



PREPARED FOR



Samsung C&T Renewable Energy
Australia Pty Ltd

DATE
13 August 2025

REFERENCE
0704056

Romani BESS

Historic Heritage Due Diligence



DOCUMENT DETAILS

DOCUMENT TITLE	Romani BESS
DOCUMENT SUBTITLE	Historic Heritage Due Diligence
PROJECT NUMBER	0704056
Date	13 August 2025
Version	Final 04
Author	Victoria Gleeson
Client name	Samsung C&T Renewable Energy Australia Pty Ltd

DOCUMENT HISTORY

				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
Draft	01	V. Gleeson	E. Finnegan	L. Baker	22.08.2024	For client review
Final	02	V. Gleeson	E. Finnegan	L. Baker	4.10.2024	
Final	03	M. Linton-Smith	L. Perchard	L. Baker	11.04.2025	Amended project scope
Final	03	M. Linton-Smith	L. Perchard	L. Baker	27.06.2025	Amended from client comments
Final	04	M. Linton-Smith	L. Perchard	L. Baker	13.08.2025	Amended from client comments

Romani BESS

Historic Heritage Due Diligence

0704056



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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AC	Alternating Current
BESS	Battery Energy Storage System
CH	Commonwealth Heritage
CHL	Commonwealth Heritage List
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
ERM	Environmental Resources Management Australia Pty Ltd
DC	Direct Current
FTE	Full Time Equivalent
GWh	Gigawatt hours
ha	Hectares
Heritage Act	<i>Heritage Act 1977</i>
HHDD	Historic Heritage Due Diligence
ICOMOS	International Council on Monuments and Sites
IHO	Interim Heritage Order
km	Kilometres
kV	Kilovolt
LEP	Local Environmental Plan
LGA	Local Government Area
m	Metres
MW	Megawatt
Navin Officer	Navin Officer Heritage Consultants
NHL	National Heritage List
NSW	New South Wales
PCU	Power conversion unit
PEC	Project EnergyConnect
PV	Photovoltaic
RAP	Registered Aboriginal Party
REZ	Renewable Energy Zone
RNE	Register of National Estate

Acronyms	Description
SEARs	Secretary's Environmental Assessment Requirements
SHR	State Heritage Register
SLNSW	State Library of New South Wales
SSD	State Significant Development
The Burra Charter	The Australia International Council on Monuments and Sites, Charter for Places of Cultural Significance (2013)
UNESCO	United Nations Educational, Scientific and Cultural Organisation

EXECUTIVE SUMMARY

Environmental Resources Management Australia Pty Ltd was engaged by Samsung C&T Renewable Energy Australia Pty Ltd (Samsung; the Applicant) to prepare a Historical Heritage Due Diligence (HHDD) for the Romani BESS (the Project).

The Project would involve the construction, operation and decommissioning of a battery energy storage system (BESS) with a storage capacity of 200 MW / 800 MWh (connecting to the existing X5 transmission line), and associated infrastructure. The Project Area encompasses approximately 21 hectares, approximately 44 km southwest of Hay, in the Riverina Murray region of New South Wales.

The Project will be assessed as a State Significant Development application under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (SSD-67105475). This historic heritage due diligence report has been prepared as an appendix to the Environmental Impact Statement for the Project.

The historical assessment has determined that there are no known built heritage items or significant historic view lines within the Project Area. The archaeological potential of the Project Area has been assessed as Low. However, this report has concluded that should any archaeological remains be present; these would be unlikely to provide substantive contribution to research questions relevant to the early history of the site or local area, that is not available from other sources. As such, the Project Area has low archaeological research potential and as such, low archaeological heritage significance.

There are no historical built or archaeological constraints for the proposed Project. Therefore, works may proceed with no further historic heritage assessments.

The following are key recommendations that aim to mitigate the impact of the proposed works on potential and as yet unidentified heritage values of the Project Area:

Recommendation 1 – Heritage Induction

Prior to the commencement of works, all staff and contractors should be briefed on the requirements of the *Heritage Act 1977* and the project specific Unexpected Finds Protocol.

Recommendation 2 - Unexpected Finds Protocol

In the event that relics are unexpectedly exposed, works should cease immediately. The management of relics should be in accordance with NSW Heritage guidelines and policies, as outlined in the Unexpected Finds Protocol.

1. INTRODUCTION

Samsung C&T Renewable Energy Australia Pty Ltd (Samsung; the Applicant) is proposing to construct, operate, and decommission Romani BESS (the Project) located approximately 44 km southwest of Hay, in the Riverina Murray region of New South Wales (NSW). The Project is a proposed battery energy storage systems (BESS) comprised of two allotments located on Booororban-Tchelery Road, north of The Forest Creek, with an area of approximately 21 hectares (ha). The Project will be assessed as a State Significant Development (SSD) application under the NSW Environmental Planning and Assessment Act 1979.

Environmental Resources Management Australia Pty Ltd (ERM) was commissioned by the Applicant to prepare an Historic Heritage Due Diligence (HHDD) for the Project. This HHDD has been developed to support an Environmental Impact Statement (EIS).

1.1 OBJECTIVES

This report aims to:

- Identify historic heritage resources within the Project Area, including archaeological potential and built heritage values;
- Present historical contextual data to aid in the development of an archaeological predictive model;
- Evaluate the impact of the proposed works on any identified historic heritage resources; and
- Provide recommendations for the mitigation of impacts and management of identified historic heritage resources.

The Project Area encompasses two land parcels (refer to **Table 1-1**) that covers a total area of approximately 21 ha at Booororban-Tchelery Road, Booororban. The BESS development footprint includes approximately 12 ha, the road upgrades includes approximately 1 ha, and an additional 6 ha is provided for the temporary construction compound.

The site is located north of The Forest Creek and is primarily used for small scale agricultural purposes, and the elevation across the Project Area is relatively consistent ranging from 80 m to 90 m above sea level. A map of the Project Area is provided in **Figure 1.1**.

TABLE 1-1 LAND CADASTRES OF THE PROJECT AREA

Lot	DP
57, 92	756561

1.2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The Project would involve the construction, continuous operation and decommissioning of a BESS, and associated infrastructure. The Project would occur within the 21 ha Project Area as shown in **Figure 1.1**.

The lithium-ion BESS would have a storage capacity of 200 MW / 800 MWh. It would be connected to the existing X5 transmission line. The Project construction period is expected to be 18 months, with a peak workforce of 80-100 Full Time Equivalent (FTE), with an average of 30-50 FTE. Once construction is completed, the operational workforce would be 3-5 FTE.

Table 1-2 summarises the key indicative Project components and specifications.

TABLE 1-2 INDICATIVE PROJECT DESIGN – COMPONENTS AND SPECIFICATION

Component	Feature	Specification
BESS	BESS	200 MW / 800 MWh BESS
Electrical Reticulation Network	On-site substations	A new high voltage substation, proposed along Boooroorban-Tchelery Road.
	Internal electrical reticulation network	Electrical reticulation would generally follow parallel internal access routes. The BESS would connect to the existing X5 transmission line via overhead cables.
	Switchyard	Switch and other electrical equipment providing connection to the existing 220 kV X5 transmission line.
Access Roads	Access to site	Access to the Project Area is proposed from Boooroorban-Tchelery Road via Cobb Highway.

The Project layout is illustrated in **Figure 1.2**, which shows the proposed development footprint of the BESS, including a construction compound and laydown, and indicative site accesses.

The Project would also require additional project infrastructure and associated works including:

- Internal access roads to connect ancillary infrastructure;
- Operations and maintenance building;
- Substation; and
- Additional switchyards and transformers.

The Project would require the following construction and temporary facilities:

- Temporary construction facilities such as offices, car park and amenities;
- Fencing and landscaping works;
- Delivery of project components, including battery modules, substations, transformers and associated components;
- Installing maintenance and environmental managements processes and equipment;
- Earthworks required to establish laydown areas;
- Installation of overhead and potentially underground cabling; and
- Access to the project site via Boooroorban-Tchelery Road.

1.3 METHODOLOGY

This HHDD examines non-Aboriginal heritage values within the Project Area. This report has been prepared in accordance with the following guidelines:

- *Assessing Heritage Significance* (NSW Heritage Office 2001);
- *Assessing Significance for Historical Archaeological Sites and 'Relics'* (Heritage Branch, Department of Planning 2009);
- *NSW Heritage Manual* (Heritage Office 1996); and

- *The Australia International Council on Monuments and Sites, Charter for Places of Cultural Significance* (also known as the Burra Charter, Australia ICOMOS 2013) and relevant Practice Notes.

Preparation of this report includes:

- Heritage register and database searches;
- Desktop research, including publicly available libraries and archives;
- Field survey of the Project Area;
- Assessment of the potential for impact to potential historic heritage values;
- Assessment of heritage significance; and
- Preparation of management and mitigation recommendations.

1.4 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)

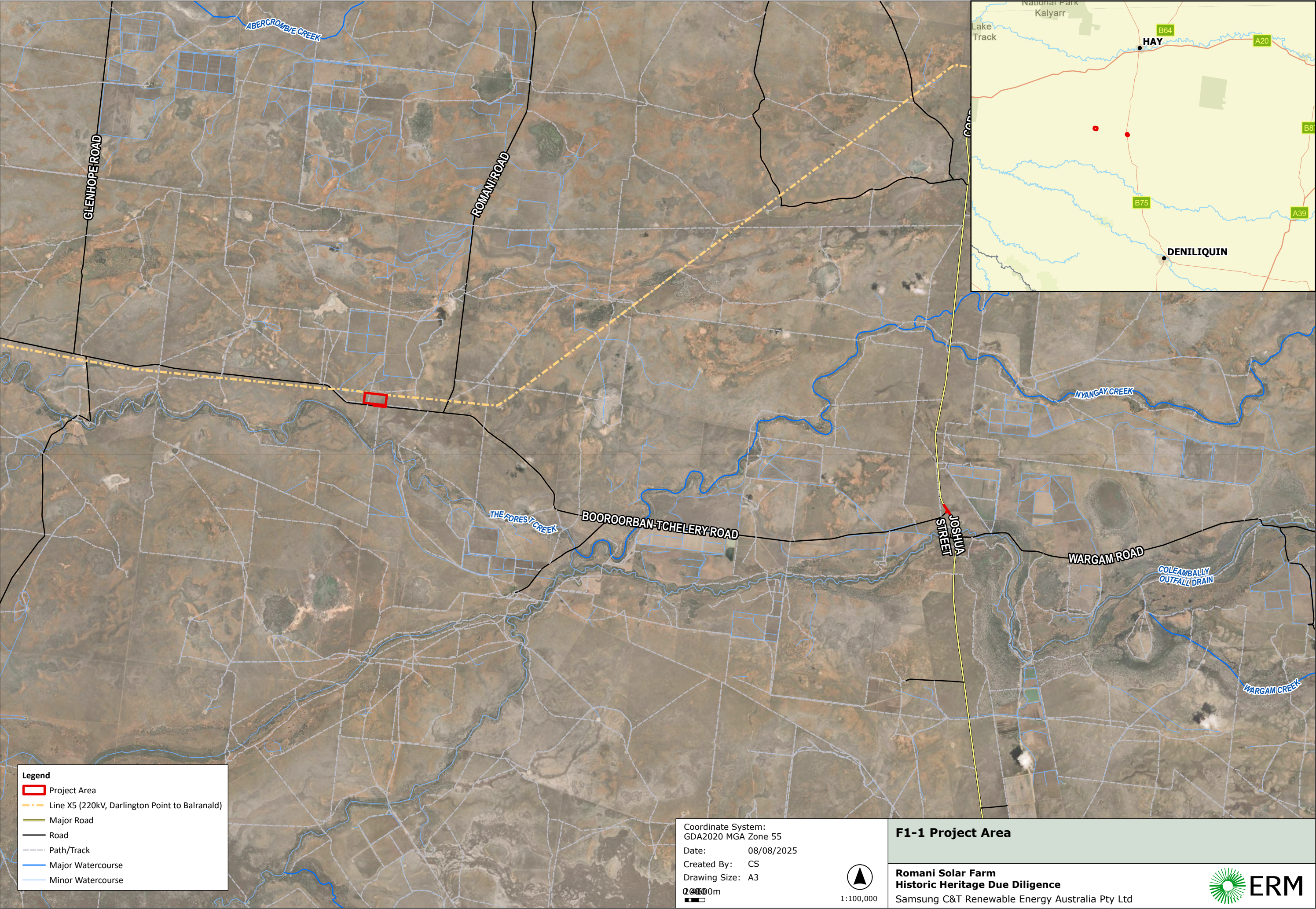
The SEARs (SSD-67105475) for the Project were issued on 19 June 2025. The requirements for historic heritage assessment and where they have been addressed are summarised in **Table 1.3**.

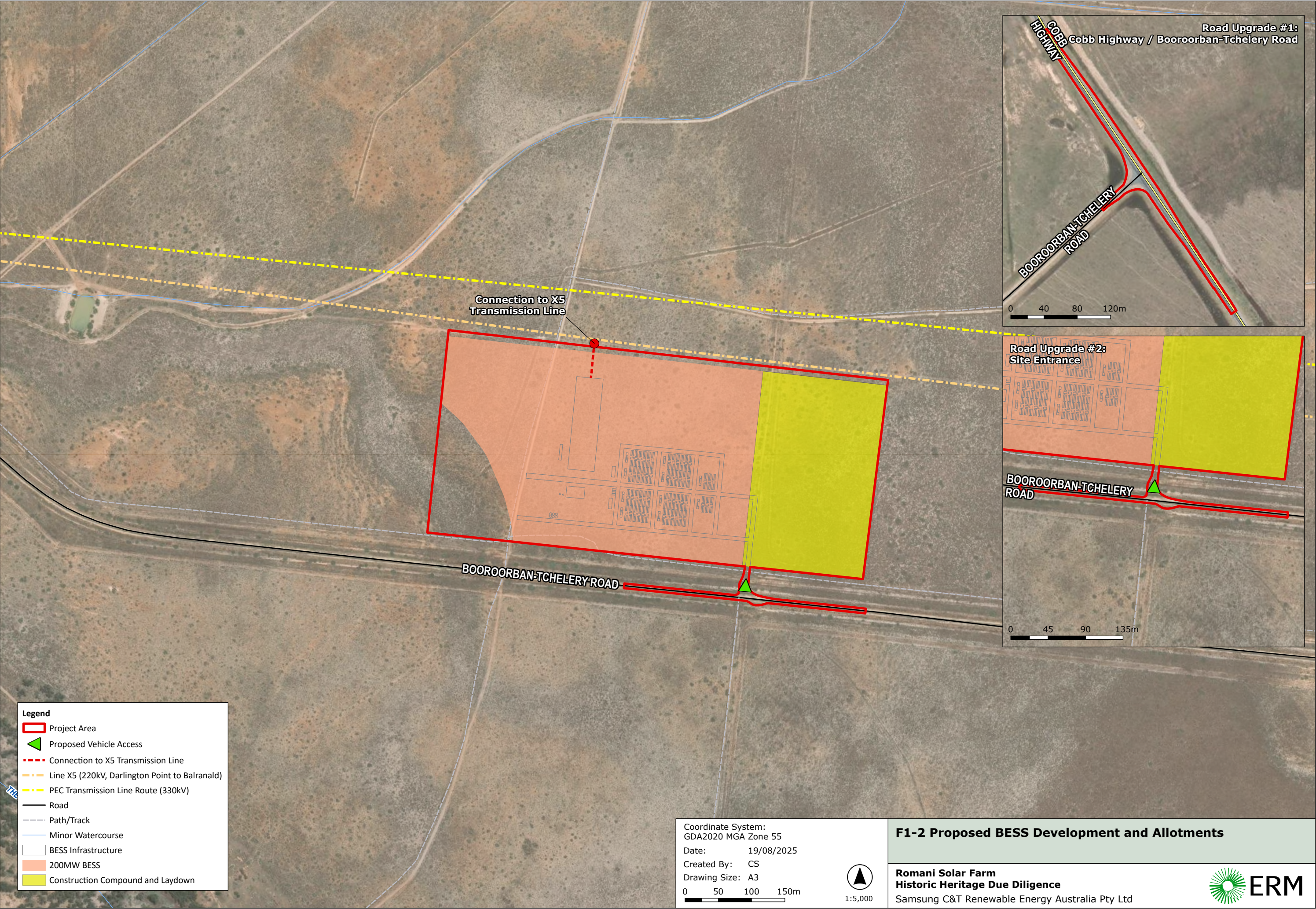
TABLE 1.3 SUMMARY OF SEARS REQUIREMENTS FOR ABORIGINAL CULTURAL HERITAGE AND WHERE ADDRESSED IN THE CURRENT REPORT

SEAR	Section addressed in this report
Assess the impact to historic heritage having regard to the NSW Heritage Manual.	Whole report

1.5 AUTHORSHIP

ERM Managing Consultant Victoria Gleeson prepared this report. ERM Technical Consulting Director – Heritage, Erin Finnegan completed a technical review. ERM Partner Lucy Baker completed a quality assurance review.





2. LEGISLATION AND GUIDELINES

Several pieces of Commonwealth and State legislation guide the assessment and management of historic heritage in NSW. This legislation also provides the framework for the establishment of heritage registers under their respective legislative purview. A summary of relevant legislation is provided below. A search of the heritage registers associated with the below legislation is provided in **Section 4.1.1** and **Table 4.1**.

2.1 COMMONWEALTH LEGISLATION

2.1.1 ENVIRONMENT PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act; as amended 2022) provides the framework for the Commonwealth Government's environmental legislation. The EPBC Act outlines a legal framework for the protection and management of nationally and internationally important flora, fauna, ecological communities, and heritage places. Several heritage lists have been established under the EPBC Act including the Commonwealth Heritage List (CHL), National Heritage List (NHL), and Register of National Estate (RNE) (now repealed). The CHL includes natural, Indigenous, and historical heritage places owned or controlled by the Australian Government. Items on the list have satisfied the Minister as having one or more Commonwealth Heritage values.

The Australian NHL contains natural, historic, and Indigenous places deemed to be of outstanding heritage significance to Australia. Before a site is placed on the list a nominated place is assessed against nine criteria by the Australia Heritage Council.

2.2 NSW LEGISLATION

2.2.1 NSW HERITAGE ACT 1977

The Heritage Act 1977 (Heritage Act) protects the cultural and natural history of NSW with emphasis on historic (non-Aboriginal) heritage items, including places, buildings, works, relics, moveable objects, precincts, historic shipwrecks, and archaeological sites of State or local significance. Protection is provided through protection provisions and the establishment of a Heritage Council and State Heritage Register (SHR). Nominated items are considered by the NSW Heritage Council, which then makes a recommendation to the Minister for Environment and Heritage. The Heritage Council is empowered to place Interim Heritage Orders (IHO) on an item of potential State significance. Section 136 of the Heritage Act allows for the Minister or Chair of the Heritage Council to place a 'Stop Work' Order on a building, work, relic, or place, that is not subject to an IHO or listed on the SHR and that is being or about to be harmed. Work can be stopped for 40 days, whilst the imposition of an IHO is considered.

Sections 139 to 146, Divisions 8 and 9 of Part 6 of the Act refer to the requirement that excavation or disturbance of land that is likely to contain, or is believed may contain, archaeological relics is undertaken in accordance with an excavation permit issued by the Heritage Council (or in accordance with a gazetted exception under Section 139(4) of the Act).

An archaeological relic is defined as meaning *any deposit, artefact, object or material evidence that:*

- (a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and*
- (b) is of State or local heritage significance.*

In particular Section 139 refers to the need for a permit in certain circumstances:

- (1) A person must not disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed unless the disturbance or excavation is carried out in accordance with an excavation permit.*
- (2) A person must not disturb or excavate any land on which the person has discovered or exposed a relic except in accordance with an excavation permit.*

The potential for archaeological 'relics' to be present within the Project Area is considered in Section 6.

STATE HERITAGE REGISTER

The SHR was established under Section 22 of the Heritage Act and is a list of places and objects of particular importance to the people of NSW, including archaeological sites. The SHR is maintained by Heritage NSW and includes a diverse range of over 1500 items, in both private and public ownership. To be listed, an item must be deemed to be of heritage significance for the whole of NSW.

Listing on the SHR controls activities such as alteration, damage, demolition, and development. When a place is listed on the SHR, the approval of the Heritage Council of NSW is required or any major work.

SECTION 170 HERITAGE AND CONSERVATION REGISTER (S170 REGISTER)

Section 170 Heritage and Conservation Register (S170 Register)

Under Section 170 of the Heritage Act, NSW government agencies are required to maintain a register of the heritage assets it owns or controls. Under S170A of the Heritage Act, government agencies are required to notify the Heritage Council about decisions affecting assets on the S170 register including removing the item from the register, transferring ownership of a listed item, or vacating and/or demolishing part or all of the item.

Government agencies are also required to maintain properties on the S170 and SHR with due diligence in accordance with State Owned Heritage Management Principles approved by the Minister on the advice of the Heritage Council.

2.2.2 NSW ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the main law regulating land use planning and development in NSW and requires that environmental impacts are considered in land use planning, including impacts on Aboriginal and non-Aboriginal heritage. The EP&A Act controls the making of environmental planning instruments (EPIs) that identify permissible land use and development constraints. Two types of EPIs can be made: Local Environmental Plans (LEPs) and State Environmental Planning Policies.

LOCAL ENVIRONMENTAL PLANS

The EP&A Act allows for the preparation of planning instruments to direct development within NSW. This includes LEPs, which are administered by local government, and principally determine land use and the process for development applications. LEPs commonly identify, and have provisions for, the protection of local heritage items and heritage conservation areas; they usually include a schedule of identified heritage items.

2.3 NON-STATUTORY CONSIDERATIONS

2.3.1 NATIONAL TRUST OF AUSTRALIA (NSW)

The National Trust is a community-based, non-government organisation. The National Trust has a database of important heritage sites across the State. There are no listed places within the Project Area or its immediate surrounds.

2.3.2 REGISTER OF THE NATIONAL ESTATE

The Register of the National Estate (RNE) is now an archive of information about more than 13,000 places throughout Australia including many places of local or State significance. The RNE was closed in 2007 and is no longer a statutory list. The closure of the RNE does not diminish protection of Commonwealth Heritage places.

The RNE is maintained on a non-statutory basis as a publicly available archive and educational resource. RNE places can be protected under the EPBC Act if they are also included in another Commonwealth statutory heritage list or are owned or leased by the Commonwealth.

In addition, places in the RNE may be protected under appropriate state, territory, or local government heritage legislation.

There are no RNE listed places within the Project Area, adjacent to or in its immediate surrounds.

2.3.3 THE BURRA CHARTER

The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance (Adopted 31 October 2013) (the Burra Charter) sets a standard of practice for those who provide advice, make decisions about, or undertake works to places of cultural significance including owners, managers, and custodians. The Charter provides specific guidance for physical and procedural actions that should occur in relation to significant places. A copy of the 2013 charter can also be accessed at: <http://australia.icomos.org/wp-content/uploads/The-Burra-Charter-2013-Adopted-31.10.2013.pdf>.

This HHDD has been prepared in accordance with the Burra Charter and to the standards it describes.

3. HISTORICAL OVERVIEW

3.1 EARLY EXPLORATION AND DEVELOPMENT OF THE REGION

Early European exploration of the Murrumbidgee Region occurred from the 1820s with expeditions originally focused along the Murrumbidgee River. Charles Sturt's accounts, from his explorations of the Murrumbidgee and lower Murray Rivers between 1828-31, described treeless plains and good water sources that lured graziers to the region. Pastoral stations focused on cattle grazing were established in the lower Murrumbidgee region from the 1820s. By 1841, the Murrumbidgee District contained 147 stations, and by 1845 an average cattle-stocked pastoral property around the Murray-Murrumbidgee junction comprised eighty thousand hectares (Eardley 1999).

Development of towns within the region soon followed. The locality of the Hay township was originally known as Lang's Crossing; named after three Lang brothers (Thomas, William, and Gideon Lang) who were leaseholders of the Mungadingadal, Eli Elwah, and Nyangay Runs (approximately 5 km north-west of the Project Area). The Lang Brothers pioneered a stock route to their pastoral run from the early 1850s when they began to transport cattle across the Murrumbidgee from Queensland, to their property in the south; the route was known as 'Lang's Wool Road'. The location of the stock route at Lang's Crossing was regularly used and the 'Great North Road' also crossed the Murrumbidgee at this location, for supply to the Victorian market in the wake of the gold rushes (Beissel 2008). In 1858-59 a store, inn, and punt service were built at Lang's Crossing; the place became an important port for steam-boat navigation of the Murrumbidgee (Hay Shire Council 2023).

The town was gazetted in 1858 and surveyed the following year; it was named after Sir John Hay, a local pastoralist and Member of parliament. In 1859 the first Post office was opened and in 1860 the original courthouse was built (now present location of the Post Office). Cobb & Co Coaches made Hay the headquarters of their Victoria and Riverine operations from 1862 to 1896, setting up a coach factory on the corner of Lachlan and Randall Streets; this became the largest coach factory in Australia outside of Sydney (Hay Shire Council 2023). As it developed, Hay became a service hub for the large pastoral district. The Municipal Council of Hay was proclaimed in 1872 and the town was connected by rail to Narrandera in 1882 (Historical Encounters 2023).

3.2 NINETEENTH CENTURY DEVELOPMENT OF BUNDYULUMBLAH AND THE PROJECT AREA

The Project Area spans the historic parishes of Miranda within the counties of Wakool (**Figure 3.1**). The Project Area is located within the pastoral run of Miranda (**Figure 3.2**). Large blocks of land in this region between the Murrumbidgee River and Billabong Creek were released by the Government c.1850s (Empire 1865:5).



FIGURE 3.1 DETAIL PLAN 'PLAN SHOWING MURRUMBIDGEE RIVER DISTRICT', 1901, SHOWING PROJECT AREA (OUTLINE RED) (SLNSW, Z/M3814/1901/1)

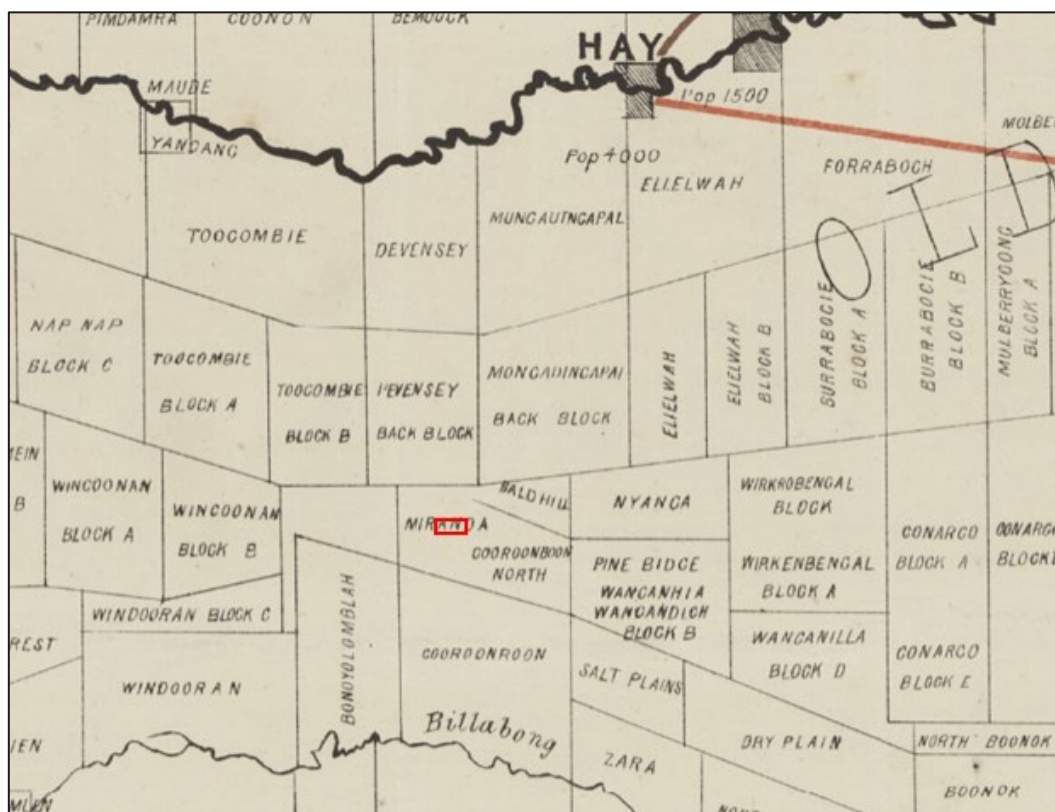


FIGURE 3.2 DETAIL OF 'DIRECT ROUTE TO HAY FROM WAGGA WAGGA', C.1881, SHOWING PROJECT AREA WITHIN THE PASTORAL RUNS OF MIRANDA AND BALD HILL (SLNSW, M2 814.2/1881/1)

Miranda pastoral run later became encompassed by the larger Bundyulumbulah Station and Bald Hill pastoral run later became encompassed by Nyangay Station.

By 1861, the Nyangay Station had also been acquired by the Lang brothers. By the late 1860s improvements on the property included a house, store, men's hut, out station huts, wells, dams and a tank (Navin Officer Heritage Consultants, 2022b).

The management of pastoral runs was changed by the *Crown Lands Act 1884*, which introduced new types of land tenure including grazing licences, conditional leaseholds, and pastoral leases. Pastoral runs were divided into two areas; leasehold areas, for which a pastoral lease could be granted to a squatter, and resumed areas, that could be leased under an annual occupation licence (Navin Officer 2021:22).

In 1885, the Bundyulumbulah and Nyangay Stations were gazetted as the 'Bundyulumbulah Holding No.470, and 'Nyangay Holding No.43', respectively (NSW Government Gazette 1888: 7049; New South Wales Government Gazette 1888: 4069). In c.1885, the leasehold area of Nyangay totaled 22,600 acres and the resumed area totaled 16,900 acres. In c.1886, the leasehold area of Bundyulumbulah totaled 52,400 acres and the resumed area totaled 45,600 acres (**Figure 3.3**). At this time, improvements on the property included a homestead, stores, wool sheds, numerous huts, wells, tanks and dams. These structures were present to the south-west of the Project Area (NSW HLRV 2023). The Project Area is within the resumed area of Bundyulumbulah Station and the leasehold area of Nyangay Station (**Figure 3.4**).

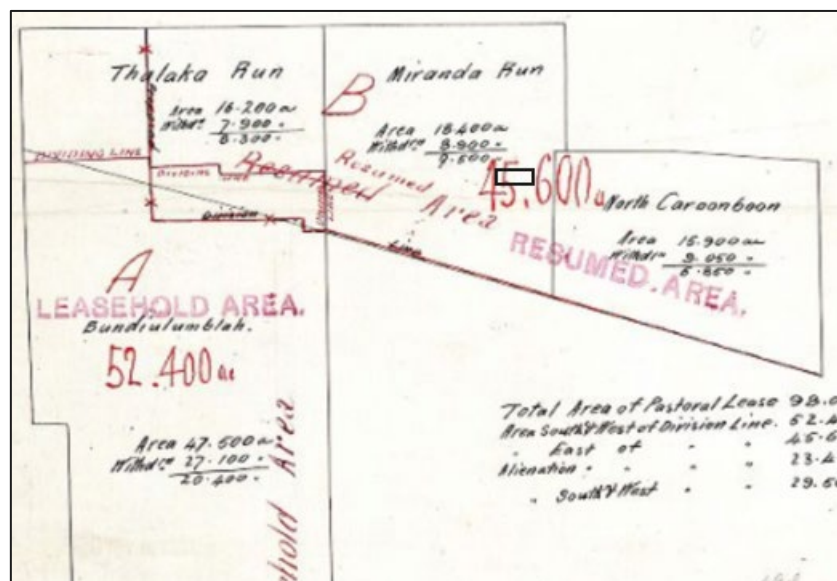


FIGURE 3.3 PASTORAL MAP OF 'BUNDIULIMBLAH', C.1886, SHOWING DIVISION OF LEASEHOLD (A) AND RESUMED AREAS (B). THE PROJECT AREA IS BOXED (NSW HISTORICAL LAND RECORDS VIEWER, [HTTPS://HLRV.NSWLRS.COM.AU/](https://HLRV.NSWLRS.COM.AU/))

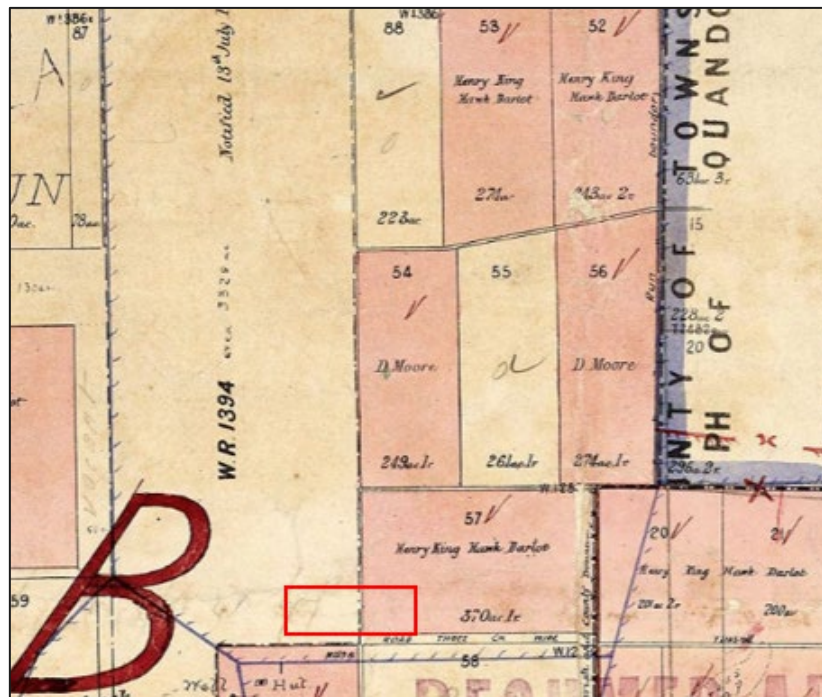


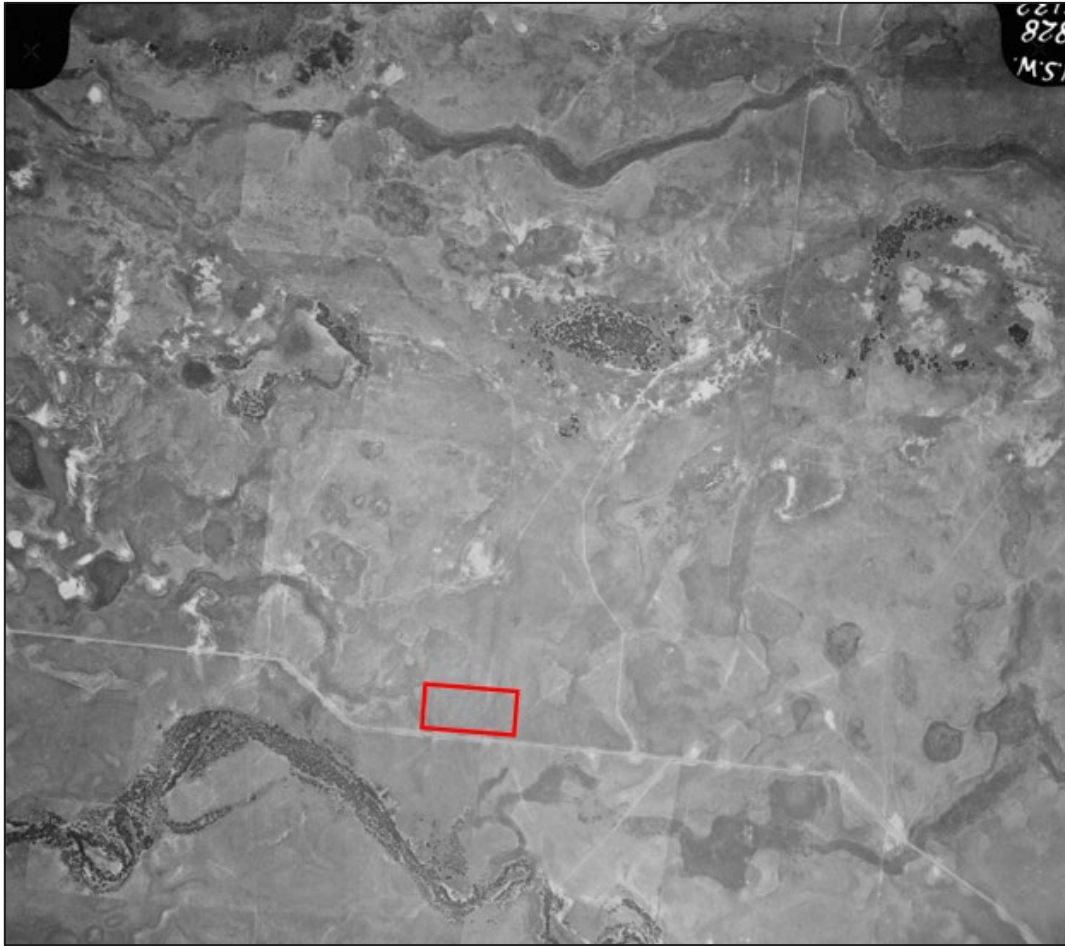
FIGURE 3.4 MAP OF 'BUNDIULIMBLAH', C.1884, WITH THE PROJECT AREA BOXED (NSW HISTORICAL LAND RECORDS VIEWER, [HTTPS://HLRV.NSWLRS.COM.AU/](https://HLRV.NSWLRS.COM.AU/))

3.3 TWENTIETH CENTURY DEVELOPMENT TO PRESENT

Bundyulimblah Station was purchased in c.1918 by Messrs Howe and Horton, from the late Mr. D. Moore (Riverina Recorder 1918: 2). In 1926, Mr. R. J. Horton purchased the property and formed the Bundyulimblah Pty Ltd (The Pastoral Review Pty Ltd 1929: 386).

In 1925, Nyangay Station was sold by Messrs Dalgety and Co Ltd in conjunction with Messrs. Wilkinson and Lavender Ltd (on behalf of Trustees of the late R.C. Simson) to Mr. J. F. Ryan (The Pastoral Times 1925:2).

The Project Area remained largely undeveloped into the mid-twentieth century (**Photograph 3.1**). By this time, a residence and associated sheds has been established in the eastern area off Romani Road. The woodland areas, natural drainage channels, and areas cleared for grazing have remained largely unchanged. However, since the 1960s, farming practices within the Project Area have intensified, with a network of irrigation channels and canals being established. Little has changed in the use of the property encompassing the Project Area, as pastoral grazing of sheep and cattle remains the principal industry.



PHOTOGRAPH 3.1 1960 AERIAL SHOWING THE PROJECT AREA (BOXED RED) (NSW HISTORICAL IMAGERY)

4. HISTORIC HERITAGE CONTEXT

4.1 HISTORICAL ENVIRONMENT

4.1.1 HERITAGE REGISTER AND DATABASE SEARCH RESULTS

A search of the relevant statutory heritage registers was conducted on 6 June 2025 as part of the desktop assessment.

- Australian Heritage Database, which includes World Heritage List (WHL), NHL, CHL, RNE;
- SHR; and
- Conargo LEP 2013.

The search area encompassed the Project Area with a 2 km buffer surrounding. A summary of the search results is provided in **Table 4.1** below.

TABLE 4.1 STATUTORY HERITAGE REGISTER SEARCH SUMMARY

Register Name	Description	Findings
WHL	The United Nations Educational, Scientific and Cultural Organisation (UNESCO) WHL includes properties in Australia that are matters of national environmental significance and are protected and managed under the EPBC Act.	There are no WHL places within, or in close proximity to, the Project Area.
CHL	The CHL includes natural, Indigenous, and historical heritage places owned or controlled by the Australian Government. Items on the list have satisfied the minister as having one or more Commonwealth Heritage (CH) values.	There are no CHL places within or in close proximity to the Project Area.
NHL	The NHL contains natural, historic, and Indigenous places deemed to be of outstanding heritage significance to Australia. Before a site is placed on the list a nominated place is assessed against nine criteria by the Australia Heritage Council.	There are no NHL places within or in close proximity to the Project Area.
SHR	The SHR is a list of places and objects of particular importance to the people of NSW. The register lists a diverse range of over 1,650 items, in both private and public ownership. To be listed, an item must be significant for the whole of NSW.	There are no SHR listed items within the Project Area.
S170 Heritage Registers	S170 of the Heritage Act requires all NSW state agencies to identify, conserve and manage the heritage assets owned, managed, and occupied by that agency. In order to facilitate this, S170 heritage registers were established for all NSW government agencies. These registers are held and maintained by each state agency and updated as assets are acquired, altered, or decommissioned.	As the project boundary does not coincide with any NSW government property, S170 register searches were not required for this assessment.
Conargo LEP 2013	LEPs contain a register of environmental heritage items important to the locality. These registers are included as Schedule 5 of all NSW LEPs, and include built items, archaeological sites, and conservation areas.	There are no locally listed heritage sites within the Project Area.

4.2 PREVIOUS REPORTING

The Project Area has been previously assessed for historic heritage values by Navin Officer Heritage Consultants (Navin Officer) in 2021. A summary of this report is provided below.

4.2.1 PROJECT ENERGYCONNECT (NSW EASTERN SECTION), BURONGA TO WAGGA WAGGA NSW (NAVIN OFFICER 2021)

Navin Officer prepared a Historic Heritage Impact Assessment to support the EIS and Submissions Report for Project EnergyConnect, a new high voltage interconnector between NSW and South Australia. Project EnergyConnect comprises several sections, the NSW Eastern Section would involve the installation of transmission lines between Buronga and Wagga Wagga. The historic heritage study area was generally a 100 m wide corridor (50 m either side of the proposed alignment) between the Buronga substation and the Wagga Wagga substation, totalling approximately 540 kms and traversing nine Local Government Areas (LGA) being Wentworth Shire, Balranald Shire, Murray River, Edward River, Hay Shire, Murrumbidgee, Federation, Lockhart Shire, and Wagga Wagga LGAs. The proposed 330 kV transmission line traversed the southern portion of the Project Area, as shown in **Figure 4.1**.

There were no listed heritage items within the Project Area or within its vicinity, and no potential heritage items were identified within the Project Area as part of the study. The closest potential historic heritage feature identified was the PEC-E-H4 Hut Site Nyangay Pastoral Holding, located approximately 6 km east of the Project Area (**Figure 4.2**).

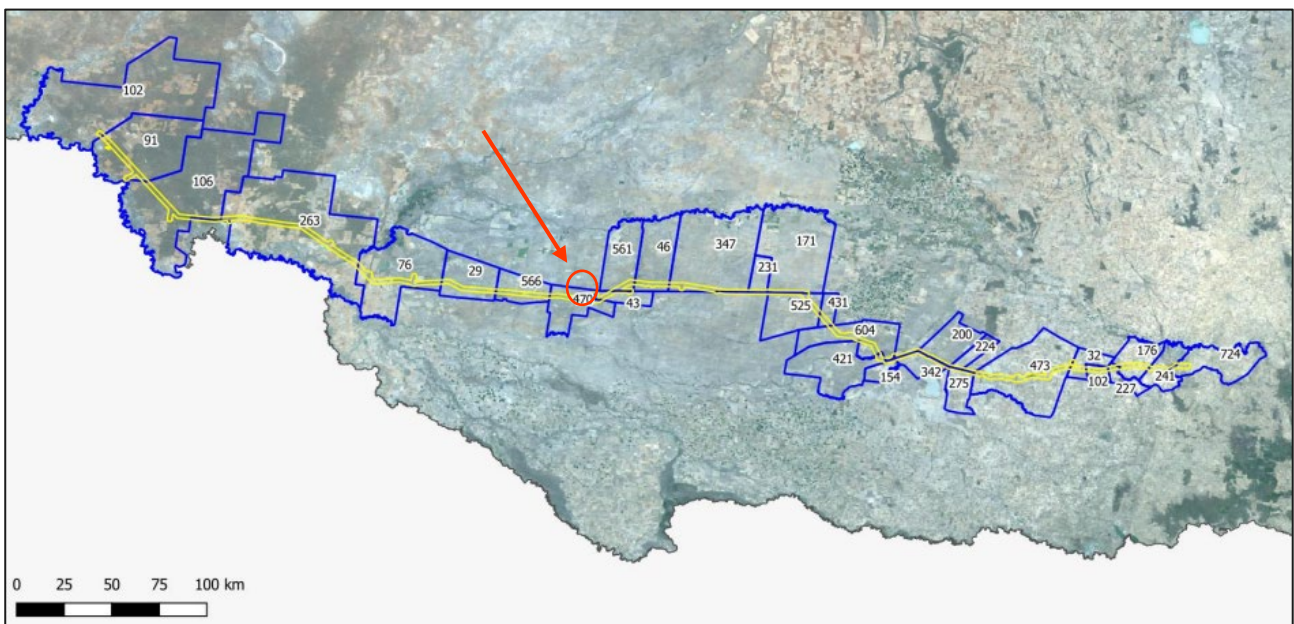


FIGURE 4.1 HISTORIC HERITAGE STUDY AREA (YELLOW) AND HISTORIC PASTORAL HOLDINGS (BLUE) WITH THE APPROXIMATE LOCATION OF THE PROJECT AREA CIRCLED RED, WITHIN THE BUNDYULUMBLAH HOLDING (NAVIN OFFICER 2021:24)



FIGURE 4.2 DETAIL OF MAP SHOWING POTENTIAL HISTORIC HERITAGE ITEM (PEC-E-H4) WITH THE PROJECT AREA LOCATION CIRCLED RED (NAVIN OFFICER 2021:43)

5. PHYSICAL ANALYSIS

5.1 SURVEY AIMS AND PERSONNEL

A field survey of the Romani Solar Farm Project Area was undertaken on 22 February 2024 by ERM Managing Consultants Lorien Perchard and Victoria Gleeson, and Registered Aboriginal Party (RAP) representatives¹. A second survey of the Romani Solar Farm Project Area was undertaken on 16 to 18 July 2024 by ERM Managing Consultant Victoria Gleeson and ERM Consulting Senior Associate, Timothy Pinches, and RAP representatives. A third field survey with a focus on the Romani BESS was undertaken by ERM Managing Consultants and RAP representatives on 7 April 2025.

The methodology of the site visits included pedestrian survey of the Project Area and visual inspection of potential view lines to potential surrounding heritage items. The aims of the historical heritage surveys were to:

- Cover a representative sample of the Project Area that would potentially be impacted by the proposed works. Areas identified through desktop research as having historic development were targeted during survey;
- Identify any previously unidentified built heritage items or areas of historic archaeological potential that may be impacted by the Project; and
- Gather sufficient information to provide an assessment of the historic heritage significance of the Project Area.

5.2 SURVEY RESULTS AND DESCRIPTION OF PROJECT AREA

The landscape encompassing the Project Area is largely densely vegetated with grasses, saltbush, and weeds. The Project Area is generally flat, with little discernible topography aside from gentle undulations and small rises.

The property that the Project Area is moderately disturbed from agricultural activities and irrigation channels are present throughout (**Photograph 5.1**). Water troughs, dams, and access roads were also present throughout the broader property. Additionally, a TransGrid electrical transmission line and associated access track are to the immediate north of the Project Area.

The property contains an occupied residence and numerous agricultural structures off Romani Road to the north of the Project Area. The residence and associated structures are outside of the development footprint.

The main residence is weatherboard-clad, with a corrugated iron-clad combination roof (**Photograph 5.2**). A verandah runs around the northern, eastern and southern sides of the house. Other agricultural structures are located in close proximity to the residence, including a corrugated iron-clad shearing shed with gable roof and associated fenced yards, as well as multiple corrugated iron-clad worker's accommodation sheds and outhouses, machinery sheds, and tanks (**Photograph 5.3** to **Photograph 5.6**).

¹ RAPs were in attendance as the survey for Aboriginal Cultural Heritage Assessment was undertaken in concurrence with historic heritage surveys.



PHOTOGRAPH 5.1 VIEW OF IRRIGATION CHANNEL IN SOUTHERN PORTION OF PROPERTY (ERM 2024)



PHOTOGRAPH 5.2 EASTERN ELEVATION OF MAIN RESIDENCE AT PROPERTY (ERM 2024)



PHOTOGRAPH 5.3 VIEW EAST OF SHEARING SHED TO NORTH OF MAIN RESIDENCE (ERM 2024)



PHOTOGRAPH 5.4 VIEW NORTH OF YARDS ASSOCIATED WITH SHEARING SHED (ERM 2024)



PHOTOGRAPH 5.5 VIEW WEST OF MACHINERY SHED ADJACENT TO SHEARING SHED (ERM 2024)



PHOTOGRAPH 5.6 VIEW EAST OF WORKERS ACCOMMODATION TO WEST OF MAIN RESIDENCE (ERM 2024)

6. ASSESSMENT OF ARCHAEOLOGICAL POTENTIAL

Review of the potential for historical archaeological resources to be present within the Project Area is based on a consideration of current ground conditions and analysis of historic development within the Project Area.

Grading of archaeological potential used for this assessment is detailed in **Table 6.1**.

TABLE 6.1 GRADING OF ARCHAEOLOGICAL POTENTIAL

Grading	Justification
Nil	No evidence of historical development or use, or where previous impacts would have removed all archaeological potential.
Low	Research indicates little or low intensity historical development, or substantial previous impacts. Expected that deep subsurface archaeological features may survive.
Moderate	Known historical development with some evidence of previous impact. Likely that archaeological remains survive with some localised truncation and disturbance.
High	Evidence of multiple phases of historical development and structures with minimal or localised twentieth century development impacts. Archaeological remains likely to be largely intact.

Table 6.2 summarises the archaeological potential of each land use phase across the Project Area.

TABLE 6.2 SUMMARY OF ARCHAEOLOGICAL POTENTIAL ASSOCIATED WITH LAND USE PHASES

Phase	Land use and potential remains	Archaeological potential
Phase 1 c.1850s to c.1920s	The Project Area is within the Parish of Miranda. This later became encompassed by Bundylumblah Station by c.1885. Historic maps do not illustrate homesteads or other large agricultural structures within the Project Area in the nineteenth century. However, it is likely that agricultural improvements such as tanks and fences were present within the broader property surrounding the Project Area by the early twentieth century. It is also possible (but unlikely given the distance from the main homestead) that discrete or ephemeral features could be located within the Project Area. These may include rubbish pits, associated with early rubbish disposal prior to the introduction of council rubbish removal, as well as postholes associated with light structures or demarcating former fence lines. There have been substantial impacts to the area in the twentieth and twenty-first centuries, with the construction of extensive irrigation systems and dams. Additionally, evidence of the evolving agricultural landscape (insubstantial remains such as postholes) are unlikely to be present with good integrity.	Low
Phase 2 c.1920s- Present	Bundylumblah Station was sold in the 1920s and continued to be used for agricultural pursuits. The property surrounding the Project Area remained largely undeveloped into the mid-twentieth century. By this time, a residence and associated sheds has been established in the eastern area off Romani Road. The residence is extant on the property.	Low

Phase	Land use and potential remains	Archaeological potential
	Since the 1960s, farming practices within the Project Area intensified, including the property within which it is located, with the construction of irrigation systems and dams. In recent years, the TransGrid electrical transmission line was constructed to the immediate north of the Project Area. These activities would have substantially impacted or removed any remaining archaeological resource in these areas.	

6.1.1 SUMMARY OF HISTORIC ARCHAEOLOGICAL POTENTIAL

The historic research undertaken for this assessment has identified that the Project Area has been characterised by agricultural pursuits since the early nineteenth century.

Whilst no substantial nineteenth century structures are known to have been present within the Project Area, it is possible that other discrete or ephemeral features could be located within the Project Area. These may include rubbish pits, associated with early rubbish disposal prior to the introduction of council rubbish removal, as well as postholes associated with light structures or demarcating former fence lines.

The Project Area remained largely undeveloped into the mid-twentieth century. Since the 1960s, farming practices within the Project Area and surrounding property intensified, with the construction of irrigation systems and dams. Additionally, in recent years, the TransGrid electrical transmission line was constructed to the immediate north of the Project Area, which would have substantially impacted or removed any archaeological resource in these areas.

Most of the Project Area has remained largely undisturbed from substantial impacts; however, it is unlikely that evidence of the evolving agricultural landscape (insubstantial remains such as post holes) would be present with good integrity.

As such, there is **Low potential** for historical archaeological resources to be present within the Project Area.

7. SIGNIFICANCE ASSESSMENT

7.1 HISTORIC HERITAGE SIGNIFICANCE ASSESSMENT FRAMEWORK

The NSW Heritage Management System sets out a detailed process for conducting assessments of heritage significance. The guideline *Assessing Heritage Significance* (NSW Heritage Office, 2001), part of the Heritage Manual, provides a set of specific criteria for assessing the significance of an item, including guidelines for inclusion and exclusion (which reflect four categories of significance and whether a place is rare or representative) under which a place can be evaluated in the context of State or local historical themes.

An item will be considered to be of State or local heritage significance if, in the opinion of the Heritage Council, it meets one or more of the following criteria outlined in **Table 7.1**.

TABLE 7.1 NSW HERITAGE ASSESSMENT CRITERIA

Criteria	Description
<i>Criterion (a) – Historical significance</i>	<i>an item is important in the course, or pattern, of NSW’s cultural or natural history (or the cultural or natural history of the local area);</i> Note: The site must show evidence of significant human activity or maintains or shows the continuity of historical process or activity. An item is excluded if it has been so altered that it can no longer provide evidence of association.
<i>Criterion (b) – Associative significance</i>	<i>an item has strong or special association with the life or works of a person, or group of persons, of importance in NSW’s cultural or natural history (or the cultural or natural history of the local area);</i> Note: The site must show evidence of significant human occupation. An item is excluded if it has been so altered that it can no longer provide evidence of association.
<i>Criterion (c) – Aesthetic significance</i>	<i>an item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area);</i> Note: An item can be excluded on the grounds that it has lost its design or technical integrity or its landmark qualities have been more than temporarily degraded.
<i>Criterion (d) – Social significance</i>	<i>an item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons;</i> Note: This criterion does not cover importance for reasons of amenity or retention in preference to proposed alternative.
<i>Criterion (e) – Research potential</i>	<i>an item has potential to yield information that will contribute to an understanding of NSW’s cultural or natural history (or the cultural or natural history of the local area);</i> Note: Under the guideline, an item can be excluded if the information would be irrelevant or only contains information available in other sources.
<i>Criterion (f) – Rarity</i>	<i>an item possesses uncommon, rare or endangered aspects of NSW’s cultural or natural history (or the cultural or natural history of the local area);</i> Note: An item is excluded if it is not rare or if it is numerous, but under threat. The item must demonstrate a process, custom or other human activity that is in danger of being lost, is the only example of its type or demonstrates designs or techniques of interest.

Criteria	Description
<i>Criterion (g) - Representative</i>	<i>an item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places, or cultural or natural environments;</i> Note: An item is excluded under this criterion if it is a poor example or has lost the range of characteristics of a type.

The Heritage Council requires the summation of the significance assessment into a succinct paragraph, known as a Statement of Significance. The Statement of Significance is the foundation for future management and impact assessment. The following assessment has been prepared in accordance with these guidelines.

7.1.1 ASSESSMENT OF HISTORIC HERITAGE SIGNIFICANCE

No listed or potential built heritage items are located within the Project Area or its immediate vicinity. Consequently, no assessment of significance associated with built heritage items has been completed for this assessment.

The potential for historic archaeological remains to be present within the Project Area has been assessed as Low.

An assessment of the significance of a potential archaeological resource in accordance with the guiding document *Assessing Significance for Historical Archaeological Sites and 'Relics'* (Heritage Council of NSW 2009) has been completed below.

Can the site contribute knowledge that no other resource can?

The potential archaeological resource within the Project Area would most likely comprise discrete or insubstantial agricultural features. These may include rubbish pits, associated with early rubbish disposal prior to the introduction of council rubbish removal, as well as postholes associated with light structures or demarcating former fence lines.

The nature of the potential archaeological resource within the Project Area is not rare or unique. As such, the archaeological resource has limited potential to provide a new understanding of the history of the local area that is not available from other sources.

Can the site contribute knowledge that no other site can?

The nature of the potential archaeological resource within the Project Area is not rare or unique; the surrounding area was also largely focused on agricultural pursuits throughout the nineteenth and early twentieth century. As such, the archaeological resource within the Project Area is unlikely to provide information that is not already available from other sites.

Is this knowledge relevant to general questions about human history or other substantive questions relating to Australian history, or does it contribute to other major research questions?

As detailed above, the potential archaeological resource within the Project Area is unlikely to contribute knowledge that is not already available from other sites. As such, this criterion is not applicable.

7.1.1.1 SUMMARY STATEMENT OF SIGNIFICANCE

No built heritage items are located within the Project Area or its immediate vicinity.

If archaeological resources are present within the Project Area, they would most likely comprise discrete or insubstantial agricultural features. These may include rubbish pits, associated with early rubbish disposal prior to the introduction of council rubbish removal, as well as postholes associated with light structures or demarcating former fence lines. These resources are unlikely to provide a new understanding of the history of the local area that is not available from other sources.

Therefore, any extant archaeological resources in the Project Area would have low archaeological research potential and as such, have low archaeological heritage significance.

8. IMPACT ASSESSMENT

8.1 PROPOSED WORKS

Section 1.2 provides a detailed description of the proposed Project. Activities with the potential to impact archaeological resources would include earthworks, electrical service excavation and foundation construction. A summary of potential impacts to historic heritage values is provided below.

8.2 IMPACT ASSESSMENT

The current assessment has identified that there are no known or potential historic heritage sites within the Project Area or within its immediate vicinity. Additionally, no direct or indirect impacts to built heritage items (including significant view lines) associated with the proposed works have been identified.

The Project Area has remained largely undisturbed from substantial impacts and has been characterised by agricultural pursuits since the early nineteenth century. However, the intensification of irrigation practices from the 1960s and the construction of the Transgrid electrical transmission line in c.2021-2022 would have substantially impacted or removed any remaining archaeological resource in these areas. The archaeological potential of the Project Area has been assessed as Low. However, this report has concluded that should any archaeological remains be present; these would be unlikely to provide substantive contribution to research questions relevant to the early history of the site or local area, that is not available from other sources. As such, the proposed works would result in little to no archaeological impact.

9. CONCLUSIONS

The historical assessment has determined that there are no known or potential built heritage items (or significant view lines) within the Project Area.

It has been determined that there is Low potential for archaeological resources to be present within the Project Area. However, this report has concluded that should any archaeological remains be present; these would be unlikely to provide substantive contribution to research questions relevant to the early history of the site or local area, that is not available from other sources. As such, the Project Area has low archaeological research potential and as such, low archaeological heritage significance.

There are no historical built or archaeological constraints for the proposed Project. Therefore, works may proceed with no further historic heritage assessments.

9.1 RECOMMENDATIONS

The following are key recommendations that aim to mitigate the impact of the proposed works on potential and as yet unidentified heritage values of the Project Area:

9.1.1 RECOMMENDATION 1 – HERITAGE INDUCTION

Prior to the commencement of works, all staff and contractors should be briefed on the requirements of the Heritage Act and the Unexpected Finds Protocol (outlined in *Section 9.1.2.1*).

9.1.2 RECOMMENDATION 2 - UNEXPECTED FINDS PROTOCOL

In the event that relics are unexpectedly exposed, works should cease immediately. The management of relics should be in accordance with NSW Heritage guidelines and policies, as outlined in the Unexpected Finds Protocol (**Section 9.1.2.1**).

9.1.2.1 UNEXPECTED FINDS PROTOCOL

This HHDD has identified that the archaeological potential of the Project Area is Low. However, in the event that relics are unexpectedly recovered during the proposed works, all works should cease immediately, and the Unexpected Finds Protocol should be followed. The following steps are provided below in the event that unexpected heritage items are identified during the proposed works:

- where a potential historic heritage item is found during works, all works within the vicinity of the item, or with the potential to impact the item should cease and a temporary exclusion zone established;
- an appropriately qualified heritage consultant should examine the item to assess its significance and further archaeological potential;
- where a relic is found, the NSW Heritage Council should be notified (in accordance with Section 146 of the Heritage Act) and approval will likely be required prior to the continuation of works. Other archaeological deposits should be recorded and assessed for significance and potential salvage by an appropriately qualified heritage consultant; and
- Depending on the nature of the discovery, additional assessment and approval under the Heritage Act may be required prior to the recommencement of works in the affected area.

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STATEMENT OF LIMITATIONS

This report is based solely on the scope of work described in Section 1 (Scope of Work) and performed by Environmental Resources Management Australia Pty Ltd (ERM) as commissioned by Samsung C&T Renewable Energy Australia Pty Ltd (Samsung) (the Client). The Scope of Work was governed by a contract between ERM and the Client (Contract).

No limitation, qualification or caveat set out below is intended to derogate from the rights and obligations of ERM and the Client under the Contract.

The findings of this report are solely based on, and the information provided in this report is strictly limited to that required by the Scope of Work. Except to the extent stated otherwise, in preparing this report ERM has not considered any question, nor provides any information, beyond that required by the Scope of Work.

This report was prepared in June 2025 and is based on conditions encountered and information reviewed at the time of preparation. The report does not, and cannot, take into account changes in law, factual circumstances, applicable regulatory instruments or any other future matter. ERM does not, and will not, provide any on-going advice on the impact of any future matters unless it has agreed with the Client to amend the Scope of Work or has entered into a new engagement to provide a further report.

Unless this report expressly states to the contrary, ERM's Scope of Work was limited strictly to identifying typical environmental conditions associated with the subject site(s) and does not evaluate the condition of any structure on the subject site nor any other issues. Although normal standards of professional practice have been applied, the absence of any identified hazardous or toxic materials or any identified impacted soil or groundwater on the site(s) should not be interpreted as a guarantee that such materials or impacts do not exist.

This report is based on information provided by the Client or third parties (including regulatory agencies). All conclusions and recommendations made in the report are the professional opinions of the ERM personnel involved. Whilst normal checking of data accuracy was undertaken, except to the extent expressly set out in this report, ERM:

- Did not, nor was able to, make further enquiries to assess the reliability of the information or independently verify information provided by; and
- Assumes no responsibility or liability for errors in data obtained from the Client, any third parties or external sources (including regulatory agencies).

Although the data that has been used in compiling this report is generally based on actual circumstances, if the report refers to hypothetical examples those examples may, or may not, represent actual existing circumstances.

Only the environmental conditions and or potential contaminants specifically referred to in this report have been considered. To the extent permitted by law and except as is specifically stated in this report, ERM makes no warranty or representation about:

- The suitability of the site(s) for any purpose or the permissibility of any use;
- The presence, absence or otherwise of any environmental conditions or contaminants at the site(s) or elsewhere; or
- The presence, absence or otherwise of asbestos, asbestos containing materials or any hazardous materials on the site(s);

- Use of the site for any purpose may require planning and other approvals and, in some cases, environmental regulator and accredited site auditor approvals. ERM offers no opinion as to the likelihood of obtaining any such approvals, or the conditions and obligations which such approvals may impose, which may include the requirement for additional environment works.

The ongoing use of the site or use of the site for a different purpose may require the management of or remediation of site conditions, such as contamination and other conditions, including but not limited to conditions referred to in this report.

This report should be read in full and no excerpts are to be taken as representative of the whole report. No responsibility or liability is accepted by ERM for use of any part of this report in any other context.

Except to the extent that ERM has agreed otherwise with the Client in the Scope of Work or the Contract, this report:

- Has been prepared and is intended only for the exclusive use of the Client;
- Must not to be relied upon or used by any other party;
- Has not been prepared nor is intended for the purpose of advertising, sales, promoting or endorsing any Client interests including raising investment capital, recommending investment decisions, or other publicity purposes;
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