



***Yannis Comino***

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*11 February 2026*

Dear Yannis,

*Response to Heritage NSW Request for Information (RFI) – Stoney Creek Road BESS, Narrabri, NSW (Virtus Ref: 606 & 793).*

We understand Heritage NSW has provided a Request for Information (RFI) relating to the Stoney Creek BESS, Narrabri, and requires the applicant to supply further information in order to progress the application. The RFI provided by Heritage NSW and responses are provided below.

## HERITAGE NSW RFI 1A AND 1B

***Heritage NSW RFI 1A:*** ‘Heritage NSW note that a project Registered Aboriginal Party (RAP) [sic] indicated during consultation that the project area is situated within a songline that runs from Gunnedah to Burning Mountain. We note that the project area is situated approximately 100 km north of Gunnedah, with Burning Mountain situated a further 130 km south. In consideration of this, please clarify’:

- a. ‘Is the project area within, or in the vicinity of the songline?’
- b. ‘If any specific information was received about the songline, including stories, location and/or values?’

**Response:** On 4 June 2025, comment was received from one Registered Aboriginal Party (as part of Stage 2 of the *Aboriginal cultural heritage consultation requirements for proponents 2010*) that a songline runs through the project area. Virtus Heritage undertook consultation to understand specific information about the songline, including stories, location and/or values. The following consultation was undertaken (detail of consultation also provided in Table 1 of this document; and the Consultation log in the Final ACHA for the project):



- Phone call with RAP on the 4 June 2025. RAP informed a songline runs through the project area but did not provide any additional information on stories, location or values.
- Email to RAP on the 5 June 2025 to confirm the verbal comments but received no response.
- Email and SMS to RAP on the 6 June 2025 to confirm the verbal comments but received no response.
- Email to RAP on the 16 June 2025 to confirm verbal comments and further detail about the songline, reiterating cultural safety protocols and sensitive information protocols. No response was received.
- Phone call received from RAP on the 19 June 2025 to confirm fieldwork arrangements.
- RAP attended field survey of the project area on 24 June 2025. During the survey the RAP verbally stated that a songline runs from Gunnedah to Burning Mountain (as noted by Heritage NSW up to approximately 130km south of the project area). No further information relating to a songline was provided during the survey.
- Virtus Heritage continued consultation as part of the *Aboriginal cultural heritage consultation requirements for proponents (2010)* for additional comment on the project, draft reports (ACHA/AA), and any additional cultural information on 16 July, 23 July, and 30 July 2025 via email and phone calls. No additional information was received relating to the songline.

Following extensive consultation and follow up on comment provided, as per the requirements of the *Aboriginal cultural heritage consultation requirements for proponents (2010)*, no specific information was received about the songline. No stories were shared about the songline. The only location provided was reference to a songline that runs from Gunnedah to Burning Mountain (up to 130km south of the project area). No specific values were shared about the songline. As no additional information was provided (apart from Gunnedah to Burning Mountain located up to 130km south of the project area), there is no information to indicate the songline is within or in the vicinity of the project area.

## HERITAGE NSW RFI 2

**Heritage NSW RFI 2.** *‘Should additional specific cultural information be received regarding the songline, Heritage NSW recommend that it is added to the Aboriginal Heritage Information Management System (AHIMS) as an Aboriginal Ceremony and Dreaming site’.*

**Response:** If the proponent (or Virtus Heritage if still representing the proponent) receive additional specific cultural information regarding the songline, the site will be registered in consultation with the RAP onto the Aboriginal Heritage Information Management System



(AHIMS) as an Aboriginal Ceremony and Dreaming site, following the recommendation provided by Heritage NSW.

## HERITAGE NSW RFI 3

***Heritage NSW RFI 3.*** *'We note that Figure 4 of the ACHAR shows proposed survey transects and not track logs. As per Requirement 5 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010; Code of Practice), please provide detailed and thorough mapping which includes all survey track logs.'*

**Response:** Figure 4 has been amended to include all survey track logs to comply with Requirement 5 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010; Code of Practice). Figure 4 is appended to this document.



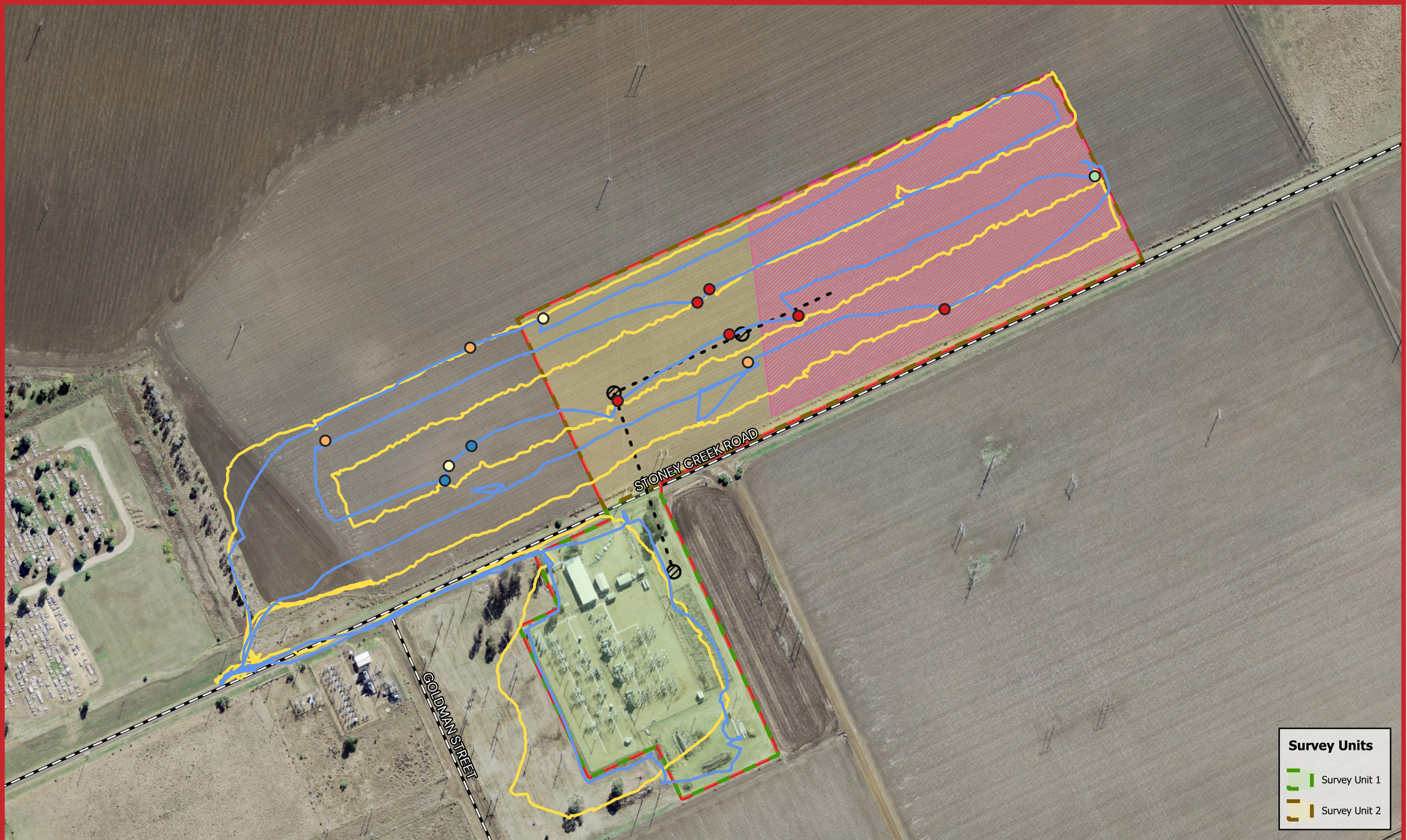
*Table 1 Summary of consultation with RAP relevant to RFI*

| Date     | Consultation type  | Content                                                                                               | Response                                                                                                                                                                                                                                                               |
|----------|--------------------|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 15/04/25 | Phone call         | Registered as a RAP                                                                                   | VH sent confirmation email                                                                                                                                                                                                                                             |
| 07/05/25 | Email              | VH emailed the Proposed Project Information (PPI) and Survey Strategy (SS)                            | No response from RAP                                                                                                                                                                                                                                                   |
| 16/05/25 | Phone call and SMS | VH unable to reach RAP or leave a voice message, so sent an SMS about due date for comments on PPI SS | No response from RAP                                                                                                                                                                                                                                                   |
| 30/05/25 | Phone              | VH received updated mailing address and reminded RAP of the due date for comments                     | No comments verbally provided from RAP                                                                                                                                                                                                                                 |
| 02/06/25 | Email and SMS      | Reminder of the due date for comments                                                                 | No response from RAP                                                                                                                                                                                                                                                   |
| 04/06/25 | Phone call         | PPI SS comments                                                                                       | RAP called the office and provided verbal comment that she had worked with the NT claimants before, that a songline runs through the project area and testing should be included in the methodology to see if any subsurface objects are associated with the songline. |

|          |               |                                                                                                 |                                                                                                                                                                                                                                          |
|----------|---------------|-------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 05/06/25 | Email         | RAP's PPI SS comments                                                                           | VH emailed RAP to confirm her verbal comments but received no confirmation or additional information                                                                                                                                     |
| 06/06/25 | Email and SMS | Reminder of the due date for comments                                                           | No response received from RAP                                                                                                                                                                                                            |
| 12/06/25 | Phone call    | RAP called VH and wanted to know about fieldwork                                                | VH referred RAP to proponent.                                                                                                                                                                                                            |
| 16/06/25 | Email         | RAP's PPI SS comments                                                                           | VH emailed RAP to confirm her verbal comments and further detail about the songline, reiterating cultural safety protocols and sensitive information protocols.<br><br>No response received from RAP                                     |
| 19/06/25 | Phone call    | RAP called VH to confirm fieldwork and attendance                                               | VH confirmed time and place                                                                                                                                                                                                              |
| 24/06/25 | In person     | Survey                                                                                          | During the survey, RAP verbally stated that a songline runs from Gunnedah to Burning Mountain.<br><br>RAP requested test pitting and/or salvage, surface collection and a care agreement prior to the final repository of the artefacts. |
| 16/07/25 | Email         | VH emailed the draft ACHA and AA to RAP which included the comments in the consultation chapter | No response from RAP                                                                                                                                                                                                                     |

|          |                      |                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                               |
|----------|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 23/07/25 | Phone call           | VH called RAP to confirm if the draft reports had been received and if any assistance was required accessing/downloading the reports. VH reminded RAP of the due date for comments | RAP said would check emails                                                                                                                                                                                                                                                                                                                                   |
| 30/07/25 | Email and phone call | VH emailed RAP a reminder of the due date for comments on the reports                                                                                                              | <p>RAP called VH to supply verbal comment. RAP did not provide any additional information or any specifics on stories, location or values of the songline.</p> <p>RAP's comments on the draft were recommending test pitting, salvage excavations, surface collection, RAP monitoring during works, ACH inductions and for a care agreement to be drafted</p> |
| 30/07/25 | Email                | VH emailed RAP to confirm her verbal comments                                                                                                                                      | No response received from RAP                                                                                                                                                                                                                                                                                                                                 |





**Survey Units**

- Survey Unit 1
- Survey Unit 2

606: 41 Stoney Creek Road BESS  
 Narrabri, NSW  
 Figure 4b. Coverage within the Project Area

Author: Liam Clerke  
 Date: 10/02/2026  
 Scale: 1:3561 @ A4  
 Datum: GDA2020 / MGA zone 55  
 Source: NSW Spatial Services

Maps and figures contained within this document may be based on third party data, may not be to scale and are intended for use as a guide only. Virtus Heritage does not warrant the accuracy of such maps or figures.

**Legend**

- Project Area
- BESS Footprint
- Proposed Transmission Tower
- Proposed Transmission Line
- Roads

- Proposed Transmission Tower
- GPS Survey Tracks - 1
- GPS Survey Tracks - 2

**Identified Artefacts**

- Broken Flake

- Core
- Flake
- Flake used as Core
- Retouched Flake

