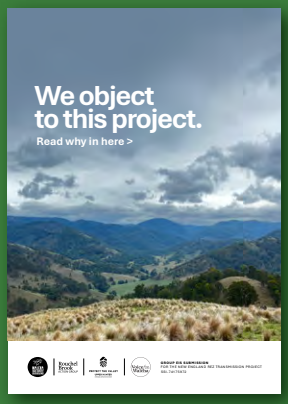
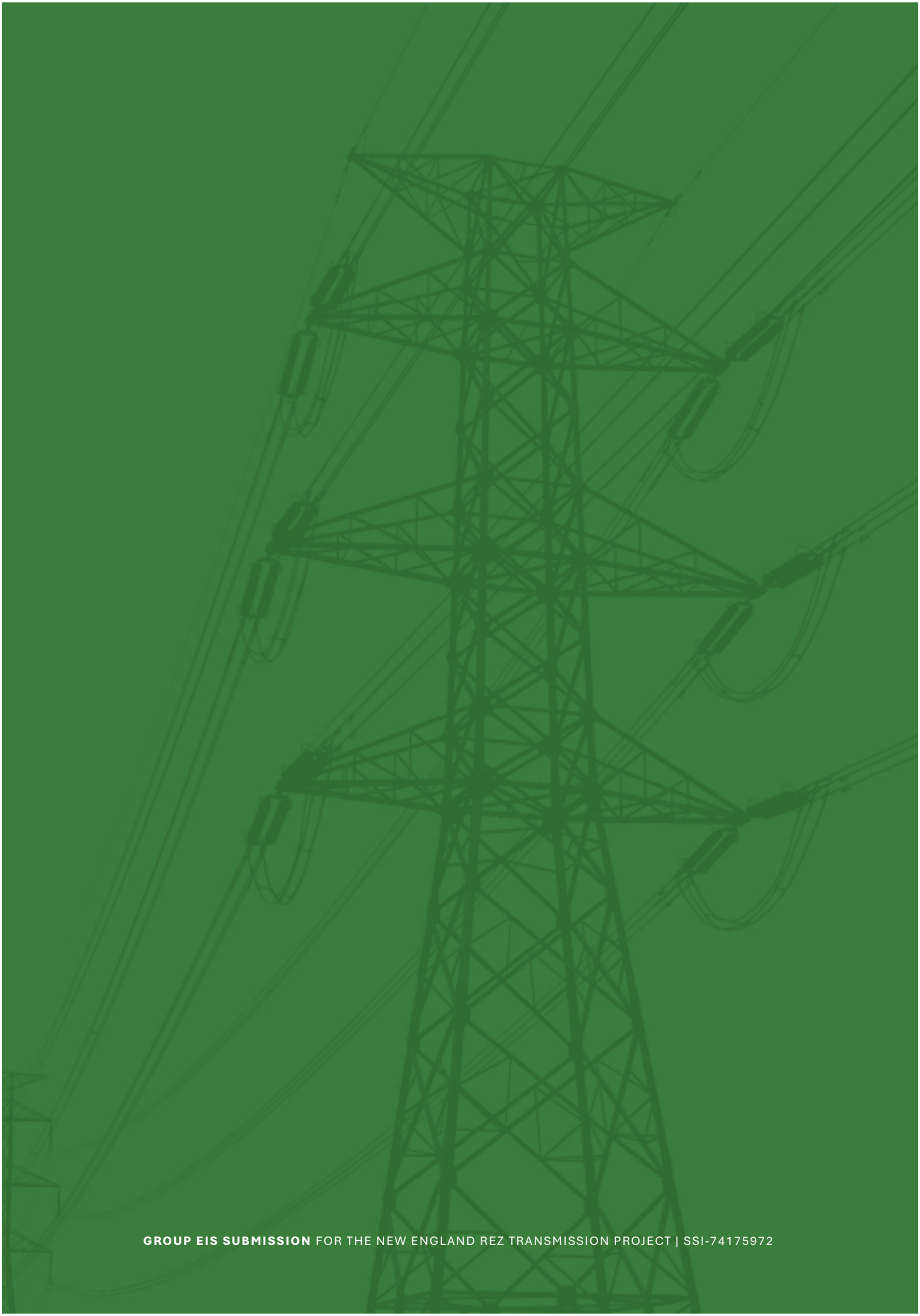
SECTION **22**

Historic Heritage

THIS IS **ONE** SECTION OF **TWENTY TWO,**
THAT FORMS PART OF A LARGER GROUP SUBMISSION
TO THE NEW ENGLAND REZ TRANSMISSION PROJECT
SSI-74175972



WALCHA HIGH COUNTRY GUARDIANS | Rouchel Brook ACTION GROUP | PROTECT THE VALLEY UPPER HUNTER RESPONSIBLE INFRASTRUCTURE GROUP | Voice for Walcha



GROUP EIS SUBMISSION FOR THE NEW ENGLAND REZ TRANSMISSION PROJECT | SSI-74175972

SECTION 21

Historic Heritage

Key issues we have found ...

Historical surveys leave major gaps	Most of the project area remains unsurveyed, and specialist inspections covered only a fraction of locations initially identified through research.
Local knowledge was largely missed	Local historians, societies and many landholders were not properly engaged, leaving valuable knowledge of unrecorded places outside the heritage assessment.
Hidden heritage is being discounted	Desktop assumptions minimise archaeological potential, despite field surveys discovering unrecorded items and historical records identifying huts and outstations requiring
Living landscapes lack proper assessment	The assessment recognises pastoral landscapes and community connections, yet does not properly assess their significance or rate the proposed transformation.
Historic settings lack adequate protection	Visual assessments rely on public viewpoints, overlooking views from historic properties, while specific measures to mitigate visual impacts remain undeveloped.
Complete heritage assessment before approval	Complete specialist surveys, consult local communities, assess landscape impacts and publicly exhibit the findings before approving potentially damaging project works.

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Read in more detail >



> The Twenty Foot Waterfall on Tomalla Creek - 500m as crow flies from transmission line route

SECTION **22**

Historical Heritage

SUMMARY

The historical heritage assessment relies on a survey that covered about 46% of the project area. That figure is itself borrowed from the Aboriginal heritage team's sampling. It inspected 30 of the 131 locations its own desktop research first identified. The assessment then concludes that heritage impacts are "generally low" and largely avoided. Those conclusions can't be supported for the unsurveyed land.

The EIS attributes the gaps to land access, but provides no record of access being sought. Heritage consultation was a single online question, asked after field survey had ended. Visual and cultural landscape impacts are understated and mostly absent, and the remaining assessment is deferred to "detailed design" and a management plan prepared after approval, out of public view. Local voices, knowledge and concerns are clearly absent from the document. As a result, the EIS does not meet several of the historical heritage requirements Heritage NSW set for it (the SEARs).

POSITION

We consider the historical heritage assessment incomplete, history-lite, and not a sound basis for determination.

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Why this landscape matters

Much of the project area is a living heritage landscape, where the natural country and nearly two centuries of pastoral life are bound together. Oxley crossed this country in 1818, and squatters took up runs here from the early 1830s. The pattern they set down is still visible: stations and family holdings, homesteads tucked into sheltered valleys, woolsheds and yards, stock routes and early roads following the ridges, and old huts, gold workings and graves scattered through the back country. All of it sits within open granite and basalt country, remnant woodland, rivers and gorges, and long, uninterrupted views. Generations of the same families have worked this land, and the district's identity, comes from that continuity. This is a living landscape, largely unchanged since the 1800s. The EIS doesn't acknowledge that the transmission project also passes through barely cleared areas of farmland that have been nurtured by landholders. An example can be seen in photo 1 showing a barely touched area directly in the transmission corridor.



> Figure 1 - barely touched farmland in the transmission corridor

The value of this landscape lies in the whole, not in any single building. TR3 itself says the region's cultural landscape is defined by "open grazing lands… homestead complexes… and long views across valley systems", and that its significance depends on "the persistence of land use patterns, spatial relationships and community connections to the landscape" (TR3 pp. 56–57). Communities told EnergyCo the same: TR3 records that the heritage-related feedback "primarily related to the natural landscape character of the project area" (TR3 p. 31).

Twin 500 kV lines would change this landscape dramatically and permanently. They would bring towers up to 75 m high every few hundred metres along each line, a 140 m cleared easement, new access tracks cut across

slopes and ridges, energy hubs and workforce camps. This isn't another layer on an existing pattern of infrastructure: there is none of this scale on the Walcha section. It would be the first industrial-scale intrusion into a landscape whose character has endured since settlement. Once built, it can't be undone.

The EIS does not appear to meet the Heritage NSW requirements (SEARs)

Heritage NSW set the historical heritage requirements for this EIS in its advice of 6 August 2024 (HMS ID 6859), reconfirmed on 15 January 2026 (HMS ID 13144). TR3 reproduces the advice in Table 1.2 (p. 6) but answers each requirement only with a general cross-reference. Checked against the assessment itself, several requirements are not met:

Heritage NSW requirement	What the EIS did	Met?
1. A Statement of Heritage Impact (SOHI) by a suitably qualified consultant	An HHIA was prepared by Umwelt (TR3)	In form
1a. Identify all heritage items (State and local) in the vicinity, including built heritage, landscapes and archaeology	Only *listed* items were searched for. Unlisted items aren't identified. About 54% of the project area wasn't surveyed.	No
1a. Detailed mapping of these items	Listed items are mapped. There's no map of which land was surveyed, and the cultural landscape isn't mapped.	Partly
1a. Assess why items are significant	Listed items were "not… subject to reassessment", and "a substantial number" of listings have no significance information (TR3 p. 8). The cultural landscape is described but never assessed against the heritage criteria (TR3 pp. 56–57).	No
1b. Compliance with any relevant conservation management plans	Not addressed. TR3 doesn't say whether any affected item has one, including the State-listed items.	Not addressed
1c. Impacts on significance, including visual	Listed items within 2 km only; unlisted historic places not assessed; cultural landscape impact acknowledged but not rated (TR3 p. 469).	Partly
1c. Vibration impacts during construction	50 m study area against a 65 m blasting distance, based on an uncapped 0.5 kg charge (TR3 pp. 37–38). Walcha Road Station isn't assessed.	Partly
1d. Attempts to avoid or mitigate impacts	No-impact areas and some route changes, none in Walcha Shire. "No specific management measures for visual impacts have been developed" (TR3 p. 481). Avoidance for unsurveyed land is deferred.	Partly
1e. Justify changes to fabric or landscape, including options analysis	No options analysis. At Barry Station, a moderate impact is accepted with no alternative considered, and a photographic record is the only response.	No
1. Potential impacts on unrecorded items "will also require assessment as part of the SOHI"	Deferred to an unexhibited Submissions Report addendum and a post-approval HHMP (TR3 pp. 484–485). 54% unsurveyed; 20 target sites uninspected.	No (deferred)
2. Archaeological assessment identifying likely relics, their significance and impacts	Done for 11 areas, none in Walcha Shire. "Generally low" potential assumed for unsurveyed land from desktop sources.	Partly
2. Where harm can't be avoided, prepare a Research Design and Excavation Methodology	Seven areas will be affected, but research designs are deferred to after approval (measures HH8–HH10).	No (deferred)

We ask that Heritage NSW be invited to confirm whether its requirements have been met.

1 | Most of the project area was never surveyed

- Only about **46%** of the project area had general survey, and only **30 of 50** targeted locations (60%) were inspected (EIS pp. 345–346; TR3 p. 20). The 46% is the area sampled by the **Aboriginal** cultural heritage teams, not historical heritage specialists (TR3 p. 20). Targeted historical heritage inspection totalled **12 days** across the whole project (TR3 p. 20).
- Desktop research first identified **131** locations, cut to 50 at the desk (TR3 p. 27). So **30 of 131** were inspected. The rest of the project area was screened out "based on a review of all available background information and mapping": by desktop alone.
- The EIS's own results show what desktop review misses. Of the 26 heritage items found in the project area, **15 were found only by walking the ground** (EIS p. 363, Table 9.3). On the same basis, the unsurveyed 54% is likely to hold many more unrecorded items. Elsewhere, survey of earlier route options and nearby land kept finding "former worker accommodation huts", "vernacular farm buildings" and items of "potential heritage value" (TR3 pp. 292–293).
- No map shows which land was actually surveyed. Landholders and the public can't tell what land was walked.

2 | Land access does not explain the gaps, and the route changed mid-survey

The EIS repeatedly blames "land access restrictions". TR3 itself shows other causes:

- **No record of access being sought.** "Land access was not provided" (TR3 p. 20) doesn't say access was requested or refused. TR3 gives no count of requests, refusals, dates or methods.
- **The route changed during the survey.** Survey ran from August 2024 to 13 March 2026 (TR3 p. 19), while the corridor was still being refined "mid-2024 to mid-2026" (TR3 p. 404). Parts of the area added in the October 2025 refinements weren't surveyed before the cut-off (TR3 pp. 276, 283). 80 of the 106 recording forms relate to earlier route options or land outside the project area. Only 26 relate to the current route (TR3 p. 290).
- **Landholders on the easement were not contacted.** The majority of landholders on the Walcha section weren't contacted by Umwelt or EnergyCo about historical heritage. Inaccessibility can't be the reason for a gap on land where no one asked.

If land access is relied on, EnergyCo should provide a property-by-property log of heritage survey access requests, with dates, methods and outcomes.

3 | Heritage consultation was inadequate

- **Absence of local voices.** The only heritage-specific community input was one general question ("Are there any places or things in the area that feel important or special to you…?") in an online SIA survey in April–May 2026, after field survey had ended on 13 March 2026 (TR3 pp. 19, 30). It got 90 responses across the whole route, with no breakdown by area. The earlier SIA survey (April–July 2025) had no heritage question and was run before the October 2025 route change, so respondents were commenting

on a corridor that no longer exists. It couldn't have informed where survey went, even though EIS p. 343 lists "community consultation findings including with landholders and occupiers" as an input to survey.

- **Landholder input was left to chance.** Landholder consultation was "informal", held during field visits with owners "if in attendance" (TR3 p. 28–30). Landholders whose land wasn't visited weren't consulted. Information EnergyCo gathered was passed on only "where relevant", as judged by the proponent (TR3 p. 30).
- **No heritage bodies consulted.** TR3 cites histories by local societies but records no contact with the Walcha Historical Society, the Walcha History Centre, Walcha Shire Council or local historians.
- Agency input at the SEARs stage came only from Heritage NSW, Uralla Shire Council and Tamworth Regional Council (TR3 Table 1.2).
- **Notable local publications not cited.** The published work of local historian Jillian Oppenheimer on the Walcha district's pastoral families and history is not cited, nor the notable "From Scone to the Head Waters of the Hunter: A Survey of Properties and People Following the Gundy Road and Various Side-roads Along the Way 1896-1897".
- **Living cultural landscapes are not valued.** TR3 acknowledges that consultation identified "cultural landscapes as key considerations" and that communities value "rural landholdings, natural landscapes and recreational areas" for "community identity and sense of place" (TR3 p. viii). TR3 also records that the responses relevant to heritage "primarily related to the natural landscape character of the project area" (TR3 p. 31). The assessment then treats the landscape as unaffected in its "underlying" values (TR3 p. 469), and does not assess the natural landscape as heritage at all.

This falls well short of the community consultation needed to identify unrecorded heritage.

4 | The "generally low" and "worst case" conclusions are unsupported

- **"Generally low" archaeological potential (**EIS p. 358; TR3 p. 193) rests on historical research, previous studies and field survey. But the EIS admits there is "a general absence of detailed archaeological investigations" in the project area. TR3 accepts this gap "may also be attributable to the limited extent of past development or disturbance" (TR3 p. 192). Land that has never been disturbed is where remains are most likely to survive.
- **The wrong test.** The rating leans on there being no "homestead or head station" in the project area (TR3 p. 193). But a transmission line crosses back paddocks and run boundaries, where outstations, shepherds' huts, yards, shacks and mining camps were. TR3 records "at least eight huts" on the Aberbaldie run alone, none located (TR3 p. 132).
- **Field finds discounted for not being on old maps.** Only 2 of the 15 items found by walking went on to formal significance assessment (EIS pp. 364, 371). Items were screened out partly because they didn't appear in historical mapping, the same sources that missed them.
- **"Worst case" is a worst case of where, not what** (TR3 p. 35). Assuming disturbance could occur anywhere in the project area only covers known items. With about 54% unsurveyed, the inventory is incomplete. TR3 also states the approach is "to provide the project with flexibility for detailed design".
- **Cropped evidence.** Four pastoral plan figures are cropped to show only the head stations, with captions noting the project area is "outside of the image": Figures 6.32, 6.40, 6.42 and 6.45 (TR3 pp. 116, 132, 134, 137). The parts of the plans that would show huts and outstations near the line are not shown.

5 | Visual impact, and the natural and cultural landscape, are understated

TR3's own description of the cultural landscape (Section 5.5, pp. 56–57) shows why the impact is substantial. It defines the landscape by its "open grazing lands… cleared paddocks, homestead complexes… and **long views across valley systems**", and says its significance depends on "the persistence of land use patterns, spatial relationships and community connections to the landscape". There are areas that are basically untouched which is not really evident from the EIS (as shown in Photo 1).

Twin 500 kV lines on towers up to 75 m high, a 140 m easement and new access tracks would cut directly across those long views, open grazing lands and destroy the barely touched areas. Substations, workers camps and transmission is a fundamental alteration of a living heritage landscape. The project is bringing industrial infrastructure to a region where the landscape has remained largely unchanged since at least the 1800s as seen in Photo 2 looking north along the transmission path. TR3 states the landscape "is not defined by individual heritage items", yet the cultural landscape itself is never assessed for significance against the NSW heritage criteria or given an impact rating. Calling it "not rare at a state level" doesn't lessen it: TR3 accepts it is "a representative example" of NSW pastoral development, and that is itself a recognised heritage value.

- **Assessed from the road, not the homestead.** Listed items were viewed from public roads, and in some cases by Google Street View and aerial imagery (TR3 pp. 28, 244). Every photomontage was taken "from the closest public location" (TR3 pp. 456–460). The views that matter most to a homestead's setting were never modelled.
- **Ratings understate proximity.** Homestead "Warrane" is 0.95 km from the nearest tower, yet the impact is rated "low" (TR3 p. 457). Only the nearest tower is considered, not the several towers and spans of twin lines on 45–75 m towers about every 450 m along each line. The Timber house (I82) was rated "negligible" although TR3 couldn't identify which building is listed (TR3 p. 458). Belltrees was rated without property access (TR3 p. 460).
- **No mitigation.** "No specific management measures for visual impacts have been developed" (TR3 p. 481). At Barry Station, the only item rated "moderate", the response is archival recording.
- **The landscape is physically changed, not just seen differently.** TR3 calls the project "incremental layering" consistent with an "established pattern", and says "underlying cultural landscape values… are not fundamentally altered" (TR3 p. 469; EIS p. 376). A 140 m cleared easement, lines of large towers across ridges, access tracks, hubs and camps alter the fabric of the natural landscape the community has said is central to its identity (TR3 p. viii). No existing transmission line, extractive industry or built renewable project is named on the Walcha section. The modification TR3 relies on is in the Upper Hunter.
- **Two standards.** TR3 accepts that in "less modified" areas with "more intact rural character", such as Rouchel Brook and Gundy, the project "has greater potential to introduce perceptible change" (TR3 p. 470). The Walcha Tablelands meet that description but were never assessed on that basis.
- **The cumulative conclusion is unsupported. It** holds only "subject to implementation of the recommended mitigation" (EIS p. 376), but no landscape mitigation exists. It is tested "at a regional scale", which hides concentrated local loss, and it omits the REZ generation projects the line exists to connect.



> Figure 2 - Pastoral landscape along the transmission corridor near Walcha

7 | Assessment is deferred, and avoidance isn't secured on the ground

- **Deferred past the public.** Remaining survey "would be conducted in unsurveyed portions of the project area **before and/or after** project approval" (TR3 p. 485). The assessment will be updated "should further access be available" (TR3 p. 402). Results go into a Submissions Report addendum, which isn't exhibited, or into a post-approval management plan (HHMP).
- **New finds go straight to mitigation.** Under TR3 Section 12.4.1, newly found heritage "at risk of project impact" is assigned "mitigation". Only items "not at risk" get "avoidance and/or conservation" (TR3 p. 485). This contradicts the claim that avoidance is "the preferred option". Management measures only "may" apply to items found later (TR3 p. 473).
- **"Detailed design" is never described.** The EIS leaves the "full extent of potential impacts" on seven areas of archaeological potential to detailed design (EIS p. 375). It never explains when that happens, who does it, what siting criteria apply, how heritage is weighted against cost, or who reviews the result.
- **The HHMP has no approver or standards.** Measure HH1 (EIS p. 377) says the HHMP will be prepared "in consultation with" Heritage NSW and "approved" before construction, without saying who approves it. It is a list of headings with no performance outcomes. It is also to contain "predefined" measures by site type "to aid project delivery" (TR3 p. 479).
- **Commitments on paper have failed before.** On EnergyCo's Central-West Orana REZ transmission project, an Aboriginal rock shelter that was recorded in the project's planning documents and covered by a cultural management plan was destroyed during clearing by the network operator, ACEREZ (ABC News, 27 May 2026). Two investigations are under way. If a known, mapped and managed site can be lost, unfenced no-impact areas and an unexhibited management plan can't be relied on here.

What we ask the Department

Before determination:

1. Complete the survey. Require historical heritage survey of the whole project area, led by historical heritage specialists and including interviews with local historical societies and Councils.
2. Exhibit the results. Publish an updated assessment for public comment, not only in the Submissions Report, together with a map showing which land was physically surveyed.
3. Show the land access record. Require a log of heritage survey access requests (date, method, outcome) before accepting land access as a reason for incomplete assessment.
4. Assess the cultural/natural heritage landscape properly. Require a cultural/natural heritage landscape assessment.

Key questions to be answered

1. Which parts of the current project area were physically surveyed for historical heritage, and when? Does the "46%" figure include survey of earlier route options?
2. For each property in the project area, was access for heritage survey requested? When and how, and was it granted, refused, unanswered or never sought?
3. How many landholders were consulted about historical heritage, by local government area (LGA), and how many on the Walcha section? Why were local historical societies and Walcha Shire Council not consulted?

4. Why does Walcha Road Railway Station and yard group (State Heritage Register) have no impact assessment, given Camp 4 and the Central South Hub are at Walcha Road?
5. Why were the pastoral plans in Figures 6.32, 6.40, 6.42 and 6.45 cropped to exclude the project area? Do any recorded huts or outstations fall in or near the corridor?
6. How can the assessment be a "worst-case scenario" (TR3 p. 35) when about 54% of the project area wasn't surveyed?
7. Will EnergyCo commit that new finds in the footprint are considered for avoidance before mitigation (TR3 p. 485)?
8. Which no-impact areas will be fenced, and which will rely only on "a commitment to avoid, as documented through mapping" (TR3 p. 480)? After what happened on the CWO REZ, what will stop a recorded site being destroyed here?
9. What is the "detailed design process": when does it happen, who carries it out, what siting criteria apply, and who reviews the final footprint?
10. Who approves the HHMP? Will a draft be released for comment?
11. Why were photomontages prepared only from public locations? Will visual impacts be reassessed from inside homesteads and historic properties, including unlisted ones within 2 km?
12. Where are Workforce Camps 3 and 4, and how do they affect Barry Station and Walcha Road Station?
13. Field survey ran from August 2024 to March 2026 (EIS p. 363), but the current route wasn't settled until the October 2025 refinements. Which route or corridor was being surveyed between August 2024 and October 2025? Provide a map of each survey stage against the corridor in use at the time and the current project area. How much survey of the **current** route was done between October 2025 and the 13 March 2026 cut-off?
14. TR3 says "Umwelt field representatives consulted with landholders regarding the historical values associated with their properties", and that EnergyCo's own landholder consultation identified "additional information" (TR3 p. 30). How many landholders did Umwelt consult, and how many did EnergyCo? On which properties, in which LGAs, and how many on the Walcha section? Please release the field notes of those discussions, and the information EnergyCo passed to Umwelt.
15. How many responses did the April–July 2025 SIA survey receive? Which corridor were respondents shown, given the route changed in October 2025? Of the 90 responses to the 2026 survey, how many came from the Walcha district? What did the responses about "the natural landscape character of the project area" (TR3 p. 31) say, and how were they addressed?
16.

Conclusion

The historical heritage assessment does not give the Department, or the community, a reliable picture of what this project would affect. Most of the project area was not surveyed, the people who know the land were not asked, and the gaps are filled by desktop assumptions that the assessment's own results contradict. The Walcha district, one of the earliest settled parts of the New England Tablelands, is barely examined. What remains is deferred to processes the public will never see. The natural heritage landscape is not assessed, this is a living cultural heritage that should not be lost when there are other options to reach Net Zero goals.

We ask the Department not to determine the project until the assessment is completed and exhibited.

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