

As the site contains local heritage items, and other local items are in the vicinity, advice should be sought from the relevant local council.

Please note that the above comments relate only to environmental heritage matters. If you have any questions about this correspondence, please contact Sarah McGuinness, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,



Tim Smith OAM
 Director Assessments
 Heritage NSW
 Department of Climate Change, Energy, the Environment and Water
As Delegate of the Heritage Council of NSW
 17 March 2026

Attachment A - Recommended Draft Conditions of Consent

Heritage NSW provides the following recommended draft conditions relating to environmental heritage and the preparation and implementation of a Historical Heritage Management Plan (HHMP) for the Department of Planning, Housing and Infrastructure. It is further recommended that the applicant adopt these measures within their environmental heritage management and mitigation framework to ensure that areas of potential built and archaeological heritage significance are appropriately identified and managed.

General

1. All reasonable steps must be taken so as to not harm, modify or otherwise impact historical archaeological relics and items of built heritage significance except as authorised by this approval.
2. No State significant relics or built items of State heritage significance are authorised to be harmed under this approval.

Built Heritage

3. Project detailed design should be developed to minimise both direct and indirect impacts to Greenleek Homestead (AA 90).
4. Tree removal in the vicinity of heritage items should be minimised where possible.

Maritime Archaeology

5. If detailed design development identifies that the project may impact, in close proximity to navigable waters, an additional assessment of potential maritime archaeological impacts will be required. This assessment must be undertaken by a suitably qualified and experienced maritime archaeologist and be submitted to Heritage NSW for review and approval.

Historical Heritage Management Plan

6. Prior to carrying out any ground disturbance works associated with the project, a Historical Heritage Management Plan (HHMP) should be developed to include proposed management and mitigation measures for non-Aboriginal archaeology and built heritage and included in the Project's Construction Environmental Management Plan (CEMP). The HHMP should:
 - a. Include additional research and assessment to determine the significance and archaeological sensitivity boundaries of sites AA 140, AA 142 and AA 223.
 - b. Include details regarding establishment of exclusion barriers to protect heritage items and archaeological sites during construction and operational life of the project.
 - c. Identify and include commitments for project redesign for avoidance or impact minimisation of archaeological sites and significant built heritage items listed in Table 1.
 - d. Include provisions for preparation of an final impact assessment justifying and quantifying impacts following project detailed design.
 - e. Include commitments for remediation of disturbed land post-construction.
 - f. Include methodologies for archaeological investigations (see Point 7 below).

- g. Include an Unexpected Historical Finds and Human Remains Procedure to be implemented for the life of the project. This procedure will be applicable to the entire project area and be included in contractor inductions.
- h. Be prepared in consultation with National Parks and Wildlife Service (NPWS) and Singleton Council Heritage Advisory Committee, and to the satisfaction of Heritage NSW.

Archaeological Research Design and Excavation Methodology

7. An Archaeological Research Design and Excavation Methodology (ARDEM) should be prepared in accordance with the guideline *Archaeological Assessments* (Heritage Office and DUAP 1996) to inform and guide archaeological excavations, which includes test excavations. The ARDEM should:

- a. Be integrated into the HHMP.
- b. Identify research questions to guide the archaeological program.
- c. Propose a methodology for archaeological investigations on site, including a sampling strategy for the test excavations as appropriate.
- d. Consider the inclusion of an artefact discard policy and procedure.
- e. Include clear triggers and hold points for the identification of substantially intact (and, if present, State significant) archaeological deposits/relics. The hold points should require, and allow for, consideration of redesign to avoid impacts and consultation with Heritage NSW.
- f. Provide a methodology for post-excavation analysis and reporting.
- g. Include provision for an addendum to the ARDEM if open-area salvage excavation is recommended as mitigation based on the results of the testing. The addendum should detail the proposed salvage excavations and methodology and should be developed in consultation with Heritage NSW.
- h. Include consideration of integration of Aboriginal cultural heritage requirements during excavation of the Wishing Well site (AA 186).
- i. Include a requirement for preparation of an archaeological excavation report detailing the results of archaeological work and clarifying the significance and management of any identified relics. The report should be submitted to Heritage NSW and uploaded to the Heritage Library within 12 months of completion of archaeological works.

Nominate an Excavation Director

8. A suitably qualified and experienced Excavation Director should be nominated for test excavations. The nominated Excavation Director is to meet the requirements of *Criteria for Assessing Excavation Directors* (Heritage Council of NSW, 2019).
9. The application for the proposed Excavation Director in accordance with the Excavation Director Criteria should be submitted to Heritage NSW for approval prior to the commencement of test excavations.
10. Should significant relics be identified during archaeological works, a Heritage Interpretation Plan should be prepared for the relics in accordance with Heritage NSW publication

Interpreting Heritage Places and Items Guidelines (Heritage Office 2005) and submitted for approval to the Planning Secretary in consultation with Heritage NSW.

Test Excavations

11. Test excavation should be undertaken prior to development of detailed design for the project. The results of the test excavations should be used to inform decision-making and identify appropriate conservation outcomes and mitigation measures commensurate with the assessed significance of the identified archaeological resource. Heritage NSW advises that the current approach for the management of any identified State significant archaeology is preservation and conservation *in situ* as a preferred heritage outcome.

Table 1 Environmental Heritage sites subject to direct harm by the approved project

Site ID	Site Name	Degree of Harm	Management action
AA 186	Wishing Well	Total	Archaeological excavation and recording. Commemorative plaque and relocation of built fabric.
AA 90	Greenleek Homestead	Total (pending design finalisation)	Final design to minimise harm where feasible. Where harm cannot be avoided, undertake mitigation works involving: - Preparation of an ARDEM to guide archaeological investigation. To be prepared to satisfaction of Heritage NSW - Investigative archaeological testing phase - salvage excavation (if required by triggers in ARDEM)
AA 127	Oakhill Homestead		
AA 226	Parsons Dwelling		
AA 153	Oakley Estate	Partial (pending design finalisation)	Final design to minimise harm where feasible. Where harm cannot be avoided, undertake mitigation works involving: - Preparation of an ARDEM to guide archaeological investigation. To be prepared to satisfaction of Heritage NSW - Investigative archaeological testing phase - salvage excavation (if required by triggers in ARDEM)
AA 140	Vere school	Partial (pending further investigation and design finalisation)	Further investigation required to determine archaeological sensitivity. Investigation to be undertaken to the satisfaction of Heritage NSW.
AA 141	Blacksmith's shop and forge		Final design to minimise harm where feasible should site be determined to be significant.
AA 223 F42	Inglewood Estate homestead		Where harm cannot be avoided, undertake mitigation works involving: - Preparation of an ARDEM to guide archaeological investigation. To be prepared to satisfaction of Heritage NSW - Investigative archaeological testing phase - salvage excavation (if required by triggers in ARDEM)
AA 223 F43	Inglewood Estate homestead outbuildings		

Attachment B – Updated Advice regarding Assessment Bilateral Agreement between NSW and the Commonwealth

SSI-70610456 is a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and assessment is to be made under the bilateral agreement between the NSW and Commonwealth Governments. The relevant controlling provisions are:

- Listed threatened species and communities (sections 18 and 18A)
- Commonwealth land (sections 26 and 27A)

In regard to listed threatened species and communities, we recommend that advice be sought from Agencies with the relevant expertise.

In regard to potential heritage impacts on Commonwealth land, we note that proposed action will partially take place within the Singleton Military Area (SMA) which is designated Commonwealth land. Table 2 is an excerpt from Table 5.1 in the HHIS addendum. The table summarises the impacts of the amended SSI on sites of historical heritage significance within the SMA which is designated Commonwealth land and therefore a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Heritage NSW note that:

- For most sites within the SMA there would be minor or no impact. There would be a moderate indirect impact on Oakley Estate due to visual impacts of the HTP towers and wires on the views and setting of the item. No major impacts on historical heritage are anticipated within the SMA.
- The HHIS addendum has assessed Oakley Estate to be of local rather than State significance as previously assessed. The revised assessment is based on the derelict condition of the c.1830s homestead, and it is noted the condition of the homestead has been allowed to deteriorate in recent years to a ruinous state. Based on this we consider the HHIS addendum revised assessment of local significance to be appropriate given the current state of the structure.
- In the event that Oakley Estate is subject to heritage restoration, the threshold of State significance may again be reached, necessitating a reassessment of its significance.
- In consideration of the current level of assessed significance, we consider the assessment of impacts to be acceptable.

Table 2 Impacts of amended SSI on sites of historical significance within Singleton Military Area

Heritage item (significance)	Impacts on overall heritage values and significance (amended project)
Murinbin House complex (Commonwealth [Garrison Estate Management System GEMS] – high)	The project would not have a significantly adverse impact on the heritage significance of the item: The principal ‘attributes’ (significant elements) that are cited in the Commonwealth Heritage listing would not be directly impacted. The modest scope of the works in the landscape and the distance (around 350 m) from the significant elements (structures and homestead plantings of <i>Araucaria araucana</i> and Pine tree) mean that the proposed work is unlikely to have a significant impact on the Commonwealth Heritage Values of the Commonwealth Heritage Place.
Blacksmith’s shop and forge - Vere township (Commonwealth [GEMS – medium]) AA 141-F 25	Minor permanent direct impact to archaeological resources of potential heritage significance: The access track works extend only 1-2 m into the western portion of the feature but not directly impacting the location of the slab structure. However, there remains the possibility that archaeological resources could be in this location. This could impact possible deposits which may have the potential for research and technical values and the ability to demonstrate the past. Direct impacts would be reduced to minor due to the limited incursion into the feature boundary
Unidentified site - Vere township (Commonwealth [GEMS – low]) AA 142-F 26	No permanent or temporary direct or indirect impacts to archaeological resources of potential heritage significance: Evidence indicates that the archaeological resources associated with this site are around 14 m from access track upgrade works and around 72 m from a stringing site. Direct and indirect impacts would be reduced to none.
Vere school and second range warden’s residence (Commonwealth [GEMS – medium]) AA 140-F 24	Minor permanent direct impact to archaeological resources of potential heritage significance: The access track works extend only 1-2 m into the western portion of the feature boundary but not directly impacting the location of the school building. However, there remains the possibility that archaeological resources could be in this location. This could impact deposits which may have aesthetic values and the ability to demonstrate the past. Direct impacts would remain minor due to the limited incursion into the feature boundary. Indirect impacts would remain minor due to works entering the site curtilage.
Loder Family Sawmill (Commonwealth [GEMS – low]) F 27	No permanent or temporary direct or indirect impacts to archaeological resources of potential heritage significance: Evidence indicates that the archaeological resources associated with this site are around 243 m from access track upgrade works. Indirect impacts would be reduced to none.

Heritage item (significance)	Impacts on overall heritage values and significance (amended project)
Oakley Estate (Commonwealth [GEMS – high]) AA 153-F 8, AA 155-F 8	Minor direct impacts to archaeological resources of potential heritage significance: The amended HTP corridor extends into the area of moderate archaeological potential for resources which may have research, aesthetic or technical values and the ability to demonstrate the past. Direct impacts would remain minor due to the limited incursion into the feature boundary. No direct impact to built fabric resources of heritage significance: The amended HTP corridor is around 30 m from the homestead dwelling ruin. Direct impacts to built fabric resources of heritage significance would be reduced to none. Moderate indirect (visual) impacts to site: A worst-case scenario has been assumed for tower locations based on a photomontage that has been prepared by IRIS which visualises the proposed locations of towers and wires (Appendix 8). The degree of impact would not change. The indirect visual impact would remain moderate, as views to and from the item remain mostly unobstructed due to the structural nature of the towers and overhead wires, and the northern and eastern setting of the item would not change as a result of the works. Direct impacts to the site curtilage would remain minor
Warringah Stud/Old Myrtle (Commonwealth [GEMS – low]) AA 161-F 28	No permanent direct impacts to archaeological resources of potential heritage significance: Evidence indicates that the archaeological resources associated with this site are around 10 m from access track upgrade works. While access track works are located within the curtilage of the site, direct impacts to archaeological resources would be reduced to none. Direct impacts to site curtilage would remain minor. Indirect temporary impacts would remain minor.