

Our ref: HMS ID 11589

Kurtis Wathen
Planner
Department of Planning, Housing and Infrastructure
kurtis.wathen@dpie.nsw.gov.au

Letter uploaded to the Major Projects Planning Portal

Advice on Environmental Impact Statement – State Significant Infrastructure

Proposal: Hunter Transmission Project SSI-70610456

Major Project reference: SSI-70610456

Received: 22 August 2025

Dear Kurtis,

Thank you for your referral dated 22 August 2025 inviting comments from the Heritage Council of NSW on the above State Significant Infrastructure (SSI) proposal. It is understood that the proposal involves the construction of new electricity transmission infrastructure, two new switching stations (Bayswater South and Olney), upgrades to existing substations, transmission lines and utilities and ancillary works as required to support construction. For the purposes of assessment, it is understood that all impacts associated with the project will be confined to the area identified in the relevant documents as the 'project impact area'. Following the completion of construction, a smaller 'operation impact area' will remain in place.

The following reports were considered in our assessment:

- Relevant sections *Hunter Transmission Project Environmental Impact Statement* – prepared by EnergyCo, dated August 2025
- *Technical Report 3: Hunter Transmission Project Landscape character and visual impact assessment* – prepared by Iris dated August 2025
- *Technical Report 7: Historical Heritage Impact Statement* – prepared by Biosis, dated August 2025
- *Historic Heritage Assessment: Singleton Military Area* – prepared by Umwelt, dated 2021

No State Heritage Register (SHR) listed items are situated within, or adjacent to the project impact area. Heritage NSW notes that some items within or adjacent to the project impact area may meet the threshold of State heritage significance. Further, Heritage NSW notes that, while not currently listed, the Commonwealth Singleton Military Area (SMA) has been assessed to meet the threshold for nomination and inclusion on the Commonwealth Heritage List (CHL).

Based on our review of the above documents, Heritage NSW encourages the Department of Planning, Housing and Infrastructure (DPHI) to request the applicant address key matters summarised below, and detailed in **Attachment A**, prior to considering project approval.

Key matters critical to understanding the proposed impacts and required by RTS:

- **Assessment of unlisted heritage items and non-Aboriginal archaeology** – Heritage NSW notes that the Historical Heritage Impact Statement (HHIS) presents a consideration of listed heritage items only. Potential unlisted heritage items and non-Aboriginal archaeological sites within the project impact area have therefore not been identified or assessed. Additional desktop assessment and ground-truthing survey is requested to ensure all potential heritage constraints within the project impact area are understood.
- **Incomplete archaeological assessment** – Heritage NSW notes that the assessment of non-Aboriginal archaeology within the HHIS provides an insufficient understanding of potential archaeological constraints and is not adequate to inform the proposed archaeological excavations and management strategies. A detailed archaeological assessment, distinct from the built heritage assessment, is requested to be included in the HHIS to ensure that potential archaeological constraints are understood and can therefore be appropriately managed.
- **Site mapping** - It is requested that mapping clearly illustrating areas of heritage and archaeological sensitivity are included in the HHIS to assist with development of the detailed project design, and to ensure that potential heritage impacts of the project are understood.
- **Assessment of potential impacts** - Clarifications relating to significance / impact assessments for all sites including further consideration of the potential for heritage curtilages to extend into the project impact area and explicit consideration of potential indirect and/or partial impacts.

Matters relating to management and mitigation including commitments for post-approval assessment and/or management:

- Commitment to post-approval ground-truthing of any identified unlisted heritage items and/or non-Aboriginal archaeological sites, if this is unable to be undertaken pre-approval.
- Preparation of an Archaeological Research Design and Excavation Methodology (ARDEM) to guide all non-Aboriginal archaeological excavation within the project impact area.

Matters relating to ongoing assessment and administrative actions:

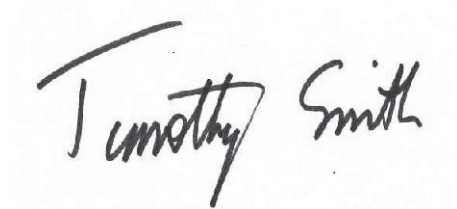
- Updates based on the outcomes of additional desktop assessment and additional ground-truthing survey.

As the project site contains local heritage items, and other local items are in the vicinity, advice should be sought from the relevant local council. Further, additional advice may be required from relevant authorities for items contained on Commonwealth land, noting their potential significance.

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. Detailed comment on the bilateral agreement between NSW and the Commonwealth is outlined in **Attachment B**.

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,

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping initial 'T'.

Tim Smith OAM

Director Assessments

Heritage NSW

Department of Climate Change, Energy, the Environment and Water

As Delegate of the Heritage Council of NSW

24 September 2025

Attachment A - Detailed Environmental Heritage Advice

Historical Heritage Impact Statement (HHIS)

1. The HHIS provided to Heritage NSW in support of the EIS, includes a combined built and archaeological assessment with a focus on listed items within, and in the vicinity of, the project area. The combined HHIS should be updated to include separate built heritage and archaeological assessment sections as its current format provides limited assessment, including survey, of non-Aboriginal archaeological potential across the project area. The updated HHIS must include:
 - a. An update to Section 4.4 Regional Context to include further detailed analysis of relevant histories. The history should include consideration and inclusion of historic imagery, maps and plans, as relevant to potential built heritage and archaeology.
 - b. A summary of desktop heritage sensitivity, as informed by the regional context (Item b). This should include consideration of potential for unlisted built or archaeological heritage within the project area. It may be appropriate to develop GIS overlays, utilising any historic imagery to identify areas of sensitivity, to be further assessed during additional survey (Item 2).
 - c. Please update the HHIS to include mapping of curtilage boundaries of '*Historic Heritage Values Sites*' and '*Historic Heritage Information Management Sites (HHIMS)*'.
 - d. Please provide additional information regarding Historic Heritage Values Site '*Former Test Mine*', as shown on Figure 4-1.3.
2. Heritage NSW notes that the project area was subject to targeted heritage survey only, limited to areas of heritage listed curtilages. Thorough survey of the project area is required to ensure that potential unlisted heritage items are identified and assessed. In consideration of this, additional survey is required to ensure that the heritage and archaeological constraints of the project area are understood.

It may be appropriate to utilise other sources of survey coverage for the project area to inform an updated assessment of heritage sensitivity. These may include the Aboriginal cultural heritage survey undertaken by EMM for the Aboriginal Cultural Heritage Assessment Report (ACHAR) for this SSI, and coverage of the SMA, as undertaken by Umwelt during development of the Heritage Management Plan. As such:

- a. Please provide a summary of survey coverage undertaken to date, including any appropriate survey coverage informed by other studies and assessments.
 - b. Please undertake additional survey of potential areas of heritage sensitivity, as informed by the regional history and desktop summary (Item 1). These will be required to have been undertaken by heritage specialists, with experience in built and archaeological sites.
 - c. Listed items that have the potential to be impacted by the proposed works that could not be located during targeted survey should be revisited.
3. The updated the archaeological assessment (Item 1) should include:

- a. Assessment of archaeological potential of listed and unlisted items. Archaeological potential of listed items that do not have archaeological potential specifically referenced in their existing assessment of significance should still be considered.
- b. Assessments of significance of potential archaeological relics of listed and unlisted items, including Commonwealth listings.
- c. Clear mapping of areas of archaeological potential and sensitivity to inform the detailed design for the project, including:
 - i. Mapping overlays of the identified archaeological potential of Oakley Estate, based on the archaeological zoning drawings by Suters Architects (Photos 4.9 to 4.11 of the HHIS).
 - ii. Archaeological potential mapping of listed items.
 - iii. Archaeological potential mapping of unlisted items.

Built Heritage

4. The assessment of significance should consider the potential heritage significance of heritage items within the SMA Commonwealth area against NSW heritage criteria, to clearly determine if the items may meet the threshold of State or local heritage significance. For example, Oakley Estate is located within the Singleton Military Area (SMA) and has been assessed as having State heritage significance. Other such items may hold other or similar levels of heritage significance.
5. The HHIS states that the Oakley Estate homestead is 30 m from the HTP corridor and as the corridor doglegs around the homestead, it is likely that a pylon will be located in close vicinity. This would result in a visual impact on the setting of the homestead, with the HHIS assessing that this would be a *moderate* adverse heritage impact. We recommend that alternative routes for the HTP corridor be considered that would avoid this impact and note that there may be opportunities for the HTP to be redirected away from the homestead within the SMA.
6. Please clarify the following in the Landscape Character and Visual Impact Assessment (LCVIA):
 - a. Two viewpoints, 251 (Abbey Green) and 2918 (Heritage dwelling) have been listed with the same address. Please check the addresses of these items and confirm that visual impact assessment for both properties is correct.
 - b. Viewpoint 251 (Abbey Green) impact assessment was changed from Moderate to Low at the detailed assessment stage, but no explanation was provided for this in the report. Please provide justification for the change in assessment.
 - c. Locally listed item Cyril Moxham's House (Singleton LEP 2013 item I39), located at 34 Trefolly Road Wylies Flat, has not been included in the LCVIA. Please justify why it has been omitted or provide an assessment of the visual impacts on the property.
 - d. The HTP corridor passes through the heritage curtilage of Local item 'Stafford' homestead and 'Clifford' homestead (ruins) (Singleton LEP 2013 item I142) (lot 25 DP7555267) but the visual impacts on this item have not been assessed in the LCVIA.

Please justify why it has been omitted or provide an assessment of the visual impacts on the property.

Maritime Archaeology

7. Heritage NSW notes that the Hunter region in which the project area is located is known for its recorded maritime activity related to European settlement. We note further that the project impact footprint includes several river and stream crossings. In consideration of this, the HHIS should be updated to consider maritime heritage constraints, particularly located in riverbeds and/or riverbanks.
8. If maritime heritage constraints are identified, the HHIS should be updated to include a consideration of the potential impact of the proposed works on such constraints. If impacts are identified, further assessment in the form of a Maritime Archaeological Assessment (MAA) may be required.

Impact Assessment and Mitigation Measures

9. The impact assessment should consider that all heritage items within the project impact footprint will be subject to direct impacts, until the impacts are refined as part of detailed design. A revised impact assessment may be required following issue of detailed design impacts.
10. The impact assessment should include mapping that clearly identifies curtilages of built heritage items and areas of archaeological sensitivity overlaid with the project impact area boundary. If possible, please also provide these as GIS data files to Heritage NSW.
11. Table 7.1 (HH4) and Section 7.2.1.2 should be updated to consider all potential ancillary subsurface impacts of the proposed works, including access trail upgrades, vegetation clearance, construction of towers, laydown areas, switchboard areas, fencing, existing line upgrades etc.
12. If applicable, the impact assessment should identify any items of significance that should be avoided as part of the proposed works.
13. Heritage NSW notes that the project impact area overlaps with lands managed and controlled under a range of approvals, including Mining Leases, longstanding Major Project and SSD Approvals, a number of wind farm projects as well as land management by NPWS, Forestry Corporation of NSW and the Department of Defence that are likely associated with active management obligations and requirements. If applicable, proposed mitigation measures should consider any obligations to exiting approvals and/or land management for built heritage and non-Aboriginal archaeology to ensure compliance and consistent management.
14. Section 7.2.1.3 should be updated to reference *Guidelines for preparing archival recordings of heritage items as a condition of consent* (DECCEEW, 2025)

Post-approval Considerations

Archaeological Research Design

15. 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. Identify research questions to guide the archaeological program
- b. Propose a methodology for archaeological investigations on site, including a sampling strategy for the test excavations as appropriate.
- c. Consider the inclusion of an artefact discard policy and procedure.
- d. 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. Heritage NSW would appreciate an opportunity to comment on the proposed management approach decided upon by the proponent.
- e. Provide a methodology for post-excavation analysis and reporting.
- f. 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.
- g. Include consideration of integration of Aboriginal cultural heritage requirements during excavation of the *Wishing Well* site.

Nominate an Excavation Director

16. 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).
17. The ARDEM and nominated Excavation Director should be submitted to Heritage NSW for approval prior to the commencement of test excavations.

Attachment B - 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 SMA which is designated Commonwealth land. Within the SMA there are two heritage places that are situated within the project impact area (Murinbin House complex and Oakley Estate) that retain above-ground structures that would potentially be impacted by the proposed works. We note the following:

- Murinbin House complex is listed on the CHL as Place ID 105642. The HHIS assesses that the SSI would result in minor indirect impacts on this item. Heritage NSW agrees with this assessment.
- Oakley Estate is assessed to be of State significance. The HHIS assesses that *'The proposed transmission line and towers would alter the setting of the site and have permanent visual changes'*, and this would result in a moderate indirect impact on the item. The impact assessment presented in the HHIS indicates that an HTP tower would be located in close proximity to the item to facilitate the HTP corridor turning to the north, and that this would significantly impact the setting of the item. In order to minimise heritage impacts on the Oakley Estate, it is recommended that consideration be given to relocating the HTP corridor away from the heritage item.
- The HHIS also assesses that there would be minor direct impacts on Oakley Estate (built fabric) related to access track works. Heritage NSW agrees with this assessment.