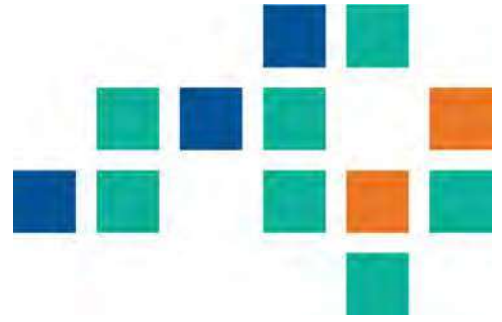

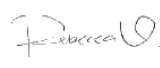





INTERNAL



# Heritage Management Plan EnergyConnect (NSW – Western Section) Stage 2 45860-HSE-PL-D-0022

REV	DATE	GENERAL DESCRIPTION	PREPARED	REVIEWED	VERIFIED	VERIFIED	APPROVED
F	12/04/2022	Updated following stakeholder review	A.Kriegel / V.Edmonds	R.Walker-Edwards	G. Crighton	JL.Barrenechea	D. Whatmough
G	24/06/2022	Updated following DPE review	A.Kriegel / V.Edmonds	R.Walker-Edwards	A.Boyd	JL.Barrenechea	D.Whatmough
1	14/09/2022	Updated for ACHAR 2a	 A.Kriegel	 R.Walker-Edwards	 A.Boyd	 B.Calligeros	 S.Basanta

Information in this plan is sensitive in nature and must be removed before the plan is to be made public. This includes Section 3, including Figure 3.2, and any figures in Appendix A.

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Revision History	
Rev.	Detailed Description
A	Prepared for initial review
B	Issued for Transgrid review
C	Issued for Transgrid review and to address draft Infrastructure Approval (Revision 2 dated 06/08/2021)
D	Issued for Transgrid review and to address Infrastructure Approval
E	Issued for agency and Aboriginal Stakeholder consultation
F	Updated following stakeholder review. Issued to ER and DPE
G	Revised to address DPE comments
1	Updated to reflect the requirements of the revised ACHS which includes ACHAR 2a

Key Document Stakeholders
To be communicated with during reviews and revisions of this document

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## Abbreviations

Acronym	Definition
Aboriginal stakeholders	Registered Aboriginal Parties (RAPs) from the EIS (as defined in the Infrastructure Approval)
ACHAR, CHAR	Aboriginal Cultural Heritage Assessment Report
ACHAR2a	Aboriginal Cultural Heritage Assessment Report, which considers the eastern portion of NSW – Western Section, that is Line 1 tower 138 (east of Great Darling Anabranch) through to Line 4 tower 58 (Murray River)
ACHAR2b	Aboriginal Cultural Heritage Assessment Report, which considers the western portion of NSW – Western Section, that is Line 1 tower 138 (east of Great Darling Anabranch) through to Line 1 tower 293 (NSW/South Australia state border)
AHIMS	Aboriginal Heritage Information Management System
Amendment Report	<i>EnergyConnect (NSW – Western Section) Amendment Report</i>
Appendix E of the Amendment Report	The Revised Non-Aboriginal and Aboriginal Cultural Heritage Assessment Report (Navin Officer, 2021) included as Appendix E of <i>EnergyConnect (NSW – Western Section) – Amendment Report</i>
APZ	Asset protection zone
BMEET	Barkindji Maraura Elders Environment Team
CCS	Community Communication Strategy
CEMP	Construction Environmental Management Plan
CSSI	Critical State significant infrastructure
Cth	Commonwealth of Australia
DAWE	Department of Agriculture, Water and the Environment
DECCW	(former) Department of Environment, Climate Change and Water
DPE or Department	NSW Department of Planning and Environment
DPIE	NSW Department of Planning, Industry and Environment, now known as NSW Department of Planning and Environment
EIS	<i>EnergyConnect (NSW – Western Section) Environmental Impact Statement</i>
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	(Commonwealth) <i>Environment Protection and Biodiversity Conservation Act 1999</i>
ER	Environmental Representative
EWMS	Environmental work method statements
GIS	Geographical Information Systems
HMP, this plan	Heritage Management Plan, this plan
HSSE	Health, Safety, Security and Environment
ICOMOS	International Council on Monuments and Sites
LEP	Local Environmental Plan
NSW	New South Wales
OEH	(former) NSW Office of Environment and Heritage
PAD	Potential archaeological deposit
PAD27	PEC-PAD27 or PEC-W-PAD27
PEC-G	Project EnergyConnect – Geotechnical
PEC-W	Project EnergyConnect – Western
PEC-W-H	Project EnergyConnect Western Historic

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Acronym	Definition
Planning Secretary	Planning Secretary under the EP&A Act, or nominee
Project, the	EnergyConnect (NSW – Western Section)
RAPs	Registered Aboriginal Party
Response to DPIE Request for Information	The 'Response to DPIE Request for Information letter dated 10 August 2021' in the definition section of the Infrastructure Approval; document is also titled <i>EnergyConnect (NSW – Western Section) Response to DPIE Request for Information – 7 May 2021 and subsequent discussions</i>
RMMs	Revised mitigation measures
RNTBC	Barkandji Native Title Claim Group Aboriginal Corporation
SAP	Sensitive area plan
Secure Energy	Elecnor and Clough Projects Australia Pty Ltd have formed the Secure Energy Joint Venture (Secure Energy). Secure Energy is the contractor who will be carrying out the project on behalf of Transgrid.
SSI	State significant infrastructure
Stage 2a/Stage 2b	Relevant to the approved staging of the Aboriginal Cultural Heritage Strategy. The updated Aboriginal Cultural Heritage Assessment Report, required by condition D29 e), has been staged based on a geographic divide of the project alignment. Stage 2a consists of the eastern portion of EnergyConnect (NSW – Western Section) from Line 1 tower 138 (east of the Great Darling Anabranch) through to L4 tower 58 (Murray River). Stage 2b consists of the western portion of EnergyConnect (NSW – Western Section) from L1 tower 138 (east of the Great Darling Anabranch) through to Line 1 tower 293 (NSW/South Australia state border).
Submissions Report	<i>EnergyConnect (NSW – Western Section) Submissions Report</i>
WMS	Work method statements

## 1 Introduction

### 1.1 Context

This Heritage Management Plan (HMP or this plan) forms part of the Construction Environmental Management Plan (CEMP) for Stage 2 of EnergyConnect (NSW – Western Section).

This document has been prepared for construction activities for Stage 2 of the project, and supersedes the existing Stage 1 Heritage Management Plan. It does not address the operational phase of the project.

This plan has been prepared to address the relevant requirements of the Infrastructure Approval (SSI 10040), the *EnergyConnect (NSW – Western Section) Environmental Impact Statement (EIS)*, *EnergyConnect (NSW – Western Section) Submissions Report* (Submissions Report), *EnergyConnect (NSW – Western Section) Amendment Report* (Amendment Report) and the Response to DPIE Request for Information letter dated 10 August 2021 (Response to DPIE Request for Information). The HMP considers the requirements related to both Aboriginal heritage and non-Aboriginal heritage for the project.

### 1.2 Background

On 29 August 2019, the then New South Wales (NSW) Minister for Planning and Public Spaces declared the NSW component of EnergyConnect to be critical State significant infrastructure (CSSI) under the *Environmental Planning and Assessment Act 1979* (EP&A Act) on the basis that it is critical to the State for environmental, economic or social reasons. EnergyConnect is therefore subject to assessment under Part 5, Division 5.2 of the EP&A Act.

Transgrid have two environmental planning approval applications for the sections within NSW:

- EnergyConnect (NSW – Western Section) – SA/NSW border to Buronga, and Buronga to the NSW/Victorian border (the project); and
- EnergyConnect (NSW – Eastern Section) – Buronga to Wagga Wagga.

A referral under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) was submitted on 27 May 2020. The Australian Department of Agriculture, Water and the Environment (DAWE) determined the project to be a controlled action on 26 June 2020 and thus, it would be assessed using the bilateral assessment process. As such, the project also requires approval from the Australian Minister for the Environment under the EPBC Act.

The EIS was prepared for the project in October 2020 and was placed on public exhibition from 30 October 2020 to 10 December 2020. A total of 20 submissions were received, with 15 from government agencies, three from organisations and two from the public.

The Submissions Report was prepared for the project in response to the submissions and was finalised on 14 April 2021.

Transgrid also prepared a separate Amendment Report to document design changes and additional environmental assessment undertaken since exhibition of the EIS. The Amendment Report describes the updated project for which approach has been sought and was finalised on 14 April 2021.

On 7 May 2021, the then Department of Planning, Industry and Environment (DPIE) requested Response to DPIE Request for Information (*EnergyConnect (NSW – Western Section)(SSI-10040) Request for Response to DPIE Request for Information*) to assist with the assessment of the project. In response Transgrid prepared and provided the Response to DPIE Request for Information, which included revised mitigation measures (RMMs) which are to be applied. The Response to DPIE Request for Information was dated 10 August 2021.



Approval for the project under the EP&A Act was granted by the then NSW Minister for Planning and Public Spaces (Infrastructure Approval SSI 10040). Approval for the project under the EPBC Act was granted by the Australian Minister for the Environment.

Transgrid have engaged SecureEnergy, a joint venture between Elecnor and Clough Projects Australia Pty Ltd to design and construct their portion of the EnergyConnect project.

### 1.3 Staging

Condition E2 allows preparation of plans on a staged basis, with the approval of the Planning Secretary. Where a plan is staged, the scope of works can be carried out without addressing particular requirements of conditions of approval that are not applicable to the particular stage. This HMP is staged in accordance with Condition E2.

The conditions of the Infrastructure Approval, and the RMMs identified in the Appendix G of the Response to DPIE Request for Information, that are relevant to construction phase heritage are included in Table 2.1 and Table 2.2 respectively. The applicability of each requirement to this HMP is also addressed in the identified tables.

This HMP has been prepared specifically for EnergyConnect (NSW – Western Section) Stage 2 and will be implemented for the duration of Stage 2 of construction. The key project components of Stage 2 of construction include, but are not limited to, the activities provided in Table 1.1.

**Table 1.1- Key project components of Stage 2 of construction**

Key activity	Description of key activity
Pre-construction minor works permitted in accordance with the Infrastructure Approval.	<p>Key activities nominated in this stage will have already commenced as part of the pre-construction minor works permitted in accordance with the Infrastructure Approval.</p> <p>The definition of ‘construction’ within the Infrastructure Approval excludes these activities. They will therefore not be subject to the Stage 2 CEMP and CEMP sub-plans. Irrespective of this, these activities will occur in accordance with the relevant conditions of the Infrastructure Approval.</p> <p>Key activities include:</p> <ul style="list-style-type: none"> <li>• environmental investigations, including biodiversity and heritage protection, salvage and recordings;</li> <li>• Aboriginal heritage assessment, mitigation (i.e. exclusion zones) and salvage activities, including subsurface testing/test excavation, additional survey, and consultation with Registered Aboriginal Parties (RAPs);</li> <li>• other survey work, such as road dilapidation surveys, and surveys of the general alignment and existing utilities;</li> <li>• installation of environmental management measures, fencing enabling works;</li> <li>• connections and pre-commissioning of utilities (wastewater treatment plant, electrical power, lighting etc.).</li> </ul>
Continuation of any outstanding Stage 1 construction activities	<p>Construction activities undertaken during Stage 1 of the project will continue where required. This includes, but is not limited to continuation of the following activities:</p> <ul style="list-style-type: none"> <li>• any outstanding construction earthworks activity at the Buronga substation;</li> <li>• operation of the Buronga earthworks material site, including the crushing and screening plant, where required;</li> <li>• operation of the Buronga construction compound including offices and laydown area; and</li> <li>• use of access and egress points.</li> </ul>
Establishment of Wentworth accommodation camp	<p>The main activities that would be undertaken at the Wentworth accommodation camp and construction compound and the Anabran South ancillary construction site include:</p> <ul style="list-style-type: none"> <li>• clearing of vegetation within the disturbance area;</li> </ul>

Key activity	Description of key activity
<p>Establishment and operation of Wentworth construction compound</p> <p>Establishment and operation of Anabranth South ancillary construction site</p>	<ul style="list-style-type: none"> <li>• clearing and removal of topsoils. Topsoil would be stockpiled on site for later reuse;</li> <li>• establishing the Wentworth accommodation camp and associated facilities, site offices, amenities, wastewater treatment plant, power generators, hazardous material and fuel storage area, and internal roads;</li> <li>• establishing and operating Wentworth construction compound including but not limited to amenities compound site offices, concrete batching plant, internal roads and other ancillary facilities; and</li> <li>• establishing and operating Anabranth South ancillary construction site laydown areas, vehicle and equipment storage, maintenance sheds, potential stockpile areas, demountable offices and parking.</li> </ul>
<p>Buronga substation upgrade and expansion</p>	<p>The existing Buronga 220kV substation would be upgraded and expanded to add a new 330kV substation on the land parcel adjacent to the existing 220kV substation. The upgrade and expansion of the Buronga substation would consist of the following key activities in addition to the works undertaken during Stage 1 of construction:</p> <ul style="list-style-type: none"> <li>• civil works including: <ul style="list-style-type: none"> <li>- underground mesh installation (earthing grid);</li> <li>- foundation and footing works for the electrical equipment; and</li> <li>- installation of the synchronous condenser (SynCon) building slab;</li> </ul> </li> <li>• mechanical works including: <ul style="list-style-type: none"> <li>- erection of the SynCon, transformers, shunt reactor and capacitor banks;</li> <li>- installation of oil treatment;</li> <li>- gantry erection;</li> <li>- installation of electrical equipment;</li> <li>- installation of supporting steel structure;</li> <li>- overhead HV cables and cable pulling;</li> <li>- switchyard building installation (including control equipment); and</li> <li>- construction of the SynCon building;</li> </ul> </li> <li>• electrical works including: <ul style="list-style-type: none"> <li>- LV cable pulling, cable dressing and terminations; and</li> <li>- outdoor installation of the lighting system.</li> </ul> </li> </ul>
<p>Establishment ancillary facilities along the transmission line corridor</p>	<p>A number of minor staging, storage and laydown ancillary areas would be required within the project corridor for temporary storage of materials, plant and equipment required to construct the various elements of the proposal (in particular transmission line structures). Some temporary mobile batching plant locations may also need to be established to enable for easily access to concrete.</p> <p>Upon completion of works, these ancillary sites would be cleared of any temporary infrastructure and equipment, and rehabilitated. These sites would be in place for shorter periods at locations suitable to support the construction works as they move along the alignment.</p>
<p>Property adjustment work, including adjustments to property fencing</p>	<p>Installation or adjustment of gates and fences would be required at some locations along the alignment to enable access from the nearest roadway to construction areas. These would be constructed in consultation with the relevant council and/or affected landholder.</p>
<p>Water supply points – establishment and/or use</p>	<p>A series of water supply points have been identified as suitable connection points to existing water supply pipelines. The proposed water supply points which are to be established and / or used include:</p> <ul style="list-style-type: none"> <li>• Alcheringa Drive, Buronga;</li> <li>• Modica Crescent, Buronga;</li> <li>• Fletchers Lake Drive, Dareton;</li> <li>• Beverley Street, Wentworth; and</li> <li>• 690 Pomona Road, Pomona/Oxley Drive, Pomona.</li> </ul>

Key activity		Description of key activity
Construct access points		<p>The establishment of access points would include:</p> <ul style="list-style-type: none"> <li>establishing vehicle access and egress points including adjustment of state and regional roads to ensure safe vehicle movements; and</li> <li>establishing truck wheel wash or rumble grids.</li> </ul> <p>The definition of construction within the Infrastructure Approval does not include road upgrades (which includes access points). Road upgrade works are, however, incorporated within the Traffic and Transport Management Plan as required by condition D40 b).</p>
Construct access tracks		<p>Access to each tower would be required during construction. Access tracks would be required to be traversable by a range of vehicles. Access tracks would fall into two broad groups:</p> <ul style="list-style-type: none"> <li>un-improved access tracks - using existing roads or tracks, or driving on existing soil or ground surface with minimal or no prior preparation; and</li> <li>constructed access tracks – around six metres wide and would generally follow the natural contour of the land as far as practicable to minimise the amount of cut and fill and soil disturbance. Access tracks would also include drainage control features such as table drains or cross banks to minimise erosion.</li> </ul> <p>Constructed access tracks would be required in areas, outside identified heritage risk zones, where there are no existing roads or tracks, or where terrain conditions prevent continuous access along the line easement between road crossings.</p>
Temporary works		<p>The project will require a significant quantity of temporary works during construction. Temporary works will be undertaken outside identified heritage risk zones. The temporary works will includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>earthworks, including trenches, excavations, temporary slopes, stockpiles, and embankments;</li> <li>structures, such as formwork, shoring, edge protection, temporary bridges, solid fencing/guardrails/barriers and signage, temporary scaffold; and</li> <li>equipment/plant foundations, such as work platforms, crane, and piling platforms.</li> </ul>
Transmission line construction	Earthworks and transmission tower footing construction	<p>Excavation works and establishment of construction pads at each tower site would be required for the installation of foundations, levelling around the individual tower foundations, drainage and grading or preparation for construction at the tower site. Excavations would typically be up to five metres in depth. Construction of footings and foundation works for the new transmission line towers includes:</p> <ul style="list-style-type: none"> <li>piling. Typical transmission line tower piling depth would be generally up to 6-15 metres below ground level and would depend on ground conditions (e.g. greater piling depths would be required where soft soil types are present). The foundation type would also vary (subject to detailed design) but would consist of either: <ul style="list-style-type: none"> <li>bored pile (reinforced concrete);</li> <li>driven or screw pile (concrete or steel); and</li> <li>helical screw anchor, or cast in-situ reinforced concrete;</li> </ul> </li> <li>excavation to create bench sites (stepped ground excavation) where required to provide a level platform for equipment setup, the erection of the tower and other construction activities. Benching would be constructed by use of earth moving equipment such as graders and excavators;</li> <li>steel fabrication works; and</li> <li>concrete pours.</li> </ul>
	Assembly and erection of transmission line towers	<p>The transmission line towers would typically be erected by assembling in sections on the ground and hoisting or lifting successive sections into place using cranes. Alternatively, towers may be erected in place on the footings by installing individual members. These towers would include infrastructure such as step bolts, climbing attachment plates, ladders, platforms, climbing barriers, identification plates, warning plates, other fixtures and fittings for the attachment of earthwires and insulators.</p>

Key activity		Description of key activity
	Stringing of transmission lines including conductors and overhead earth wires and optical ground wire	<p>Following erection and securing of the tower, the transmission line would be strung by either a ground pulled draw wire (with brake/winch sites) or a line stringing drone.</p> <p>The area required for the construction of each tower would require access for tower assembly and stringing works. Where a transmission tower is proposed to allow for a direction change of the transmission line, a larger area would be required (to allow for brake and winching sites). At a typical site, this would include a temporary area of up around 60 metres by 80 metres at each transmission line tower location.</p> <p>Stringing of transmission line would also be required across the following three major watercourses:</p> <ul style="list-style-type: none"> <li>the Great Darling Anabranh, Wentworth NSW;</li> <li>Darling River, Ellerslie NSW; and</li> <li>Murray River, Monak NSW / Red Cliffs Victoria.</li> </ul> <p>The general construction methodology is to assemble and erect a transmission line structure on either side of each major river crossing. A drone would then be used to take a lead wire over the river to allow cables to then be pulled and strung tower to tower.</p>
	Installation of earthing conductors	<p>The following key activities will be undertaken:</p> <ul style="list-style-type: none"> <li>installation of earthing conductors at each of the transmission tower arms; and</li> <li>installation of earthing or isolation sections of fences and gates where the transmission line crosses or closely runs parallels to a metallic fence.</li> </ul>
Utility works, adjustments and protection		<p>Utility adjustment works would be required to convert several overhead distribution powerlines up to and including 66kV to underground cables.</p> <p>The existing alignment of the Broken Hill transmission line would require relocation at two locations. This would comprise of:</p> <ul style="list-style-type: none"> <li>a permanent relocation of the existing transmission line in the vicinity of the Darling River. This would require the construction of two new monopoles, and the stringing of conductors/earth wires between the existing and new structures. The redundant tower would be decommissioned; and</li> <li>a temporary relocation of a section of the existing transmission line that currently passes through the existing Buronga substation. This would be temporarily relocated around 200 metres to the east of its current alignment (along the eastern boundary of the existing substation site). Once the construction works to upgrade the substation are completed, the alignment of the 220kV Broken Hill line would be restored in a location generally consistent with the original line location.</li> </ul> <p>General utility works, adjustment and protection including internal and external drainage, to allow for the Buronga substation expansion and upgrades works to occur and the establishment and operation of the construction compound.</p>
Decommissioning of existing infrastructure		<p>Decommissioning and removal of:</p> <ul style="list-style-type: none"> <li>the existing 220 kV transmission line between Buronga substation and the NSW / Victoria border;</li> <li>the temporary bypass transmission line infrastructure installed to allow construction of the new double circuit 220kV line; and</li> <li>a single tower on the existing 220kV Broken Hill line in the vicinity of the Darling River.</li> </ul>
Progressive site rehabilitation and landscaping		<p>Site rehabilitation would be carried out progressively along completed sections of the transmission line as well as the expanded substation site. These activities include:</p> <ul style="list-style-type: none"> <li>removal of redundant environmental controls within the transmission tower easement;</li> <li>removal of temporary equipment and machinery.</li> </ul>

Some activities nominated in this stage will have already commenced as part of the pre-construction minor works permitted in accordance with the Infrastructure Approval. These works will remain

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excluded from the definition of ‘construction’ and will therefore not be subject to the Stage 2 CEMP and this HMP.

### 1.4 Environmental management system

The overall Environmental Management System for the project is described in Section 4 of the CEMP.

This HMP is a sub-plan that forms part of the CEMP and is also part of the environmental management framework for the project, as described in the CEMP. Figure 1.1 shows the CEMP framework for the project.

Management measures identified in this plan will be incorporated into relevant site-based documents including, but not limited to, site or activity specific work packs or work method statements (WMSs), sensitive area plans (SAPs) or training and awareness material.

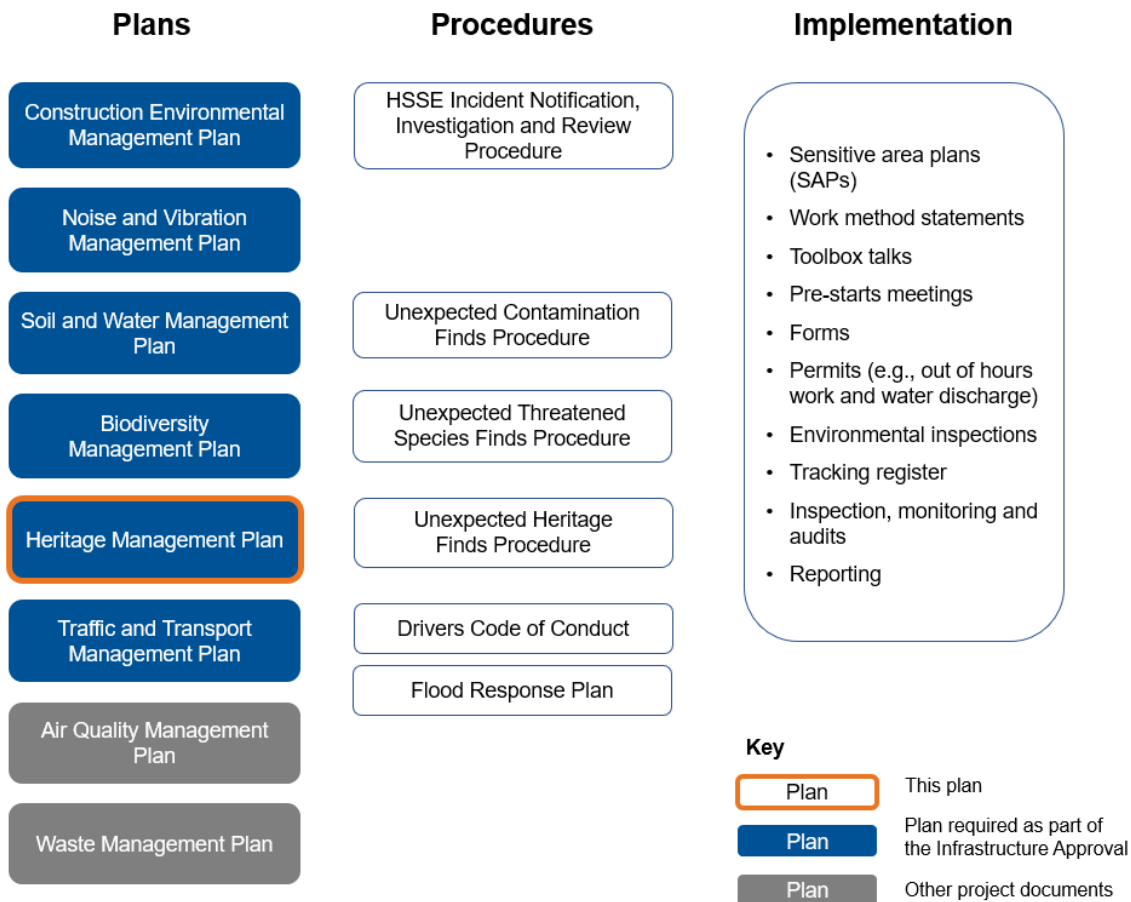


Figure 1.1 - CEMP framework

### 1.5 Purpose and objective

The purpose of this HMP is to describe the approach to manage potential impacts to Aboriginal and non-Aboriginal heritage that will be adopted during construction of the project.

The key objective of this HMP is to avoid, where possible, or minimise impacts to Aboriginal and non-Aboriginal heritage. To achieve this, the following will be undertaken:

- identify and implement measures to minimise the impact to Aboriginal objects and sites and heritage items and sites throughout the construction of the project;
- provide staff with an increased level of understanding and awareness of cultural and heritage values within and adjacent to the project alignment and the management approach that will be adopted to minimise potential impacts;

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- implement appropriate measures to address the requirements outlined in the Infrastructure Approval, EIS, and Response to DPIE Request for Information; and
- implement appropriate measures to comply with relevant legislation.

As a means of assessing environmental performance, environmental objectives (performance measures), targets (criteria) and performance indicators have been established for the project and are provided within Section 4.2 of the CEMP. The performance measures and indicators relevant to heritage management are detailed within Table 1.2.

**Table 1.2 - Environmental objectives, targets and performance indicators relevant to heritage**

Aspects	Objectives (performance measures)	Targets (criteria)	Performance indicators
Heritage	Minimise and manage the impacts of the project on Aboriginal objects and sites and non-Aboriginal heritage items within the approved project corridor.	No harm to known Aboriginal and known non-Aboriginal heritage.	Number of incidents involving harm to known Aboriginal heritage objects or known non-Aboriginal heritage items.

## 1.6 Preparation of this plan

In accordance with condition B6 and D34 of the Infrastructure Approval, this plan has been jointly prepared by suitably qualified and experienced people. This plan was prepared by Alison Kriegel of bd infrastructure and Vanessa Edmonds of Everick Heritage.

Vanessa Edmonds is suitably qualified and experienced in the field of Aboriginal and non-Aboriginal cultural heritage. Vanessa is a full and active member of Australian Association of Consulting Archaeologists Inc. Vanessa and Alison were both endorsed by the Planning Secretary on 15 November 2021 to prepare the Heritage CEMP Sub Plan (in accordance with condition D34).

## 1.7 Consultation

### 1.7.1 Development of this plan

In accordance with condition B2(d) of the Infrastructure Approval, this plan has been prepared in consultation with:

- Heritage NSW; and
- Aboriginal stakeholders (the Registered Aboriginal Representatives (RAPs) identified in Appendix C).

The plan was issued to relevant stakeholders for review and comment. Comments from the consultation process have been incorporated into this plan where appropriate. Details of all consultation with Heritage NSW and the RAPs will be submitted to the Department of Planning and Environment (DPE) along with the submission of this management plan.

### 1.7.2 Ongoing consultation

Aboriginal stakeholder consultation will be carried out in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (Department of Environment, Climate Change and Water (DECCW), 2010).

The project area intersects with the Barkandji Traditional Owners #8 (Part A) native title area (determined) administered under the *Native Title Act 1994*. Barkandji Traditional Owners have been included in consultation undertaken during the development of the EIS and are included in the RAPs identified in Appendix C who will be consulted throughout the project.

Ongoing consultation with the RAPs and gathering of cultural information will be undertaken in association with the following activities:

- Aboriginal heritage site surveys – review of proposed methodologies and involvement in the survey activities in the field (for ground or vegetation disturbance outside of previously surveyed areas) (refer Section 5.3.1). This is complete and an Addendum Aboriginal Archaeological Survey Report has been prepared in consultation with the RAPs;
- test excavation activities – review of proposed methodologies and involvement in the test excavation activities in the field (refer Section 5.4). The RAPs have been involved in all test excavation activities in the field, with test excavation activities nearing completion;
- review and comment on the Aboriginal Cultural Heritage Strategy required under condition D29. Review consisted of providing the draft to RAPs for comment, consideration of input, and actioning where practicable;
- provision of the final updated Aboriginal Cultural Heritage Strategy (refer Section 5.2) and final addendum reports, if prepared (refer Sections 5.3.1, 5.4, and 5.5.2);
- involvement in establishment of Aboriginal heritage exclusion zones prior to construction (refer Section 5.6.1).

Consultation with the RAPs and Heritage NSW for unexpected finds will be undertaken as required as outlined in the *Unexpected Heritage Finds Procedure* (45860-HSE-PR-G-1003).

Ongoing consultation and communication regarding the project will be undertaken in accordance with the *Community Communication Strategy* (CCS) (45860-CM-PL-G-1001). Any complaints received in relation to heritage management will be managed in accordance with the CCS and Section 7 of the CEMP.

### 1.7.3 Complaints

Complaints will be managed by the Community and Stakeholder Engagement Team with the use of Consultation Manager database. Complaints will be received via phone calls, emails and letters. Any complaint received is regarded as a high priority and will be recorded, tracked and responded to in accordance with the CCS. Complaints will be investigated and dealt with impartially. The key principles of the complaint management process include:

- acknowledge - SecureEnergy staff should respect the communities' right to voice their concerns. All complaints received should be acknowledged to the complainant either by telephone or in writing;
- resolve - SecureEnergy staff should aim at first contact, resolution for all community concerns. SecureEnergy staff should investigate community concerns in detail before negotiating a resolution. All SecureEnergy staff should use their relevant discretions to achieve a mutually acceptable resolution to complaints;
- escalate - all SecureEnergy staff should aim to escalate the complaint if the community member remains dissatisfied with the investigation and/or resolution offered by their first point of contact at SecureEnergy. All complaints where a community member requests to speak to a higher-level representative, should also be escalated;
- record – SecureEnergy staff should aim through the Engagement Team to record all relevant information, on the community account in Consultation Manager System, regarding customer concerns along with details of all discussions had with the community member in the process of investigating and/resolving the complaint. Detailed information on the resolutions offered to address community concerns should also be clearly recorded;
- communicate – SecureEnergy staff should remain in constant touch with the community member while their concerns are being investigated. The community member should be informed of all steps of the investigation and the resulting outcome at appropriate times;

- report – SecureEnergy should report on all complaints received to the SecureEnergy Management Team and Transgrid. The reporting should include information on the number as well as type of complaints being received, the status of these complaints from time to time and the resulting outcomes or resolutions offered to close them;
- feedback – the SecureEnergy Engagement Team should aim at regular and intensive reviews to identify possible trends in the complaints being received. These reviews should be aimed at highlighting improvements required to avoid complaints being repeated;
- action - SecureEnergy should aim to effectively implement improvements suggested directly by the community or highlighted by complaint trends.

Wherever possible, complaints will be resolved directly between SecureEnergy and the stakeholder. If a complaints management process has been followed and the issue cannot be resolved, dispute resolution will be undertaken in accordance with the CCS. DPE may request the Environmental Representative (ER) to assist in dispute resolution of community complaints.

All complaints will be provided to the ER and a summary of complaints received, such as a complaint register, will be updated monthly on the project website.

### **1.8 Submission and approval**

Prior to submission to DPE, the HMP will be reviewed by the ER to ensure that the plan is consistent with the requirements of the Infrastructure Approval. A written statement to this effect will be prepared and submitted to DPE. This review will be undertaken in accordance with condition A19 of the Infrastructure Approval.

This HMP will be submitted to DPE for review and approval by the Planning Secretary prior to commencing of Stage 2 of construction.

Stage 2 of construction will not commence until the CEMP and all sub-plans required under condition B2, or where staging is proposed the plans required for that stage, have been approved by the Planning Secretary. The approved HMP will then be implemented for the duration of the Stage 2 construction activities.

### **1.9 Periodic review**

This HMP will be reviewed at least annually and updated, if required, in accordance with Section 1.10 of the CEMP – Updating the CEMP. Any updates to the HMP will be approved as described in Section 1.0 of the CEMP.



## 2 Environmental requirements

### 2.1 Legislation

Legislation relevant to this HMP includes:

- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Commonwealth (Cth));
- *Environmental Planning and Assessment Act 1979*;
- *Heritage Act 1977*;
- *National Parks and Wildlife Act 1974*;
- *Native Title Act 1994 (NSW)*; and
- *Native Title Act 1993 (Cth)*.

Relevant provisions of the above legislation are detailed within the register of legal and other requirements included in Appendix A1 of the CEMP. The legislation relevant to Aboriginal and non-Aboriginal heritage is replicated in Appendix E of this HMP.

### 2.2 Conditions of Approval

The conditions of the Infrastructure Approval relevant to heritage are presented in Table 2.1. A cross reference is also included to indicate where the condition is addressed within this plan or other project management documents.

**Table 2.1 - Conditions of Approval relevant to heritage**

Cond. no.	Requirement	Where addressed	How addressed						
B1	Prior to commencing construction, a Construction Environmental Management Plan (CEMP) must be prepared to detail how the performance outcomes, commitments and mitigation measures specified in the EIS will be implemented and achieved during construction to the satisfaction of the Planning Secretary.	Section 2.3 Section 5 The CEMP	The CEMP has been prepared and will be implemented during construction. The CEMP incorporates and responds to relevant conditions of the Infrastructure Approval and RMMs identified in the EIS, Submissions Report, Amendment Report and Response to DPIE Request for Information.  Section 2.3 and Section 5 of this HMP describe how the commitments of the EIS relevant to heritage will be implemented.						
B2	The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan in Table 1. <table border="1" data-bbox="284 1621 759 1912"> <thead> <tr> <th></th> <th>Required CEMP Sub-plan</th> <th>Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan</th> </tr> </thead> <tbody> <tr> <td>(d)</td> <td>Heritage</td> <td>Heritage NSW Aboriginal stakeholders</td> </tr> </tbody> </table>		Required CEMP Sub-plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan	(d)	Heritage	Heritage NSW Aboriginal stakeholders	Section 1.7	This HMP was provided to Heritage NSW and Aboriginal stakeholders for consultation.
	Required CEMP Sub-plan	Relevant government agencies and stakeholders to be consulted for each CEMP Sub-plan							
(d)	Heritage	Heritage NSW Aboriginal stakeholders							
B3	Details of all information requested by an agency to be included in a CEMP Sub-plan as a result of consultation must be provided with the relevant CEMP Sub-Plan.	Section 1.7	This HMP has been developed in consultation with Heritage NSW and Aboriginal stakeholders. Details of all consultation with Heritage NSW and the						

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Cond. no.	Requirement	Where addressed	How addressed
			RAPs will be submitted to DPE along with the submission of this HMP.
B4	Any of the CEMP Sub-plans may be submitted along with, or subsequent to, the submission of the CEMP but in any event prior to commencing construction.	Section 1.8	This HMP will be submitted as a CEMP Sub-Plan to DPE for review and approval by the Planning Secretary prior to commencing Stage 2 of construction.
B5	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, must be implemented for the duration of construction. Where construction of the development is staged, construction of a stage must not commence until the CEMP and sub-plans for that stage have been approved by the Planning Secretary.	Section 1.8	Stage 2 of construction will not commence until the CEMP and all CEMP Sub-plans (including this HMP), or where staging is proposed and the plans required for that stage, have been approved by the Planning Secretary. The CEMP and CEMP Sub-plans (including this HMP) will be implemented for the duration of construction for Stage 2.
B6	The CEMP and CEMP Sub-plans required under this approval must be prepared by suitably qualified and experienced persons in accordance with relevant guidelines, and include where relevant:	Title page Section 1.6	This HMP has been jointly prepared by suitably qualified and experienced people and in accordance with relevant guidelines.
	a) a summary of relevant background or baseline data;	Section 3	The existing known Aboriginal and non-Aboriginal heritage adjacent to the Stage 2 disturbance area is outlined in Section 3.
	b) details of:		
	(i) the relevant statutory requirements (including any relevant approval or licence conditions);	Section 2 Appendix E	The relevant legislation, conditions, RMMs and guidelines applicable to heritage are outlined in Section 2. Appendix E provides further detail on the relevant legislation applicable to heritage.
	(ii) any relevant limits or performance measures and criteria; and	Section 1.5 Section 4.2 of the CEMP	The objectives (performance measures) and targets (criteria) relevant to heritage management are outlined in Section 1.5 of this HMP. The CEMP also provides project-wide environmental objectives (performance measures) and targets (criteria).
	(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	Section 1.5 Table 1.2 Section 4.2 of the CEMP	The performance indicators relevant to heritage management are outlined in Section 1.5 and Table 1.2 of this HMP. The CEMP also provides project-wide performance indicators.
c) any relevant commitments or recommendations identified in the EIS;	Section 2.3	Relevant heritage commitments and recommendations identified in the EIS, known as RMMs, have been outlined in Section 2.3.	

Cond. no.	Requirement	Where addressed	How addressed
	d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 5	Specific heritage related safeguards and management measures to address potential impacts associated with Stage 2 of construction and comply with the relevant statutory requirements, limits and performance measures are outlined in Section 5.
	e) a program to monitor and report on the:		
	(iv) impacts and environmental performance of the development (including a table summarising all the monitoring and reporting obligations under the conditions of this approval); and	Section 6 Section 6.3 Section 6.4 Section 6.5 Section 6.6	Monitoring, inspections, auditing and reporting is outlined in Section 6.3 to 6.6 of this HMP.
	(v) effectiveness of the management measures set out pursuant to paragraph (d);	Section 6	Monitoring of the effectiveness of the management measures is outlined in Section 6 through compliance management.
	f) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 6.8 Appendix D Section 8 of the CEMP – Incidents and emergencies Section 10 of the CEMP – Reporting Section 11 of the CEMP – Non-conformance, corrective and preventative action	Section 6.8 outlines a contingency plan in the event that unpredicted impacts are identified. In the event of the discovery of any unexpected heritage find, the Unexpected Heritage Finds Procedure (Appendix D) will be followed. The CEMP also provides additional detail regarding incidents and emergencies, reporting, non-compliance, non-conformance, corrective and preventative actions.
	g) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 1.9 Section 1.9 of the CEMP – Continuous improvement	Section 6 of this HMP outlines procedures for compliance management, including details for monitoring, inspections, auditing and reporting. This HMP will be reviewed at least annually as described in Section 1.9 of this HMP and Section 1.9 of the CEMP. The Plan-Do-Check-Act model will be applied to the continuous improvement process, also outlined in Section 1.9 of the CEMP.

Cond. no.	Requirement	Where addressed	How addressed
	h) a protocol for managing and reporting any: <ul style="list-style-type: none"> <li data-bbox="327 338 678 450">(i) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion;</li> </ul>	Section 6.7 Section 6.8 Section 8 of the CEMP – Incidents and emergencies Section 10 of the CEMP – Reporting Section 11 of the CEMP – Non-conformance, corrective and preventative action	Section 6.7 and 6.8 describes the procedures for emergencies, incidents and non-compliances, including those related to heritage. Additional detail for managing incidents and emergencies, non-compliances and non-conformances is included in the CEMP. The protocol for reporting of any incidents, non-compliances or non-conformances is included in Section 10 of the CEMP.
	(ii) complaint; or	Section 1.7.3 Community Communication Strategy	A summary of the complaints management procedure and reporting of complaints is included in Section 1.7.3 of this HMP. The procedure for managing and reporting any complaints is described in the <i>Enquiries, Complaint and Dispute Resolution Management Procedure</i> provided in the CCS. The procedure includes a complaints management process which outlines how SecureEnergy will respond to complaints related to the project.
	(iii) failure to comply with other statutory requirements; and	Section 6.7 Section 8 of the CEMP – Incidents and emergencies Section 10 of the CEMP – Reporting Section 11 of the CEMP – Non-conformance, corrective and preventative action	In the event of failure to comply with statutory requirements, the procedures summarised in Section 6.7 of this HMP and described in more detail in the CEMP would be followed.
	i) set out the procedures that would be implemented to: <ul style="list-style-type: none"> <li data-bbox="327 1659 751 1771">(i) keep the local community and relevant agencies informed about the construction and environmental performance of the development;</li> </ul>	Section 1.7.2 Community Communication Strategy	The local community and relevant agencies will be kept informed of construction progress and environmental performance through communication tools such as notifications, the project’s mobile van and the project website as summarised in Section 1.7.2 of this HMP. Detailed information regarding project communication is found in the CCS.

Cond. no.	Requirement	Where addressed	How addressed
	(ii) receive, handle, respond to, and record complaints;	Section 1.7.3 Community Communication Strategy	Section 1.7.3 of this HMP summarises the complaints management system, which includes a process to manage complaints including receiving, recording, tracking and responding to complaints within a defined timeframe. The complaints management system is described in detail in the CCS.
	(iii) resolve any disputes that may arise;	Section 1.7.3 Community Communication Strategy	Section 1.7.3 of this HMP describes dispute resolution, which is described in detail in the CCS. Wherever possible, complaints will be resolved directly between SecureEnergy and the stakeholder.
	(iv) respond to any non-compliance;	Section 6.7 Section 10.1 of the CEMP – Reporting non-compliances in accordance with the Infrastructure Approval Section 11 of the CEMP – Non-conformance, corrective and preventative action	Section 6.7 of this HMP outlines that where a non-compliance has been identified, corrective actions will be developed as required and implemented to address the non-conformance that occurred (as described in more detail in the CEMP). Reporting of non-compliances will be undertaken as described in the CEMP.
	(v) respond to emergencies; and	Section 6.7 Section 8.1 of the CEMP – Emergency preparedness and emergency response	Emergency management and planning including environmental emergencies related to heritage will be undertaken in accordance with the Clough management system and relevant procedures as described in Section 6.7 of this HMP. Additional detail regarding emergency management is described in the CEMP.
	j) a description of the roles and environmental responsibilities, authority and accountability for all relevant employees, as well as training and awareness; and	Table 5.1 Section 6.1 Section 6.2 Section 4.9 of the CEMP – Roles and responsibilities	Section 6.2 identifies that SecureEnergy’s organisational structure and overall roles and responsibilities are outlined in the CEMP. Specific responsibilities for the implementation of mitigation measures are detailed in Section 5 of this HMP. Training and awareness for all site personnel is outlined in Section 6.1.
	k) a protocol for periodic review of the CEMP and associated subplans and programs.	Section 1.9 Section 1.10 – Updating the CEMP	This HMP will be reviewed at least annually in accordance with the CEMP.
	<i>The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i>	Noted	Noted

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Cond. no.	Requirement	Where addressed	How addressed
D29	Prior to commencing construction, the Proponent must provide an Aboriginal Cultural Heritage Strategy, prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary. The Strategy must:	Section 5.2 Table 5.1 - H6	<p>An initial Aboriginal Cultural Heritage Strategy has been prepared for the project and was approved by the Department on 8 March 2022.</p> <p>The Aboriginal Cultural Heritage Strategy is being staged in accordance with condition E2 to allow the commencement of construction in areas outside the additional risk zones identified as required in condition D29 a) or as areas receive clearance following consultation of the Addendum Aboriginal Archaeological Survey Report. Pre-construction minor works may also commence in areas confirmed as low-risk and the subject of 'clearance letters' in line with the approved staging approach.</p> <p>In line with the staging approach approved on 1 February 2022, areas subject to additional heritage survey would be opened up progressively for works once the Archaeological Survey Report was prepared and consulted upon with RAPs and Heritage NSW or where the areas were identified as low risk and are the subject of 'clearance letters'.</p> <p>An updated Aboriginal Cultural Heritage Strategy has been prepared to document all additional survey and test excavation activities for the eastern portion of EnergyConnect NSW – Western Section in the Aboriginal Cultural Heritage Assessment Report for Stage 2a. Stage 2a extends from Line 1 tower 138 (east of the Great Darling Anabranch) through to Line 4 tower 58 (Murray River).</p> <p>Sites recorded during additional heritage surveys and areas identified as PADs located in the western portion of EnergyConnect NSW – Western Section (from Line 1 tower 138, east of the Great Darling Anabranch, through to Line 1 tower 293 at the NSW/South Australia border) would not be impacted by works until the final Aboriginal Cultural Heritage Strategy, incorporating the updated Aboriginal Cultural Heritage Assessment Report Stage 2b is completed to the satisfaction of the Planning Secretary, and any other mitigation measures (e.g. salvage) and conditions had been satisfied.</p>

Cond. no.	Requirement	Where addressed	How addressed
	<p>a) Identify any additional risk zones outside the potential archaeological deposits (PADs) where construction must not commence until subsurface testing in b) and surveys in c) are complete;</p>	<p>Section 5.2 Table 5.1 - H6</p>	<p>The additional risk zones have been identified and confirmed within the initial Aboriginal Cultural Heritage Strategy. This document with the risk mapping was approved by the Department on 8 March 2022.</p> <p>The risk zones consisted of all areas requiring additional heritage survey and all areas identified as potential archaeological deposits.</p> <p>In line with the staging approach approved on 01 February 2022, construction may commence in areas outside the risk zones, subject to complying with other relevant conditions. A large portion of the Stage 2 disturbance area falls into this category.</p>
	<p>b) describe additional subsurface testing that will be undertaken to confirm the significance of the PADs that would be impacted by the final transmission infrastructure design and ancillary facilities in line with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010);</p>	<p>Section 5.4 Table 5.1 - H13 to H15</p>	<p>The Aboriginal Archaeological Test Excavation Methodology was incorporated into Appendix C of the approved Aboriginal Cultural Heritage Strategy.</p> <p>Test excavation activities are being undertaken to confirm the significance of the PADs where direct impact is proposed to occur.</p>
	<p>c) describe additional Aboriginal heritage surveys that will be undertaken where ground disturbance activities are required outside of the heritage survey area;</p>	<p>Section 5.3.1 Table 5.1 - H9 to H11</p>	<p>The Aboriginal Archaeological Survey Methodology was incorporated into Appendix D of the approved Aboriginal Cultural Heritage Strategy.</p> <p>Aboriginal heritage survey has been undertaken in areas where ground or vegetation disturbance activities are required outside of the areas previously surveyed. As detailed design and construction planning progresses, additional areas where ground or vegetation disturbance activities are required outside of the areas previously surveyed, may be identified and require additional survey. An example of this would include the installation of traffic signage.</p>
	<p>d) include details of ongoing consultation with the Aboriginal stakeholders, including any written responses and records of any meetings; and</p>	<p>Section 1.7 Section 5.2 Table 5.1 - H7</p>	<p>The initial Aboriginal Cultural Heritage Strategy was prepared in consultation with the RAPs and Heritage NSW. Details of consultation undertaken with the RAPs and Heritage NSW were submitted to the Department with the initial Aboriginal Cultural Heritage Strategy.</p> <p>An updated Aboriginal Cultural Heritage Strategy has been prepared and submitted to the Planning Secretary. The updated Aboriginal Cultural Heritage Strategy incorporates the Aboriginal Cultural Heritage Assessment Report for Stage 2a, which was prepared in consultation with the RAPs and Heritage NSW. Evidence of</p>

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Cond. no.	Requirement	Where addressed	How addressed
			<p>this consultation has been submitted to DPE along with the submission of the updated Aboriginal Cultural Heritage Strategy.</p> <p>A final Aboriginal Cultural Heritage Strategy will be prepared incorporating the Aboriginal Cultural Heritage Assessment Report for Stage 2b, which will be prepared in consultation with Heritage NSW and the RAPs. Details of consultation with Heritage NSW and the RAPs will be submitted to DPE along with the submission of the final Aboriginal Cultural Heritage Strategy.</p>
	<p>e) include an updated Aboriginal cultural heritage assessment report, which:</p> <ul style="list-style-type: none"> <li>• is based on the findings of the subsurface testing in b) and surveys in c);</li> <li>• describes any potential additional impacts to heritage items;</li> <li>• identifies further mitigation measures, including avoidance or salvage;</li> <li>• includes detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and</li> <li>• provides an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative locations.</li> </ul>	<p>Section 5.2 Table 5.1 - H17</p>	<p>The updated Aboriginal Cultural Heritage Strategy includes the Aboriginal Cultural Heritage Assessment Report for Stage 2a.</p> <p>A final Aboriginal Cultural Heritage Strategy will be prepared that includes the Aboriginal Cultural Heritage Assessment Report for Stage 2b.</p> <p>Any mitigation measures identified in the updated Aboriginal Cultural Heritage Assessment Reports will be implemented.</p>
D30	<p>The Proponent must implement all reasonable and feasible measures to avoid and minimise harm to heritage items and potential archaeological deposits (PADs) identified in the EIS and the Aboriginal Cultural Heritage Strategy required by condition D29, prior to carrying out any development that could harm the items or deposits.</p>	<p>This HMP, particularly Section 5</p>	<p>Section 5 provides the management measures to avoid and minimise harm to heritage items and PADs.</p> <p>For those Stage 2 disturbance areas that are available for construction (i.e. within Stage 2a areas, or outside the PADs in Stage 2b areas), impact to all artefact scatters that are to be directly impacted will be avoided through surface collection in accordance with RMM AH6 and condition D32.</p> <p>No sites identified during additional heritage survey or any PADs identified (during previous surveys or additional heritage surveys) located in the Stage 2b area will be harmed prior to the finalisation of the final Aboriginal Cultural Heritage Strategy, including the Aboriginal Cultural Heritage Assessment Report for Stage 2b to the satisfaction of the Planning Secretary.</p> <p>Any additional mitigation measures identified in the Aboriginal Cultural Heritage Assessment Report for Stage 2b will be incorporated into a revised</p>

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Cond. no.	Requirement	Where addressed	How addressed
			version of this HMP as required, and implemented.
D31	The Proponent must ensure the development does not cause any harm to heritage items identified for avoidance in the approved Aboriginal Cultural Heritage Strategy or any Aboriginal heritage items located outside the approved development footprint.	Section 5 Table 5.1 - H2 to H6 Section 6	<p>This HMP has been revised to consider the updated Aboriginal Cultural Heritage Strategy, which includes the Aboriginal Cultural Heritage Assessment Report for Stage 2a.</p> <p>No sites identified during additional heritage survey or any PADs identified (during previous surveys or additional heritage surveys) in the Stage 2b area will be harmed prior to the finalisation of the final Aboriginal Cultural Heritage Strategy, including the relevant Aboriginal Cultural Heritage Assessment Report Stage 2b to the satisfaction of the Planning Secretary.</p> <p>If required, this HMP will be revised when the updated Aboriginal Cultural Heritage Strategy is finalised to consider any additional mitigation measures or proposed impacts.</p> <p>Surface collection will be undertaken of artefact scatters that are to be directly impacted (or the portions of the artefact scatter that will be directly impacted) by the construction disturbance area.</p> <p>Mitigation measures identified in Section 5 of this HMP will be implemented to avoid any harm to any heritage items identified for avoidance or located outside the disturbance area.</p> <p>Monitoring, inspections and auditing described in Section 6 of this HMP will check the implementation and effectiveness of the management measures identified in Section 5.</p>
D32	Prior to carrying out any activity that could harm heritage items, the Proponent must salvage and relocate all heritage items identified for salvage and relocation in the updated and approved Aboriginal Cultural Heritage Strategy to a suitable alternative location, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010).	Section 5.5.1 Table 5.1 - H18 to H19 Appendix B	<p>Salvage and relocation of the relevant Aboriginal heritage items and the process is summarised in Section 5.5.1.</p> <p>Proposed surface collection and salvage activities located in the Stage 2a area identified in the updated Aboriginal Cultural Heritage Strategy have been incorporated into this HMP.</p> <p>No salvage (for example open area excavation in PADs or surface collection of sites) identified during the additional heritage survey in the Stage 2b area will be undertaken until the final Aboriginal Cultural Heritage Strategy, including the Aboriginal Cultural Heritage Assessment Report Stage 2b has been prepared to the satisfaction of the Planning Secretary.</p> <p>Where construction may commence (via the staged Aboriginal Cultural Heritage Strategy), surface collection will be undertaken of artefact scatters that are to be directly impacted (or the portions of the artefact scatter that will</p>

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Cond. no.	Requirement	Where addressed	How addressed
			<p>be directly impacted) by construction and where undertaken in consultation with the RAPs.</p> <p>A strategy for the long-term management of any heritage items or material collected during the project is being developed. Consultation regarding the long-term management will continue throughout the salvage activities and beyond, as required. Consultation to date, has indicated that cultural material is to be repatriated. Refer to Section 5.7 for additional information.</p>
D33	The Proponent must ensure the development does not cause any harm to heritage items PEC-W-H-1 and PEC-W-SE-H1.	Section 5.6.3 Table 5.1 - H24	Restricted access will be established and maintained for survey marker trees during vegetation clearing and construction to avoid harm during works in accordance with RMM NAH1 and condition D33.
D34	The Heritage CEMP Sub-Plan required under condition B2 must:		
	a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary;	Title page Section 1.6	This HMP has been jointly prepared by suitably qualified and experienced people. The authors of this HMP were endorsed by the Planning Secretary on 15 November 2021.
	b) include a description of the measures that would be implemented for:		
	<ul style="list-style-type: none"> <li>addressing the outcomes of the additional assessment, testing and surveys identified in condition D29;</li> </ul>	Section 5.2 Section 5.3	<p>This HMP incorporates the outcomes and mitigation measures from the Stage 2a Aboriginal Cultural Heritage Assessment Report included in the updated Aboriginal Cultural Heritage Strategy.</p> <p>No harm to any PADs or any sites identified through the additional heritage survey within the Stage 2b area would occur prior to the finalisation of the updated Aboriginal Cultural Heritage Strategy to the satisfaction of the Planning Secretary.</p> <p>This HMP would be updated to consider any mitigation measures identified in the updated Aboriginal Cultural Heritage Assessment Report for Stage 2b.</p>
<ul style="list-style-type: none"> <li>protecting the heritage items identified in conditions D31 and D33, including fencing off the heritage items (where required) prior to carrying out any development that could harm the heritage items, and protecting any items located outside the approved development corridor;</li> </ul>	Section 5.6 Table 5.1 - H2 to H3 and H22 to H25	<p>Harm to known Aboriginal heritage objects and PADs located outside the disturbance area will be avoided through the implementation of both awareness and physical management measures.</p> <p>All PADs and all sites that require protection will be protected (e.g. exclusion fencing) prior to carrying out any development that could harm the heritage items.</p>	

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Cond. no.	Requirement	Where addressed	How addressed
	<ul style="list-style-type: none"> <li>salvaging and relocating the heritage items identified in condition D32;</li> </ul>	Section 5.5.1 Table 5.1 - H18	The process for salvaging and relocation heritage items identified in condition D32 is discussed in Section 5.5.1.
	<ul style="list-style-type: none"> <li>minimising and managing the impacts of the development on heritage items within the development corridor, including:                             <ul style="list-style-type: none"> <li>a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works;</li> </ul> </li> </ul>	Section 5 Table 5.1 – H7 Appendix D	If an unexpected heritage find or Aboriginal skeletal material is discovered, the Unexpected Heritage Finds Procedure will be followed.
	<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works;</li> </ul> </li> </ul>	Section 5.7 Table 5.1 - H19	<p>A strategy for the long-term management of any heritage items or material collected during the project is presented in Section 5.7. Consultation regarding long-term management will continue throughout the salvage program and beyond, as required.</p> <p>A temporary repository has been identified to store any unexpected Aboriginal objects and/or non-Aboriginal items identified during Stage 2 works.</p>
	<ul style="list-style-type: none"> <li>a contingency plan and reporting procedure if:                             <ul style="list-style-type: none"> <li>heritage items outside the approved disturbance area are damaged;</li> <li>previously unidentified heritage items are found; or</li> <li>Aboriginal skeletal material is discovered;</li> </ul> </li> </ul>	Section 6.8	<p>Section 6.8 outlines a contingency plan in the event that unexpected impacts are identified.</p> <p>In the event of any unexpected non-Aboriginal heritage find, the Unexpected Heritage Finds Procedure will be followed.</p>
	<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>previously unidentified heritage items are found; or</li> <li>Aboriginal skeletal material is discovered;</li> </ul> </li> </ul>	Appendix D	If an unexpected heritage find or Aboriginal skeletal material is discovered, the Unexpected Heritage Finds Procedure will be followed.
	<ul style="list-style-type: none"> <li>ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and</li> </ul>	Section 6.1 Table 5.1 - H2	All site personnel will undergo a site induction which addresses elements related to heritage management. In addition, toolbox talks will be delivered for personnel with key roles in heritage management. Records will be retained by SecureEnergy.
	<ul style="list-style-type: none"> <li>ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and</li> </ul>	Section 1.7 Table 5.1 - H7 Appendix C	Consultation with Aboriginal stakeholders is outlined in Section 1.7.
	<ul style="list-style-type: none"> <li>include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the development.</li> </ul>	Section 6.3 Section 6.4 Section 6.6	The effectiveness of the management measures identified in Section 5 of this HMP will be monitored and reported through the program provided in Section 6.3, 6.4 and 6.6.

### 2.3 Revised mitigation measures

The revised mitigation measures (RMMs) are defined in Appendix G of the Response to DPIE Request for Information. The RMMs relevant to heritage management are presented in Table 2.2 below.

The RMMs identified in Appendix G of the Response to DPIE Request for Information (and reproduced below) are generally based on the management measures identified in Appendix E of the Amendment Report *Revised Non-Aboriginal and Aboriginal Cultural Heritage Assessment*

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Report (Navin Officer, April 2021). A number of differences have been identified in the ‘application location(s)’ for RMMs AH4, AH6 and AH7. These differences are identified in Appendix B.

A cross reference is also included to indicate where the measure is addressed within this plan or other project management documents. The management measures that will be implemented for the project are provided in Section 5 of this plan.

**Table 2.2 - Revised mitigation measures relevant to heritage**

Reference	Revised mitigation measures	Application location(s) (Response to DPIE Request for Information)	Where addressed	How addressed
<b>Aboriginal heritage</b>				
AH1	The detailed design and construction methodology, and associated final disturbance area, will be developed to avoid impacts to features/items of Aboriginal archaeological significance as far as practical. Avoidance and minimisation of impact to features/items and Potential Archaeological Deposits (PADs) of moderate or higher archaeological significance will be prioritised.	All locations	Section 5.1	Detailed design and construction methodology will be developed to avoid impacts to features/items of Aboriginal archaeological significance and scarred trees is detailed in Section 5.1.
AH2	<p>Aboriginal stakeholder consultation will be carried out in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW, 2010a).</p> <p>Engagement with Registered Aboriginal Parties (RAPs) will consist of the following:</p> <ul style="list-style-type: none"> <li>Aboriginal heritage site surveys (AH3) – review of proposed methodologies and involvement in the survey activities in the field (for ground or vegetation disturbance outside of previously surveyed areas)</li> <li>test excavation activities (AH4) – review of proposed methodologies and involvement in the test excavation activities in the field</li> <li>review of the draft addendum report/s (relating to surveys (AH3), test excavations (AH4) and scar trees (AH5)), and consultation on the draft reports which will typically be in the form of a RAP meeting</li> <li>provision of final addendum report/s will be provided to RAPs (AH3, AH4, AH5)</li> <li>involvement in establishment of Aboriginal heritage exclusion zones prior to construction commencing (AH7).</li> </ul> <p>Further cultural information will be gathered during consultation undertaken in association with these activities. All addendum reports to the Aboriginal Cultural Assessment Report (CHAR) will be provided to RAPs for comment, and input will be considered, and actioned wherever practicable.</p>	All locations	<p>Section 1.7.2 Section 5.7 Table 5.1 - H9, H11, H13, H15, H22 and H28 Appendix D</p>	<p>Consultation with Aboriginal stakeholders is described in Section 1.7.2 of this HMP.</p> <p>Methodologies for site survey (AH3) and test excavation activities (AH4) have been prepared and provided to RAPs for comment and discussion.</p> <p>Consultation also occurs through on-site survey and test excavation activities.</p> <p>Any consultation required with RAPs in relation to unexpected finds will be undertaken in accordance with the Unexpected Heritage Finds Procedure (45860-HSE-PR-G-1003).</p>

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Reference	Revised mitigation measures	Application location(s) (Response to DPIE Request for Information)	Where addressed	How addressed
AH3	<p>An Aboriginal heritage survey will be carried out with RAPs where ground or vegetation disturbance activities are required in all locations outside of the previously surveyed heritage survey area (including water supply points), prior to works occurring in any such areas.</p> <p>These surveys will be carried out in accordance with the <i>Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW</i> (2010).</p> <p>If no sites are found or if sites are found and they will not be impacted, then a letter report will be provided that gives notification of this and clearance to proceed.</p> <p>Where sites are located and will be impacted, a draft survey addendum report/s to the ACHAR will be prepared for each of these survey areas. The report(s) will:</p> <ul style="list-style-type: none"> <li>• detail findings of the survey activities</li> <li>• detail where test excavation is required in accordance with AH4 to inform detailed design</li> <li>• outline any additional mitigation strategies beyond those required by AH5 to AH12</li> <li>• be presented to the RAPs for comment.</li> </ul> <p>Final reports will be provided to RAPs and to Heritage NSW for their information prior to the commencement of construction that impacts these locations.</p>	All locations	Section 5.3.1 Section 5.7 Table 5.1 - H9 to H11	<p>Survey will be undertaken for any disturbance areas outside of the previously surveyed heritage survey area.</p> <p>A survey methodology has been prepared in consultation with the RAPs and is being implemented.</p>
AH4	<p>In developing the detailed design and construction methodology, the construction contractor will review the location of all identified PADs and will aim to avoid and/or minimise direct impacts to the identified PADs</p> <p>Where direct impacts cannot be avoided, test excavation programs will be carried out in the parts of any PADs where direct impact is likely (including where root-ball of trees are being removed). The purpose of the test excavations will be to determine the presence or absence and significance of subsurface archaeological deposits.</p> <p>Test excavations works will be carried out in accordance with a methodology that is presented to and consulted on with the RAPs.</p> <p>Test excavation addendum report/s to the ACHAR will be prepared for each test excavation program(s) which will:</p> <ul style="list-style-type: none"> <li>• detail findings of the test excavation activities</li> <li>• outline how the detailed design has been further developed to avoid or</li> </ul>	PEC-W-6, PEC-W-11, PEC-W-12, PEC-W-15, PEC-W-17, PEC-W-18, PEC-W-27, PEC-W-31, PEC-W-36, PEC-W-37, PEC-W-45, PEC-W-47, PEC-W-50, PEC-W-51, PEC-W-55, PEC-W-63, PEC-W-100, PEC-W-102, PEC-G-7 PEC-PAD1 through	Section 5.1 Section 5.2 Section 5.4 Table 5.1 - H13 to H16	The detailed design and construction methodology will be developed to avoid impacts to features/items of Aboriginal archaeological significance, and scarred trees as detailed in Section 5.1, 5.2 and Table 5.1– H13 to H16.

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Reference	Revised mitigation measures	Application location(s) (Response to DPIE Request for Information)	Where addressed	How addressed
	<p>minimise impacts to the identified constraints/features of significance/PADs</p> <ul style="list-style-type: none"> <li>as applicable, detail any additional mitigation strategies beyond those required by AH6 to AH12, and the required timing for these to be implemented</li> <li>be presented to the RAPs for comment.</li> </ul> <p>Final reports will be provided to RAPs and to Heritage NSW prior to the commencement of construction that impacts these locations. The addendum report(s) may be staged to enable progressive commencement of construction. Any additional mitigation strategies beyond those required by AH6 to AH12, and the required timing of implementation, will be included with the Construction Environmental Management Plan and implemented accordingly.</p>	<p>PEC-PAD14, PEC-PAD-16 through PEC-PAD26, and PEC-PAD-28</p>		
AH5	<p>All scarred trees identified during archaeological survey will be assessed by a qualified arborist to determine tree age and likely cause of the scarring in order to confirm the scientific significance prior to any impact to the scarred trees.</p> <p>Impacts to all scarred trees (including those of cultural significance) will be avoided where possible through design or construction methodology and must only be removed for permanent infrastructure and/or to meet <i>Vegetation Clearance Requirements at Maximum Line Operating Conditions</i> (Transgrid, 2003).</p> <p>If any scarred tree cannot be avoided, the tree will be subject to 3D scanning, followed by salvage of the scarred trunk. The results of this assessment will be reported on in addendum reports.</p> <p>Reports will be provided to RAPs for comment. Final reports will be provided to RAPs and to Heritage NSW.</p>	<p>PEC-W-57, PEC-W-67, PEC-W-80, PEC-W-85, PEC-W-86, PEC-W-88, PEC-W-90, PEC-W-91, PEC-W-99, PEC-W-104, PEC-W-105, PEC-W-106, PEC-W-107, PEC-W-108, PEC-W-109, PEC-W-110, PEC-W-111, PEC-W-112, PEC-W-113, PEC-W-115, PEC-W-118, PEC-W-121, PEC-W-122, PEC-W-127, PEC-W-128, PEC-W-130</p>	<p>Section 5.1 Section 5.3.2 Section 5.5.2 Section 5.7 Table 5.1 - H26 to H28</p>	<p>The management of identified scarred trees is outlined in Section 5.1, 5.3.2, 5.5.2, 5.7 and in Table 5.1 – H26 to H28.</p>
AH6	<p>All portions of artefact scatters that are to be directly impacted will require surface collection prior to construction commencement in those areas.</p>	<p>Surface collection (artefact scatters impacted by</p>	<p>Section 5.5.1 Section 5.7 Table 5.1 - H18</p>	<p>The management of artefacts that requires surface collection prior to construction in those areas are</p>

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Reference	Revised mitigation measures	Application location(s) (Response to DPIE Request for Information)	Where addressed	How addressed
	<p>Additionally, based on the outcomes of the test excavation, items or PADs will be subject to surface collection or salvage prior to the commencement of construction in those areas.</p> <p>The activities will be documented in a surface collection report.</p>	<p>disturbance area A)                      PEC-W-6,                      PEC-W-7,                      PEC-W-11,                      PEC-W-12,                      PEC-W-15,                      PEC-W-17,                      PEC-W-18,                      PEC-W-27,                      PEC-W-31,                      PEC-W-35,                      PEC-W-36,                      PEC-W-37,                      PEC-W-45,                      PEC-W-47,                      PEC-W-50,                      PEC-W-51,                      PEC-W-55,                      PEC-W-63,                      PEC-W-74,                      PEC-W-75,                      PEC-W-100,                      PEC-W-102,                      PEC-W-114,                      PEC-W-119,                      PEC-G-7,                      39-6-0030</p>		<p>detailed in Section 5.5.1, 5.7 and Table 5.1 – H18.</p>
AH7	<p>Aboriginal heritage exclusion zones will be established to protect:</p> <ul style="list-style-type: none"> <li>known features/items of significance that have been identified to remain in-situ throughout construction (and not subject AH6)</li> <li>scarred trees that are to remain in-situ.</li> </ul> <p>Suitable controls will be identified in the heritage management sub-plan, which may include site fencing and sediment control. Aboriginal heritage zones will be demarcated by a suitably qualified archaeologist in consultation with the RAPs prior to the commencement of construction at each location.</p> <p>Areas of PADs that are located within areas of vegetation clearance where ground disturbance will not occur will be managed through construction methodologies and will not be delineated as exclusion zones. These methodologies will be developed in the heritage sub-plan.</p>	<p>PEC-W-1,                      PEC-W-4,                      PEC-W-5,                      PEC-W-6,                      PEC-W-7,                      PEC-W-10,                      PEC-W-12,                      PEC-W-23,                      PEC-W-27,                      PEC-W-29,                      PEC-W-30,                      PEC-W-35,                      PEC-W-36,                      PEC-W-37,                      PEC-W-38,                      PEC-W-45,                      PEC-W-46,                      PEC-W-47,                      PEC-W-48,</p>	<p>Section 5.6.1                      Section 5.6.4                      Section 5.7                      Table 5.1 - H22,                      H23 and H25</p>	<p>Suitable controls to protect this object/PAD are identified in Section 5.6.1, 5.6.3, 5.7 and Table 5.1 – H20, H22 and H24.</p>

Reference	Revised mitigation measures	Application location(s) (Response to DPIE Request for Information)	Where addressed	How addressed
		PEC-W-49, PEC-W-52, PEC-W-53, PEC-W-54, PEC-W-60, PEC-W-61, PEC-W-62, PEC-W-66, PEC-W-66, PEC-W-78, PEC-W-81, PEC-W-82, PEC-W-100, PEC-W-101, PEC-W-102, 46-3-0086		
AH8	Construction planning and management will ensure that indirect impacts to features of heritage significance located outside areas of direct impact do not occur (including physical disturbance from surface water drainage or other mechanism).	All locations	This HMP, particularly Section 5 Soil and Water Management Plan	Indirect impacts to Aboriginal heritage objects/areas will be avoided through the implementation of both awareness and physical management measures.
AH9	Cultural and historic heritage awareness training will be carried out for all personnel working on the proposal prior to the personnel participating in construction activities. The training shall cover features of heritage significance within and adjacent to project locations and project protocols that must be complied with to minimise and manage potential impacts to those features.	All locations	Section 5.7 Table 5.1 - H2	All site personnel will undergo a site induction which address elements related to heritage management. In addition, toolbox talks will be delivered for personnel with key roles in heritage management.
AH10	If at any time during construction, any items of potential Aboriginal archaeological or cultural heritage significance, or human remains are discovered, they will be managed in accordance with the Aboriginal heritage unexpected finds protocol (refer to Appendix 2 of the <i>Non-Aboriginal and Aboriginal Cultural Assessment Report</i> (Navin, 2021)).	All locations	Section 5.7 Table 5.1 - H29 and H11 Appendix D	If an unexpected heritage find or Aboriginal skeletal material is discovered, the Unexpected Heritage Finds Procedure will be followed.
AH11	A temporary repository of any retrieved archaeological material and Aboriginal objects will be appropriately secured and under the care of the archaeological consultant.  The strategy for the long-term conservation of salvaged or collected Aboriginal objects will be determined in consultation with RAPs.	As relevant	Section 5.5.1 Section 5.7 Table 5.1 - H19	A temporary repository has been identified to store any unexpected Aboriginal objects and/or non-Aboriginal items

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Reference	Revised mitigation measures	Application location(s) (Response to DPIE Request for Information)	Where addressed	How addressed
				identified during Stage 2 works. Consultation regarding the long-term conservation of salvaged or collected cultural material has commenced and the strategy is currently being developed
AH12	Features/items of heritage significance that will remain in-situ within the transmission line easement will be mapped and recorded within GIS systems managed by Transgrid. Relevant Transgrid systems and procedures will be updated as required with protocols that will be implemented during operation to ensure that impacts to the features/items of significance do not occur during maintenance activities. to ensure inadvertent impacts do not occur during maintenance activities.	Transmission line	Section 5.7 Table 5.1 - H4	Features/items of heritage significance that will remain in-situ within the transmission line easement will be mapped and recorded within GIS systems.
<b>Non-Aboriginal heritage</b>				
NAH1	A non-Aboriginal heritage exclusion zone will be established for sites PEC-W-H-1 and PEC-W-SE-H1 (Survey Marker Trees). These sites will be fenced during construction and vegetation clearance for the proposal, to avoid inadvertent impacts during works. If impacts cannot be avoided, then the tree will be archivally recorded and research undertaken to confirm the nature and history of the item prior to impact occurring.	Transmission line	Section 5.6.3 Section 5.6.4 Section 5.7 Table 5.1 - H24	Restricted access will be established and maintained for survey marker trees PEC-W-H-1 and PEC-W-SE-H1 during vegetation clearing and construction to avoid harm during works in accordance with RMM NAH1 and condition D33.
NAH2	Should the disturbance area for the proposal extend beyond the survey area, further assessment by an archaeologist will be carried to determine the likelihood of occurrence and significance of potential archaeology and impacts from the proposal (including built heritage) prior to the commencement of construction in these areas. The results of this assessment will be reported on in addendum reports for non-Aboriginal heritage. Reports will be provided to Heritage NSW.	Transmission line	Section 5.3.3 Section 5.7 Table 5.1 - H12	Survey will be undertaken for any disturbance areas outside of the previously surveyed heritage survey area.
NAH3	If at any time during construction, any items of potential non-Aboriginal archaeological significance, or human remains are discovered, they will be managed in accordance with the non-Aboriginal unexpected finds protocol (refer to Appendix 2 of the <i>Non-Aboriginal &amp; Aboriginal Cultural Heritage Assessment Report</i> (Navin, 2021)).	All locations	Section 5.7 Table 5.1 - H29 and H2 Appendix D	If an unexpected heritage find or human remains are discovered, the Unexpected Heritage Finds Procedure will be followed.

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## 2.4 Guidelines

The main guidelines, specifications and policy documents relevant to this plan include:

- Aboriginal Cultural Heritage Consultation Requirements for Proponents (Office of Environment and Heritage (OEH) 2010), and
- Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010).

The documents identified above are considered by the project as described and referenced throughout this HMP.

### 3 Existing environment

The following section summarises the existing Aboriginal and non-Aboriginal heritage within and adjacent to the project. The key reference documents include:

- Chapter 10 and Chapter 11 of the EIS;
- Section 6.3 and Section 6.4 of the Amendment Report;
- Appendix E of the Amendment Report (Revised Non-Aboriginal and Aboriginal Cultural Heritage Assessment Report, Navin Officer 2021); and
- Appendix D of the Response to DPIE Request for Information (*Additional PAD detail*).

#### 3.1 Aboriginal heritage

The following terminology is used in the context of this HMP regarding the desktop and on-site surveys that were undertaken:

- **disturbance area:** area required to construct and operate the proposal, which would be within the proposal study area and the heritage survey area (below). The disturbance area is sub-divided into three areas, which are visually represented in Figure 3.1. The three sub-divided areas are:
  - **Disturbance Area A:** areas subject to ground disturbance across the defined area due to construction and/or operation (e.g. construction compounds and accommodation camp sites, upgraded and/or new access tracks, areas around transmission towers);
  - **Disturbance Area A (centreline clearing):** refers to areas between the proposed transmission towers in which all vegetation would be removed during construction to ground however topsoil materials and ground material would be retained, where possible and would not likely result in sub-surface impacts in these locations. Plant and equipment movements would occur through the centreline, particularly during vegetation clearing activities and stringing activities, however, this is not the primary means of access. The area would be subject to ground disturbance where tree removal is necessary and vegetation root-balls are required to be removed. This area would also be subject to ongoing maintenance during operation (i.e. removal to ground level) for operational and safety requirements (including bushfire); and
  - **Disturbance Area B:** area between and around transmission towers in which removal of vegetation (including trees) would be undertaken where they have the potential to exceed vegetation clearance heights. The removal (which may include the removal of vegetation root-balls) may result in temporary ground disturbance. Plant and equipment movements would occur in this area during vegetation clearing activities;
- **heritage survey area:** 100m corridor subject to archaeological survey along the length of the proposal, as described in Appendix E of the Amendment Report;
- **proposal study area:** comprises a 1km wide corridor between the SA/NSW border near Chowilla and Buronga substation and a 200m wide corridor between Buronga substation and the NSW/Victoria border at Monak, near Red Cliffs.

As described in the Appendix E of the Amendment Report, the proposal study area encompasses the disturbance area and a buffer zone which has been applied to identify the constraints nearby to the proposal which may or may not be indirectly impacted by the proposal;

- **heritage study corridor:** 10km site search corridor used in Appendix E of the Amendment Report to develop a preliminary predictive model focused on Aboriginal site locations. This area is based on the proposal study area centreline between the SA/NSW border and Buronga and down to the NSW/Victoria border at Monak (approximately five kilometres either side).

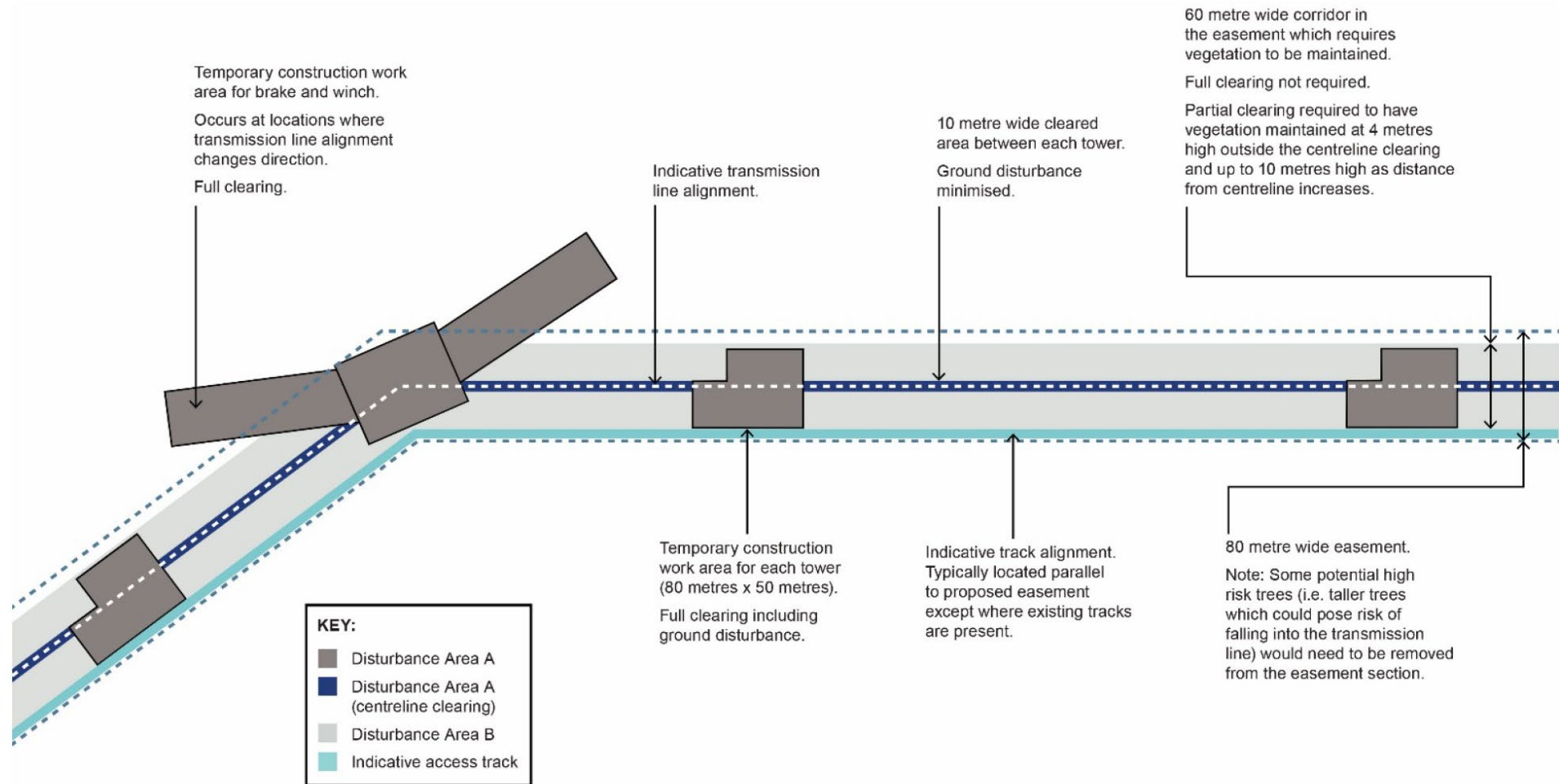


Figure 3.1 - Indicative disturbance area definition for a typical transmission line section (Figure 2-14 of the Submissions Report)

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It is noted that the disturbance areas may shift/change as detailed design and construction planning progresses. The disturbance areas shown on the figures included in Appendix A and used to inform Appendix B are current at the time of preparation of the document.

The location of previously recorded and newly recorded Aboriginal heritage sites is depicted in Figure 3.2 (overview). Recorded sites will be identified on Sensitive Area Plans (SAPs) prepared for the project. More detailed maps are provided in Appendix A. A list of all identified sites in the proposal study area is included in Appendix B.

### **3.1.1 Aboriginal heritage context and recorded sites and archaeology**

The oldest archaeological evidence of Aboriginal Occupation near the project area is connected to Lake Victoria dating back 21,000 years and the oldest evidence of regional occupation dates back 45,000 years.

The proposal study area is within the lands of the Barkindji and Maraura people. The Barkindji people lived along the Darling River which they refer to as 'Barka', and substantial communities still live in the townships of Wentworth, Dareton and Buronga. The Maraura people were located along the Murray River between Wentworth and Paringa (South Australia) with camping grounds around Lake Victoria.

### **3.1.2 AHIMS sites**

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### **3.1.3 Sites identified during archaeological field survey**

*Information removed for public display*

*Information removed for public display*

#### **3.1.4 Sites identified during geotechnical investigations**

*Information removed for public display*

### **3.1.5 Sites identified during SecureEnergy site visit with traditional owners**

*Information removed for public display*

### **3.1.6 Sites identified during additional survey**

*Information removed for public display*

*Information removed for public display*

### **3.1.7 Aboriginal site patterns**

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### 3.1.8 Significance of Aboriginal heritage

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**Figure 3.2 - Overview of recorded Aboriginal sites (Navin Officer, 2021)**

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## 3.2 Historic (non-Aboriginal) heritage

### 3.2.1 Historic (non-Aboriginal) heritage context

The Darling River and Murray River were first mapped by explorers around the 1830s and led to the development of overland trails linking NSW with the new colony of SA and introduction of cattle to the region. Between 1838 and 1941 sheep, cattle, horses, bullock, drays and goods were brought into Aboriginal territories leading to conflict in the area and pastoral leases being introduced in 1847.

The introduction of paddle steamers in 1853 made remote places along the Murray more accessible and encouraged more diversified industries and employment in the region and the establishment of Wentworth. The establishment of artesian bores in 1880s enabled irrigation and subsequently the subdivision of larger properties and introduction of higher value horticulture to the region.

### 3.2.2 Listed heritage items

The transmission line easement passes through the curtilage of three listed heritage items of local significance on the Wentworth Local Environmental Plan:

- Nulla Nulla Woolshed (181): A large modern shearing shed with sawtooth roof, representative of the pastoral industry modernisation and associated with Lake Victoria. It is also noted as having aesthetic significance due to its setting in a featureless landscape;
- Nulla Nulla Homestead (182): A rare elevated homestead, associated with the main homestead and other buildings, is representative of management changes in the pastoral industry in the twentieth century; and
- Sturts Billabong (127): A landscape area of aesthetic significance, it is quiet stretch of water off the Darling River with river red gum trees, its historic significance is its association with Captain Sturt on his exploration in 1829. The riparian zone along the edge of the Sturts Billabong, including the mature River Redgums is a natural landscape that contribute to the heritage item.

There are an additional five heritage listed sites of local significance located outside the project area. The location of the locally listed heritage sites are shown in Figure 3.3 to Figure 3.7.

### 3.2.3 Previously unrecorded heritage

Two previously unrecorded sites were identified, one during the field survey undertaken during the development of the EIS and one during the traditional owner and SecureEnergy site visit in December 2020, comprising two historic survey marker trees (PEC-W-H-1 and PEC-W-SE-H1). The previously unrecorded sites are shown in Figure 3.8.

### 3.2.4 Additional historic heritage survey

In accordance with RMM NAH2, additional heritage survey was undertaken from December 14-19 2021 in locations where disturbance areas extend beyond the previously surveyed areas.

A portion of the project traverses two areas identified on the Commonwealth Department of Defence's unexploded ordnance (UXO) register as potentially containing unexploded ordinances dating from World War II. The physical remnants of an area which used for target practice was identified from the remains of 40-gallon drums with evidence of 50 calibre bullet holes within the Oak Plains Air to Ground range. Extant remains such as these are relatively common within areas which have been designated as air to ground firing ranges. In addition to the targets, one 20 mm solid shot bullet was identified approximately 300 metres to the south of the target location.

The remains of the unexploded ordnance have significance to the local area, as it is physical remains from a period of history when the Sunraysia region contributed to the World War II war effort as a training location for fighter pilots. Individual ordinance or scrap metal does not necessarily meet the threshold for local listing, but the landscape containing used targets and spent cartridges may constitute a heritage landscape which represents the use of the region during World War II

The results of the survey have been included in a historic heritage survey report, *Additional Survey Areas: Historic Heritage Survey Report (45860-G70005-REP-U-00015)*. Once finalised, this report will be provided to Heritage NSW in accordance with RMM NAH2 and Wentworth Shire Council, as recommended by the Project Archaeologist.

Subsequent heritage survey has also been undertaken, primarily consisting of areas required for relocated access points and traffic signage along gazetted roads. No archaeological relics or heritage items were identified as part of these subsequent surveys.

### **3.2.5 Archaeology**

Potential archaeology may also occur associated with; graves, fence lines, remains of former dwellings including homesteads, houses and huts, historical roads, other transport and access routes, such as bridle paths and stock routes and evidence of historical agricultural and industrial processing or extractive sites. No unrecorded archaeology was identified during the field surveys and the potential for archaeology is considered to be low to nil.

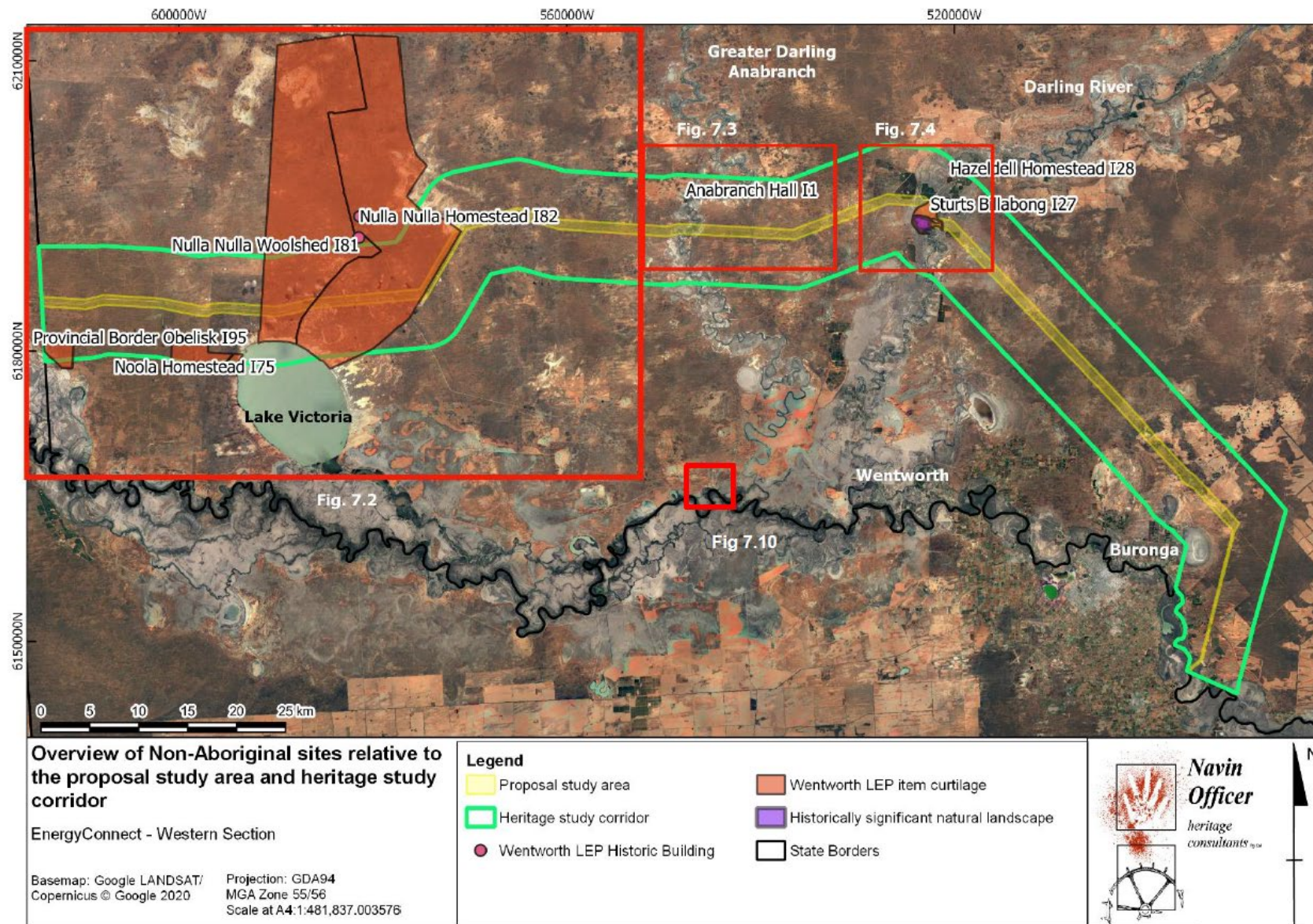


Figure 3.3 - Location of historical heritage items (1 of 5, overview) (source Navin Officer, 2021)

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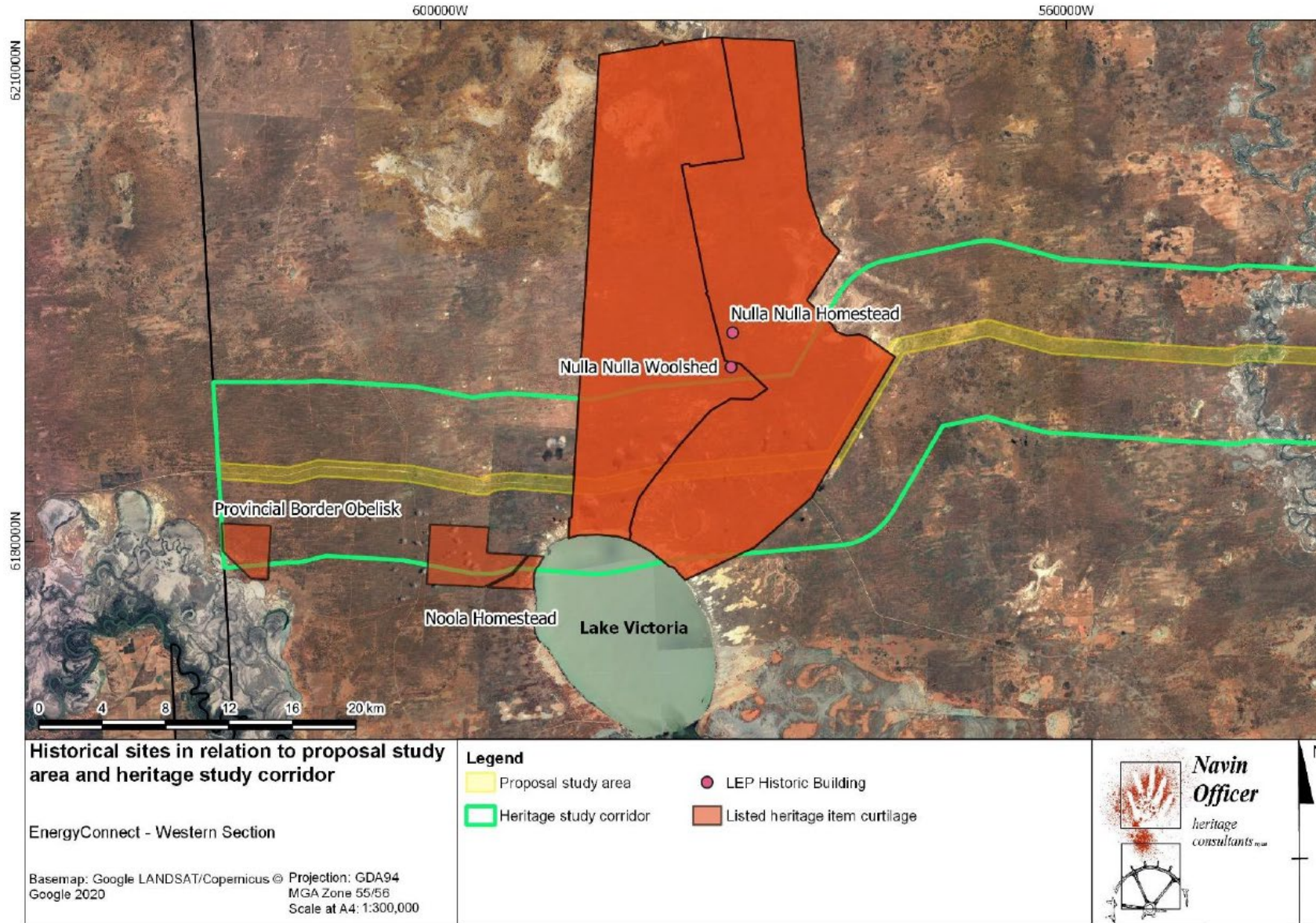


Figure 3.4 - Location of historical heritage items (2 of 5, near Lake Victoria) (source Navin Officer, 2021)

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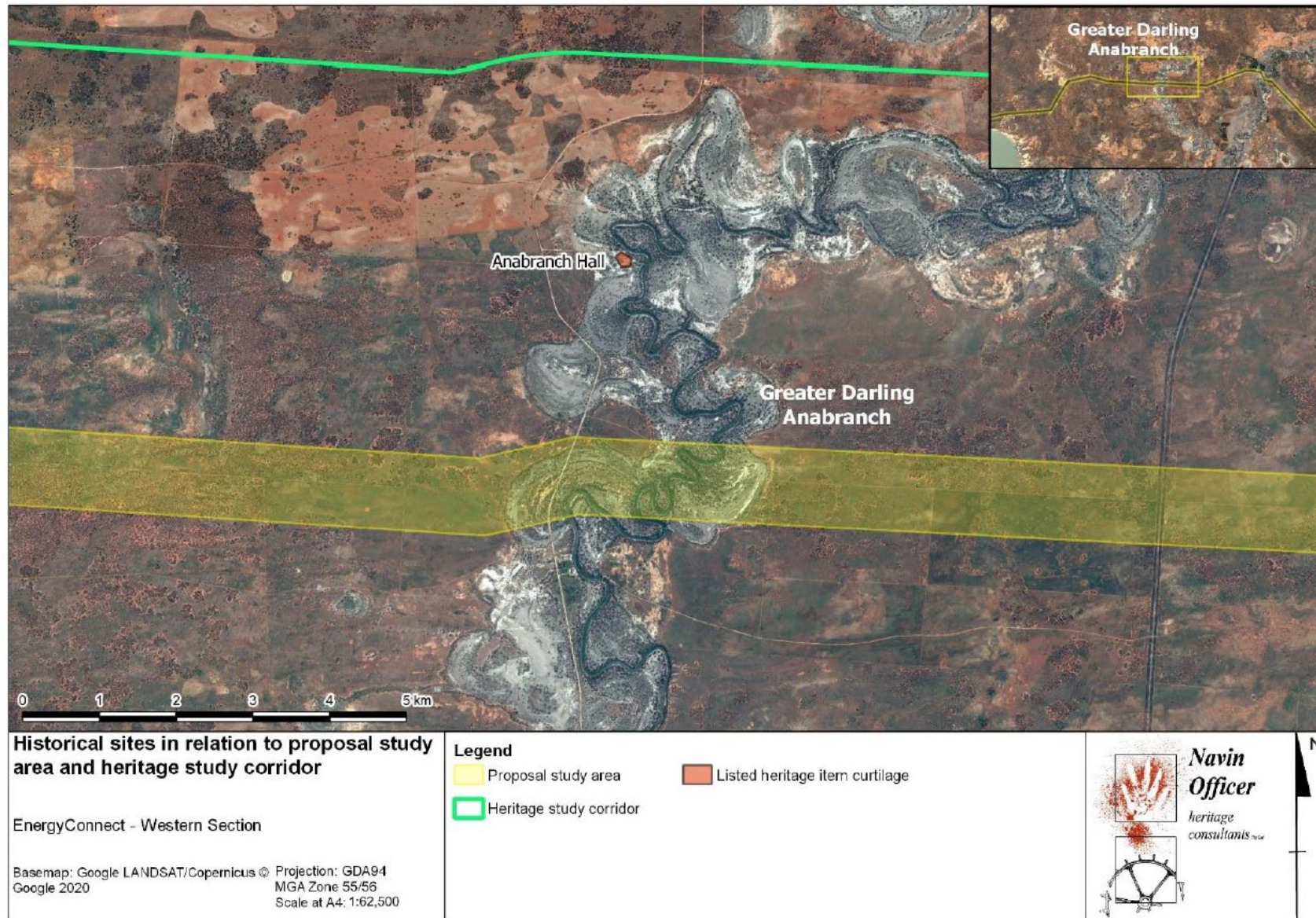


Figure 3.5 - Location of historical heritage items (3 of 5, near Greater Darling Anabranch River) (source Navin Officer, 2021)

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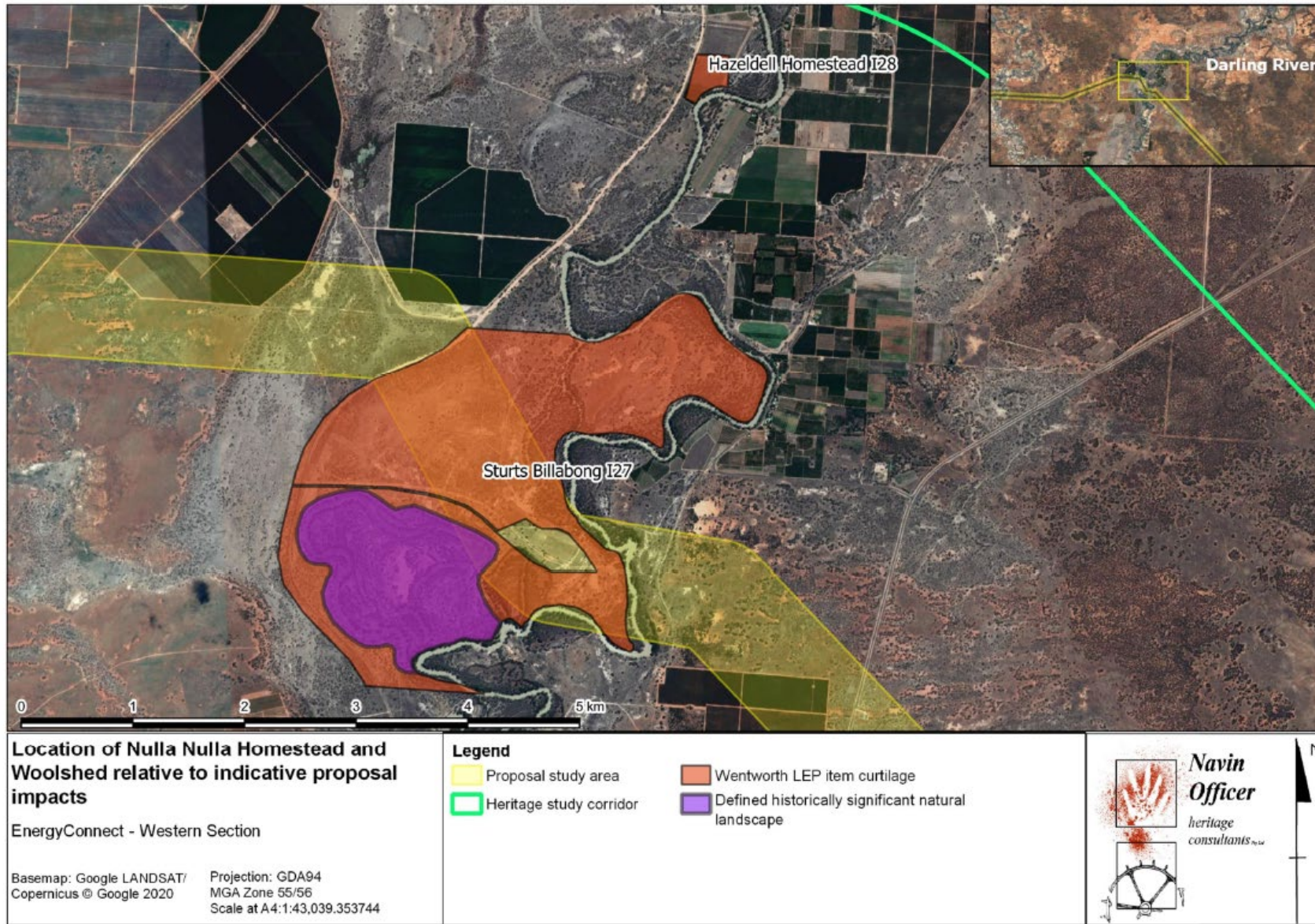


Figure 3.6 - Location of historical heritage items (4 of 5, near Darling River) (source Navin Officer, 2021)

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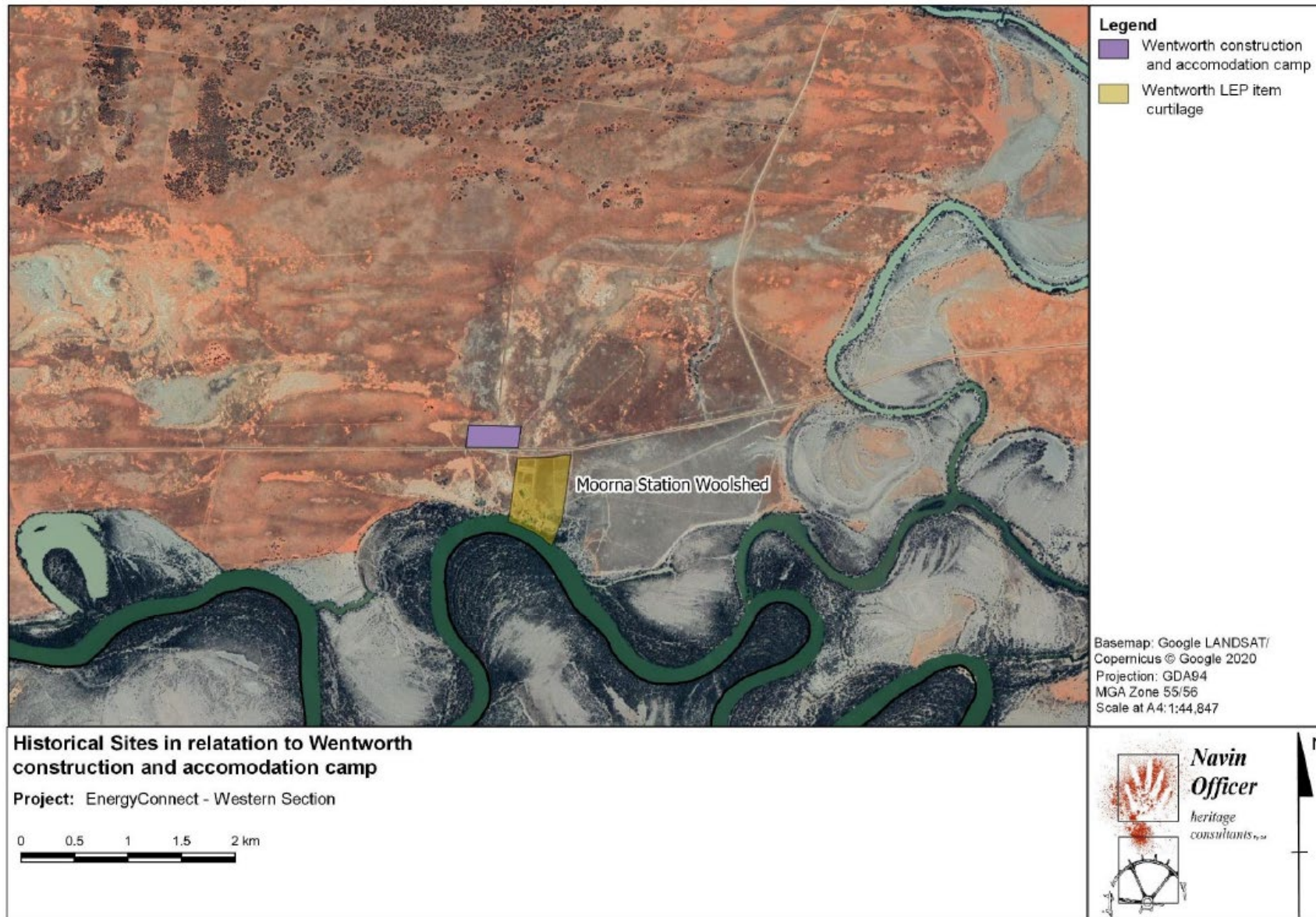


Figure 3.7 - Location of historical heritage items (5 of 5, Wentworth accommodation camp) (source Navin Officer, 2021)

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**Figure 3.8 - Location of historic survey marker trees**

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## 4 Environmental aspects, impacts and risks

### 4.1 Construction activities

An environmental aspect is an element of an organisation's activities, products, or services that has or may have an impact on the environment (ISO 14001 Environmental Management Systems). The relationship of aspects and impacts is one of cause and effect.

Key aspects of the project that could result in adverse impacts to heritage include:

- surface and/or ground disturbance as a result of vegetation clearing and grubbing;
- surface and/or ground disturbance as a result of ground excavation and earthworks;
- surface and/or ground disturbance as a result of vehicular movements or vibration-producing equipment; and
- surface disturbance as a result of surface water runoff from the active worksite.

### 4.2 Impacts/harm

The potential for impacts on heritage will depend on a number of factors. Primarily impacts will be dependent on the nature, extent and magnitude of construction activities and their interaction with the natural environment.

Use of the term 'impacts' has been incorporated into the EIS, Amendment Report and Revised Heritage Assessment, while the Infrastructure Approval refers primarily to 'harm'. Harm is defined in the *National Parks and Wildlife Act 1974* and in the *Heritage Act 1977*.

#### 4.2.1 Aboriginal heritage

Potential impacts and the total or partial loss of heritage value were assessed in Appendix E of the Amendment Report based on the Amendment Report design and proposed construction methodology by defining three disturbance areas (A, A – centreline and B) (refer Section 3.1 of this plan). The type of impacts attributable to construction within the three disturbance areas are generally described below.

- **direct impacts:** impacts that move or physically alter items, objects, or features of a site. This includes, but is not limited to, direct physical impacts to midden/shell, hearths, stone artefacts, and scarred trees. Also, as impacts that directly and physically disturb the sediments and deposits of PADs.
  - Area A disturbance would directly impact all items, objects, or features of a site and or PAD located in this area.
  - Area A – centreline clearing would directly impact archaeological deposits associated with surface sites and/or PADs when removing vegetation root-balls of trees that are located in this area. All scarred trees would be impacted (Area A – centreline clearing is referred to as 'direct' and 'potential direct' in different locations of Appendix E of the Amendment Report. For the purposes of this HMP, we have identified it as 'potential direct' to remain consistent with other items located in Area A – centreline clearing and as described in Section 10.4 of Appendix E of the Amendment Report, including Table 10.1). There is a risk of potential direct impacts from heavy machinery to items, objects, or features located in this area.
  - Area B disturbance would directly impact archaeological deposits associated with surface sites and/or PADs when removing vegetation root-balls that are above or have the potential to grow above a specified height, that are located in this area. All scarred trees that are above or have the potential to grow above the specified height will also be directly impacted. There is a risk of potential direct impacts from heavy machinery to items, objects, or features located in this area.

- **indirect impacts:** impacts that result from changes to the site environment and may include increased erosion risk and inadvertent direct impact (e.g. during vegetation clearance).

The expected direct and potential direct impacts for Aboriginal heritage items/features defined in the Appendix E of the Amendment Report are based on the design described in the Amendment Report and are identified in Appendix B of this plan.

Indirect impacts to items/features are dependent on several factors, including aerial extent of the site, depth of deposits, and the works being conducted adjacent to these areas. Management measures identified in Section 5 will minimise indirect impacts due to physical disturbance, which may result in a loss of heritage values.

As far as practical, impacts to items/features of Aboriginal archaeological significance will be avoided. It is noted, however, that changing the location of a single transmission tower/pole (for example, to avoid one area/PAD/item) may result in a flow-on effect that may change the location of multiple other towers in either direction, which will change the potential impacts of those now altered transmission towers.

The environmental management described in Section 5 (particularly Table 5.1) has been developed to address the potential impacts to Aboriginal heritage items/features described here and in Appendix B. Surveys and test excavation will be undertaken in consultation with the RAPs and as described in Section 5.3 and 5.4, respectively.

#### 4.2.2 Non-Aboriginal heritage

Potential impacts to non-Aboriginal heritage items and the loss of heritage value of the site were assessed in Appendix E of the Amendment Report. The type of impacts attributable to construction described in Appendix E of the Amendment Report include:

- **direct impacts:** impacts that move or physically alter items, objects, or features of a site. This includes, but is not limited to, direct physical impacts to historic items, objects or features of a site and historic archaeological deposits; and
- **indirect impacts:** can be defined as impacts that alter the relationship of an item to other site features and/or its position in the natural landscape, including visual and/or aesthetic impacts.

The expected impacts for non-Aboriginal heritage items defined in Appendix E of the Amendment Report are based on the design described in the Amendment Report and are identified in Table 4.1.

**Table 4.1 - Impact assessment of non-Aboriginal heritage items**

Site name	Item ID	Significance	Potential impacts
Nulla Nulla Woolshed	181	Local	No direct impact of the woolshed, which is located about 6.2km north of the indicative disturbance area.  The landscape is largely open, with low vegetation. The distance and gentle changes in landform over this area would result in the transmission line and structures being absorbed into the far background of views from the woolshed. As such, there would be no appreciable change to the views from the woolshed.  The project is not anticipated to impact the significance of the item from direct or indirect (visual) impacts.
Nulla Nulla Homestead	182	Local	No direct impact of the homestead or other buildings.  As above, the transmission line and structures would be absorbed into the far background of views from the site and is not anticipated to impact the significance of the item from direct or indirect (visual) impacts.
Moorna Station Woolshed	183	Local	No direct impact on the listed curtilage and will not impact the woolshed itself nor diminish its heritage significance.

Site name	Item ID	Significance	Potential impacts
PEC-W-H-1 (survey marker tree)	Previously unrecorded	Local	This item is located within 10m of the indicative disturbance area. However, with the implemented of mitigation measures to protect the item, no impacts to its significance are anticipated.
PEC-W-H-2 (survey marker tree)	Previously unrecorded	Local	This item is located within 10m of the indicative disturbance area. However, with the implemented of mitigation measures to protect the item, no impacts to its significance are anticipated.
Sturts Billabong	I27	Local	<p>The transmission line corridor passes through the central portion of the curtilage. The natural landscape of Sturts Billabong is in the south western portion of the curtilage. No direct impact to any features (landscape or mature trees) of significance to this item, including River Redgums.</p> <p>While the new transmission structure would be easily visible from Sturts Billabong, the visual impact is considered low given the presence of existing transmission lines within the existing easement. The project is not expected to impact the significance of this heritage item.</p>

The potential for non-Aboriginal heritage archaeology is considered to be low to nil.

The environmental management described in Section 5 (particularly Table 5.1) has been developed to address the potential impacts to non-Aboriginal heritage items described here.

## 5 Environmental management

### 5.1 Detailed design and construction methodology

The detailed design and construction methodology will be developed to avoid impacts to features/items of Aboriginal archaeological significance (RMM AH1, AH4, condition D33), and scarred trees (RMM AH5) as far as practical. This will occur through the design review process and may result in a feedback loop between design and the results of activities identified in this HMP, including further survey (Section 5.3.1) and test excavation (Section 5.4).

As far as practical, impacts to items/features of Aboriginal archaeological significance and scarred trees will be avoided.

The location of scarred trees will be considered during detailed design. Scarred trees may only be removed for permanent infrastructure and/or to meet *Vegetation Clearance Requirements at Maximum Line Operations Conditions* (Transgrid, 2003) (RMM AH5).

Avoidance and minimisation of impact to features/items and PADs of moderate or higher archaeological significance will be prioritised (RMM AH1).

However, it is noted that changing the location of a single transmission tower/pole to avoid an site/PAD/object, may result in a flow-on effect that may change the location of multiple other towers, in either direction, which will change the potential impacts at the altered tower locations. In some instances, impacts may be practically unavoidable. Decisions regarding adjustments to tower locations will be made based on the outcomes of the test excavation carried out within PADs (refer Section 5.4) with consideration of the significance of any archaeological material discovered.

The recommendations identified in the Aboriginal Cultural Heritage Assessment Report for Stage 2a are incorporated into this HMP, particularly in Appendix B.

### 5.2 Aboriginal Cultural Heritage Strategy

Condition E2 allows the preparation of any strategy or plan on a staged basis, with the approval of the Planning Secretary. The proposed staging of the Aboriginal Cultural Heritage Strategy was approved by the Secretary on 1 February 2022. The Aboriginal Cultural Heritage Strategy will be staged to confirm the additional risk zones required in condition D29 a) to allow the commencement of construction in areas that are not identified as within the risk zones (i.e. either requiring additional survey or test excavation) until the relevant survey and/or subsurface testing has been undertaken. The staging of the Aboriginal Cultural Heritage Strategy does not mirror the staging of the CEMP and sub-plan documents (including this HMP), which are staged explicitly on a geographical separation of Buronga and Alcheringa water supply point (Stage 1) and then the entire project, including the extent of the alignment (Stage 2). The Aboriginal Cultural Heritage Strategy is staged on an activity basis to allow for construction to commence progressively across the project site as heritage-related activities (e.g. additional survey and/or test excavation) are completed.

Approval was issued on 19 July 2022 to further stage the Aboriginal Cultural Heritage Strategy to prepare two updated Aboriginal cultural heritage assessment reports that are based on a geographic divide of the project alignment. Stage 2a consists of the eastern portion of EnergyConnect (NSW – Western Section) from Line 1 tower 138 (east of Great Darling Anabran) through to Line 4 tower 58 (Murray River). Stage 2b consists of the western portion of EnergyConnect (NSW – Western Section) from Line 1 tower 138 through to Line 1 tower 293 (NSW/South Australia state border).

An initial Aboriginal Cultural Heritage Strategy has been prepared for the project and was provided to the RAPs and Heritage NSW for review and comment. In accordance with condition D29 a), the initial Aboriginal Cultural Heritage Strategy identified risk zones where construction must not commence until subsurface testing and/or additional survey is undertaken.

An Aboriginal Archaeological Survey Methodology and Aboriginal Archaeological Test Excavation Methodology were prepared and provided to the RAPs and Heritage NSW for review and comment. These methodologies described the additional Aboriginal heritage surveys and additional subsurface testing/test excavation that was required in accordance with condition D29 c) and condition D29 b),

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respectively. These methodologies were subsequently appended to the initial Aboriginal Cultural Heritage Strategy and provided to the Planning Secretary. The initial Aboriginal Cultural Heritage Strategy was approved by the Planning Secretary on 8 March 2022. In line with the approved staging strategy, approval of the initial Aboriginal Cultural Heritage Strategy allows construction to commence in areas outside of the additional risk zones, subject to complying with other relevant conditions. A large portion of the Stage 2 disturbance area falls into this category.

The Addendum Aboriginal Archaeological Survey Report (45860-G-70005-REP-U-00010) has been prepared to summarise additional heritage surveys undertaken in December 2021. Initial results of the survey were presented at an Aboriginal focus group meeting on 9 February 2022. The draft Archaeological Survey Report was provided to the RAPs for review and comment on 01 April 2022. Two additional Aboriginal focus group meetings were held during the review period to discuss the survey results and recommendations. No comments specific to the Archaeological Survey Report were provided by 6 May 2022 and the report was finalised 7 May 2022. Heritage NSW was also consulted for this document and stated that they had no additional comments or concerns in relation to the information provided in the Addendum Aboriginal Archaeological Survey Report.

In line with the approved staging strategy for the Aboriginal Cultural Heritage Strategy, construction may commence in areas that have been subject to additional heritage survey, which are presented in an Archaeological Survey Report and consulted with RAPs and Heritage NSW, subject to complying with other relevant conditions.

As per the approved staging approach for the Aboriginal Cultural Heritage Strategy, construction may not commence in PAD sites until the relevant Aboriginal Cultural Heritage Assessment Report, required in accordance with condition D29 e) is finalised and incorporated into the updated Aboriginal Cultural Heritage Strategy.

An updated Aboriginal Cultural Heritage Strategy has been prepared to report on the outcomes of the test excavation activities and any recommended mitigation measures for the Stage 2a area. The Aboriginal Cultural Heritage Assessment Report for Stage 2a was provided to the RAPs for review and comment on 23 July 2022. Two Aboriginal focus group meetings were held during the review period to discuss the test excavation results and proposed recommendations, including salvage. The updated Aboriginal Cultural Heritage Strategy including the Stage 2a Aboriginal Cultural Heritage Assessment Report has been submitted to the Planning Secretary for approval.

The final Aboriginal Cultural Heritage Strategy will be prepared to report on the outcomes of test excavation activities and any recommended mitigation measures for the Stage 2b area.

## 5.3 Survey

### 5.3.1 Aboriginal heritage

Aboriginal heritage survey was undertaken as part of the EIS and Amendment Report along an approximately 100m wide corridor and at the proposed locations for the main construction compounds and accommodation camps.

In accordance with RMM AH3 and condition D29 c), additional Aboriginal heritage survey has been undertaken in December 2021, in areas where ground or vegetation disturbance activities are required outside of the areas previously surveyed. Subsequent surveys of distinct areas (e.g. relocated access points and traffic signage along gazetted roads) has also been undertaken. The results of these surveys are summarised in Section 3.1.6 and are included in Appendix A and Appendix B.

As detailed design and construction planning progresses, additional areas where ground or vegetation disturbance activities are required outside of the areas previously surveyed, may be identified and require additional survey.

These surveys, and any others that are identified, will be carried out in accordance with the *Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW* (2010).

Briefly, the survey process will include:

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- a draft survey methodology was prepared in consultation with RAPs (Aboriginal Archaeological Survey Methodology, Everick Heritage 2021);
- survey will be undertaken with RAPs in areas where ground or vegetation disturbance is required, outside those areas previously surveyed;
- if no sites are found, or they will not be impacted, a letter report (or similar) will be prepared that gives notification of this and clearance to proceed with nominated activities;
- an Archaeological Survey Report will be prepared to document the findings of the survey activities. The draft report(s) will be presented to the RAPs for comment; and
- the finalised reports will be provided to the RAPs and Heritage NSW for information.

The letter reports and Archaeological Survey Report described above have been incorporated into the Aboriginal Cultural Heritage Assessment Report for Stage 2a that forms part of the updated Aboriginal Cultural Heritage Strategy required by condition D29 and described in Section 5.2. Additional letter reports will be incorporated into the Aboriginal Cultural Heritage Assessment Report for Stage 2b that forms part of the final Aboriginal Cultural Heritage Strategy. Alternatively, the results of the additional survey will be directly incorporated into the relevant updated Aboriginal Cultural Heritage Assessment Report with no Archaeological Survey Report prepared. Consultation would then be undertaken on the relevant updated Aboriginal Cultural Heritage Assessment Report.

The results of the survey have informed and will continue to inform the refinement of the detailed design and construction methodology (refer to Section 5.1) and have identified requirements for test excavation (refer to Section 5.4) and other relevant management measures (refer to Table 5.1).

### 5.3.2 Scarred trees

Scarred trees identified during the archaeological survey (refer to Appendix B) have been assessed by a qualified arborist engaged to determine the tree age and likely cause of scarring in order to confirm the scientific significance of the tree (prior to any impact on the scarred tree).

The assessment has been summarised and appended to the updated Aboriginal Cultural Heritage Assessment Reports (Stage 2a and Stage 2b), which have been provided to Heritage NSW and the RAPs for review and comment.

### 5.3.3 Non-Aboriginal heritage

Historical heritage survey was undertaken as part of the EIS along an approximately 100m wide corridor and at the proposed locations for the main construction compounds and accommodation camps.

In accordance with RMM NAH2, additional survey has been undertaken in December 2021, in areas where disturbance is proposed outside of the previously surveyed area. The results of this survey area summarised in Section 3.2.4.

As detailed design and construction planning progresses, additional areas where disturbance is proposed outside of the previously surveyed area, may be identified and will require additional survey.

Briefly, the survey process will include:

- survey to be undertaken by an archaeologist to determine the likelihood of occurrence and significance of potential archaeology and impacts from the project (including built heritage) prior to the commencement of construction;
- an addendum report(s) to Appendix E of the Amendment Report or a Historic Heritage Survey Report will be prepared to detail the survey findings; and
- the finalised report(s) will be provided to Heritage NSW.



## 5.4 Test excavation

Subsurface testing/test excavation has been undertaken to confirm the significance of the PADs anticipated to be impacted by the project.

The test excavations for both Stage 1 (2a) and Stage 2 (2b) were conducted between the 10 February to the 28 June 2022.

Specific locations for test excavation identified as applicable locations for RMM AH4 in the Response to DPIE Request for Information include:

- *Information removed for public display*

PADs identified during the additional heritage survey undertaken from 14-19 December 2021, where ground/soil disturbance is currently proposed, and will therefore require test excavation include:

- *Information removed for public display*

Test excavation is not required in areas where vegetation will be removed to ground level with no ground/soil disturbance. Test excavation is required where ground/soil disturbance is required, and/or root-ball clearing of trees is required and will not be undertaken in PADs where ground/soil disturbance is not proposed. The sites and PADs where test excavation was undertaken are identified in Appendix B.

The test excavation process is summarised below:

- a draft test excavation methodology will be prepared and then presented to and consulted on with RAPs;
- test excavation will be undertaken with RAPs in areas of proposed ground disturbance (described above);
- if no deposits are identified, or they will not be impacted, a letter report (or similar) will be prepared that gives notification of this and clearance to proceed with nominated activities;
- a Test Excavation Report will be prepared to detail the findings and any additional mitigation strategies (including timing). The draft report(s) will be presented to RAPs for comment;
- the finalised reports will be provided to RAPs and Heritage NSW prior to the commencement of construction.

The report(s) described above will be incorporated into the updated Aboriginal Cultural Heritage Assessment Report required by condition D29 e), which forms part of the Aboriginal Cultural Heritage Strategy described in Section 5.2. Alternatively, the results of the test excavation will be directly incorporated into the updated Aboriginal Cultural Heritage Assessment Report with no interim reports prepared. Consultation would then be undertaken on the updated Aboriginal Cultural Heritage Assessment Report.

The Test Excavation Report for Stage 2a was incorporated into the updated Aboriginal Cultural Heritage Assessment Report for Stage 2a and was provided to Heritage NSW and RAPs for review and comment. The Aboriginal Cultural Heritage Assessment Report for Stage 2a was included in the updated Aboriginal Cultural Heritage Strategy and submitted to the Planning Secretary for approval.

This HMP has been updated to include relevant mitigation measures identified in the Aboriginal Cultural Heritage Assessment Report for Stage 2a. These are primarily included in Appendix B, but are also considered in Section 5.5.1 and the maps with the revised PADs in Appendix A.2.

The Test Excavation Report for Stage 2b was incorporated into the updated Aboriginal Cultural Heritage Assessment Report for Stage 2b and has been provided to Heritage NSW and RAPs for review and comment. Once consultation is complete, the updated Aboriginal Cultural Heritage

Assessment Report for Stage 2b will be incorporated into the final Aboriginal Cultural Heritage Strategy and submitted to the Planning Secretary for approval.

Where required, this HMP will be updated to include any required additional mitigation strategies that are identified as a result of the test excavation process and described in the Aboriginal Cultural Heritage Assessment Report for Stage 2b.

Where supported by the RAPs, test excavation and salvage may be undertaken concurrently.

## 5.5 Recording and collection/salvage

### 5.5.1 Aboriginal heritage

All portions of artefact scatters that are to be directly impacted by the project will be subject to surface collection prior to commencement of construction in that area (RMM AH6).

Applicable locations for surface collection identified in RMM AH6 in the Response to DPIE Request for Information include:

- surface collection (artefact scatters impacted by disturbance area A); and
- *Information removed for public display*

It is noted that the list of applicable locations for surface collection differs in Appendix E of the Amendment Report from that listed in the Response to DPIE Request for Information and reproduced above.

The differences are resolved in Appendix B of this HMP, which notes the updated list of all sites identified for surface collection in line with the Aboriginal Cultural Heritage Assessment Report for Stage 2a.

Further to surface collection, Table 13-3 in the Aboriginal Cultural Heritage Assessment Report for Stage 2a identifies controlled salvage excavation for select locations, including:

- *Information removed for public display*

The surface collection and controlled salvage excavation recommendations identified in the Aboriginal Cultural Heritage Assessment Report for Stage 2a are also included in Appendix B of this HMP.

Additional items or PADs will be recommended for surface collection or salvage as described in the Aboriginal Cultural Heritage Assessment Report for Stage 2b. These mitigation measures will be incorporated into a revised version of this HMP.

Further to the above, condition D32 requires all heritage items identified for salvage and relocation in the updated and approved Aboriginal Cultural Heritage Strategy (refer Section 5.2) to be salvaged and relocated to a suitable alternative location, in line with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010) prior to carrying out any activity that could harm that heritage item(s). Salvage/surface collection of cultural material within PADs or sites identified during the additional heritage surveys will be undertaken after the updated Aboriginal Cultural Heritage Strategy has been approved.

The collection/salvage process is summarised below:

- a collection/salvage methodology will be prepared;
- collection/salvage will be undertaken, prior to commencement of construction in that area; and

- a surface collection/salvage report will be prepared.

It is noted that during surface collection/salvage, additional material may be identified for surface collection/salvage by the participating RAPs (particularly, but not exclusively, those sites that are not proposed to be collected and instead are identified simply for direct impact, e.g. middens, hearths). In these instances, the project will defer to the opinion of the archaeologists and/or RAPs on site. Any additional material will be recorded and reported upon in the surface collection/salvage report and be managed in line with all other collected/salvaged material.

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The strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works is described in Section 5.7.

### **5.5.2 Scarred trees**

If any scarred tree cannot be avoided, the tree will be subject to 3D scanning, followed by salvage of the scarred trunk.

## **5.6 On-site management**

### **5.6.1 Clearing and land disturbance**

The project utilises a clearing and land disturbance permit which must be completed and signed off prior to clearing or land disturbance. The clearing and land disturbance permit includes a section on heritage constraints such as the presence of recorded sites and appropriate management measures (e.g. surface collection, exclusion fencing), presence of recorded PADs and requirement for the approved Aboriginal Cultural Heritage Assessment Report (incorporated into the updated Aboriginal Cultural Heritage Strategy) and any necessary salvage to be undertaken.

The approval to clear is granted by the Environmental Manager or delegate.

### **5.6.2 Aboriginal heritage (exclusion zones or other controls)**

Aboriginal heritage exclusion zones will be established to protect selected features/items of significance and scarred trees that have been identified to remain in-situ throughout construction. Relevant locations are described in Appendix B.

Suitable controls will be developed during detailed design to consider type of feature/item of significance, proximity to works and landform. Controls may include:

- an established on-site/physical exclusion zone (e.g. fencing, flagging, signage, or similar). Where an on-site/physical zone is necessary for items listed as applicable locations in RMM AH7 of the Response to DPIE Request for Information and/or Appendix E of the Amendment Report (as described in Appendix B), zones will be demarcated by a suitably qualified archaeologist in consultation with RAPs prior to the commencement of construction at each location. Regardless of the detail provided in Appendix B, exclusion zones may be established as a large exclusion zone or as multiple, smaller exclusion zones, depending on the nominated site and consultation with RAPs;
- delineation of the disturbance area (e.g. fencing or star pickets and flagging, etc.) in the vicinity of a particular heritage item or feature located outside of the disturbance area;
- identification of features/items within GIS systems or other equivalent systems;
- identification on sensitive area plans;
- toolbox personnel working in the area regarding the retained features/items and associated controls; and/or

- regular environmental inspections, and maintenance of controls as required.

Areas of PADs that are located within areas of vegetation clearance where ground disturbance will not occur, will not be delineated as exclusion zones (RMM AH7). Suitable controls will be developed during detailed design to consider type of feature/item of significance, proximity to works and landform. Similar to above, controls may include:

- an established on-site/physical zone (e.g. fencing, flagging, signage, or similar);
- identification of features/items within GIS systems or other equivalent systems;
- identification on sensitive area plans;
- toolbox personnel working in the area regarding the retained features/items and associated controls; and/or
- regular environmental inspections, and maintenance of controls as required.

If temporary access to an exclusion area is required, this will be managed as described in Section 5.6.4.

In instances where both an exclusion zone and an additional measure(s) (e.g. surface collection) is recommended, once the additional measure (e.g. surface collection) is undertaken, the exclusion zone may no longer be necessary. This will be managed in accordance with Section 5.6.4.

### **5.6.3 Non-Aboriginal heritage (restricted access)**

Restricted access (e.g. fencing, flagging, signage or similar) will be established and maintained for survey marker trees PEC-W-H-1 and PEC-W-SE-H1 during vegetation clearing and construction to avoid any harm to the trees during works in accordance with RMM NAH1 and condition D33.

### **5.6.4 Access to exclusion/no-go zones**

If access is required into an exclusion/no-go zone, personnel are to contact the Supervisor who will request a *Permit to Enter No-Go Areas* (45860-HSE-FO-G-1005) from the Environment Team. The permit must be signed off by the Environmental Manager or their delegate. The Environmental Manager will review the request, including a review of:

- the reason for access;
- if access is permissible;
- if the impact was assessed as part of the EIS or Amendment Report;
- if conditions or requirements apply to the site – for example if it is a heritage item, are there any requirements for the site which must occur prior to any impacts (e.g. surface collection, test excavation);
- if any consultation is required (such as for test excavation); and
- if following consultation additional conditions apply to the area.

Where access is permissible, the permit will be approved for the applicable activity. Where access is not permissible, the permit will not be approved.

Where the sensitive area/site is to be retained following cessation of the activity, the no-go zone will be immediately re-established with delineation reinstalled. An example of this is clearing for Disturbance Area B and heritage site PEC-W-5. The impact type for PEC-W-5 is assessed as being potentially direct impacts (Table 10.2 of Appendix E of the Amendment Report and is within Disturbance Area B in Figure 10.3 of the same report). If the item remains and is not subject to surface collection, the delineation/no-go fencing will be reinstalled immediately upon cessation of the relevant clearing activities.

If the exclusion zone is no longer required (e.g. surface collection has been undertaken), this will be recorded on the *Permit to Enter No-Go Areas* (45860-HSE-FO-G-1005) and the exclusion zone will not be reinstated.

### 5.6.5 Expected Finds

In the event that suspected cultural material is encountered during the works, where it is not unexpected, e.g. within a previously identified PAD (after test excavation and salvage activities) or within an Aboriginal site area/extent with the potential for subsurface context (as indicated in an Aboriginal Cultural Heritage Assessment Report), the Unexpected Finds Procedure in Appendix D will not be adopted. The following protocol would be implemented:

- works in the area that could potentially harm the cultural material (Artefact) would stop;
- a no-go zone would be established to avoid the potential for accidental harm;
- Transgrid would be notified;
- the nature and significance of the suspected cultural material encountered would be determined in consultation with the heritage consultant and RAPs;
- await Instructions from Transgrid (Transgrid to provide Instructions for dealing with the cultural material);
- the cultural heritage find/s would be managed in consultation with the RAPs. This could include collection and repatriation, depending on the nature and significance of the material.

If the discovery is suspected human remains, the Discovery of Suspected Human Remains Procedure would be implemented.

### 5.7 Long-term management of heritage items or material

Initial consultation regarding the long-term management of any Aboriginal heritage objects or material collected during the test excavation or salvage works has commenced. The general sentiment from RAPs expressed to the Project team is the desire for cultural material to be returned to country, as close as possible to the original location. The RAPs have generally not favoured the burial of cultural material within plastic bags. Consideration has been given to reburial within other material, e.g. dilly bag or other.

An off-site repository has been secured to catalogue and temporarily store any Aboriginal objects and/or non-Aboriginal heritage items or material collected during project activities. The material will be stored temporarily until such time that material can be repatriated to appropriate locations within the transmission line easement.

The location of the repatriated/relocated cultural material collected/salvaged during project activities will consider areas least likely to be subject to future harm or risk of harm caused by disturbance, such as:

- construction activities;
- operational vegetation maintenance of the easement and/or operational access routes;
- operational maintenance of transmission line infrastructure (towers, footings, guys, earthing, conductor, earth-wire);
- maintenance of operational access tracks; and
- landowner activities, such as access tracks, fences, cultivation, etc.

Figure 5.1 (not to scale) shows the recommended exclusion zones and off-sets for transmission lines (220kV and above) from *Living and working with electricity transmission lines* (Transgrid 2021), which details restrictions for land owners in relation to transmission line easements and infrastructure. The recommended locations for repatriated material based on the above considerations are identified as green boxes.

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## **5.8 Management measures**

A range of environmental requirements and mitigation measures are identified in the EIS, the Response to DPIE Request for Information, the Infrastructure Approval and the updated Aboriginal cultural heritage assessment reports. Safeguards and management measures will be implemented to minimise or manage impacts to Aboriginal and non-Aboriginal heritage features.

Specific heritage related safeguards and management measures to address impacts associated with the project are outlined in Table 5.1.

Table 5.1 - Heritage management measures

ID	Measurement/Requirement	When to implement	Responsibility	Source document
<b>General</b>				
H1	No harm is to occur to any PADs or any sites recorded during the additional heritage surveys within the Stage 2b area until the final Aboriginal Cultural Heritage Strategy, including the Aboriginal Cultural Heritage Assessment Report Stage 2b, is finalised to the satisfaction of the Planning Secretary.	Pre-construction Construction	ALL	Condition D29
H2	Training will be provided to all project personnel, including relevant sub-contractors on heritage practices and the requirements from this plan through inductions, toolboxes and targeted training. Cultural and historic heritage awareness training will be carried out for all personnel working on the project.	Pre-construction Construction	Health, Safety, Security and Environment (HSSE) Manager	RMM AH9 Condition D34 b)
H3	Identify known features/items of heritage significance/PADs on sensitive area plans (SAPs) (or other equivalent system) which will be communicated and made available to personnel working in the proximity of the relevant items.	Pre-construction Construction	Environmental Advisor, Environmental Manager	Good practice RMM AH8
H4	Features/items of heritage significance that will remain in-situ within the transmission line easement will be mapped and recorded within GIS systems.	Construction Pre-Operation	SecureEnergy	RMM AH12
H5	During detailed design, the location of identified Aboriginal PADs and scarred trees will be reviewed.  Detailed design will be developed to avoid harm to features/items of Aboriginal archaeological significance and scarred trees as far as practical. Avoidance and minimisation of impacts to features /items and PADs of moderate or higher archaeological significance will be prioritised.	Detailed design	Engineering Manager	RMM AH1 Condition D30
H6	An Aboriginal Cultural Heritage Strategy will be prepared in consultation with RAPs and Heritage NSW, to the satisfaction of the Planning Secretary.  The Aboriginal Cultural Heritage Strategy will be staged to confirm the additional risk zones initially, to allow the commencement of construction in areas that are not identified as risk zones until the relevant subsurface testing or additional heritage survey has been undertaken.	Pre-construction	SecureEnergy	Condition 29

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
H7	<p>Aboriginal stakeholder consultation will be carried out in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW, 2010). Engagement with RAPs will consist of the following:</p> <ul style="list-style-type: none"> <li>Aboriginal heritage site surveys (H9) – review of proposed methodologies and involvement in the survey activities in the field (for ground or vegetation disturbance outside of previously surveyed areas);</li> <li>test excavation activities (H13) – review of proposed methodologies and involvement in the test excavation activities in the field;</li> <li>review of the draft addendum report/s (relating to surveys (H11), test excavations (H15) and scar trees (H26)), and consultation on the draft reports which will typically be in the form of a RAP meeting;</li> <li>provision of final addendum report/s will be provided to RAPs (H11, H15, H26); and</li> <li>involvement in establishment of Aboriginal heritage exclusion zones prior to construction commencing (H22).</li> </ul> <p>Further cultural information will be gathered during consultation undertaken in association with these activities. All addendum reports to Appendix E of the Amendment Report will be provided to RAPs for comment, and input will be considered, and actioned wherever practicable.</p> <p>Consultation on the draft addendum report/s relating to surveys (H11) and test excavations (H15) may instead be undertaken through the development of the updated Aboriginal Cultural Heritage Assessment Report required in condition D29 e) (management measure H17).</p>	Pre-construction Construction	SecureEnergy	RMM AH2 Condition D29
H8	Potential harm due to surface water run-off (e.g. physical disturbance from surface water drainage) to Aboriginal heritage items located outside of the disturbance areas will be managed in accordance with the <i>Soil and Water Management Plan</i> (45860-HSE-PL-D-0021).	Pre-construction Construction	Environmental Manager Environmental Advisor	RMM AH8 Condition D31
<b>Survey</b>				
H9	<p>Where ground disturbance or vegetation clearance is required outside of the area subject to previous Aboriginal heritage survey, additional survey will be undertaken. The additional survey will involve the following:</p> <ul style="list-style-type: none"> <li>the proposed survey methodology will be provided to RAPs for review; and</li> <li>survey will be undertaken with the RAPs.</li> </ul>	Pre-construction Construction	SecureEnergy	RMM AH2 RMM AH3 Condition D29 b)
H10	If no sites are found in the additional Aboriginal heritage survey, or if sites are found and they will not be impacted, then a letter report will be provided that gives notification of this and clearance to proceed.	Pre-construction Construction	SecureEnergy	RMM AH3

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
H11	<p>Archaeological Survey Report(s) will be prepared to:</p> <ul style="list-style-type: none"> <li>• detail findings of the survey activities;</li> <li>• detail where any test excavation is required;</li> <li>• outline any additional mitigation strategies beyond those required by RMM AH5 to AH12; and</li> <li>• be presented to the RAPs for comment.</li> </ul> <p>Reports will be incorporated into the updated Aboriginal Cultural Heritage Assessment required in condition D29 e) (management measure H17). Alternatively, the updated Aboriginal Cultural Heritage Assessment will be prepared and consulted upon as a single comprehensive document.</p>	Pre-construction	SecureEnergy	RMM AH3 Condition D29 c) Condition D29 e)
H12	<p>A non-Aboriginal survey will be undertaken if the disturbance area for the project extends beyond the previously surveyed area, which will include:</p> <ul style="list-style-type: none"> <li>• assessment by an archaeologist will be carried to determine the likelihood of occurrence and significance of potential archaeology; and</li> <li>• potential impacts from the project (including built heritage).</li> </ul> <p>The results of this assessment will be reported on in addendum reports for non-Aboriginal heritage. Reports will be provided to Heritage NSW.</p>	Pre-construction (in the relevant area)	SecureEnergy	RMM NAH2
<b>Test excavation</b>				
H13	<p>Subsurface testing/test excavation will be undertaken at some identified sites and in the parts of any PADs where direct impact is likely (including where the root-balls of trees are being removed). The test excavation will involve the following:</p> <ul style="list-style-type: none"> <li>• the proposed test excavation methodology will be provided to RAPs for review; and</li> <li>• test excavation will be undertaken with RAPs.</li> </ul> <p>Subsurface testing will be undertaken in line with <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010).</p>	Pre-construction	SecureEnergy	RMM AH2 RMM AH4 Condition D29 b)
H14	<p>If no features of significance/PADs are found during the test excavation, or if the site will not be impacted, then a letter report will be provided that gives notification of this and clearance to proceed.</p>	Pre-Construction Construction	SecureEnergy	RMM AH4

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
H15	<p>Test Excavation Report(s) will be prepared to:</p> <ul style="list-style-type: none"> <li>• detail findings of the test excavation activities;</li> <li>• as applicable, detail any additional mitigation strategies beyond those required by RMM AH6 to RMM AH12, and the required timing for these to be implemented; and</li> <li>• be presented to the RAPs for comment.</li> </ul> <p>Reports will be incorporated into the updated Aboriginal Cultural Heritage Assessment Report required in condition D29 e) (management measure H17). Alternatively, the updated Aboriginal Cultural Heritage Assessment will be prepared and consulted upon as a single comprehensive document.</p>	Pre-Construction Construction	SecureEnergy	RMM AH2 RMM AH4 Condition D29 e)
H16	If additional mitigation strategies (beyond those required by RMM AH6 to RMM AH12) are identified in the test excavation report(s), those additional mitigation strategies and the required timing for implementation will be included in a revised version of this HMP.	As required	Environmental Advisor TransGrid	RMM AH4
<b>Updated Aboriginal Cultural Heritage Assessment Report</b>				
H17	<p>An updated Aboriginal Cultural Heritage Assessment Report will be prepared in consultation with the RAPs and Heritage NSW, to consider additional survey undertaken (refer H9 to H11) subsurface testing/test excavation (H13 to H16) and ongoing consultation with RAPs (H7).</p> <p>The updated Aboriginal Cultural Heritage Assessment Report will include:</p> <ul style="list-style-type: none"> <li>• how the detailed design has been further developed to avoid or minimise impacts to the identified constraints/features of significance/PADs;</li> <li>• an updated and consolidated list of sites that will be protected and remain in-site throughout construction; and</li> <li>• sites that will be salvaged/relocated to suitable alternative locations.</li> </ul>	Pre-construction	SecureEnergy	RMM AH4 Condition D29 e)
<b>Recording, collection and salvage</b>				
H18	<p>Surface collection/salvage will be undertaken in the parts of artefact scatters or PADs where direct impact is expected:</p> <ul style="list-style-type: none"> <li>• a collection/salvage methodology will be prepared;</li> <li>• collection/salvage will be undertaken;</li> <li>• a surface collection/salvage report will be prepared.</li> </ul> <p>Surface collection or salvage will be undertaken prior to commencement of any works that could harm the relevant heritage item(s). This includes the salvage of heritage items identified in the updated Aboriginal Cultural Heritage Assessment Report required in condition D29 e) (management measure H17).</p>	Pre-construction Construction	Environmental Manager Heritage Consultant	RMM AH6 Condition D32 Condition D34 b)
H19	A temporary repository of any retrieved archaeological material and Aboriginal objects will be appropriately secured and under the care of the archaeological consultant. The strategy for the long-term conservation of salvaged or collected Aboriginal objects will be determined in consultation with RAPs.	Construction	TransGrid	RMM AH11 Condition D34 b)

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
H20	Record the location (on GIS) of any identified unexploded ordinance (UXO) and assign an artefact number to be included in the project's surface collection/salvage report.	Pre-construction Construction	SecureEnergy	Recommendation of the Historic Heritage Survey Report, required by RMM NAH2
H21	Remaining PADs will be registered with AHIMS to assist in the longer-term protection of the area.	Pre-construction Construction	SecureEnergy	Recommendation raised by RAPs during consultation on ACHAR2a.
<b>Restricted access</b>				
H22	<p>Restricted access (e.g. star pickets and flagging along the disturbance area boundary), heritage exclusion zones or other controls (refer Section 5.6.1) will be established to protect:</p> <ul style="list-style-type: none"> <li>known features/items of significance that have been identified to remain in-situ throughout construction (and not subject to H18);</li> <li>scarred trees that are to remain in-situ;</li> <li>any other heritage items identified for avoidance in the updated Aboriginal Cultural Heritage Assessment Reports required in condition D29 e) (management measure H17).</li> </ul> <p>Where physical marking of Aboriginal heritage exclusion zones are required, they will be demarcated by a suitably qualified archaeologist in consultation with the RAPs prior to the commencement of any activity that could harm the relevant item(s).</p>	Prior to any activity that could harm the relevant item(s)	Environmental Manager Supervisor	RMM AH7 RMM AH8 Condition D31 Condition D34 b)
H23	Temporary exclusion zones or other controls (refer Section 5.6.1) will be established to protect known features/items of significance that require management (e.g. salvage, test excavation).	Pre-construction (in the relevant area)	Environmental Manager Supervisor	RMM AH8
H24	An exclusion zone will be established for survey marker trees (PEC-W-H-1 and PEC-W-SE-H1) with fencing/flagging or similar during vegetation clearance and construction in the vicinity of the trees.	Pre-construction Construction (in the relevant area)	Environmental Manager Supervisor	RMM NAH1 Condition D33 Condition D34 b)
H25	An approved <i>Permit to Enter No-Go Areas</i> (45860-HSE-FO-G-1005) is required prior to accessing any identified no-go/exclusion zone (e.g. for approved vegetation clearing that does not require ground disturbance).	Pre-construction Construction	All personnel	RMM AH7 RMM AH8

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
<b>Scarred trees</b>				
H26	An assessment of all scarred trees identified during archaeological survey will be undertaken by a qualified arborist to determine tree age and likely cause of the scarring in order to confirm the scientific significance prior to any impact to the scarred trees. The results of this assessment will be included in the updated Aboriginal Cultural Heritage Assessment Report required in condition D29 e). Draft reports will be provided to RAPs for comment. Final reports will be provided to RAPs and to Heritage NSW.	Pre-construction	SecureEnergy	RMM AH5
H27	Scarred trees may only be removed for permanent infrastructure and/or to meet <i>Vegetation Clearance Requirements at Maximum Line Operations Conditions</i> (Transgrid, 2003).	Pre-construction Construction	Design Manager Construction Manager Environmental Manager	RMM AH5
H28	If any scarred tree cannot be avoided, the tree will be subject to 3D scanning, followed by salvage of the scarred trunk.	Pre-construction Construction	SecureEnergy	RMM AH5
<b>Unexpected finds</b>				
H29	If at any time during construction, any potential Aboriginal object, or human remains or any items of potential non-Aboriginal archaeological significance are discovered, stop all work in the immediate vicinity of the find and notify the Site Supervisor and Environmental Manager. The Unexpected Heritage Finds Procedure (45860-HSE-PR-G-1003) will be followed.	Pre-construction Construction	All personnel	RMM AH10 RMM NAH3 Condition D29 b) <i>Heritage Act 1977</i> <i>National Parks and Wildlife Act 1974</i>

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## 6 Compliance management

### 6.1 Training and awareness

All site personnel will undergo the SecureEnergy site induction prior to the personnel participating in on-site construction activities. The induction training addresses elements related to heritage management including, but not limited to:

- the environmental management system, including the CEMP;
- cultural and historic awareness training, including features of heritage significance within and adjacent to project locations;
- management measures that are necessary to comply with to minimise and manage potential impacts to those features such as heritage exclusion zones; and
- the Unexpected Heritage Finds Procedures (45860-HSE-PR-G-1003).
- Targeted training in the form of toolbox talks or specific training will also be delivered to personnel with a key role in heritage management. Examples of training topics include:
  - establishment of heritage exclusion zones;
  - details of specific features of heritage significance within or adjacent to the proposed work area; and
  - discovery of any unexpected finds.

Records of training, including attendance, will be retained by SecureEnergy.

### 6.2 Roles and responsibilities

SecureEnergy's organisational structure and overall roles and responsibilities are outlined in Section 4.9 of the CEMP. Specific responsibilities for the implementation of mitigation measures are detailed in Section 5.8 of this HMP.

### 6.3 Monitoring

The impacts and environmental performance of the project relevant to Aboriginal and non-Aboriginal heritage, and the effectiveness of the management measures identified in Section 5.8 will be monitored through the proposed monitoring program Table 6.1.

**Table 6.1 - Monitoring program**

Item	Scope	Frequency	Responsibility	Records/ reporting
Daily observations	Visual inspection of work site, including heritage exclusion zones and fencing along the disturbance boundaries	Daily within active work areas	Supervisors Environmental Advisor	Site diary entry
Weekly inspection	Inspection of environmental controls and implementation of heritage management measures outlined in Table 5.1	Weekly	Environmental Advisor Supervisors	Weekly environmental inspection checklist

### 6.4 Inspections

Weekly inspections of the project will be performed by the Environmental Advisor and documented in the weekly environmental checklist. Visual inspection of areas such as established exclusion zones, delineated/fenced disturbance boundaries and any known heritage items/features immediately adjacent to the work site will be undertaken.

## 6.5 Auditing

No heritage-specific audits are identified in the Infrastructure Approval or the RMMs.

Audits will be undertaken to assess the effectiveness of the management measures and overall compliance with this plan, and other relevant approvals, licences and guidelines. Audit requirements are detailed in Section 9.3 of the CEMP.

## 6.6 Reporting

Reporting which will be undertaken in accordance with the HMP is summarised within Table 6.2.

**Table 6.2 - Reporting program**

Item	Scope	Frequency	Responsibility	Recipient
Aboriginal Cultural Heritage Strategy	As defined in condition D29.	Prior to construction	SecureEnergy/ Transgrid*	ER RAPs Heritage NSW DPE
Unexpected finds report	Unexpected heritage finds identified during project activities will be managed and reported upon in accordance with the <i>Unexpected Heritage Finds Procedure</i> (45860-HSE-PR-G-1003).	As required	Environmental Manager Transgrid	Transgrid Wentworth Council RAPs DPE Heritage NSW AHIMS register ER (all as required in accordance with the procedure)
Audit reports	Independent audits undertaken in accordance with the Infrastructure Approval will include audits of heritage measures (based on the Independent Auditor's program). Audit reports will be prepared. Further detail in relation to auditing is provided within Section 9.3 of the CEMP.	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.	Environmental Manager / Independent Auditor	TransGrid DPE ER

\* SecureEnergy will prepare the documents in accordance with D29 and Transgrid will provide the documents to the recipients

### 6.6.1 Unexpected impacts outside the disturbance area

If, as a result of Stage 2 construction activities, any heritage item(s) located outside of the approved disturbance area is damaged, the following steps will be undertaken:

- stop all works in the immediate vicinity of the Aboriginal heritage item;
- notify TransGrid and relevant authorities as required in accordance with non-compliance and/or environmental incident procedures (e.g. DPE, Heritage NSW);
- set up a no-go zone;
- assess the nature of the item (if unknown) and damage based on consultation as required with: relevant statutory authority (Heritage NSW), relevant stakeholder groups and heritage consultant;
- determine the appropriate course of action;
- implement appropriate course of action;
- commence works in accordance with the Infrastructure Approval, if and when accepted by Heritage NSW or DPE (as relevant); and

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- finalise reporting to relevant statutory authority (as required).

## 6.7 Emergencies, incidents and non-compliances

Emergency management and planning including emergencies related to Aboriginal and non-Aboriginal heritage will be undertaken in accordance with the Clough management system and relevant procedures. Emergencies will be managed in accordance with the relevant Health, Safety, Security and Environment (HSSE) Plan as identified in Section 8.1 of the CEMP – Emergency preparedness and emergency response.

Environmental incidents, including incidents related to Aboriginal and non-Aboriginal heritage (e.g. unauthorised/unapproved impact to heritage objects, items, artefacts or sites) will be managed as described in Section 8.2 of the CEMP – Environmental incidents and the Incident, Notification and Investigation Procedure Flowchart provided in Appendix A4 of the CEMP. The Unexpected Heritage Finds Procedure will also be followed to prevent any further damage and to notify the appropriate authorities.

Incident reporting is described in Section 8.3 of the CEMP – Incident notification and reporting.

Where a non-compliance has been identified, including those relevant to Aboriginal and non-Aboriginal heritage (e.g. not following the notification or reporting requirements in the Unexpected Finds Procedure), corrective actions will be developed as required and implemented to address the non-conformance that occurred as described in Section 11 of the CEMP – Non-compliance, non-conformance, corrective and preventative action. Reporting of non-compliances will be undertaken as described in Section 10.1 of the CEMP – Reporting non-compliances.

## 6.8 Contingency plan

Although the project has been assessed through the environmental impact assessment process and potential impacts identified, unpredicted impacts may occur as the project progresses. In the event that unexpected impacts are identified, the action or cause will be categorised and as required will be managed as:

- an emergency or environmental incident in accordance with Section 8 of the CEMP – Incidents and emergencies; and/or
- a non-compliance or non-conformance in accordance with Section 11 of the CEMP – Non-compliance, non-conformance, corrective and preventative action.

Reporting of the unpredicted impacts would be in line with the above processes and as described in Section 10 of the CEMP – Reporting.

Through the identification of corrective and/or preventative actions through the above processes, the following steps will be considered as relevant:

- a) determine the relevant impact assessment criterion/criteria, below which the impact should be reduced, consistent with the requirements of this HMP;
- b) identify options to reduce the unexpected impacts to below the relevant criterion/criteria and appropriate timeframe for implementation;
- c) implement the selected measure(s) to reduce the unexpected impacts; and
- d) identify and implement an appropriate monitoring program to determine the effectiveness of the selected measure(s) to reduce the unexpected impact.

If the above monitoring program identifies that the unexpected impacts have not been reduced to below the nominated criterion/criteria, items b) to d) of the contingency process will be repeated.

This section does not apply to unexpected heritage finds. These will be managed in accordance with the Unexpected Heritage Finds Procedure included in Appendix D of this HMP.

## Appendix A - Detailed maps

Appendix A.1 shows the areas of the project alignment that have been subject to heritage surveys by Navin Officer Heritage Consultants (NOHC), by Everick Heritage as part of the December 2021 surveys and subsequent addendum/additional survey undertaken throughout 2022 for the eastern portion of EnergyConnect (NSW – Western Section) (or Stage 2a). These maps are from Section 14 of the Aboriginal Cultural Heritage Assessment Report for Stage 2a.

Appendix A.2 includes the results of test excavation activities for the Stage 2a area. The maps show positive and negative (no cultural material identified) test pits, the location of repatriation test pits and the refined post-excavation PAD locations. Areas that have been subject to test excavation are generally no longer considered to be PADs. The site extents and PADs for these figures supersede the site extents and PADs shown in Appendix A.3. These maps in Appendix A.2 are from Section 15 of the Aboriginal Cultural Heritage Assessment Report for Stage 2a.

The figures provided in Appendix A.3 display the current disturbance areas and the recorded Aboriginal heritage sites and PADs. These disturbance areas are indicative only and may shift/change as detailed design and construction planning progresses. These disturbance areas were used to inform the revised impact zone identified in Appendix B.



## Appendix A.1 - Survey areas for Stage 2a

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## Appendix A.2 - Test excavation maps for Stage 2a

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## Appendix A.3 - Detailed maps (pre-test excavation results)

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## Appendix B - Aboriginal heritage features/items of archaeological significance

Table B.1 is an assessment of impacts to archaeological sites within and adjacent to the Stage 2a Project disturbance area. The recommended mitigation measures and corresponding RMMs applicable to each site are included in the last two columns. Table B.1 is based on Table 12-1 of the Aboriginal Cultural Heritage Assessment Report for Stage 2a. Sites included were originally identified by Navin Officer Heritage Consultants in Appendix E of the Amendment Report or by Everick Heritage during additional heritage survey or test excavation activities. The site extents of some previously identified sites were refined/increased during test excavation activities. Site that were previously included in (now) Table B.3 or B.4 in previous revisions of the HMP have been removed from those tables.

Table B.2 identifies mitigation measures and salvage recommendations for applicable PADs in the Stage 2a area and is based primarily on Table 13-3 of the Aboriginal Cultural Heritage Assessment Report for Stage 2a, with some input from Table 12-1 and Table 13-1 of the same report.

Table B.3 considers sites and features that are not included in the Aboriginal Cultural Heritage Assessment Report for Stage 2a. The first eight columns of the Table B.3 are based primarily on Table 10.2 of Appendix E of the Amendment Report. Column nine, the original mitigation measures are identified in Table 11.2 of Appendix E of the Amendment Report (to conserve space, abbreviated as reference document 'A' for this column only) and Appendix G of the Response to DPIE Request for Information (reference document 'B' for this column only). Table 10.2 of Appendix E of the Amendment Report identifies direct and potential direct impacts based on the design at the time of the Amendment Report.

As detailed design and construction planning has progressed (including to avoid recorded heritage features, where possible), some disturbance areas have changed/shifted resulting in differing impacts to some recorded features/items and PADs. The 'impact zone' based on the current design/disturbance area has been included in the 'revised impact zone' column. Where the revised impact zone has 'improved' e.g. changed from Disturbance Area A to Disturbance Area B or outside the disturbance area, or from Disturbance Area B to outside the disturbance area, the reference cell is **coloured yellow** (e.g. PEC-W-17). Mitigation measures informed by the revised impact zone are included in the final column.

Even where not specifically identified in the table below, exclusion zones may be established as single exclusion zones, or as multiple smaller exclusion zones.

[A number of the sites/PADs in the table below have information (**shown in red text**) where discrepancies have been noted either in Table 10.2 of Appendix E of the Amendment Report (identified as 'A' in column 9 of the below table) or between applicable locations identified in a RMM between Appendix G of the Response to DPIE Request for Information (identified as 'B' in column 9 of the below table) and Appendix E of the Amendment Report.

The discrepancies identified in Table B.3 and described above are resolved for sites and features included in the Aboriginal Cultural Heritage Assessment Report for Stage 2a. Table B.1 and Table B.2 incorporate the relevant impact and mitigation measures identified in the Aboriginal Cultural Heritage Assessment Report for Stage 2a.

Table B.4 is also included within Appendix B. It summarises the results of the additional heritage survey.

A key is provided below for the tables in Appendix B.

**Key**

Artefact scatter (AS), scarred tree (ST), isolated artefact (IA), isolated hearth (IH), hearth complex (HC), shell middens (SM), open campsite (OC).

**Table B.3 only:**

Table 11.2 of Appendix E of the Amendment Report (A); Appendix G of the Response to DPIE Request for Information (B).

**Red text** – Indicates where there was discrepancy between the Amendment Report (A) and Appendix G of the Response to DPIE Request for Information (B).

**Grey text** – heritage item or site is not in an impact zone, therefore for the most part there is no mitigations recommended.

**Yellow shading** – revised impact zone has improved.

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## Appendix C - Registered Aboriginal Parties

Registered Aboriginal Parties were identified during the EIS process in accordance with *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010). Registrations of interest were received from:

- Muragadi
- Murra Bidgee Mullangari
- Merrigarn
- Dareton Local Aboriginal Land Council
- Arthur Kirby
- Barkandji Native Title Claim Group Aboriginal Corporation (RNTBC)
- Barkandji Native Title Claim Group Aboriginal Corporation
- Barkindji Maraura Elders Environment Team (BMEET)
- Riverina Murray Regional Alliance
- Ricky Handy
- Hector Hudson
- Kingsley Abdulla
- Warren Clarke
- Barkindji-Maraura Elders Council
- Ta-Ru of Management/Maroura Barkindji Traditional Owners
- Biodiversity and Conservation Department of Planning, Industry and Environment
- C/- Damos Family Dream
- Alynthia Kennedy.

The above list was confirmed by Navin Officer to be the complete list of RAPs.

## Appendix D - Unexpected Heritage Finds Procedure

INTERNAL



## Unexpected Heritage Finds Procedure EnergyConnect (NSW – Western Section)

45860-HSE-PR-G-1003

REV	DATE	GENERAL DESCRIPTION	PREPARED	REVIEWED	VERIFIED	VERIFIED	APPROVED
A	23/04/2021	For internal review	N. Whatmough	R. Walker-Edwards	G. Crighton	JL.Barrenechea	D. Whatmough
B	30/04/2021	Issued for TransGrid review	N. Whatmough	R. Walker-Edwards	G. Crighton	JL.Barrenechea	D. Whatmough
C	11/06/2021	Issued for TransGrid review	A.Kriegel	R. Walker-Edwards	G. Crighton	JL.Barrenechea	D. Whatmough
D	05/07/2021	Issued for TransGrid review	A.Kriegel	R. Walker-Edwards	G. Crighton	JL.Barrenechea	D. Whatmough
E	06/08/2021	Issued for TransGrid review	A.Kriegel	R. Walker-Edwards	G. Crighton	JL.Barrenechea	D. Whatmough
F	07/10/2021	Issued for TransGrid review	V. Edmonds / A.Kriegel	R. Walker-Edwards	G. Crighton	JL.Barrenechea	D. Whatmough
G	11/04/2022	Revised in response to Heritage NSW comments	<i>Vanessa Edmonds</i> <i>Oliver Kriegel</i> V. Edmonds / A.Kriegel	<i>Frederick</i> R. Walker-Edwards	<i>[Signature]</i> G. Crighton	<i>[Signature]</i> JL.Barrenechea	<i>[Signature]</i> D. Whatmough

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Revision History	
Rev.	Detailed Description
A	Issued for Internal review
B	Issued for TransGrid review
C	Revised in response to TransGrid comments
D	Revised in response to TransGrid comments
E	Revised in response to TransGrid comments and draft Infrastructure Approval
F	Revised in response to TransGrid comments and to address the Infrastructure Approval
G	Revised in response to Heritage NSW comments

Key Document Stakeholders
To be communicated with during reviews and revisions of this document

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## 1 Introduction

This procedure explains the actions to be undertaken in the event that an unexpected actual or potential Aboriginal object or non-Aboriginal heritage item is identified during project activities.

### 1.1 Purpose

The purpose of this procedure is to detail the actions to be taken in the event that an unexpected actual or potential heritage find is encountered during project works within the NSW section of the works.

This procedure has been prepared to address a select portion of the requirements of condition D34 b) of the Infrastructure Approval (SSI 10040) granted by the then Minister for Planning and Public Spaces and the revised mitigation measures (RMMs) AH10 and NAH3 identified in the *EnergyConnect (NSW – Western Section) Response to DPIE Request for Information – 7 May 2021 and subsequent discussions* (Additional Information).

## 2 Induction/Training

Personnel involved in any aspect of the project works will undertake an induction which will include details relating to this procedure. Training may also occur through toolbox talks, pre-starts and targeted training as required.

## 3 Scope

This procedure applies to the discovery of any unexpected Aboriginal object or non-Aboriginal heritage item (usually during construction activities, such as clearing, access track construction and tower pad construction), not identified and assessed in the environmental impact assessment of the project (excluding any item(s) identified during test excavations and salvage activities carried out in accordance with project commitments and approval).

### 3.1 Heritage objects/items

A heritage object or item can be found anywhere along the project corridor.

Examples of Aboriginal objects and sites include middens, Aboriginal burial sites, hearths, scarred trees and artefacts. An artefact is a normally portable object made or modified by human hand (*Non-Aboriginal & Aboriginal Cultural Heritage Assessment Report* (Navin Officer 2021)). An artefact can be found as an isolated find without associated evidence of occupation in a 60m radius, or as an artefact scatter when there are two or more artefacts within a 60m radius of each other.

Examples of non-Aboriginal heritage items include historic non-Aboriginal graves, old fence lines, survey marker trees and farm dwellings or outbuildings. All items will have their own respective cultural significance.

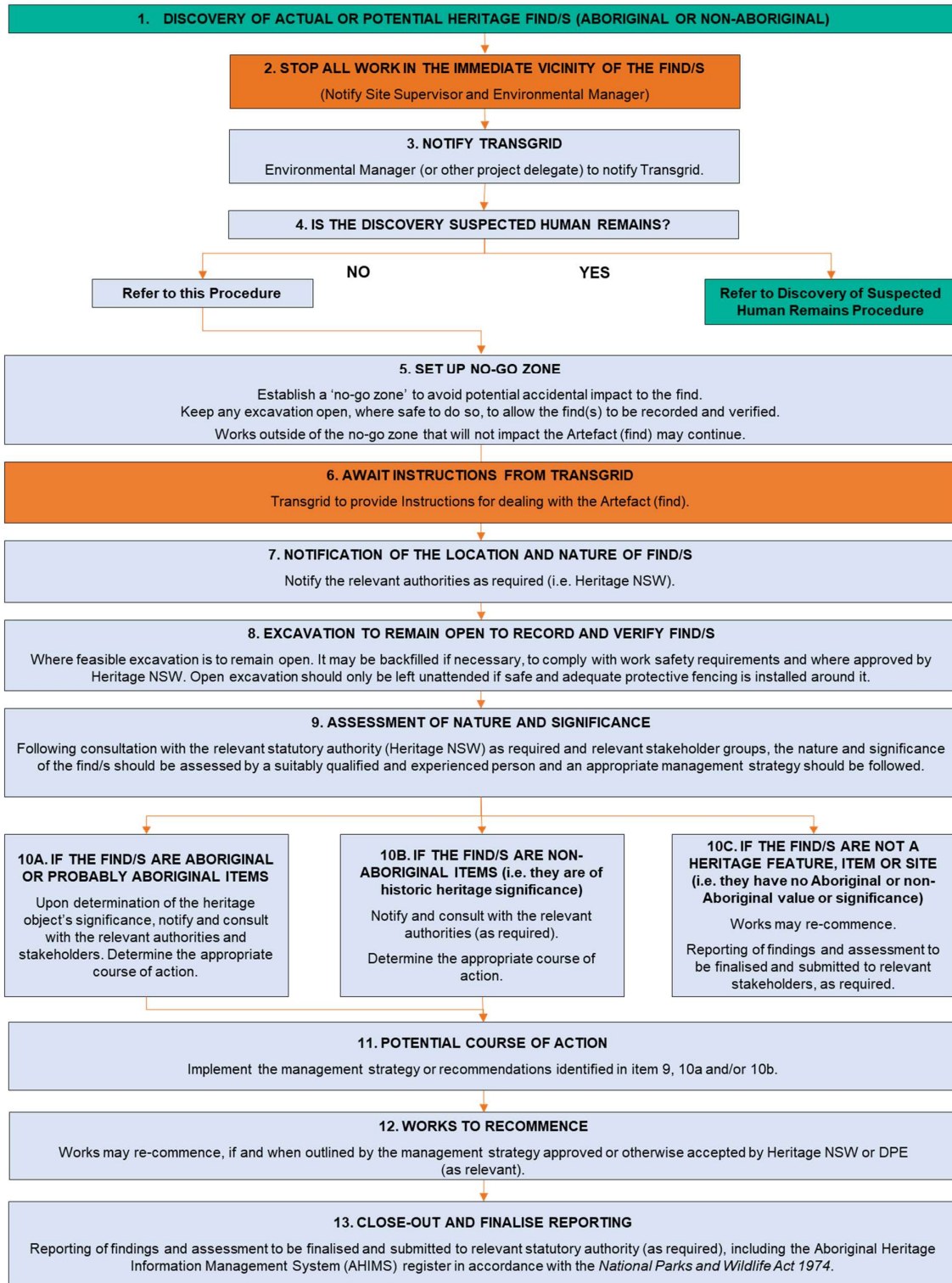
Some examples of heritage items and objects that have been identified within the project survey area are displayed in Table 3.1 below.

**Table 3.1 - Examples of Aboriginal objects and sites and heritage items found in the project area**

*Information redacted for public display*

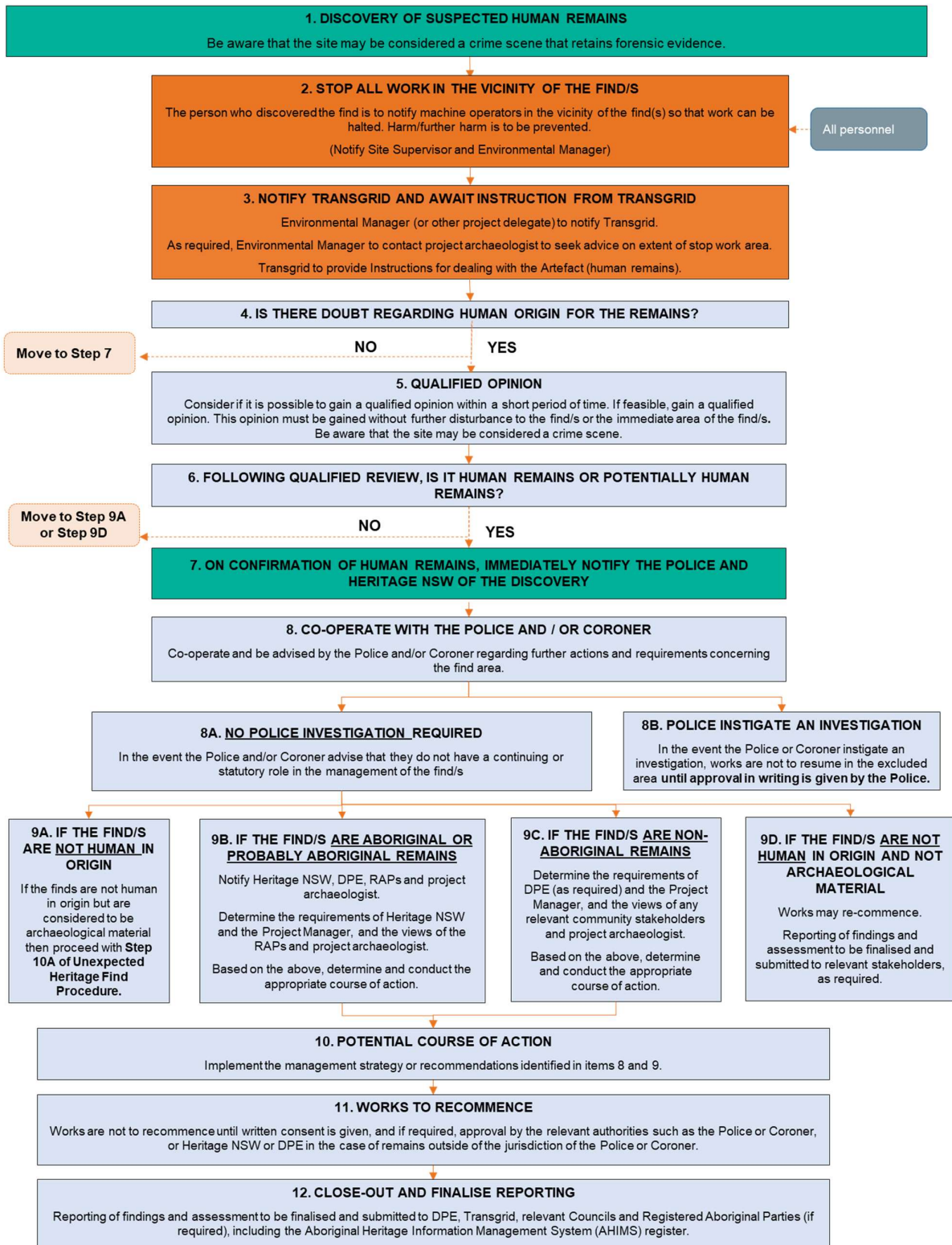
*Information redacted for public display*

Heritage Management Procedure  
**UNEXPECTED HERITAGE FINDS PROCEDURE**



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Heritage Management Procedure  
**DISCOVERY OF SUSPECTED HUMAN REMAINS PROCEDURE**



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## Appendix E - Relevant legislation

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
<b>Commonwealth legislation</b>					
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	Protection of areas and objects	Section 10	Comply with any declarations relating to the project area	No declarations have been made relating to the project area. In the event that declarations are made, this HMP will be updated if required.	Transgrid SecureEnergy
		Section 20	Report any discovery of Aboriginal remains to the Federal Minister for the Environment and Heritage.	Yes, notification requirements are detailed in the Heritage Management Plan.	SecureEnergy
		Section 22	Comply with the provisions of any declaration in relation to a significant Aboriginal area or object.	Yes, a Heritage Management Plan has been prepared and will be implemented for the project to outline the compliance requirements for the declared Aboriginal areas or objects within the project footprint.	Transgrid SecureEnergy
<i>Native Title Act 1994</i>	Native Title Land	All	Native Title claims, registers and Indigenous Land Use Agreements are administered under the Act.	The project area intersects with the Barkandji Traditional Owners #8 (Part A) native title area (determined). Barkandji Traditional Owners will be included in consultation and archaeological survey for the project.	Transgrid / SecureEnergy
<b>New South Wales legislation</b>					
<i>Environmental Planning and Assessment Act 1979</i> (EP&A Act)	All	Section 5.5	A determining authority has the duty to fully consider the environmental impact (including Aboriginal or non-Aboriginal heritage) of an activity and is required to 'take into account the fullest extent possible all matters affecting, or likely to affect the environment' arising from the proposal.	<p>The <i>EnergyConnect (NSW - Western Section) - Environmental Impact Statement</i> was submitted to Department of Planning, Industry and Environment in October 2020 and publicly exhibited between 26 September 2019 and 10 December 2020.</p> <p>On 14 April 2021, the response to submissions was finalised in the <i>EnergyConnect (NSW - Western Section) – Submissions Report</i>.</p> <p>A separate <i>EnergyConnect (NSW - Western Section) – Amendment Report</i>, to document design changes and additional environmental assessment undertaken, was also finalised on 14 April 2021.</p> <p>Transgrid prepared and provided a memorandum titled <i>EnergyConnect (NSW – Western Section) Response to DPIE Request for Information – 7 May 2021</i> and subsequent discussions to DPIE on the 10 August 2021 in response to DPIE requested Response to DPIE Request for Information (<i>EnergyConnect (NSW –</i></p>	Transgrid

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**EnergyConnect (NSW – Western Section) Stage 2 Heritage Management Plan**

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
				Western Section) (SSI-10040) Request for Response to DPIE Request for Information).	
		Section 5.19	Approval of the Minister required to carry out critical State significant infrastructure (CSSI). Comply with the conditions of the Infrastructure Approval and generally in accordance with the revised mitigation measures from Appendix G of the Response to DPIE Request for Information.	The project requires approval from the NSW Minister for Planning and Public Spaces under Division 5.2, Part 5 of the EP&A Act. The project was assessed as above. Approval for EnergyConnect (NSW - Western Section) was granted by the Minister for Planning and Public Spaces.	Transgrid
<i>National Parks and Wildlife Act 1974</i> (NP&W Act)	Aboriginal places and objects	Part 6 Division 2 Clause 90	This Act provides protection for Aboriginal cultural heritage in NSW, including Aboriginal objects and declared Aboriginal places. Section 86 creates the offence and section 90 creates the requirement to obtain a permit to impact an Aboriginal object, place, land, activity or person.	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, section 90 of the <i>National Parks and Wildlife Act 1974</i> , which outlines the requirements for Aboriginal heritage impact permits, does not apply.	Not applicable
		Part 6 Division 1 Clause 89A	Notify the NPWS within reasonable time of becoming aware of the location or discovery of certain Aboriginal objects.	Yes, notification requirements are detailed in the Heritage Management Plan, specifically in the Unexpected Finds Procedure.	SecureEnergy
<i>Heritage Act 1977</i>	Heritage	Section 57	Do not undertake an activity that will affect a place, building, work, relic, moveable object or precinct which is subject to an Interim Heritage Order or is listed on the State Heritage Register without approval from the Heritage Council.	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, approval under Section 57 (1) of <i>Heritage Act 1977</i> does not apply.	Not applicable
		Section 139	An excavation permit is required under certain circumstances. A person must not disturb or excavate land with knowledge or reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed; or a person must not disturb or excavate land on where a relic has been discovered or exposed.	As the project has been declared as critical State significant infrastructure, in accordance with s.5.23 of EP&A Act, approval under Section 139 of <i>Heritage Act 1977</i> does not apply.	Not applicable

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**EnergyConnect (NSW – Western Section) Stage 2 Heritage Management Plan**

Legislation/ Regulations	Aspect	Reference	Requirement	Applicability	Responsibility
		Section 146	A person who is aware or believes that he or she has discovered or located a relic must within a reasonable time notify the Heritage Council of the location of the relic, unless he or she believes on reasonable grounds that the Heritage Council is aware of the location of the relic, and within the period required by the Heritage Council, furnish the Heritage Council with such information concerning the relic as the Heritage Council may reasonably require.	Yes, notification requirements are detailed in the Heritage Management Plan.	SecureEnergy

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