

GREGADOO SOLAR FARM PTY LTD

Modification 4 Application as amended

ABORIGINAL HERITAGE DUE DILIGENCE ASSESSMENT

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Premise

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1. INTRODUCTION

1.1 Background

Premise has been commissioned by Gregadoo Solar Farm Pty Ltd to prepare an application to amend Modification 4 to the approved Gregadoo Solar Farm (SSD 8825). The project is located at 123 Redbank Road and 50 Ashfords Road, Gregadoo, being Lot 43 DP1303215 and Lot 1 DP524499 (the 'development site').

The Gregadoo Solar Farm is a State Significant Development (SSD). The Development Consent for the Gregadoo Solar Farm (SSD-8825) was approved by the Department of Planning and Environment (DPE) now Department of Planning, Housing and Infrastructure (DPHI) under the delegation of the Minister for Planning on 11 December 2018.

Since being approved in 2018, four (4) applications for modification have been lodged:

- > Modification 1 was submitted on 30 July 2020, seeking to make changes to the approval with respect to the administrative description of the lots. This modification application was subsequently withdrawn.
- > Modification 2 was submitted on 8 February 2021 which sought to make an amendment to the schedule of lands to include Lot 1 (which is owned by Transgrid), to make an adjustment to the transmission line design to provide an underground connection, and, to include a subdivision with respect to the onsite substation. This modification was approved on 5 March 2021.
- > Modification 3 was submitted on 12 May 2023, seeking to amend the layout and capacity of the solar farm, associated with infrastructure supply lines and improved efficiency of internal layout. This modification was approved on 11 August 2023.
- > Modification 4 was submitted in late October 2025, seeking to optimise the approved Gregadoo Solar Farm by incorporating a Battery Energy Storage System (BESS) within the approved development footprint and for the creation of an additional access point and internal access track from Boiling Down Road to the approved transmission line between the Gregadoo Solar Farm Substation and the Transgrid Substation,

Since submitting Modification 4, the design has been further refined by adjusting the location of the proposed BESS from the southwest corner of the approved development footprint to the southeast corner of the approved development footprint, adjacent to the approved solar farm substation.

An Aboriginal Heritage Due Diligence Assessment (AHDDA) has been prepared to support the modification 4 as amended report. Previous Aboriginal Cultural Heritage Assessment Reports (ACHAR) have been prepared for the project by NGH Environmental and Heritage (NGH) in 2018 and 2020, which identified 11 Aboriginal sites within the development site. Three (3) of these Aboriginal sites were located on land which would be physically impacted by the solar farm development and therefore, were salvaged from the site.

This AHDDA has been prepared to assess the proposed BESS relocation as well as addressing the access point and internal access track only as per Modification 4, as this area had been excluded in the previous ACHAR and ACHAR amendments.

This assessment has been undertaken in accordance with the guidelines prepared in 2010 by the Department of Climate Change and Water (DECCW, 2010) [formerly Office of Environment and Heritage (OEH) now Heritage NSW] *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*. The aim of the guidelines is to assist individuals and organisations to exercise due diligence when carrying out activities that may harm Aboriginal objects. This assessment includes recommendations regarding Aboriginal heritage constraints for the proposed works.

1.2 Development Site and Locality

The development site of the Gregadoo Solar Farm is located in the Wagga Wagga Local Government Area (LGA) approximately 13 kilometres (km) south-east of the Wagga Wagga Central Business District (CBD). Specifically, the development site includes 123 Redbank Road and 50 Ashfords Road, Gregadoo, being Lot 43 DP1303215 and Lot 1 DP524499.

Wagga Wagga is located within the Riverina region and is situated approximately 460km southwest of Sydney and 450km northeast of Melbourne. The town is located along the banks of the Murrumbidgee River which meanders from the Snowy Mountains into the Murray River near Balranald.

The development site is located towards the southern extent of Wagga Wagga and is zoned as RU1 Primary Production under the *Wagga Wagga Local Environmental Plan 2010* (WLEP). The development site is surrounded by rural land to the immediate north, east and west with the Wagga Wagga Waste Disposal Facility (zoned SP1 Waste Disposal Facility) located to the south. Residential areas are located on land further to the northeast which is zoned RU4 Primary Production Small lots and as well as land further to the north which is zoned R5 Large Lot Residential.

The development site is accessed from Boiling Down Road to the south. The entirety of the property at 123 Redbank Road has an area of 153.70 hectares (ha), noting the development footprint of the approved solar farm is located on 97.48 ha of this land.

Boiling Down Creek meanders north to south along the eastern portion of the site with a thick woodland area situated along the northeastern boundary of the site. The land is used for agricultural activities (particularly cropping) and contains several paddocks which are mostly flat and cleared of vegetation. There are also a number of farm dams and unnamed drainage lines within the development site.

The Wagga Wagga Transgrid Substation is located to the east of the development site on Lot 1 DP524499. The proposed internal access track meanders from the proposed access point on Boiling Down Road, north towards the approved overhead transmission line between the Wagga Wagga Transgrid Substation and the approved Gregadoo Solar Farm Substation. The BESS is proposed to be situated in the south eastern extent of the development site.

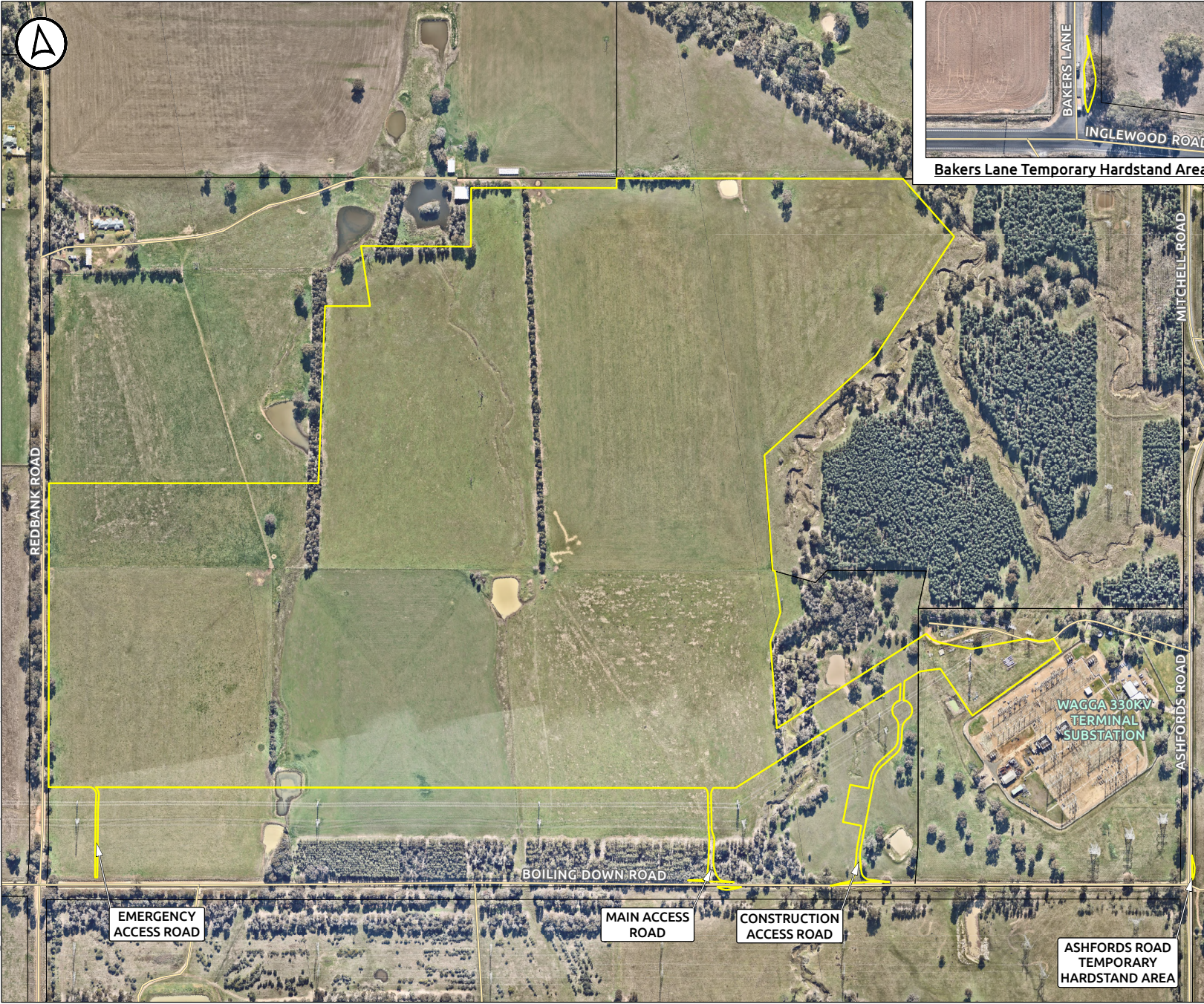
The development site is shown in **Figure 1**

**Figure 1
 Development Site**

- Legend**
-  Development Footprint
 -  Cadastre
 -  Road

Sources: © State of NSW, Department of Customer Service, Spatial Services 2022
 NCCr 2023, Topomap 2022

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1.3 Authorship and Acknowledgements

This report was prepared by Tamera Rudd (Graduate Archaeologist, Premise). Management review was undertaken by Latisha Ryall (Archaeologist, Premise) and Daniel Drum (Environmental Team Leader, Premise). A site inspection was undertaken by Tamera Rudd on 1 March 2024 and on 22 August 2024 to assess the landform for any Aboriginal heritage sensitivities and to determine if any impacts to Aboriginal heritage would likely occur as part of the proposed internal access track and access point development.

A review of the previous ACHAR and ACHAR addendum prepared by NGH for the Gregadoo Solar Farm was undertaken to gain an understanding of the site and to inform this AHDDA.

1.4 Report Limitations

This assessment presents the results of an Aboriginal cultural heritage due diligence assessment only. No historic (European) heritage constraints are considered.

Due to the extensive archaeological surveys across the site in 2018 and 2020 by NGH Archaeologists and Registered Aboriginal Parties (RAPs), only the land situated between the eastern bank of Boiling Down Creek and the development site eastern boundary was surveyed (refer **Section 5**) as a part of this AHDDA. This area was not included in the previous surveys.

It is important to note that there is a discrepancy between the AHIMS database and the 2020 NGH Addendum ACHAR (prepared for Mod 2). NGH have identified that two (2) possible culturally modified trees were registered on the AHIMS database by RAPs present on site during site inspections. A review of AHIMS however, has identified that these two (2) scarred trees have not been recorded. As these trees (Gregadoo SF Cultural Tree 1 and Gregadoo SF Cultural Tree 2) were requested by the RAPs on site to be included within the assessment, Premise have ensured that these two (2) trees were assessed as a part of this AHDDA.

At the time this report was prepared (September 2025) the AHIMS database has yet to be updated with reference to the above.

This report should be read as an appendix to the previous assessments prepared by NGH.

1.5 Consultation

As part of this AHDDA Aboriginal community consultation was undertaken to inform Registered Aboriginal Parties (RAPs) of the proposed design changes. RAPs were identified through the original NGH investigations and the following groups and/or individuals were contacted as part of this assessment:

- > Wagga Wagga Local Aboriginal Land Council
- > Bundyi Aboriginal Cultural Knowledge
- > Peter Ingram
- > Yalmambirra

A draft copy of the Modification 4 AHDDA was provided to all RAPs listed above for the Gregadoo Solar Farm project on 9 August 2024 for a 14-day review period. Following proposal refinements and updates to the AHDDA (refer **Section 1.6**), the report was provided to RAPs again on 29 August 2024 with another 14-day review period.

Additional updates to the AHDDA were made in September 2025 to reflect design amendments (refer **Section 1.6**). A draft copy of the revised AHDDA (Modification 4 as amended) was subsequently provided to RAPS for a 14-day review period with a response date of 18 September 2025.

At the end of the review period one (1) RAP response has been received as summarised in Table 1.

Table 1 – Consultation summary

Group	Comment
Bundi Aboriginal Cultural Knowledge	<p><i>The area is culturally important to Wiradjuri people.</i></p> <p><i>All persons are to be mindful of disturbance to Wiradjuri cultural heritage including all sites that are recorded on AHIMS and any newly identified sites within this location.</i></p> <p><i>No movement of Aboriginal objects/artefacts are to occur as part of the development.</i></p> <p><i>I would also ask that your company staff, contractors and anyone who has something to do with this site attends a Wiradjuri Cultural Awareness Program. Please have my comments added to your report.</i></p>

A copy of all consultation undertaken during the preparation of this report is provided in **Appendix D**.

1.6 Description of Amendment

Modification 4, submitted in October 2024, sought to optimise the approved Gregadoo Solar Farm by incorporating a Battery Energy Storage System (BESS) within the approved development footprint, while maintaining a solar generation capacity of 65 MWAC. The proposed BESS had a capacity of up to 200 MWAC / 400 MWh.

Modification 4 also included an additional access point and internal access track from Boiling Down Road to the approved overhead transmission line between the Gregadoo Solar Farm Substation and the Wagga Wagga TransGrid Substation, designed to enable construction and maintenance without impacting Boiling Down Creek or the adjoining riparian corridor.

Consideration for minimising impacts to the identified potential 'Aboriginal Ring Tree' (refer **Section 5**) occurred as part of the Modification 4 submission..

Since that time, the design has been further refined (2025) to relocate the proposed BESS from the southwest corner to the southeast corner of the development footprint, adjacent to the approved solar farm substation. Minor adjustments to internal access tracks are also proposed to enable efficient



construction and maintenance in the new location, while ensuring compliance with environmental protections for Boiling Down Creek and the riparian corridor.

Finally, Modification 4 as amended seeks to update the Schedule of Lands to reflect the subdivision of Lot 11 DP1043022, creating Lot 42 DP1303215 and Lot 43 DP1303215. This subdivision is consistent with Development Consent SSD 8825,

In summary, this amendment does not alter the overall objectives, generation capacity, or external connection arrangements of Modification 4. It solely involves the relocation of the BESS within the approved footprint, with minor associated track adjustments, to optimise site functionality and reduce potential environmental impacts.

The amendment does not impact on Aboriginal cultural heritage values.

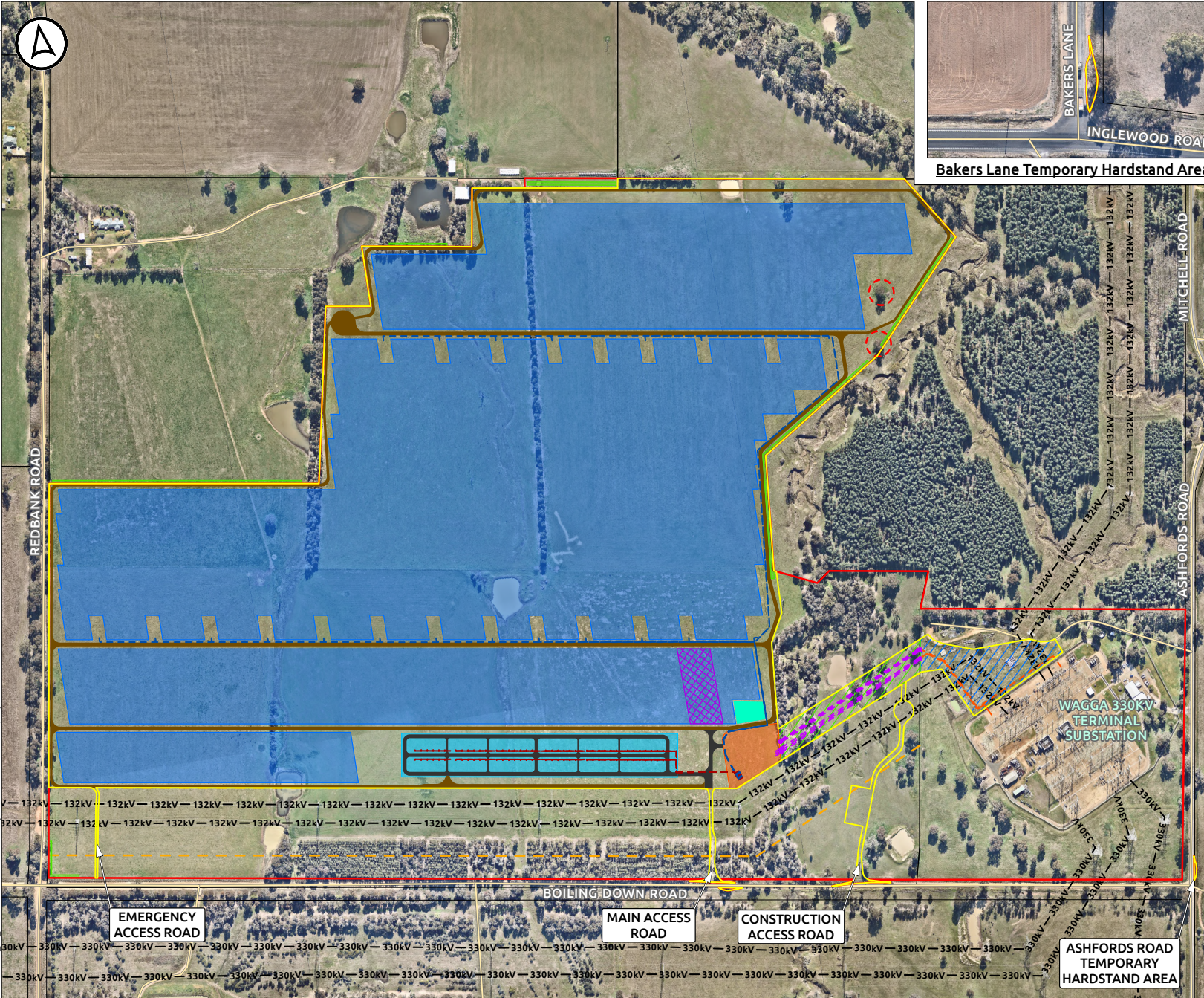
The proposed amendment is illustrated **Figure 2**.

The proposed works drawings are provided in **Appendix C**.



Figure 2
 Proposed Works

Sources: © State of NSW, Department of Customer Service, Spatial Services 2022
 Necir 2025, Neomaps 2022



- Legend**
- Project Area
 - Development Footprint
 - Indicative Visual Screening
 - Indicative Sealed Road
 - Indicative Gravel/Dirt Road
 - Indicative Construction Compound/Laydown Area
 - Indicative Temporary Construction Facilities
 - Indicative Asset Protection Zone
 - Indicative Array Layout
 - Indicative BESS
 - Indicative Substation
 - Indicative Overhead Connection Easement
 - Indicative Underground Connection Easement
 - Indicative Solar Farm 33kV Underground Connection Route
 - Indicative BESS Connection Route
 - Indicative Solar Farm 132kV Overhead Transmission Line
 - Indicative Solar Farm 132kV Underground Transmission Line
 - Transgrid 132kV Transmission Lines
 - Transgrid 330kV Transmission Lines
 - Transgrid 132kV Easement
 - Cadastre
 - Road

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2. LEGISLATIVE CONTEXT

2.1 State Legislation

2.1.1 NATIONAL PARKS AND WILDLIFE ACT 1974

The *National Parks and Wildlife Act 1974* (NPW Act), provides statutory protection for all Aboriginal 'objects' and 'places' in NSW.

The NPW Act defines an Aboriginal 'object' as:

...any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction and includes Aboriginal remains.

The NPW Act defines an Aboriginal 'place' as:

any place declared to be an Aboriginal place under section 84.

Part 6 of the NPW Act provides specific protection for Aboriginal objects and declared places where it is an offence to harm them without appropriate consent or defence. Harm is defined as destroying, defacing, damaging an Aboriginal object or place, or by moving an object from the land.

An Aboriginal place, as defined under Section 84, is declared by the Minister in recognition of its special significance with respect to Aboriginal culture. All Aboriginal objects are protected under the NPW irrespective of whether they are recorded or not and irrespective of their level of significance. However, areas are only gazetted as Aboriginal places if the Minister is satisfied that sufficient evidence exists to demonstrate that the location was and/or is of special significance to Aboriginal culture.

There are no gazetted Aboriginal places in the study area.

The development is SSD under Part 4 of Division 4.7 of the EP&A Act and permits under Section 90 NPW Act are not required.

2.1.2 NATIVE TITLE ACT 1994

The *Native Title Act 1994* was introduced to work in conjunction with the *Commonwealth Native Title Act 1993*. Native Title claims, registers and Indigenous Land Use Agreements are administered under the Act.

A search of the Native Title Register for Wagga Wagga LGA was undertaken on 1 September 2025

No active Native Title claims were identified in the study area at the time this report was prepared.

2.1.3 ABORIGINAL LANDS RIGHT ACT 1983

The *Aboriginal Land Rights Act 1983* (ALR Act) established Aboriginal Land Councils (at State and Local levels). These bodies have a statutory obligation under the ALR Act to:

- a. take action to protect the culture and heritage of Aboriginal persons in the council's area, subject to any other law, and
- b. promote awareness in the community of the culture and heritage of Aboriginal persons in the council's area.

The study area falls within the Wagga Wagga Local Aboriginal Land Council (LALC) boundary.

2.1.4 HERITAGE ACT 1977

The *NSW Heritage Act 1977* (Heritage Act) provides recognition of native title for Aboriginal and Torres Strait Islanders and protects the state's natural and cultural heritage.

The Heritage Act provides protection for items of 'environmental heritage' including places, buildings, works, relics, movable objects or precincts considered significant based on historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic values.

While Aboriginal heritage is primarily protected under the NPW Act, it may be subject to provisions of the Heritage Act if it is listed on the State Heritage Register (SHR) or subject to an Interim Heritage Order (IHO).

Items considered to be significant to the state are listed on the SHR. Items listed on the SHR or subject to an IHO cannot be destroyed, demolished, altered, moved or damaged without approval from Heritage NSW and until the significance of the item has been assessed.

2.1.4.1 State Heritage Register

Section 22 of the Heritage Act established the SHR which lists places and object of state significance.

While the development is assessed as SSD and is therefore not subject to approvals under the Heritage Act, consultation with Heritage NSW and DPHI would be conducted as part of the consultation process to ensure appropriate management of potential heritage impacts.

A review of the SHR indicates that there are no Aboriginal places of significance listed under the NPW Act located within the development site.

2.1.5 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The *NSW Environmental Planning and Assessment Act 1979* (EP&A Act) establishes a framework for assessing cultural heritage values in the land use planning and development consent process.

The proposed works will be assessed under Part 4, Division 4.7 of the EP&A Act, which establishes an assessment and approval regime for SSD. Part 4, Division 4.7 applies to development that is declared to be SSD by a State Environmental Planning Policy (SEPP). Pursuant to Part 4.41 of the EP&A Act an Aboriginal Heritage Impact Permit (AHIP) under Section 90 of the NPW Act is not required for SSD.

2.1.6 STATE ENVIRONMENTAL PLANNING POLICY (PLANNING AND SYSTEMS) 2021

The *State Environmental Planning Policy (Planning Systems) 2021* (Planning SEPP) identifies development which is declared to be state significant.

Schedule 1, Clause 20 of the Planning SEPP identifies development for the purpose of electricity generating works and heat or co-generation that has a that has a capital investment value of more than \$30 million, or more than \$10 million and is located in an environmentally sensitive area of State significance, as State Significant Development.

The Gregadoo Solar Farm is an SSD under the Planning SEPP (SSD-8825).

2.2 Commonwealth Legislation

2.2.1 ENVIRONMENTAL PROTECTION AND BIODIVERSITY ACT 1999

The *Environment and Heritage Legislation Amendment Act (No.1) 2003* amends the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to include 'national heritage' as a matter of National Environmental Significance and protects listed places to the fullest extent under the Constitution.

The EPBC Act further establishes and lists protected heritage items under the National Heritage List and the Commonwealth Heritage List.

Chapter 3 of the EPBC Act assists the Minister to:

...decide whether an action that has, will have or is likely to have a significant impact on certain aspects of the environment should proceed.

Any action, including a project, development, undertaking, activity, series of activities or alteration, which will or is likely to have a significant impact on Matters of National Environmental Significance (MNES) may only occur with approval of the Minister for the Environment and Energy obtained under Part 9 of the EPBC Act.

The *Australian Heritage Council Act 2003* established a new heritage advisory body, the Australian Heritage Council, to advise the Minister and retain the Register of the National Estate (RNE). The RNE was closed in 2007 and no longer remains statutory, however retains an archive of heritage places throughout Australia.

The Acts outlined above provide protection for Australia's natural, Indigenous, and non-Indigenous heritage to include:

- > A new National Heritage List of places of national heritage significance.
- > A new Commonwealth Heritage List of heritage places owned or managed by the Commonwealth.
- > The creation of the Australian Heritage Council, an independent expert body to advise the Minister on the listing and protection of heritage places.
- > Continued management of the non-statutory Register of the National Estate.

There are no Aboriginal heritage items listed on the National Heritage List, Commonwealth Heritage List or RNE relevant to the development site.

2.2.2 ABORIGINAL AND TORRES STRAIT ISLANDER HERITAGE PROTECTION ACT 1984

The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (ATSIHP Act) provides for the preservation and protection of Aboriginal cultural property in Australia and in Australian waters that are of particular significance to Aboriginal peoples such as places, objects, and folklore in accordance with Aboriginal tradition.

Aboriginal tradition as defined under the ATSIHP Act, refers to:

...the body of traditions, observances, customs and beliefs of Aboriginals generally or of a particular community or group of Aboriginals, and includes any such traditions, observances, customs or beliefs relating to particular persons, areas, objects or relationships.

Archaeological sites or objects registered under State legislation will typically be recorded as Aboriginal places subject to the provisions of the Commonwealth.

The ATSHIP Act takes precedence over State cultural heritage legislation where there is conflict. Under Section 10 of the ATSIHP Act, The Minister may make a declaration that overrides state or territory decisions in situations where state or territory laws do not provide adequate protection of heritage.

No declarations relevant to the development site have been made under the ATSIHP Act.

3. BACKGROUND

3.1 Gregadoo Solar Farm Previous Archaeological Assessments

A State Significant Development Application (SSDA) was submitted for the Gregadoo Solar Farm project in 2018 which included an EIS and an accompanying ACHAR, prepared by NGH. A site survey was undertaken on the entirety of the property (124 ha) through this assessment, which identified seven (7) Aboriginal stone artefacts and one (1) 'possible culturally modified tree'. Each of the stone artefacts were isolated finds and were scattered across the area while the possible modified tree was located 100 m north of Boiling Down Creek. Overall, all sites were located within proximity to ephemeral water sources. These sites are identified as the following:

- > Gregadoo SF 463.
- > Gregadoo SF 619.
- > Gregadoo SF 393.
- > Gregadoo SF 360.
- > Gregadoo Solar IF 1.
- > Gregadoo Solar IF 2.
- > Gregadoo Solar IF 3.
- > Gregadoo SF 645.

Two (2) of the isolated artefacts were located within the development footprint of the approved solar farm (Gregadoo SF 360 and Gregadoo Solar IF2) and were recommended to be salvaged prior to the development commencing. The possible culturally modified tree (Gregadoo SF 645) was also located within proximity to the approved solar farm development impact area, and it was recommended that a minimum 10 m buffer around the tree be implemented.

In 2020, NGH updated the 2018 ACHAR and submitted it as an addendum for Modification 2. As a part of this ACHAR addendum, a secondary site inspection was conducted which assessed the modification impact area located to northwest of the Wagga Wagga Transgrid substation. This assessment identified one (1) additional isolated find as well as two (2) 'possible culturally modified trees' located within the boundary of the substation (Lot 1 DP 524499):

- > Gregadoo SF IF 5.
- > Gregadoo SF Cultural Tree 1.
- > Gregadoo SF Cultural Tree 2.

The two (2) possible culturally modified trees were located outside of the Modification 2 impact area while the isolated artefact was located adjacent to an overflow dam to the west of the development footprint for Modification 2. It was recommended that demarcated fencing of the isolated find occurred prior to works commencing, as well as the implementation of a minimum 5 m buffer around the site to ensure no heritage impacts occurred as a result of the Modification 2 works.

NGH identified that that these two (2) possible culturally modified trees were recorded on the AHIMS database by one of the RAPs. However, a review of the AHIMS database in February 2024 and subsequently in September 2025 has identified that these two (2) 'probable' trees have not been recorded.

In 2022, NGH prepared a notification letter to the RAPs for the project which informed of changes to the development footprint proposed in Modification 3. Modification 3 involved decreasing the space between solar panel arrays to increase the capacity of the solar farm. As this modification did not involve changes to the development footprint, NGH undertook a desktop review to determine potential impacts to previously recorded Aboriginal sites.

This assessment concluded that Gregadoo SF 619, Gregadoo SF IF 2 and Gregadoo SF IF 4 would have been impacted, however, were salvaged from the site in 2019. It was therefore determined that the proposed Modification 3 would not result in impacts to Aboriginal sites. No recommendations were made beyond the communication of this information to the RAPs.

3.2 Environmental Context, Landscape and Land Use

Section 3.1, Section 3.3 and **Section 3.4** provides a summary of the information previously presented for the Gregadoo Solar Farm project in the previous ACHAR prepared by NGH in 2018; *Aboriginal Cultural Heritage Assessment Gregadoo Solar Farm – Draft*.

The site is located within the South-Western Slope Bioregion in the Riverina region of New South Wales. The Murrumbidgee River is located approximately 10km north of the site and was a major resource for local Aboriginal communities. Boiling Down Creek meanders the eastern portions of the site and is surrounded by scattered mature trees and vegetation.

Soils within this area are typically a reddish-brown silty loam with the solar farm site located on two different soil landscapes; O'Briens Creek and Redbank and Glenmornon and Forest Hill. The base geology for the site consists of Quaternary alluvium clays and silts with granite commonly found across these areas.

There are two primary plant community types (PCT) located within the site including the Western Grey Box tall grassy woodlands and Blakely's Red Gum and Yellow Box tall grassy woodlands. Remnant Blakely's Red Gum and White Box trees are located along Boiling Down Creek as well as native grasses, forbs and sedges.

The site has been used for intensive agricultural and pastoral use since the early 1800s. The land has been subject to heavy ground disturbance as a result of these agricultural activities. Moreover, the development of the Wagga Wagga TransGrid substation on the western extent of the site also resulted in further disturbance to the land, as well as the construction of powerlines which have been installed in the southern extent of the site.

3.3 History

Aboriginal communities are based largely on varying language groups rather than the geographical boundaries of an area. It is likely that these boundaries in pre-European Aboriginal society were fluid and often intersected into different towns or regions. The Wiradjuri Aboriginal people/s are associated with the

Wagga Wagga region, although other Aboriginal language groups were likely to have also existed within the region.

The Wiradjuri Nation extends from Albury and Corowa in the south of New South Wales, north to Nyngan and Gilgandra, east to Mudgee and Lithgow and to the west to Hay. The Wiradjuri Nation is the largest Aboriginal tribe in both geographical size and population in all of central NSW (Tindale 1974:156). Wiradjuri people/s are commonly known as 'the people of three rivers' as they camped and made use of the abundance of resources along the Wambool River (also the Macquarie River), the Murumbidgee River (the Murrumbidgee River) and the Kalari River (the Lachlan River).

The Wagga Wagga LGA also forms part of the Murray Darling region which is home to some of the oldest recorded Aboriginal sites in Australia. For example, the Murray Darling region includes evidence of human remains which were discovered at Lake Mungo, dating back to approximately 40,000 years ago (Heritage Insight Pty Ltd, 2012: ii). This evidence suggest that the Aboriginal community have occupied the lands within the Murray Darling region for at least 40,000 years prior to European colonisation of Australia. The Murray River in particular, was one of the most densely populated areas in pre-contact Australia, with Aboriginal occupation likely to have been the heaviest in the lower and central portions of the river (Macgregor, 2020: 16). This is likely due to the abundance of protein which was sourced from the Murray River and associated tributaries including shellfish, crayfish and fish (Hill 2015: 9).

Aboriginal society focused on small familiar groups with immediate family members making shelter, sourcing food and performed daily rituals within their campsite. The movements of these small groups was based largely on seasonal food gathering and availability. The Murrumbidgee River was a major resource for the local Aboriginal community of Wagga Wagga who would have utilised the river and surrounding lands for food, water and shelter. The Murrumbidgee River and associated floodplain would have provided the most consistent and diverse source of food for the Wiradjuri community.

European settlers first started arriving in Wagga Wagga in the 1830s following Captain Charles Sturt's expedition through the region in 1829 (NGH, 2018: 15). Following the arrival of European settlers, the population of the local Aboriginal community quickly began to decline as a result of diseases such as smallpox and influenza. The Wiradjuri people/s also suffered the dispossession of their land and from acts of violence which was caused by social upheaval between the Aboriginal and European communities. By removing Aboriginal people/s from their lands and their resources, they were also limited from taking part in their traditional practices and customary way of life. Aboriginal people's from the region were forced to move into missions and in Darlington Point (known as Warangesda) or to Brungle Reserve which was located between Gundagai and Tumut. By 1900, it was believed that there were as few as 20 Aboriginal people left living in the Wagga Wagga LGA (NGH, 2018; 15).

3.4 Archaeological Sensitivity

In 2008, Kelleher and Nightingale developed a predictive model of the site location and distribution of Aboriginal objects or places previously discovered in the Wagga Wagga region. This model determined that spur and ridge crests had a moderate archaeological sensitivity, while hillslopes had a low to moderate archaeological sensitivity and areas on undulating or flat colluvial deposits and drainage lines had a moderate to high archaeological sensitivity.

NGH (2018, 23) determined that stone artefact scatters were likely to occur at the Gregadoo Solar Farm site, particularly in areas surrounding Boiling Down Creek. Moreover, due to the prevalence of mature trees across the site, it was determined that culturally modified trees were also likely to occur, possibly along Boiling Down Creek.

Site inspections performed by NGH staff and representatives from the Wagga Wagga Aboriginal community have identified modified trees and isolated stone artefacts. These finds align with the predictive model.

The land associated with the proposed internal access track and access point for Mod 4 can be assessed against the same predictive model. There is a likelihood of stone artefacts being identified within this area. There is also a small scatter of mature trees along the eastern boundary of the site (to the east of the access track) which may present signs of cultural scarring.



4. PREVIOUSLY RECORDED ABORIGINAL SITES OR PLACES

The locations and details of Aboriginal sites are considered culturally sensitive information. It is recommended that this information, including the Aboriginal Heritage Information Management System (AHIMS) data, is removed from this report if it is to enter the public domain.

NSW Heritage (formerly OEH) AHIMS database, a register of Aboriginal archaeological sites that have been recorded in New South Wales.

An updated basic and extensive search of the AHIMS database of the Gregadoo Solar Farm site and surrounding land within a 1 km radius was undertaken on 3 September 2025 (Client ID: 1040202). The AHIMS search provides an archaeological context for the area and identifies whether any previously recorded Aboriginal sites are located within or near the study area. The results are as follows:

- > 24 Aboriginal sites or places have been recorded within a 1 km radius of the development site.
- > Three (3) of those sites have been recorded as 'destroyed'.
- > One (1) site is located within the approved solar farm development footprint (56-1-0531- Gregadoo SF 645) and will not be impacted on as part of the Modification 4 amendment.
- > 12 sites are located within 200 m of the development footprint.

The nature and location of registered sites reflects past Aboriginal occupation of the land; however, the sites are also influenced by historical land-use, and the nature and extent of previous archaeological investigations. Although Aboriginal occupation covered the whole of the landscape, the availability of fresh water, and associated resources, was a significant factor in repeated and long-term occupation of specific areas within the landscape.

The stone artefacts identified by NGH in 2018 were at that time, the first stone artefacts to be identified within the local area. This suggests the likelihood of other artefacts of this type to also be located within the region.

As mentioned above (refer **Section 3.1**) two (2) possible culturally modified trees are located to the west of the Wagga Wagga Transgrid Substation. These sites are not listed on the AHIMS database. Potential impacts to these trees have however, been evaluated as a part of this assessment.

No impacts will occur to Aboriginal heritage items, consistent with the Modification 4 submission.

Previously recorded Aboriginal sites or places listed on AHIMS are shown in **Figure 3**.

A copy of the AHIMS search is shown in **Appendix A**.

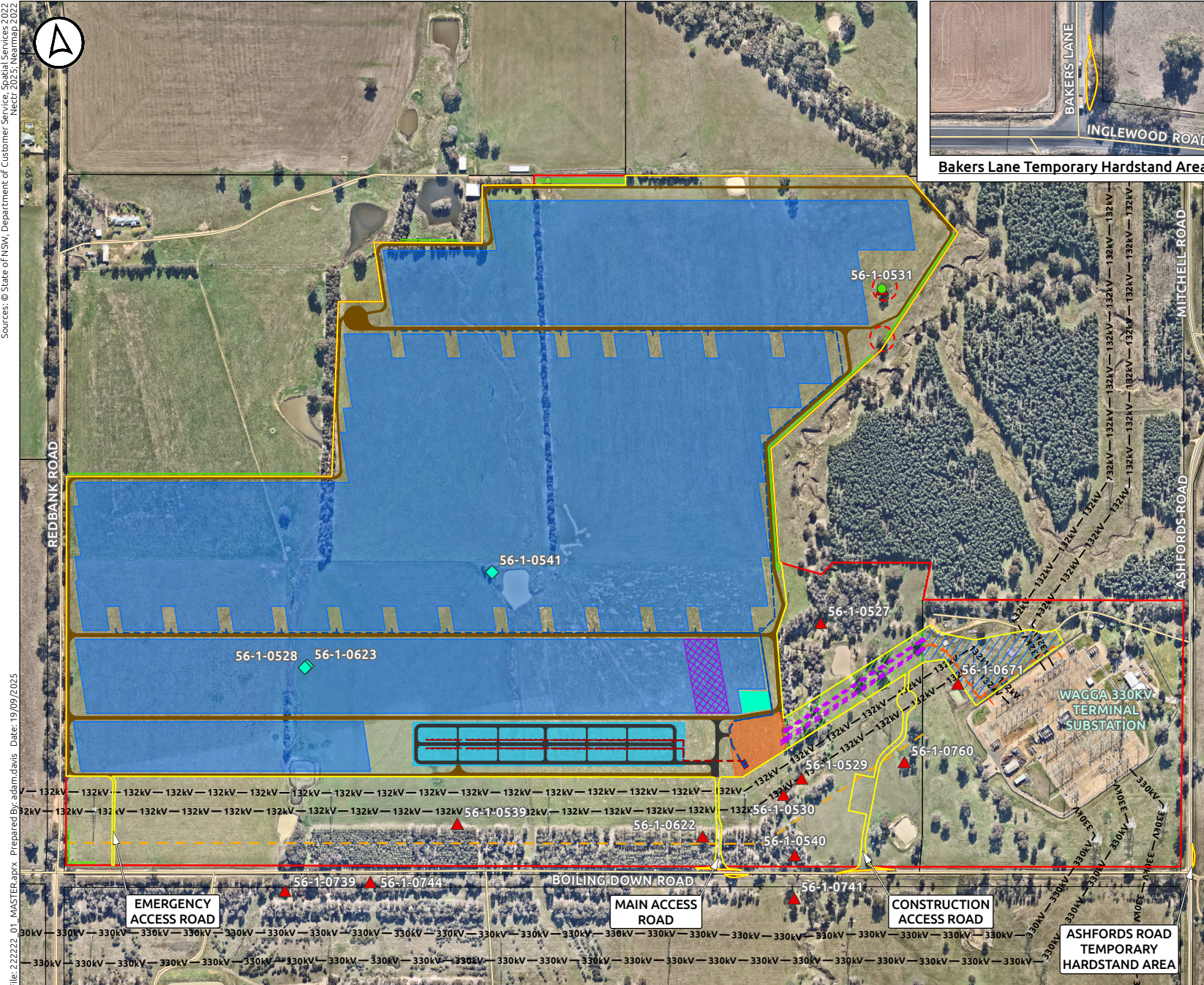
4.1 National Native Title Tribunal

A search of the Native Title Tribunal and Native Title Vision (NTV) online database was undertaken on 23 August 2024 and more recently on 1 September 2025 for the Wagga Wagga LGA to ascertain if any Native Title claims, determinations or registrations were associated with the study area.

No recorded Native Title claims, or determinations were identified.

**Figure 3
 Previously Recorded
 Aboriginal Sites**

Sources: © State of NSW, Department of Customer Service, Spatial Services 2022
 Vector 2023, Geospatial 2022



- Legend**
- Project Area
 - Development Footprint
 - Indicative Visual Screening
 - Indicative Sealed Road
 - Indicative Gravel/Dirt Road
 - Indicative Construction Compound/Laydown Area
 - Indicative Temporary Construction Facilities
 - Indicative Asset Protection Zone
 - Indicative Array Layout
 - Indicative BESS
 - Indicative Substation
 - Indicative Overhead Connection Easement
 - Indicative Underground Connection Easement
 - Indicative Solar Farm 33kV Underground Connection Route
 - Indicative BESS Connection Route
 - Indicative Solar Farm 132kV Overhead Transmission Line
 - Indicative Solar Farm 132kV Underground Transmission Line
 - Transgrid 132kV Transmission Lines
 - Transgrid 330kV Transmission Lines
 - Transgrid 132kV Easement
 - Cadastre
 - Road
- Aboriginal Heritage Sites**
- ▲ Sites In Situ
 - ◆ Sites Salvaged to Date

0 100 200m

File: 222222_01_MASTER.aprx. Prepared By: adam.davis. Date: 19/09/2023

5. SITE INSPECTIONS

A site inspection was undertaken on 1 March 2024 by Tamera Rudd (Graduate Archaeologist, Premise) to assess the proposed internal access track and access point for any potential Aboriginal cultural heritage sites or areas of archaeological sensitivity. Following proposal refinements and the addition of the construction staging area, the semi-trailer turning head and the proposed widening of the main site access track, a second site inspection was undertaken by Tamera Rudd on 22 August 2024. The results of these inspections are summarised below.

5.1 March 2024

The first site inspection was undertaken on 1 March 2024 and included a pedestrian survey of the proposed internal access track and access point. The survey area was accessed via Boiling Down Road, an unsealed roadway which meanders onto Redbank Road in the north. The Wagga Wagga Transgrid Substation is located to the east of the development site boundary and was subject to earthwork activities at the time of the AHDDA site inspection.

Ground visibility across the survey area was low due to dense vegetation coverage. Boiling Down Creek is located approximately 80 m to the west of the proposed internal access track and access point and is surrounded by woodlands and eroded lands with moderate to high ground visibility. Previous archaeological assessments have identified Aboriginal sites located along this creek (refer **Figure 3**) including a quartz core (Gregadoo Solar IF 1) which was identified during the site inspection (refer **Figure 8**).

A farm dam is located to the east of the proposed internal access track where higher levels of ground visibility and soil erosion were observed. A second farm dam is located approximately 250 m northwest with a drainage line meandering from the dam, southeast towards the eastern boundary of the development site.

Scattered trees across the development footprint area were inspected during the survey. Aerial imagery has identified that trees along Boiling Down Road are not mature and were planted during the late 1990s to early 2000s. Vegetation and trees on either side of the eastern farm dam appeared to be mature, however, showed no signs of Aboriginal cultural modification. A scatter of three (3) mature trees located towards the northern extent of the proposed access road were also assessed, one (1) of which was located within the drainage channel which meanders to the northern farm dam. This tree contains one (1) ring, approximately 3m high. This tree has been assessed as being a 'potential' Aboriginal 'Ring Tree.'

The potential Ring Tree is approximately 12-15m in height and was an Iron Bark species (*Eucalyptus sideroxylon*) (refer **Figure 10** to **Figure 13**). The tree appears to be dead, with a number of the branches having fallen to the ground. The potential Ring Tree is located approximately 200 m from Boiling Down Creek and within 250 m of three (3) previously recorded Aboriginal sites (two of which being the possible culturally modified trees). The location of the potential Ring Tree is identified in **Figure 20**.

This potential Ring Tree was recorded on the AHIMS database on 21 March 2024 (AHIMS ID: 56-1-0760) and is referred to as the 'Gregadoo Ring Tree.' The site card for this Aboriginal site has been provided in **Appendix B**.

This area to the north of the proposed access road contained a number of mature trees, none showing signs of Aboriginal cultural modification. Ground visibility in this area was low and no Aboriginal artefacts were identified.

The proposed BESS is to be located on land in the south-eastern boundary of the site which has been subject to previous investigations by NGH which identified no Aboriginal sites across this portion of the site (refer **Section 3.1**). The land here is cleared and contains moderate ground visibility. Due to previous archaeological investigations of this area, the land was not surveyed during the site inspection, however, the area was viewed and photographed from the fence lines of Boiling Down Road.

The two (2) possible scarred trees located to the west of the Wagga Wagga Substation are located 200 m from the proposed internal access track and approximately 400 m from the proposed BESS site. Due to the proximity of these sites, no impacts are anticipated to occur. There are also two (2) fence lines situated between these two (2) trees and the proposed internal access track which will further mitigate potential impacts.

Upon completion of the site inspection, Premise Archaeologists made a recommendation to the project engineers (Premise) that the proposed access road should be moved further to the west to mitigate impacts to the newly identified potential Ring Tree (AHIMS ID: 56-1-0760). The proposed internal access track was moved approximately 14.5 m to the northwest which has allowed for an approximate 30 m buffer between the proposed internal access track and the potential Ring Tree. This updated internal access track has been presented in **Figure 1**.

5.2 August 2024

The second pedestrian survey was undertaken on 22 August 2024 and focused on the main site access road and the internal access track, including the proposed construction staging area and the semi-trailer turning head. Pedestrian transects were undertaken from the eastern development site boundary to the eastern banks of Boiling Down Creek (in an east to west direction), towards the dam to the north of the proposed access track.

Low to moderate ground visibility was noted with visibility decreasing along drainage channels which were covered in dense vegetation (refer **Figure 14**). At the time of inspection, land appeared to have been recently sowed (refer **Figure 14**). The land is characterised as being highly disturbed, consistent with the assessment made during the March 2024 survey.

The main access road has a high level of visibility, surrounded by a plantation of native trees (refer **Figure 19**). These trees are not considered mature and therefore, will not contain any signs of cultural modification. No Aboriginal artefacts were identified along or within proximity to the main access road. It is noted that the artefacts previously identified within the development site were salvaged and reburied (Gregadoo SF Reburial 1) to the west of this main access road (refer **Figure 3**). This reburial site will remain outside of the development footprint.

Overall, no additional Aboriginal sites or areas of archaeological sensitivity were identified during the survey undertaken in August 2024.

An overview of the Modification 4 development footprint during the August survey is provided in **Figure 14** to **Figure 19**.

Figure 4 – Proposed Access Point



Figure 5 – Boiling Down Road (view east)



Figure 6 – Ground Coverage Access Point



Figure 7 – Ground Coverage Internal Access Track



Figure 8 – Quartz Core (Gregadoo Solar IF 1)



Figure 9 – Farm Dam



Figure 10 – Drainage Channel and Potential Ring Tree



Figure 11 – Potential Ring Tree



Figure 12 – North of Internal Access Track



Figure 13 – Drainage Channel and Potential Ring Tree



Figure 14 – Internal Access Track Visibility (August)



Figure 15 – Location of Semi-Trailer Turning Head



Figure 16 – Boiling Down Creek (view north)



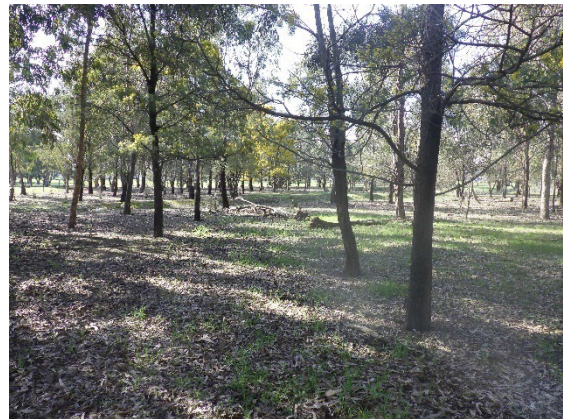
Figure 17 – Internal Access Track (view north) August



Figure 18 – Main Access Road (view north)

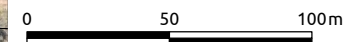
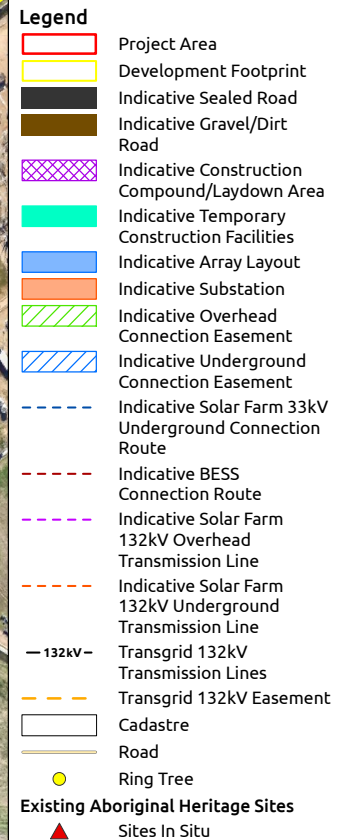
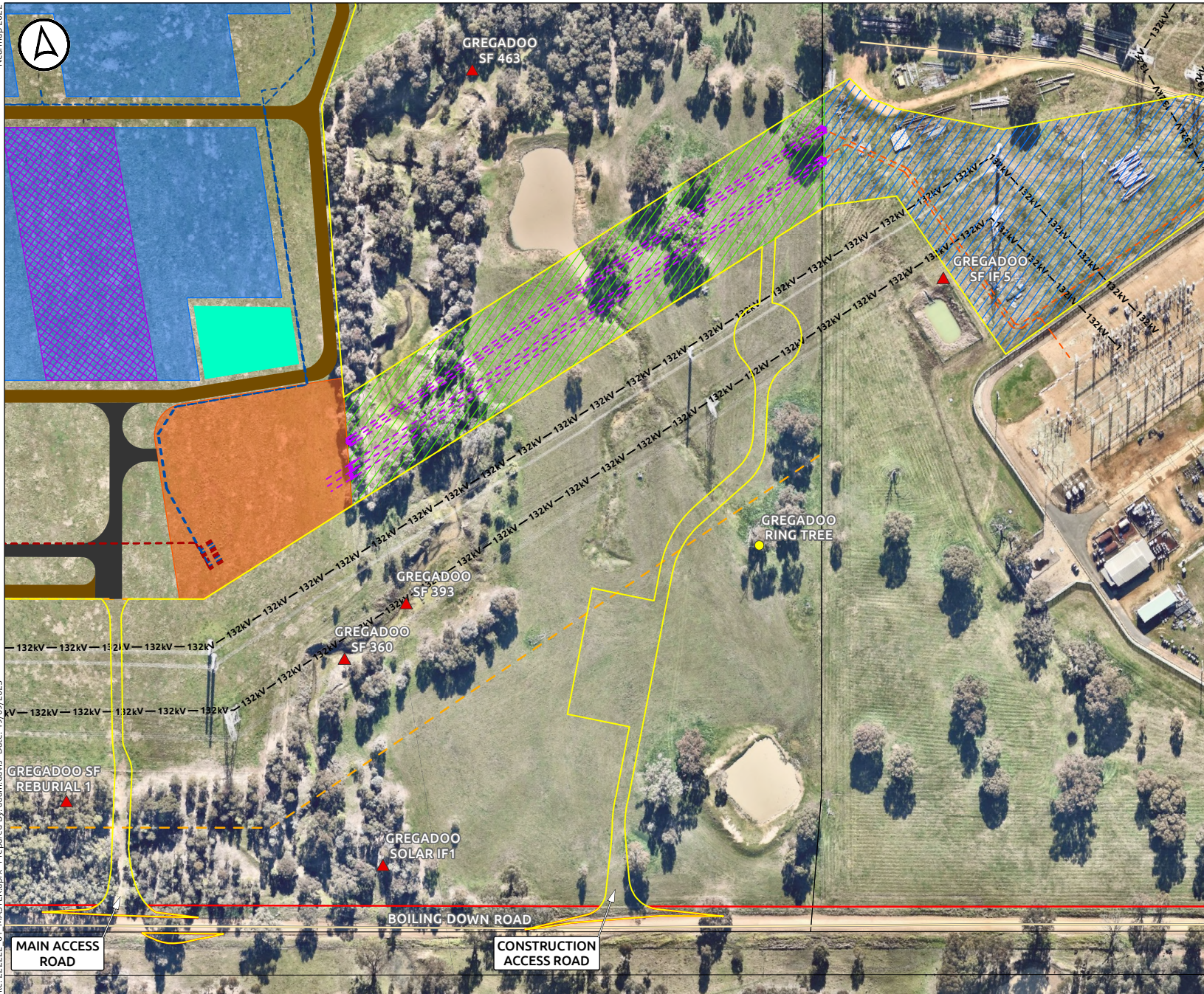


Figure 19 – Plantation (East of Main Access Road)



GREGADOO SOLAR FARM PTY LTD
Gregadoo Solar Farm

Figure 20
Location of the
Gregadoo Ring Tree



5.3 Archaeological Sensitivity and Impacts

This due diligence assessment provides a preliminary assessment of archaeological potential, to determine if there are or are likely to be Aboriginal objects in the study area.

When assessing the study area for Aboriginal sensitivity it is essential to determine whether the site contains landscape features that indicate the likely existence of Aboriginal objects. Examples of such landscape features are rock shelters, sand dunes, waterways, waterholes, and wetlands. On assessing the site, considerations must be made if the proposed activity is:

- > within 200 m of waters, or
- > located within a sand dune system, or
- > located on a ridge top, ridge line or headland, or
- > located within 200 m below or above a cliff face, or
- > within 20 m of or in a cave, rock shelter, or a cave mouth, and
- > is on land that is not disturbed land.

Archaeological sensitivity is closely related to the levels of ground disturbance. However, other factors are also considered when assessing archaeological potential as mentioned above, such as whether artefacts were located on the surface, and whether the area is within a sensitive landform unit according to the predictive statements.

The Due Diligence Code of Practice (DECCW 2010) defines disturbed land as:

Sec 7.5 (4) For the purposes of this clause, land is disturbed if it is has been the subject of human activity that has changed the lands surface, being changes that remain clear and observable.

This includes disturbed land via:

- a) soil ploughing,*
- b) construction of rural infrastructure,*
- c) clearing of vegetation,*
- d) construction of buildings and the erection of other structures,*
- e) construction or installation of utilities and other similar services (such as above or below ground electrical infrastructure, water or sewerage pipelines, stormwater drainage and other similar infrastructure).*

The proposed internal access track and access point are located within 200 m of Boiling Down Creek. The surrounding property has been subject to previous archaeological investigations (refer **Section 3.1**) and while the landscape is characterised as being 'disturbed' under the definition provided in the Due Diligence

Code of Practice, it has been identified as being culturally sensitive due to the presence of Aboriginal artefacts and possible culturally modified trees.

The proposed BESS is located within 180 m of Boiling Down Creek and is characterised as being disturbed and does not contain any previously recorded or Aboriginal sites.

5.3.1 ABORIGINAL RING TREES

Aboriginal 'Ring Trees' are modified by Aboriginal people/s while they were young to fuse together the branches using string. This technique binds the branches together and trains them to grow in the form of a "ring" over time (University of Tasmania, 2018). Each tree may vary in the number of rings present and often symbolise a nearby watercourse or boundary. Ring Trees are commonly identified at water junctions and inlets, at Aboriginal campsites or at burial grounds.

These types of trees are considered to be culturally significant as they mark travel routes and song lines and also link culturally significant landscape features and places (GML Heritage, 2020: 4). There are various beliefs as to what the purpose and significance of these trees are, including acting as direction markers for travel between cultural sites, and as markers of 'women's areas' or 'men's business' places (OzArk, 2022: 262). They are also believed to have marked the boundaries between Aboriginal Nations. It is also argued that Aboriginal people/s would look through the ring in the tree and would be directed to an area of natural resources, which is why they are commonly identified within proximity to a watercourse. Ring Trees are commonly associated with Aboriginal communities along the Murray River and in other landscapes across the southeast of Australia (Koori History, 2016).

Ring Trees are considered highly significant as markers of cultural places for local Aboriginal communities across southeastern Australia. These trees "hold stories and have spiritual and cultural significance" as explained by Elder Aunty Marilyn Nicholls (University of Tasmania, 2018). They are also commonly associated with Aboriginal ties to water and stories of water. For these reasons, it is important to note that the significance of these trees is therefore not restricted to the tree itself but extends to the surrounding landscape and intangible qualities of the area as well.

Notwithstanding the above, trees can be subject to the process of 'inosculation' involving the natural fusing of branch formations. This can occur for two (2) branches on the same tree or on branches from two (2) separate trees. Due to the natural abilities of tree branches to be grafted together, it is possible that the above mentioned Ring Tree identified during the site inspection, may be natural rather than culturally modified by Aboriginal people/s. The Gregadoo Ring Tree has been assessed as more likely to be of Aboriginal origin however, owing to the manner in which the branches have fused together and due to the age and proximity of the tree to Boiling Down Creek and other previously recorded Aboriginal sites.



6. ASSESSMENT OF PROPOSED WORKS

The results of the due diligence process are outlined in **Table 2**. The table contains a response to the questions included in the *Due Diligence Code of Practice* (DECCW 2010), which are intended to assist in determining whether or not a proposed activity may result in harm to Aboriginal objects, which are protected by the *National Parks and Wildlife Act 1974*.

Table 2 – Due Diligence Process

Question	Comment
1. Will the activity disturb the ground surface or any culturally modified trees?	<p>The Modification 4 as amended development will result in ground disturbance through the construction of the BESS and the internal access track and access point.</p> <p>The development of the BESS on site will not result in any impacts to culturally modified trees.</p> <p>The development of the internal access track and access point will not disturb the newly identified Gregadoo Ring Tree (AHIMS ID: 56-1-0760) as the proposed track alignment has been altered to allow for an approximate 30 m buffer for protection.</p>
2a. Are there any relevant confirmed site records or other associated landscape feature information on AHIMS?	<p>A review of the AHIMS database has identified 24 previously recorded Aboriginal sites in the surrounding landscape (within 1km buffer), including three (3) sites marked as destroyed, nine (9) culturally modified trees, 11 artefacts and one (1) potential archaeological deposit site type.</p> <p>An additional two (2) potential culturally modified trees are also located in the Wagga Wagga Transgrid Substation to the east of the development site; however, these sites are not recorded on the AHIMS database.</p>
2b. Are there any other sources of information of which a person is already aware?	<p>Previous Aboriginal cultural heritage assessments have been undertaken in the immediate vicinity of the proposed development for the construction of the Gregadoo Solar Farm (NGH 2018 and 2020).</p>
2c. Are there any landscape features that are likely to indicate the presence of Aboriginal objects?	<p>Boiling Down Creek is located within 200 m of the proposed access point and internal access track and within 180 m of the proposed BESS..</p> <p>This watercourse has been identified in previous assessments as being culturally sensitive with a number of Aboriginal sites being identified along the creek bank and in the surrounding landscape.</p>

Question	Comment
<p>3. Can harm to Aboriginal objects listed on AHIMS or identified by other source of information and/or can the carrying out of the activity at the relevant landscape features be avoided?</p>	<p>The development of the BESS will not cause impacts to previously or newly recorded Aboriginal sites.</p> <p>The development of the vehicle access road will not cause impacts to previously recorded Aboriginal sites.</p> <p>Modification 4 as amended will not result in adverse impacts to the newly recorded Aboriginal Ring Tree (AHIMS ID: 56-1-0760) as an approximately 30 m buffer has been implemented.</p>
<p>4. Does a desktop assessment and visual inspection confirm that there are Aboriginal objects or that they are likely?</p>	<p>The desktop assessment has identified that eight (8) Aboriginal sites and two (2) possible culturally modified trees have been identified during the previous archaeological assessments on the solar farm development site. Three (3) of these sites (Gregadoo SF 619, Gregadoo SF IF4 and Gregadoo Solar IF2) have been salvaged and were reburied within the development site (outside of the development footprint) and are now recorded on the AHIMS database as 'Gregadoo SF Reburial 1.'</p> <p>A review of the AHIMS database has also informed that there are 24 sites recorded within the wider context of the development site.</p> <p>As visual inspection of the development footprint in March and August of 2024 has confirmed the presence of one (1) of the previously recorded Aboriginal artefacts on site (Gregadoo Solar IF 1). The inspection also identified the presence of one (1) additional potential Ring Tree (Gregadoo Ring Tree) on site which has been recorded onto the AHIMS database (AHIMS ID: 56-1-0760).</p>



7. CONCLUSION AND RECOMMENDATIONS

The Development Consent for the Gregadoo Solar Farm (SSD-8825) was approved by the Department of Planning and Environment (DPE) under the delegation of the Minister for Planning on 11 December 2018.

Modification 4 sought to optimise the approved Gregadoo Solar Farm. The optimised design has been conceived to utilise the approved development footprint more effectively by incorporating a Battery Energy Storage System ('BESS') while maintaining a power output of 65 MW(AC).

In addition, Modification 4 sought to include an additional access point and internal access track (including a construction staging area and a semi-trailer turning head area) from Boiling Down Road to the approved overhead transmission line between the Gregadoo Solar Farm substation and the Transgrid substation. The access point and access track are required to ensure that the approved overhead and underground transmission line can be constructed and maintained without impacting on the Boiling Down Creek or the adjoining riparian corridor. The latter is the subject of this assessment.

Since submitting Modification 4, the design has been further refined by adjusting the location of the proposed BESS from the southwest corner of the approved development footprint to the southeast corner of the approved development footprint, adjacent to the approved solar farm substation.

Previous archaeological investigations have taken place across the development site by NGH in 2018 and 2020 as well as a desktop review in 2022. This AHDDA prepared by Premise has assessed the potential impacts of the proposed Mod 4 development on previously recorded Aboriginal sites in relation to the access track only. The BESS development footprint area had previously been assessed as part of the NGH investigations.

A survey of the proposed internal access track and access point was undertaken in March and August of 2024 as a part of this assessment as this area was not included in previous investigations conducted by NGH. A potential Ring Tree (referred to as the 'Gregadoo Ring Tree') was identified during this inspection and is located to the east of the proposed internal access track. This site was recorded on the AHIMS database on 21 March 2024 (AHIMS ID: 56-1-0760).

Following the March 2024 site inspection, it was recommended that the proposed internal access track be shifted to the west to allow a minimum of 10 m buffer between the potential Ring Tree and the proposed internal access track. This recommendation was implemented by Premise Engineers and the final proposed Mod 4 layout is shown in **Figure 1** and **Appendix C**.

There are no previously recorded Aboriginal sites located at or within close proximity to the proposed BESS location. The development of the BESS will, therefore, not result in adverse impacts to Aboriginal cultural heritage.

The newly identified Gregadoo Ring Tree is located approximately 30 m to the east of the proposed internal access track. The construction and use of the internal access track and access point are not likely to result in adverse heritage impacts due to 30 m buffer which has been recommended and implemented into the design.

It is advised that that the proposed Modification 4 amendment to the Gregadoo Solar Farm proceed, conditional upon recommendations outlined below:

- > The development must avoid the Gregadoo Ring Tree located within the study area (AHIMS ID 56-1-0760) as per the proposed development footprint in this report. Nearby Aboriginal sites including Gregadoo Solar IF 1, Gregadoo SF 393, Gregadoo SF 360 and Gregadoo SF Reburial, should also be avoided. A minimum 10 m buffer around each site is appropriate.
- > Staff undertaking construction works should be subject to a heritage induction prior to commencing works. This induction should inform workers of Aboriginal objects on site (including the reburial site located to the west of the main access road) and the necessary measures which have been implemented to protect these sites. A Wiradjuri Cultural Awareness Program may be considered as recommended through Aboriginal consultation.
- > If suspected Aboriginal objects are located during future works, works should cease, and a qualified heritage consultant advised to assess the find and recommend if further investigation or permits are required. Heritage NSW and the Wagga Wagga LALC must be identified.
- > No further archaeological investigations are proposed.
- > All impacts must remain within the assessed study area or further archaeological investigation may be required.

8. REFERENCES

GML Heritage Pty Ltd (2020). *Cunningham Valley: The Aboriginal Cultural Landscape* (a). Report to Young Local Aboriginal Land Council.

Hill. J (2015). *Gee Gee Bridge Replacement Project, South-West New South Wales*, Appendix J Aboriginal Archaeological Survey Report for Wakool Shire Council.

Koori History (2016). *Modified Trees (Scar Trees)*. Accessed: <https://koorihistory.com/modified-trees-scar-trees/>

Macgregor. O (2020). *Hume Dam Battery Energy Storage System Aboriginal Cultural Heritage Assessment*, prepared by Jacobs for Meridian Energy Australia.

NGH (2018). *Aboriginal Cultural Heritage Assessment Gregadoo Solar Farm -Draft*, prepared by Kristen Bradley and Emily Dillon for Gregadoo Solar Farm Pty Ltd (GSF).

NGH (2021). *Addendum Aboriginal Cultural Heritage Assessment Gregadoo Solar Farm Mod*, in Modification Application Gregadoo Solar Farm (Mod 2), prepared by Amy Ziesing and Matthew Barber.

OzArk Environment and Heritage (2022). *Revision 2 ACHAR and Historic Heritage Assessment: Proposed Intensive Livestock Operation (Piggery), Eulie Farm, Harden NSW*, prepared for Blantyre Farms Pty Ltd.

Tindale. N (1974). *Aboriginal Tribes of Australia: Their Terrain, Environmental Controls, Distribution, Limits, and Proper Names*, Australian National University Press, Canberra.

University of Tasmania (2018). *The role of ring trees*. Accessed <https://www.utas.edu.au/about/news-and-stories/articles/2018/660-the-role-of-ring-trees>



Appendix A

AHIMS Search Results

Latisha Ryall
154 Peisley Street
Orange New South Wales 2800
Attention: Latisha Ryall

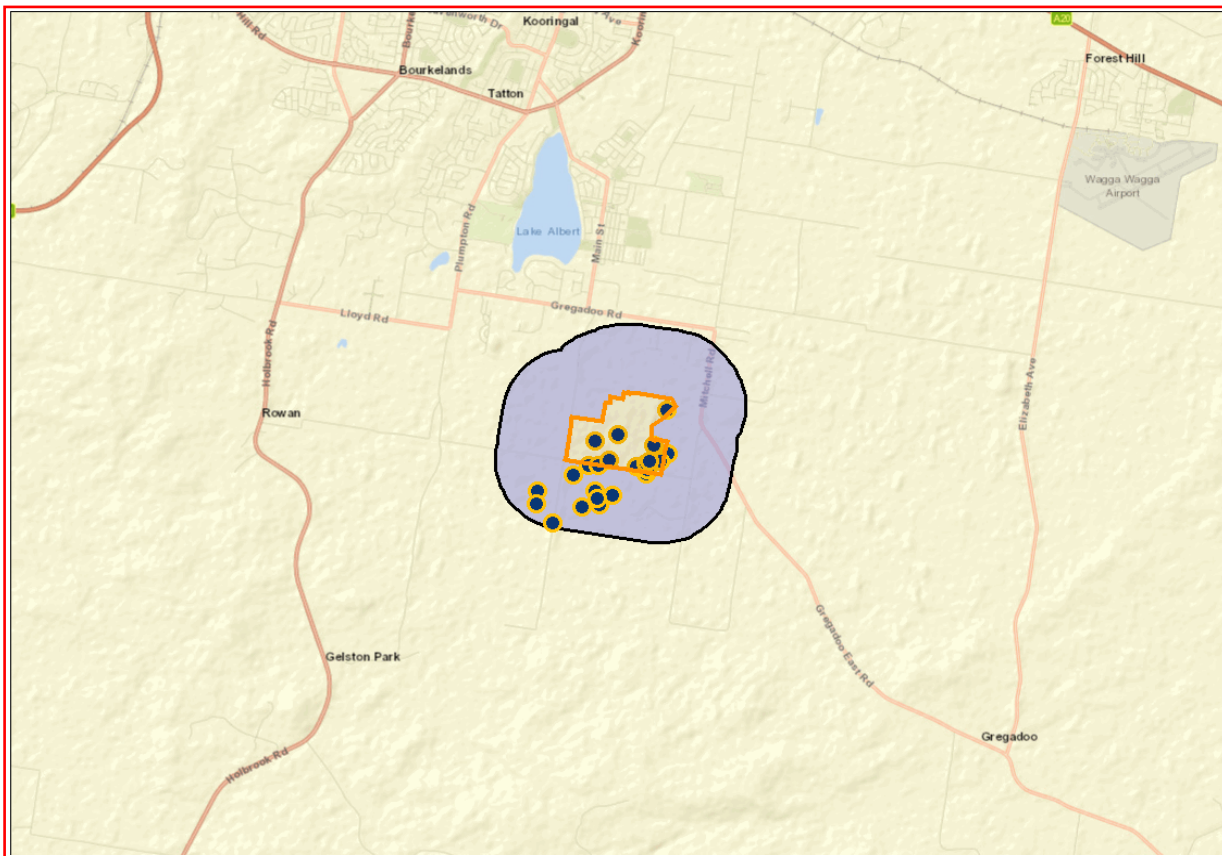
Date: 03 September 2025

Email: latisha.ryall@premise.com.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Lot : 43, DP:DP1303215, Section : - with a Buffer of 1000 meters, conducted by Latisha Ryall on 03 September 2025.

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.



A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

24	Aboriginal sites are recorded in or near the above location.
0	Aboriginal places have been declared in or near the above location. *

If your search shows Aboriginal sites or places what should you do?

- You must do an extensive search if AHIMS has shown that there are Aboriginal sites or places recorded in the search area.
- If you are checking AHIMS as a part of your due diligence, refer to the next steps of the Due Diligence Code of practice.
- You can get further information about Aboriginal places by looking at the gazettal notice that declared it. Aboriginal places gazetted after 2001 are available on the [NSW Government Gazette \(https://www.legislation.nsw.gov.au/gazette\)](https://www.legislation.nsw.gov.au/gazette) website. Gazettal notices published prior to 2001 can be obtained from Heritage NSW upon request

Important information about your AHIMS search

- The information derived from the AHIMS search is only to be used for the purpose for which it was requested. It is not to be made available to the public.
- AHIMS records information about Aboriginal sites that have been provided to Heritage NSW and Aboriginal places that have been declared by the Minister;
- Information recorded on AHIMS may vary in its accuracy and may not be up to date. Location details are recorded as grid references and it is important to note that there may be errors or omissions in these recordings,
- Some parts of New South Wales have not been investigated in detail and there may be fewer records of Aboriginal sites in those areas. These areas may contain Aboriginal sites which are not recorded on AHIMS.
- Aboriginal objects are protected under the National Parks and Wildlife Act 1974 even if they are not recorded as a site on AHIMS.
- This search can form part of your due diligence and remains valid for 12 months.



Appendix B

AHIMS Site Card

AHIMS site ID:

Date recorded:

Site Location Information

Site name:

Easting: Northing: Coordinates must be in GDA94 (MGA)

Horizontal Accuracy (m):

Zone:

Recorder Information

(The person responsible for the completion and submission of this form)

Title	Surname	First name
<input type="text" value="Ms."/>	<input type="text" value="Rudd"/>	<input type="text" value="Tamera"/>

Organisation:

Address:

Phone: E-mail:

Site Context Information

Land Form Pattern: Land Use:

Land Form Unit: Vegetation:

Distance to Water (m): Primary Report:

How to get to the site:

Other site information:

Site location map



Site plan



Site contents information

open/closed site:

Site condition:

Features:

Number of features Length of feature(s) extent (m) Width of feature (s) extent (m)

1.

Feature condition:

Description:

An culturally modified Ring Tree. The tree appears to be dead with a number of limbs at the base of the tree. The ring is located approximately 3m high in the tree and faces Boiling Down Creek in the west. The tree is situated along a drainage channel which meanders northwest to a dam. The tree is approximately 12-15m in height with approximate modification measures of 30 x 50cm

Scarred Trees

Scar Depth (cm) Regrowth (cm) Scar shape Tree Species

Features:

Number of features Length of feature(s) extent (m) Width of feature (s) extent (m)

2.

Feature condition:

Description:

Scarred Trees

Scar Depth (cm) Regrowth (cm) Scar shape Tree Species

Features:

Number of features Length of feature(s) extent (m) Width of feature (s) extent (m)

3.

Feature condition:

Description:

Scarred Trees

Scar Depth (cm) Regrowth (cm) Scar shape Tree Species

Features:

Number of features Length of feature(s) extent (m) Width of feature (s) extent (m)

4.

Feature condition:

Description:

Scarred Trees			
Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Iron Bark

Features:

Number of features Length of feature(s) extent (m) Width of feature (s) extent (m)

5.

Feature condition:

Description:

Scarred Trees			
Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Site photographs



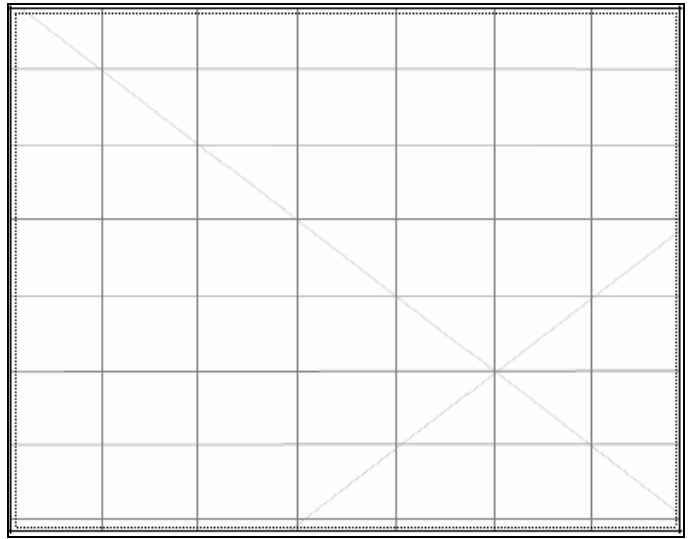
Description:



Description:



Description:



Description:

Site restrictions

Do you want to Restrict this site?:

Restriction type: Gender N/A General Location

Why is this site restricted?:

Further information contact

Title	Surname	First name
Ms.	Rudd	Tamera
Organisation:	Premise	
Address:	Level 1, 60-62 McNamara Street, Orange, NSW	
Phone:	0432752416	E-mail: tamera.rudd@premise.com.au

Site interpretation and community statement



Appendix C

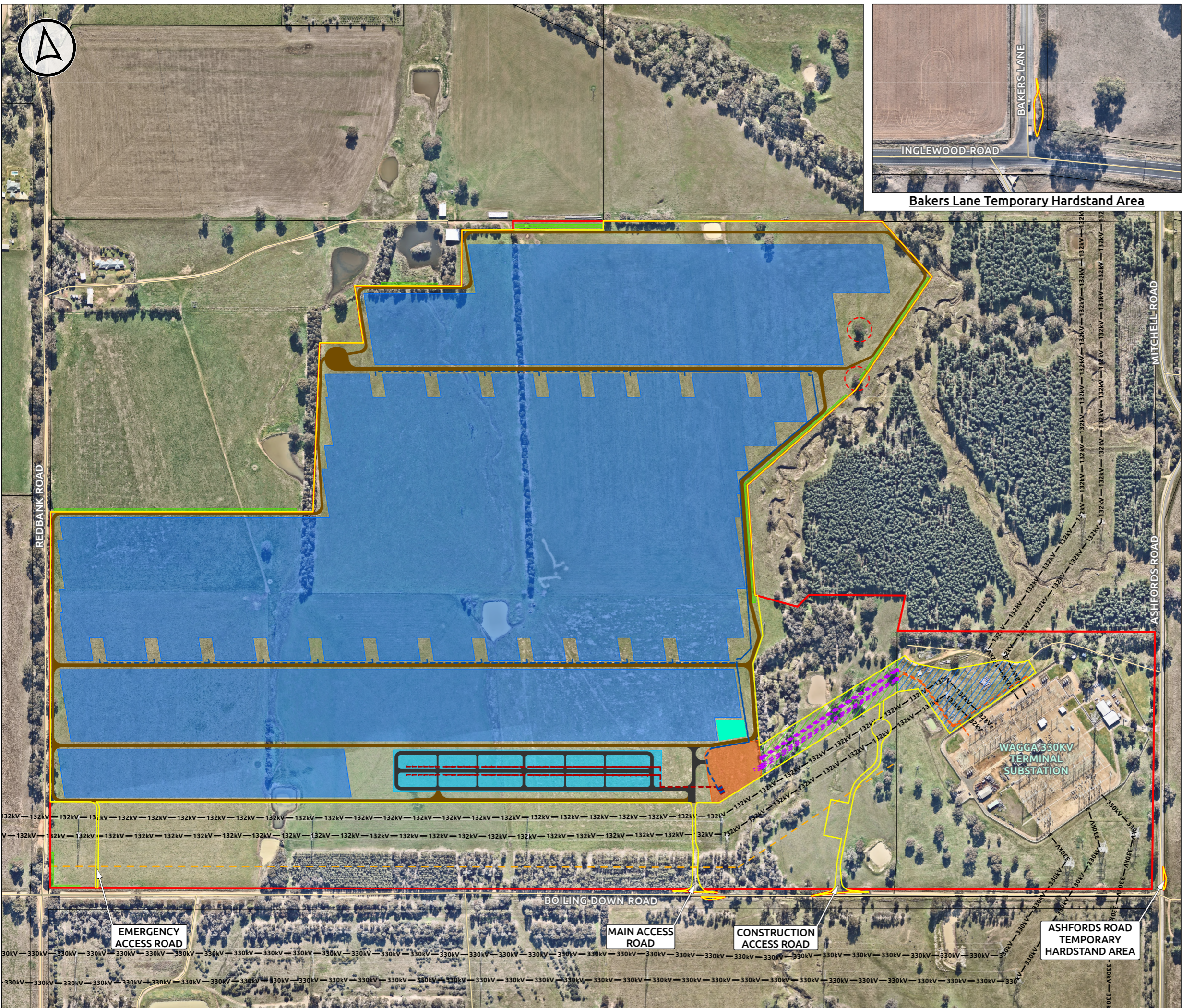
Internal Access Track and Access Point Drawings



GREGADOO SOLAR FARM PTY LTD Gregadoo Solar Farm

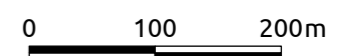


Bakers Lane Temporary Hardstand Area



Legend

- Project Area
- Development Footprint
- Indicative Visual Screening
- Indicative Sealed Road
- Indicative Gravel/Dirt Road
- Indicative Temporary Construction Facilities
- Indicative Asset Protection Zone
- Indicative Array Layout
- Indicative BESS
- Indicative Substation
- Indicative Overhead Connection Easement
- Indicative Underground Connection Easement
- Indicative Solar Farm 33kV Underground Connection Route
- Indicative BESS Connection Route
- Indicative Solar Farm 132kV Overhead Transmission Line
- Indicative Solar Farm 132kV Underground Transmission Line
- Transgrid 132kV Transmission Lines
- Transgrid 330kV Transmission Lines
- Transgrid 132kV Easement





Appendix D

Consultation

From: [Latisha Ryall](mailto:Latisha.Ryall)
Bcc: ["wiradjuriengineeringservices@outlook.com"](mailto:wiradjuriengineeringservices@outlook.com); ["yalmambirra@outlook.com"](mailto:yalmambirra@outlook.com); ["Mark Saddler"](mailto:Mark.Saddler); ["lorraine@waggawaggalac.org.au"](mailto:lorraine@waggawaggalac.org.au)
Subject: 222222 Gregadoo Solar Farm Modification 4 amendment - Consultation
Date: Thursday, 4 September 2025 3:21:00 PM
Attachments: [222222_AHDDA_001D.pdf](#)

Good afternoon,

Premise has been engaged to complete an amended report for Modification 4 (Mod 4) of the approved Gregadoo Solar Farm development, located at 123 Redbank Road and 50 Ashford's Road, Gregadoo, NSW.

I am emailing you today as you have previously registered as an interested party for the Gregadoo Solar Farm Project through the initial investigations undertaken by NGH in 2018-2020. Premise has previously written to you to ask for comment or feedback on Mod 4, however since our last correspondence some minor changes to the design of the proposed BESS has occurred, which has resulted in minor changes to our report.

As a brief overview, Mod 4 involves the addition of a Battery Energy Storage System (BESS) to the approved Solar Farm site, as well as an additional access point and internal access track. An Aboriginal Heritage Due Diligence Assessment has been prepared to assess the potential impacts of these modifications on Aboriginal cultural heritage values. Mod 4 was submitted to the Department in October 2024. Since that time design refinements have occurred (2025) with the location of the proposed BESS being relocated from the southwest corner to the southeast corner of the development footprint, adjacent to the approved solar farm substation.

There are no impacts to Aboriginal heritage values as part of this design change.

I have attached a copy of our draft amendment report for your review.

If you wish to provide feedback or have any questions regarding the Mod 4 amendment, please do not hesitate to reach out by C.O.B on the **18th September, 2025**.

Kind regards
Latisha

To: info@bundy.com.au
From: info@bundy.com.au
Subject: info@bundy.com.au
Date: info@bundy.com.au
Attachments: info@bundy.com.au

Yamato Lataha,
I would also ask that your company staff, contractors and anyone who has something to do with this site attends a WindaJit Cultural Awareness Program.
I'd like these programs as well.
Please have my concerns added to your report.

Georgy (Sally) Travelski
Mark Sadtler,
Cultural Awareness,
School & Tour Programs,
Bundy Cultural Tours.
Web Page: www.bundy.com.au
Facebook Page: <https://www.facebook.com/WindaJit/>
YouTube Channel: https://www.youtube.com/channel/UCQOChIdU_Wu79u721A

PH 0412 832 830
"I respectfully acknowledge the traditional custodians of our land, The WindaJit people!
"Always Win, Always Will Be"

On 9 Sep 2025, at 1:30 pm, Lataha Ryall <lataha.ryall@grapevine.com.au> wrote:

Good afternoon Mark,
Just to follow up, the Grapes Mod 4 amendment relates to movement of the proposed BESS within the approved Solar Farm development footprint. The proposed BESS is being moved from the southwestern corner to the southeastern corner. This area has previously been assessed through NGR investigations with RWFS.
There are no impacts to Aboriginal heritage items and no movement of Aboriginal objects/structures has occurred through this modification.
The amendment does not change the location of the proposed access road.
The report will reflect that all persons are to be notified of distances to WindaJit cultural heritage including all sites that are recorded on AHMS and any newly identified sites within this location. We acknowledge that the area is culturally important to WindaJit.

Kind regards,
Lataha
Lataha Ryall
Archaeologist
0429 777 741 | 02 6330 5000 | lataha.ryall@grapevine.com.au
Level 1, 60-62 McNameera Street, Orange NSW, 2800, Australia
www.lataha.com.au
<https://www.facebook.com/lataha.archaeology>
<https://www.instagram.com/lataha.archaeology>
<https://www.linkedin.com/company/lataha-archaeology>
Follow me on [LinkedIn](https://www.linkedin.com/company/lataha-archaeology) and check out our [website](https://www.lataha.com.au)
<https://www.linkedin.com/company/lataha-archaeology>
Please note that I work part-time. My days are Monday to Thursday

From: Mark Sadtler <mark.sadtler@bundy.com.au>
Sent: Monday, 8 September 2025 10:20:04 AM
To: Lataha Ryall <lataha.ryall@grapevine.com.au>
Subject: Re: 202222 Grapes Solar Farm Modification 4 amendment - Consultation
Yamato,
On the road.
Hang about a job.

Georgy (Sally) Travelski
Mark Sadtler,
Cultural Awareness,
School & Tour Programs,
Bundy Cultural Tours.
Web Page: www.bundy.com.au
Facebook Page: <https://www.facebook.com/WindaJit/>
YouTube Channel: https://www.youtube.com/channel/UCQOChIdU_Wu79u721A

PH 0412 832 830
"I respectfully acknowledge the traditional custodians of our land, The WindaJit people!
"Always Win, Always Will Be"

On 8 Sep 2025, at 9:11 am, Lataha Ryall <lataha.ryall@grapevine.com.au> wrote:

Good morning Mark,
Happy to give you a call around 11am this morning if that is suitable?
Kind regards,
Lataha

Lataha Ryall
Archaeologist
0429 777 741 | 02 6330 5000 | lataha.ryall@grapevine.com.au
Level 1, 60-62 McNameera Street, Orange NSW, 2800, Australia
www.lataha.com.au
<https://www.facebook.com/lataha.archaeology>
<https://www.instagram.com/lataha.archaeology>
<https://www.linkedin.com/company/lataha-archaeology>
Follow me on [LinkedIn](https://www.linkedin.com/company/lataha-archaeology) and check out our [website](https://www.lataha.com.au)
<https://www.linkedin.com/company/lataha-archaeology>
Please note that I work part-time. My days are Monday to Thursday

From: Mark Sadtler <mark.sadtler@bundy.com.au>
Sent: Saturday, 6 September 2025 9:17 AM
To: Lataha Ryall <lataha.ryall@grapevine.com.au>
Subject: Re: 202222 Grapes Solar Farm Modification 4 amendment - Consultation
Yamato Lataha,
Can you please give me to discuss the changes please?
I'm available 7 days a week to you.

Georgy (Sally) Travelski
Mark Sadtler,
Cultural Awareness,
School & Tour Programs,
Bundy Cultural Tours.
Web Page: www.bundy.com.au
Facebook Page: <https://www.facebook.com/WindaJit/>
YouTube Channel: https://www.youtube.com/channel/UCQOChIdU_Wu79u721A

PH 0412 832 830
"I respectfully acknowledge the traditional custodians of our land, The WindaJit people!
"Always Win, Always Will Be"

On 4 Sep 2025, at 12:23 pm, Lataha Ryall <lataha.ryall@grapevine.com.au> wrote:

Good afternoon,
Permit has been engaged to complete an amended report for Modification 4 (Mod 4) of the approved Grapes Solar Farm development, located at 123 Redbank Road and 52 Ashford's Road, Grapes NSW.
I am emailing you today as you have previously registered as an interested party for the Grapes Solar Farm Project through the initial investigations undertaken by NGR in 2018-2020. Permit has previously written to you to ask for comment or feedback on Mod 4, however since our last correspondence some minor changes to the design of the proposed BESS has occurred, which has resulted in minor changes to your report.
As a final overview, Mod involves the addition of a Battery Energy Storage System (BESS) to the approved Solar Farm site, as well as an additional access point and internal access track. An Aboriginal Heritage Due Diligence Assessment has been prepared to assess the potential impacts of these modifications on Aboriginal cultural heritage values. Mod 4 was submitted to the Department in October 2024. Since that time design refinements have occurred (2025) with the location of the proposed BESS being relocated from the southwest corner to the southeast corner of the development footprint, adjacent to the approved solar farm substation.
There are no impacts to Aboriginal heritage values as part of this design change.
I have attached a copy of our draft amendment report for your review.
If you wish to provide feedback on any questions regarding the Mod 4 amendment, please do not hesitate to reach out by COB on the 18th September, 2025.

Kind regards,
Lataha
Lataha Ryall
Archaeologist
0429 777 741 | 02 6330 5000 | lataha.ryall@grapevine.com.au
Level 1, 60-62 McNameera Street, Orange NSW, 2800, Australia
www.lataha.com.au
<https://www.facebook.com/lataha.archaeology>
<https://www.instagram.com/lataha.archaeology>
<https://www.linkedin.com/company/lataha-archaeology>
Follow me on [LinkedIn](https://www.linkedin.com/company/lataha-archaeology) and check out our [website](https://www.lataha.com.au)
<https://www.linkedin.com/company/lataha-archaeology>
Please note that I work part-time. My days are Monday to Thursday

PH 0412 832 830
"I respectfully acknowledge the traditional custodians of our land, The WindaJit people!
"Always Win, Always Will Be"

From: [Tamera Rudd](#)
Cc: [Latisha Ryall](#)
Bcc: wiradjuriengineeringservices@outlook.com; yalmambirra@outlook.com; [Mark Saddler](#); lorraine@waggawaggalac.org.au
Subject: RE: [#222222] Gregadoo Solar Farm Modification 4 - RAP Notification
Date: Thursday, 29 August 2024 9:19:00 AM
Attachments: [222222_AHDDA_001B.pdf](#)
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[icon-home_387553ff-7c4b-4c96-9452-24cf9d6c1b2d.png](#)

Good morning,

Since our previous correspondence regarding the Gregadoo Solar Farm Modification 4 Aboriginal cultural heritage assessment (see email below), some minor changes to the design of the internal access track and access point have occurred. This has resulted in minor changes to our report, which I have attached to this email for your review.

There will be an additional 14-day review period for the amended report. If you wish to provide feedback or have any questions regarding Mod 4, please do not hesitate to reach out by the **12th September, 2024**.

Kind regards,

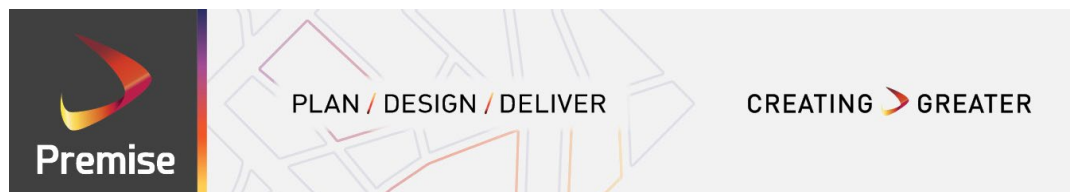
Tamera Rudd

Graduate Archaeologist

0432 752 416 | 02 6921 3312 | tamera.rudd@premise.com.au
64 Hammond Ave, Wagga Wagga NSW, 2650, Australia



Follow Premise on [LinkedIn](#) and check out our [new-look website](#)



From: Tamera Rudd <tamera.rudd@premise.com.au>

Sent: Friday, 9 August 2024 3:59 PM

Cc: Latisha Ryall <latisha.ryall@premise.com.au>; Tamera Rudd <tamera.rudd@premise.com.au>

Subject: [#222222] Gregadoo Solar Farm Modification 4 - RAP Notification

From: [Tamera Rudd](#)
Cc: [Latisha Rvall](#); [Tamera Rudd](#)
Bcc: wiradjuriengineeringservices@outlook.com; yalmambirra@outlook.com; [Mark Saddler](#); lorraine@waggawaggalalc.org.au; waggawaggalalc@bigpond.com
Subject: [#222222] Gregadoo Solar Farm Modification 4 - RAP Notification
Date: Friday, 9 August 2024 3:59:05 PM
Attachments: [facebook_cc64b49b-0134-4939-9297-6e20edee64ee.png](#)
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[icon-home_387553ff-7c4b-4c96-9452-24cf9d6c1b2d.png](#)
[222222_AHDDA_001A.pdf](#)

Good afternoon,

Premise have been engaged to complete a Modification Report for the proposed 'Mod 4' of the approved Gregadoo Solar Farm development, located at 123 Redbank Road and 50 Ashford's Road, Gregadoo, NSW. Mod 4 involves the addition of a Battery Energy Storage System (BESS) to the approved Solar Farm site, as well as an additional access point and internal access track. An Aboriginal Heritage Due Diligence Assessment has been prepared to assess the potential impacts of these modifications on Aboriginal cultural heritage.

You have previously registered as an interested party for the Gregadoo Solar Farm Project. We have attached a copy of our draft report for your review.

If you would like to provide any feedback on the attached report or have any questions regarding the proposed modification, please do not hesitate to reach out by the **23 August 2024**.

Kind regards,

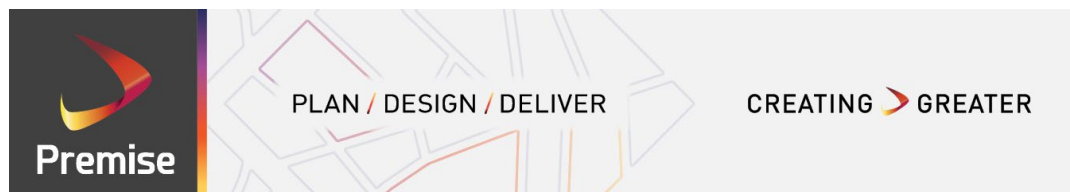
Tamera Rudd

Graduate Archaeologist

0432 752 416 | 02 6921 3312 | tamera.rudd@premise.com.au
64 Hammond Ave, Wagga Wagga NSW, 2650, Australia



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