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# **HERITAGE IMPACT STATEMENT**

Deniliquin East Battery Energy  
Storage System

Prepared for

**BESS ARCTIC PTY LTD C/O GRANSOLAR  
DEVELOPMENT AUSTRALIA (GDA, THE  
APPLICANT)**

12 February 2025

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| Project Code       | P0050308                                                                 |            |                     |
| Report Number      | 01                                                                       | 07/06/2024 | Draft Issue         |
|                    | 02                                                                       | 04/07/2024 | Final Issue         |
|                    | 03                                                                       | 12/12/2025 | Revised Final Issue |

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# EXECUTIVE SUMMARY

Urbis has been engaged by BESS Arctic Pty Ltd c/o Gransolar Development Australia (GDA, the Applicant) to prepare this heritage impact statement (**HIS**) for 21356 Riverine Highway, Deniliquin, herein referred to as the subject site to accompany a state significant development application (**SSDA**) for the construction of a battery energy storage system (**BESS**). The subject area is within the Edward River Council local government authority (**LGA**).

The subject site is not identified as a heritage item, nor is it located within a heritage conservation area (**HCA**). The closest heritage item is located approximately five kilometres to the north-west of the subject site, being the *Water Tower, pumping station and chimney stack* at Memorial Drive (item 33) listed on the Deniliquin Local Environmental Plan 2013. There are no heritage items located in the immediate vicinity of the subject site, or within a distance that could be considered to be within the same context as the subject site (in terms of potential for heritage impacts).

The new works associated with the Deniliquin East BESS includes the transformer, control room, maintenance container, and a new access track off Riverina Highway. The subject area also includes areas to be impacted by infrastructure relating to an overhead cable which will traverse the Riverina Highway road reserve and connect to the electrical substation.

The proposal has been assessed as having no detrimental heritage impacts. Key aspects of the assessment of the proposal are listed below:

- There is no heritage listed items or potential heritage items within the subject site. Further, the site the subject site comprises of vacant farming land. No elements within the site have been assessed to have any heritage significance. The works therefore have no potential to physically impact any listed or significance items.
- The proposal is located approximately five kilometres from the nearest heritage item. Furthermore, there are no direct views between the heritage items and subject site on account of the existing undulating topography, which includes a highway and regional park, and the distance between the heritage items and subject site. Therefore, there would be no adverse visual impacts on the heritage significance of these items as a result of the proposal.

For the reasons stated above, the proposed works are supported from a heritage perspective.

# 1. INTRODUCTION

## 1.1. BACKGROUND AND PURPOSE

Urbis has been engaged by GDA to prepare this HIS for 21356 Riverine Highway, Deniliquin, herein referred to as the subject site to accompany the SSDA for the construction of a Battery Energy Storage System (BESS). The subject area is within the Edward River Council LGA.

The Deniliquin East BESS is proposed for part of Lot 11 DP 856212 and part of Lot 1 DP 536901. Lot 11 DP 856212 includes the portion allocated for the BESS including the transformer, operations and maintenance container, and a new access track off Riverina Highway.

## 1.2. RESPONSE TO SEARS

This HIS has been guided by the Secretary's Environmental Assessment Requirements (**SEARs**) for SSD-61612229.

The SEARs require preparation of a HIS in accordance with the guidelines *Assessing Heritage Significance* and *Statements of Heritage Impact*. The specific requirements of the SEARs are identified in Table 1 with the corresponding sections of this HIS.

Table 1 - SEARS requirements for SSD- 61612229 and relevant report sections

| Requirement No. | Requirement                                                                                                         | Report Section                                     |
|-----------------|---------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| -               | Heritage – including<br><br><i>Assess the impact to historic heritage having regard to the NSW Heritage Manual.</i> | Throughout report.<br><br>Section 5 and Section 6. |

## 1.3. METHODOLOGY

This HIS has been prepared in accordance with the Heritage NSW guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance, 2013.

Site constraints, opportunities and impacts have been considered with reference to the relevant controls and provisions contained within the Deniliquin Local Environmental Plan 2013 and the Deniliquin Development Control Plan (DCP) 2016.

## 1.4. AUTHOR IDENTIFICATION

The following report has been prepared by Alexandria Cornish (Associate Director).

Unless otherwise stated, all drawings, illustrations and photographs are the work of Urbis.

## 1.5. SITE LOCATION

The subject area is legally referred to as part of Lot 11 DP 856212 and part of Lot 1 DP 536901. The project would be located within a 3.5 ha area, within a 14-ha paddock.

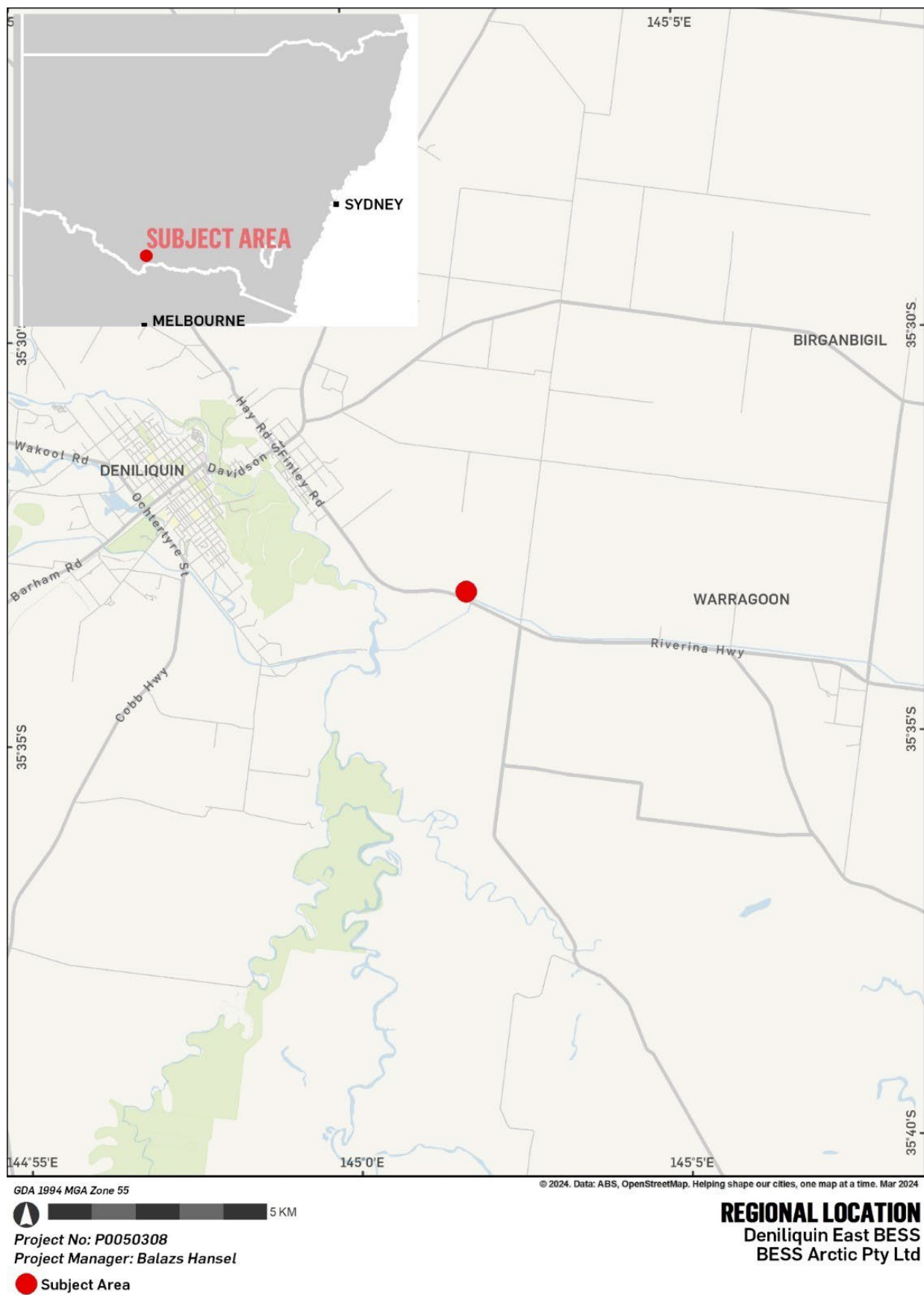


Figure 1 Location of subject site in the context of the region.

Source: Urbis



Figure 2 Location of subject site (red boundary)

Source: Urbis

## 2. SITE DESCRIPTION

### 2.1. SUBJECT SITE DESCRIPTION

The project would be located within a 3.5 ha area, within a 14-ha paddock. Current surrounding land uses constitute grazing and irrigated cropping. The topography of the land is flat and has been historically cleared of dense vegetation and native species. Extensive irrigation channels traverse within the region, the closest to the site being the Mulwala Canal, as part of the Murray Irrigation Area.

Surrounding existing development includes the Deniliquin Substation and seven separate rural dwellings to the east within a 1.5 km radius. The Moulamein Channel and Mulwala Canal irrigation channels are adjacent to the site.

The Riverina Highway abuts the southern border of the site. The site is adjacent to the Mulwala Canal, itself part of the larger Murray Irrigation water supply network. The Deniliquin Substation is located 400 metres south-east to the subject site across the Mulwala Canal and the Riverina Highway.

The main entry to the site is off Riverina Highway. The site is largely clear of vegetation, which is limited to low grasses and shrubs. There is a small structure in the paddock. The structure is a utilitarian agricultural structure of no significance. Some additional utilitarian structures are visible outside the site.

There are no notable views from the subject site to the town of Deniliquin or the heritage items located within it.



Figure 3 View to the entry to the subject site.

Source: Urbis



Figure 4 View across the subject site.

Source: Urbis



Figure 5 View across the subject site.

Source: Urbis



Figure 6 View across the subject site showing the small structure.

Source: Urbis

## 3. HISTORICAL OVERVIEW

### 3.1. AREA HISTORY

The following history of Deniliquin has been reproduced from *Historic Deniliquin, Walking and Touring Routes* (reprint 2021)

*The township of Deniliquin grew around a crossing place on the Edward River. The river lies within the lands of the Wamba Wamba and Perrepa Perrepa Nations. the traditional name for the river is 'Kolety' (pronounced 'kol-etch'). The river was named the Edward by 'overlanders' en-route to Adelaide with cattle in 1840. Several versions as to the origins of the name 'Deniliquin' exist, however it is believed to be a corruption of the name of local Aboriginal Elder 'Denilakoon' and was thought then to mean 'big man' or 'Wrestler's Ground'. The town of Deniliquin as we know it now was established in about 1846 and was gazetted as a municipality in 1868.*

*Deniliquin was the centre of early pastoral settlement and was a major stopping point on the stock routes and coaching roads that travelled to the new gold fields. Large Aboriginal groups lived on the saltbush country around Deniliquin and in the early days of settlement would still camp near the current town centre between the river and lagoons. By the 1850s there were only about 20 named individuals recorded. In 1916, under the control of the Aborigines Protection Board, Aboriginal families were mostly 'required to reside' within the newly gazetted Moonahcullah Aboriginal Station, 50km north west of Deniliquin, while others lived on the outskirts of the town and on a food-prone area of the riverbank known as 'The Flat'.*

*By the 1860s there was a significant Chinese community, originally working as cooks and gardeners and soon proving they could take on a range of labour tasks that were originally considered the work of white men.*

*War shaped the community, with locals serving in all major conflicts. The role of local women changed during WW2, when they took on more responsibility for local labour and society. The influx of Airforce men and women at the RAAF training base was also a boost to the local social life during and following the war years.*

*The major post-war irrigation construction projects brought a new wave of immigration from Europe, with many Italian families putting down roots in the area.*



Figure 7 undated. Historic Napier Street.

Source: *Historic Deniliquin, Walking and Touring Routes* (reprint 2021)

### 3.2. SUBJECT SITE HISTORY

Until the present day, the subject area has been continually used as agricultural land. This is indicated by historical aerial images of the site from the late-20<sup>th</sup> and early 21<sup>st</sup> centuries below. In 1883, it was also subject to the construction of a road which was realigned and resurfaced in 1940. The subject area was also impacted by the construction of the Mulawa Canal in 1935.

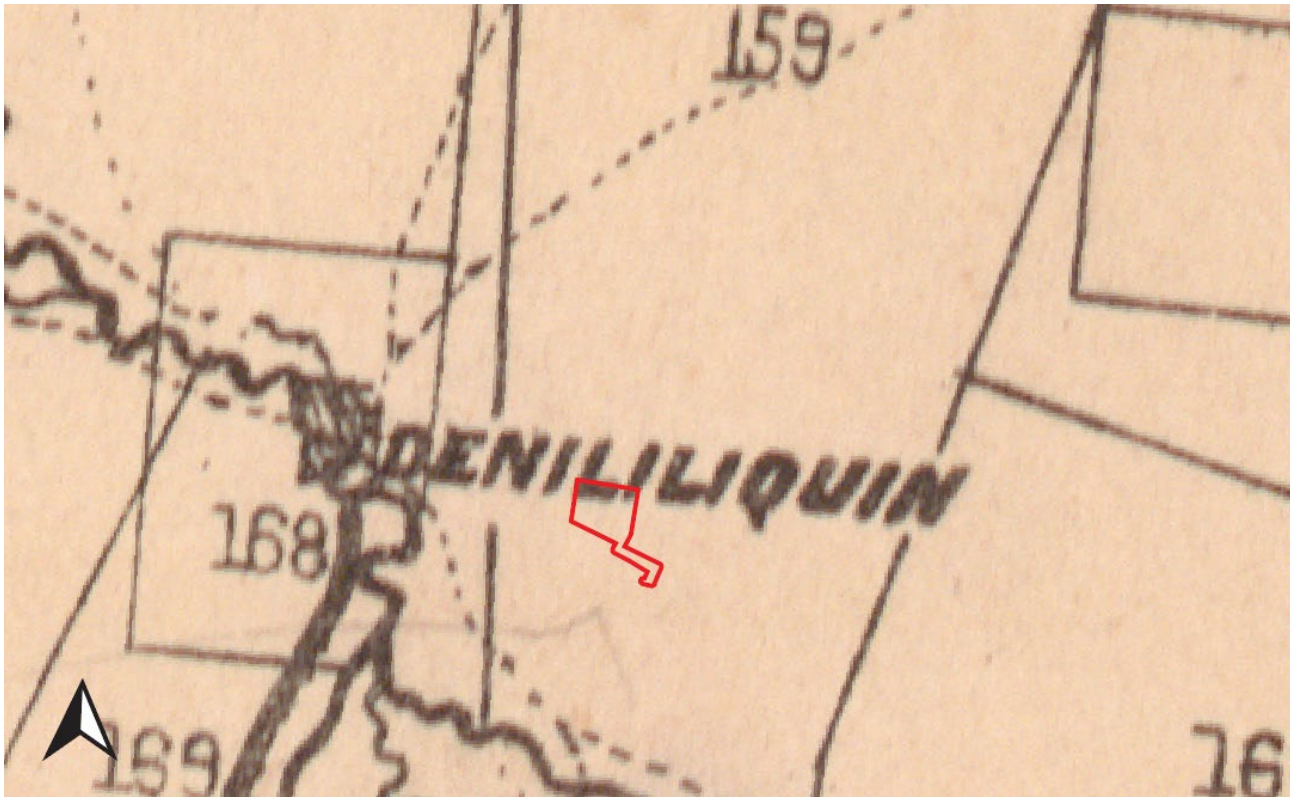


Figure 8 – 1877 Squatting map of Riverina district of N.S.W. showing the approximate location of the subject area.

Source: NLA, 1877. Map F 277.

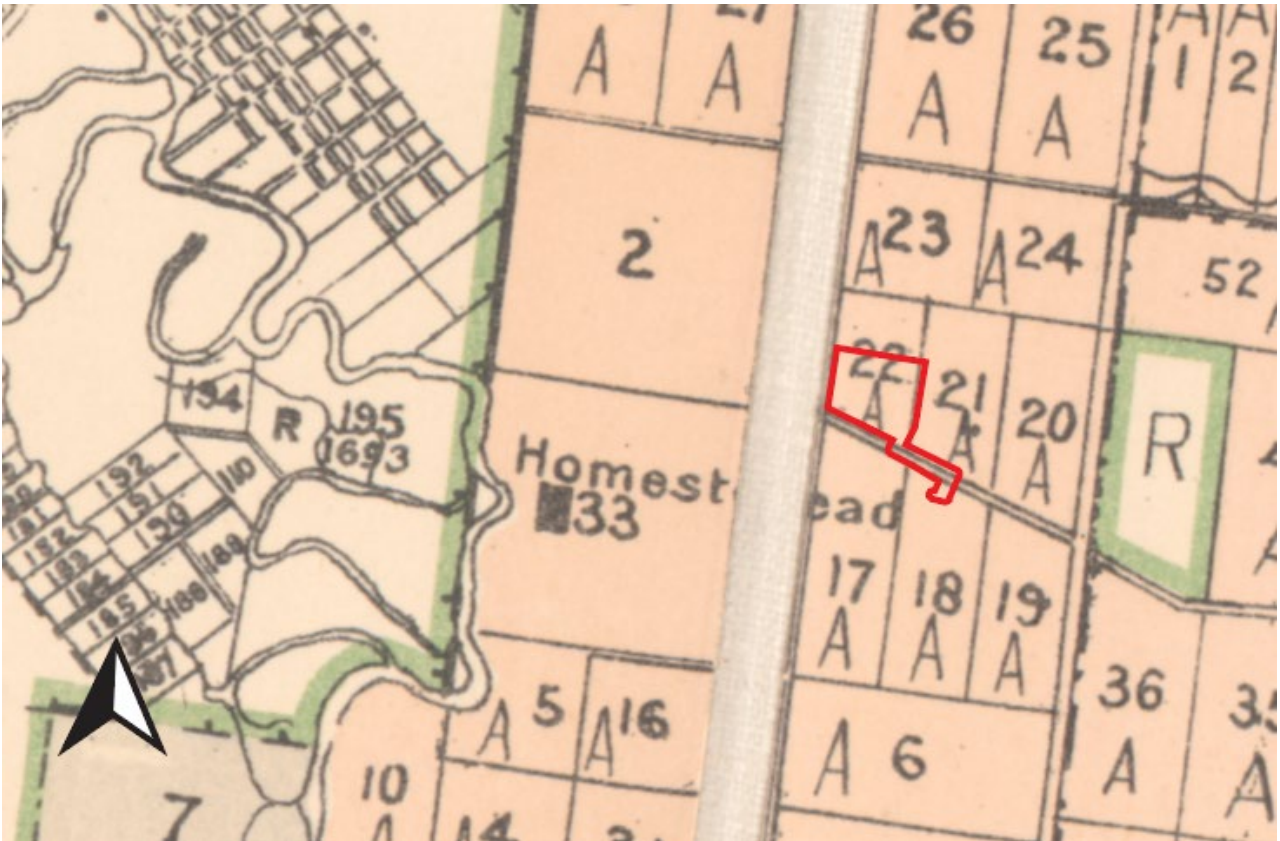


Figure 9 – Subdivision plan of the Town of Deniliquin and its surrounds, showing the location of the subject area.  
Source: NLA, 1883. Obj. No. 231690019.



Figure 10 – Berriquin Irrigation District, showing the route of the Mulawa Canal through the subject area.  
Source: Dept. of Lands, Sydney NSW, 1948. No. 48-733. .



Figure 11 – Construction of the Mulwala Canal using Bucyrus Erie dragline excavators.  
Source: State Water Archives Collection.



Figure 12 – Construction of the Mulwala Canal, showing the depth and extent of ground disturbance.  
Source: State Water Archives Collection.



Figure 13 – Aerial image of the subject area from 1968.  
Source: NSW Government, Historical Aerial Viewer, 1968.



Figure 14 – Aerial image of the subject area from 1976.  
Source: NSW Government, Historical Aerial Viewer, 1976.



Figure 15 – Aerial image of the subject area from 1991.  
Source: NSW Government, Historical Aerial Viewer, 1991.



Figure 16 – Aerial image of the subject area from 1995.  
Source: NSW Government, Historical Aerial Viewer, 1995.

## 4. PRELIMINARY ASSESSMENT OF POTENTIAL HISTORICAL ARCHAEOLOGICAL RESOURCES

### 4.1. HISTORICAL ARCHAEOLOGICAL POTENTIAL

Historical archaeological potential is defined as:

*The degree of physical evidence present on an archaeological site, usually assessed on the basis of physical evaluation and historical research (Heritage Office and Department of Urban Affairs and Planning 1996).*

Archaeological research potential of a site is the extent to which further study of relics likely to be found is expected to contribute to improved knowledge about NSW history which is not demonstrated by other sites, archaeological resources or available historical evidence. The potential for archaeological relics to survive in a particular place is significantly affected by later activities that may have caused ground disturbance. These processes include the physical development of the site (for example, phases of building construction) and the activities that occurred there. The archaeological potential of the subject site is assessed based on the background information presented in Section 3, and graded as per:

- **Nil Potential:** the land use history demonstrates that high levels of ground disturbance have occurred that would have completely destroyed any archaeological remains. Alternatively, archaeological excavation has already occurred, and removed any potential resource;
- **Low Potential:** the land use history suggests limited development or use, or there is likely to be quite high impacts in these areas, however deeper sub-surface features such as wells, cesspits and their artefact bearing deposits may survive;
- **Moderate Potential:** the land use history suggests limited phases of low to moderate development intensity, or that there are impacts in the area. A variety of archaeological remains is likely to survive, including building footings and shallower remains, as well as deeper sub-surface features; and
- **High Potential:** substantially intact archaeological deposits could survive in these areas.

The potential for archaeological remains or 'relics' to survive in a particular place is significantly affected by land use activities that may have caused ground disturbance. These processes include the physical development of the site (for example, phases of building construction) and the activities that occurred there. The following definitions are used to consider the levels of disturbance:

- **Low Disturbance:** the area or feature has been subject to activities that may have had a minor effect on the integrity and survival of archaeological remains;
- **Moderate Disturbance:** the area or feature has been subject to activities that may have affected the integrity and survival of archaeological remains. Archaeological evidence may be present, however it may be disturbed; and
- **High Disturbance:** the area or feature has been subject to activities that would have had a major effect on the integrity and survival of archaeological remains. Archaeological evidence may be greatly disturbed or destroyed.

### 4.2. PRELIMINARY ASSESSMENT OF HISTORICAL ARCHAEOLOGICAL POTENTIAL

The assessment of potential historical resources has been informed by the historical overview provided in Section 3 provides a preliminary assessment of potential archaeological relics retained at the subject site, as well as their likelihood to occur at the subject site.

Taken together, this preliminary historical archaeological assessment has concluded that there is **nil- low potential** for historical archaeological remains to occur at the site. As demonstrated below, the most likely resource to occur is artefacts, which are likely to occur with low physical and/or spatial integrity.

Table 2 - Historical archaeological potential of the subject site

| Potential Resource | Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Archaeological Potential |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| Artefacts          | <p>The entire subject area has been impacted by recurrent ground disturbing works including agriculture, the construction of roads and irrigation channels. Therefore, it is very unlikely for in situ deposits of artefacts to occur anywhere within the site.</p> <p>The subject site has been continually occupied as agricultural and grazing land since the mid-19<sup>th</sup> Century. Deposits of agricultural and animal agistment tools, as well as general discard items could occur throughout the northern section of the site. However, given the extent of subsequent ground disturbances, these deposits are likely to have been removed. If retained, these deposits would retain little-no spatial or physical integrity.</p> | <b>Low</b>               |
| Deep Features      | <p>There is no documentary evidence which suggests the former presence of deep features within the subject site – such as, wells or cesspits.</p> <p>Although undocumented deep features may occur in unmapped locations, these deposits would be truncated and highly disturbed.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Nil-Low</b>           |
| Structural Remains | <p>Except for its clearance, there is no historical evidence for the subject site's development since it was settled in the 19<sup>th</sup> Century. Undocumented cursory structures – such as, small sheds or structures for animal containment – may have formerly been present within the site. However, associated deposits would have been substantially disturbed or entirely removed by subsequent ground disturbing works.</p>                                                                                                                                                                                                                                                                                                          | <b>Nil-Low</b>           |
| Ephemeral Evidence | <p>The subject site has been continually occupied as agricultural and grazing land since the mid-19<sup>th</sup> Century. Ephemeral evidence of agriculture – such as, hoe marks or post holes – would have been entirely removed by subsequent ground disturbances.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Nil</b>               |

## 5. HERITAGE SIGNIFICANCE

Before undertaking change a listed heritage item, a property within a heritage conservation area, or a property located in proximity to a listed heritage item, it is important to understand the heritage values of the place and its broader heritage context. This understanding will underpin the approach to any proposed changes and identify what is important and why, and how these values can be protected. Statements of heritage significance summarise the heritage values of a listed heritage item – why it is important and why a statutory listing was made to protect these values.

### 5.1. HERITAGE LISTINGS

#### 5.1.1. The Subject Site

The subject site is not a listed heritage item and does not contain any elements of potential built heritage significance.

#### 5.1.2. Vicinity Heritage Items

The subject site is not identified as a heritage item, nor is it located within a HCA. The closest heritage item is located approximately five kilometres to the north-west of the subject site, being the *Water Tower, pumping station and chimney stack* at Memorial Drive (item 33) listed on the Deniliquin Local Environmental Plan 2013.

Given the substantial distance between the site and any heritage items, there are not considered to be any heritage items in the vicinity of the subject site.

### 5.2. STATEMENT OF SIGNIFICANCE (SUBJECT SITE)

The site is open agricultural land with no significant plantings and no notable structures. The site does not have any heritage significance and does not contribute to the heritage significance of any other item.

## 6. THE PROPOSAL

The Project would include a lithium-ion battery energy storage system with a 100 MW/200MWh capacity and associated power conversion systems, switchgear and a control room. Associated infrastructure as part of the project would include overhead lines and collector units, storage area, internal access tracks, on-site parking, security fencing, temporary construction laydown area and landscaped screening.

The Project will be connected to the nearby Deniliquin Substation (Deniliquin 132/66kV TS) via a 132kV overhead transmission line crossing the Moulamein Channel, Mulwala Canal and Riverina Highway. Site access to the Project will be provided through a new six metre-wide vehicular access road, crossing the Moulamein Channel, and connecting to the Riverina Highway.

The key elements of the Project will include:

- Containerised lithium-ion battery modules with up to 100MW/200MWh capacity.
- Power conversion units, which convert the DC power from the battery modules to 33kV AC.
- On-site 33/132 kV substation, including power transformer and oil containment system.
- A 33kV switch-room.
- Control room.
- Maintenance container.
- A 132 kV overhead transmission line connecting with the Deniliquin Substation.

Permanent supporting infrastructure will include:

- Upgraded site vehicle access road and bridge to provide access to Riverina Highway
- Internal access roads and car parking for maintenance vehicles.
- Three 25,000 litre water tanks.
- Security fencing and CCTV security system.
- Landscape screening.
- Lightning mast.

Temporary construction facilities will include:

- Laydown area.
- Construction materials storage.

## 7. IMPACT ASSESSMENT

The following impact assessment has assessed the proposed works against the relevant provisions and controls of the Council's statutory and non-statutory planning controls as well as the Heritage NSW 'Statement of Heritage Impact' assessment guideline questions.

### 7.1. DENILIQVIN LOCAL ENVIRONMENTAL PLAN 2013

The table below provides an impact assessment of the proposal against the relevant clause for heritage conservation in the *Deniliquin LEP 2013*.

Table 3 - Impact assessment against the relevant clauses of the *Deniliquin LEP 2013*.

| Clause                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>(1) Objectives</b></p> <p><i>The objectives of this clause are as follows:</i></p> <p><i>(a) to conserve the environmental heritage of Mid-Western Regional,</i></p> <p><i>(b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,</i></p> <p><i>(c) to conserve archaeological sites,</i></p> <p><i>(d) to conserve Aboriginal objects and Aboriginal places of heritage significance</i></p>                                      | <p>The proposed works are in line with the objectives set out in the <i>Deniliquin LEP 2013</i> as discussed below.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p><b>(4) Effect of proposed development on heritage significance</b></p> <p><i>The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).</i></p> | <p>This report has been prepared to assess whether any unlisted elements of heritage significance exist on the subject site (none exist) and whether the proposal has any potential to impact heritage items.</p> <p>There are no heritage items located in the immediate vicinity of the subject site, or within a distance that could be considered within the same context as the subject site.</p> <p>The subject site is not identified as a heritage item, nor is it located within a Heritage Conservation Area (HCA). The closest heritage item is located approximately 5 kilometres to the north west of the subject site, being the Water Tower, pumping station and chimney stack at Memorial Drive (item 33) listed on the Deniliquin Local Environmental Plan 2013. There are no heritage items located in the immediate vicinity of the subject site, or within a distance that could be considered to be within the same context as the subject site.</p> |
| <p><b>(5) Heritage assessment</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>This heritage impact statement has been prepared to assist the consent authority in their determination and to assess the potential heritage impacts of the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| Clause                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Response                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| <p><i>The consent authority may, before granting consent to any development:</i></p> <p><i>(a) on land on which a heritage item is located, or</i></p> <p><i>(b) on land that is within a heritage conservation area, or</i></p> <p><i>(c) on land that is within the vicinity of land referred to in paragraph (a) or (b),</i></p> <p><i>require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.</i></p> | <p>proposed works. This heritage impact statement satisfies the requirement under this clause.</p> |

## 7.2. HERITAGE NSW GUIDELINES

The table below provides an impact assessment of the proposal against the relevant questions posed in Heritage NSW's (former Heritage Office/Heritage Division) 'Statement of Heritage Impact' guidelines.

Table 4 - Impact assessment against the relevant Heritage NSW Guideline Considerations

| Provision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b><i>Works adjacent to a heritage item or within the heritage conservation area (listed on an LEP)</i></b></p> <p><i>Will the proposed works affect the heritage significance of the adjacent heritage item or the heritage conservation area?</i></p> <p><i>Will the proposed works affect views to, and from, the Interpretation heritage item? If yes, how will the impact be mitigated?</i></p> <p><i>Will the proposed works impact on the integrity or the streetscape of the heritage conservation area?</i></p> | <p>The subject site is not a listed heritage item and is not in a conservation area. There are no items within the site which are identified to be of any heritage significance.</p> <p>The closest heritage item is located approximately 5 kilometres to the north west of the subject site, being the Water Tower, pumping station and chimney stack at Memorial Drive (item 33) listed on the Deniliquin Local Environmental Plan 2013. There are no heritage items located in the immediate vicinity of the subject site, or within a distance that could be considered to be within the same context as the subject site (in terms of potential for heritage impacts).</p> <p>The proposal comprises of the development of a hybrid battery energy storage system (BESS) that will enable energy captured from solar to be stored and released during times of demand to provide grid stability and security of supply.</p> <p>The subject site is located at a considerable distance of approximately 5km from the nearest heritage item. As such, the proposed works will not result in any adverse visual impacts on account of the</p> |

| Provision | Response                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | <p>physical distance between the heritage item and subject site, and the geographic features in between.</p> <p>Whilst it is acknowledged that the proposed BESS will alter the existing rural landscape. However, due to the physical distance between the subject site and the heritage items, this change would not have a detrimental heritage impact on the setting of the heritage item.</p> |

## 8. CONCLUSION

The subject site is not a listed heritage item and is not in a conservation area. There are no items within the site which are identified to be of any heritage significance.

The closest heritage item is located approximately five kilometres to the north-west of the subject site, being the Water Tower, pumping station and chimney stack at Memorial Drive (item 33) listed on the Deniliquin Local Environmental Plan 2013. There are no heritage items located in the immediate vicinity of the subject site, or within a distance that could be considered to be within the same context as the subject site (in terms of potential for heritage impacts). The change in the landscape character would be minor and likely imperceptible in views from the heritage item. There is therefore no potential for the proposed works to have any heritage impacts.

# DISCLAIMER

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