MEMO

To: Department of Housing and Infrastructure, Heritage NSW

From: Latisha Ryall and Amber Hewson Archaeologists (Premise)

cc:

Date: 3 March 2026

Job # #223155 Yanco Battery Energy Storage System (Yanco BESS) – Modification

Re: Final Aboriginal Heritage Technical Memo

1.1 Overview

ACEnergy (the applicant) has received approval for the Yanco Battery Energy Storage System (referred to as the Yanco BESS). The project was approved by the Independent Planning Commission (IPC-N) on 2 October 2025 as a State Significant Development (SSD). Since the approval, several small design refinements have occurred which were not assessed as part of the original Environmental Impact Statement (EIS). These changes necessitate the need for a project modification and approval under the *Environmental Planning and Assessment Act 1979*.

This technical memorandum outlines the proposed modification changes, specifically relating to the Aboriginal cultural heritage values associated with the project.

1.2 Location

The approved development footprint is situated approximately 2.5 kilometres (km) west-southwest of Yanco village and is located within Lots 516 and 521 DP 751745 at 120 Houghton Road, Yanco NSW. Ancillary aspects of the project associated with road upgrades and electricity transmission line routes affect other land including the road reserves of Hume Road, Houghton Road and Irrigation Way, Lot 7350 DP1199551 and Lot 10 DP8449631.

1.3 Background

An Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared for the Yanco BESS project to support the SSD application (SSD-67478479). The ACHAR was prepared in consultation with 14 Registered Aboriginal Parties (RAPs). The ACHAR assessed the BESS footprint, access roads and associated intersection upgrade and concluded that the study area has low archaeological potential due to extensive historical and modern ground disturbances.

No new Aboriginal sites were recorded during the survey and only one previously recorded AHIMS site (49-5-0211) was identified in proximity to the project with avoidance and buffering measures recommended.

The ACHAR states that all impacts must remain within the assessed study area, otherwise further archaeological investigation may be required. It also identifies widespread disturbance associated with historic and ongoing irrigated cropping, construction and maintenance of sealed and unsealed roads, irrigation channels, electricity infrastructure, the TransGrid substation and earthworks including grading and imported fill.

Details of the approved project are summarised in **Table 1** and the approved development layout is illustrated in **Figure 1**.

Table 1 – Project Summary

Item	Approved Project
Development footprint	11.45 ha
Storage Capacity (MW / MWh)	250 MW_{AC}, 1,100 MWh_{AC} Battery
Lifespan	~ 23 years, with the possibility of upgrades to extend the operational life
Workforce	Up to 70 construction jobs and up to 5 operational jobs
Hours of Operation	24 hours, 7 days a week
Transmission line	Overhead and/or underground
Substation	Connection to Yanco Transgrid Substation.
Other	New site access, cabling and collector units, internal access tracks, new site access from Hume Road, site office, storage area, car parking and security fencing and a temporary construction laydown area. External works include intersection upgrades at Houghton Road and Hume Road; and Houghton Road and Irrigation Way.
Schedule of Lands	Lots 516 and 521 DP 751745 (proposed site) Houghton Road, Hume Road and Irrigation Way Road Reserves Lot 1 DP931848 and Lot 1 DP1072592 (part of Houghton Road traverses these lots owned by the NSW Transport Asset Holding Entity).

Figure 1 - Approved Development footprint (Appendix 1 of the consent)

Figure 1: General Development Layout

1.4 Consultation

1.4.1 AGENCY CONSULTATION

As a modification to an SSD, Heritage NSW was consulted with to determine the appropriate approach for assessing Aboriginal cultural heritage values. A meeting was held between the applicant, Premise and Heritage NSW on 15 January 2026.

Given that that the proposed impacts are minor in nature and located in disturbed contexts or in areas that have been subject to previous archaeological survey, it was deemed appropriate that a technical memo could be prepared, outlining the proposed modification for RAP review and comment relating to the assessed aboriginal cultural heritage values of the project.

1.4.2 RAP CONSULTATION

This technical memo was issued to all RAP as identified through the original ACHAR to advise of the proposed modification changes and to provide an opportunity to provide feedback and comment.

The memo was issued on 27 January 2026 with a 28-day review period allowed for.

At the end of the response period, no comment or feedback had been received on the proposed modification or need for additional survey.

Consultation documentation is provided in **Appendix A**.

1.5 Proposed Modification

The proposed modification will require an increase to the ground disturbance impacts, outside of the area initially assessed as part of the ACHAR completed by Premise Australia Pty Ltd (Premise) in 2025.

No new landforms, undisturbed ground surfaces or intact soil profiles are proposed to be impacted.

The proposed modification relates to several design amendments, including:

1. Changes to the approved layout plan to reflect minor changes to the Irrigation Way intersection upgrade works as a result of detailed intersection design and compliance with relevant Austroads standards;
2. Minor change to the site access and Hume Road intersection with Houghton Road to reflect detailed design;
3. Minor changes to the project internal layout and alignment of the Electricity Transmission Line connecting the BESS to the Yanco Substation on Houghton Road to reflect detailed design; and
4. Inclusion of a nominated site access point to the Yanco substation and minor adjustments to the project development footprint.

The proposed modification area is shown in **Figure 2**.

Evidence of survey coverage relating to the proposed modification areas is shown in **Figure 3**.

Figure 2 - Proposed Modification

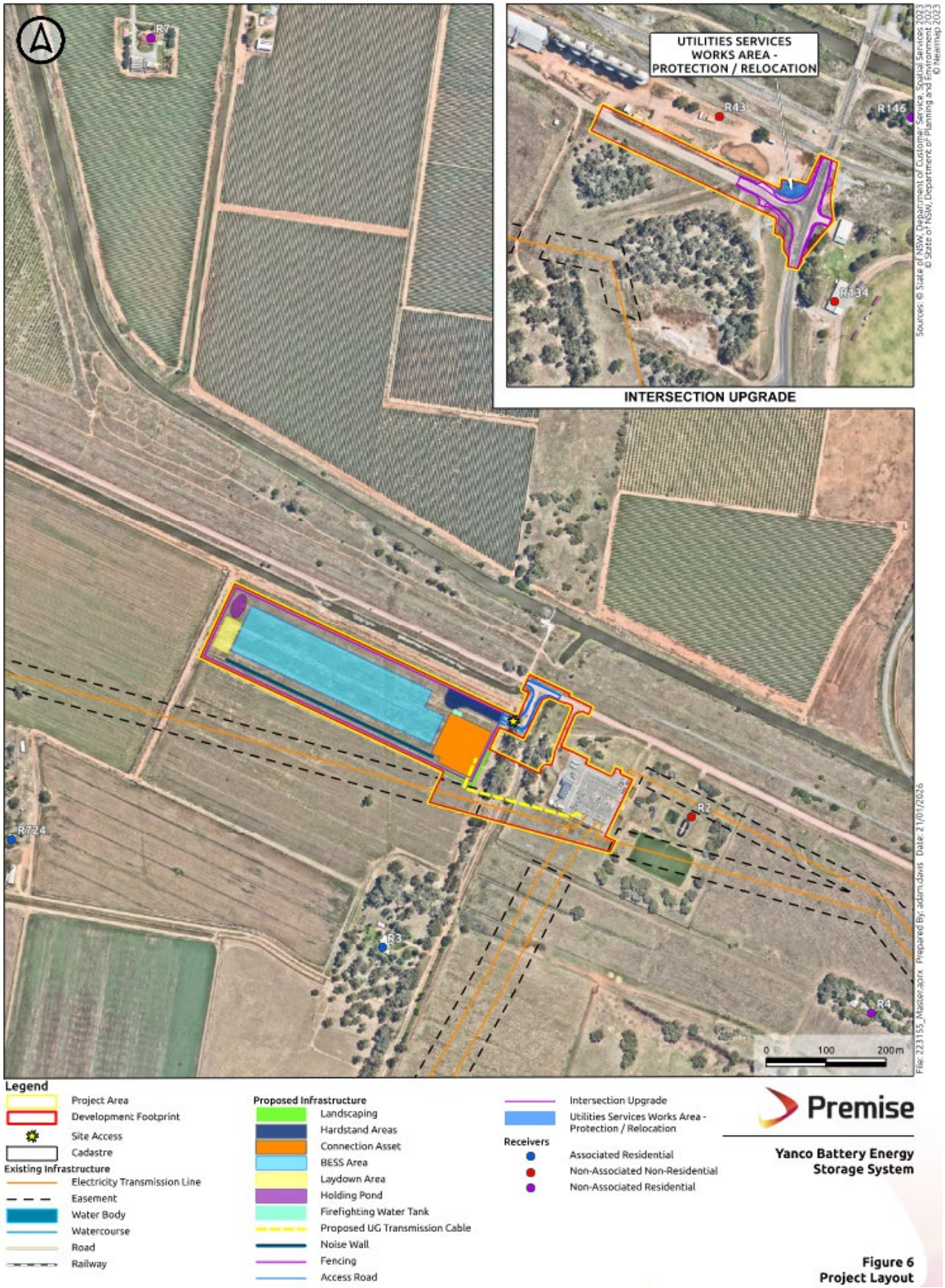
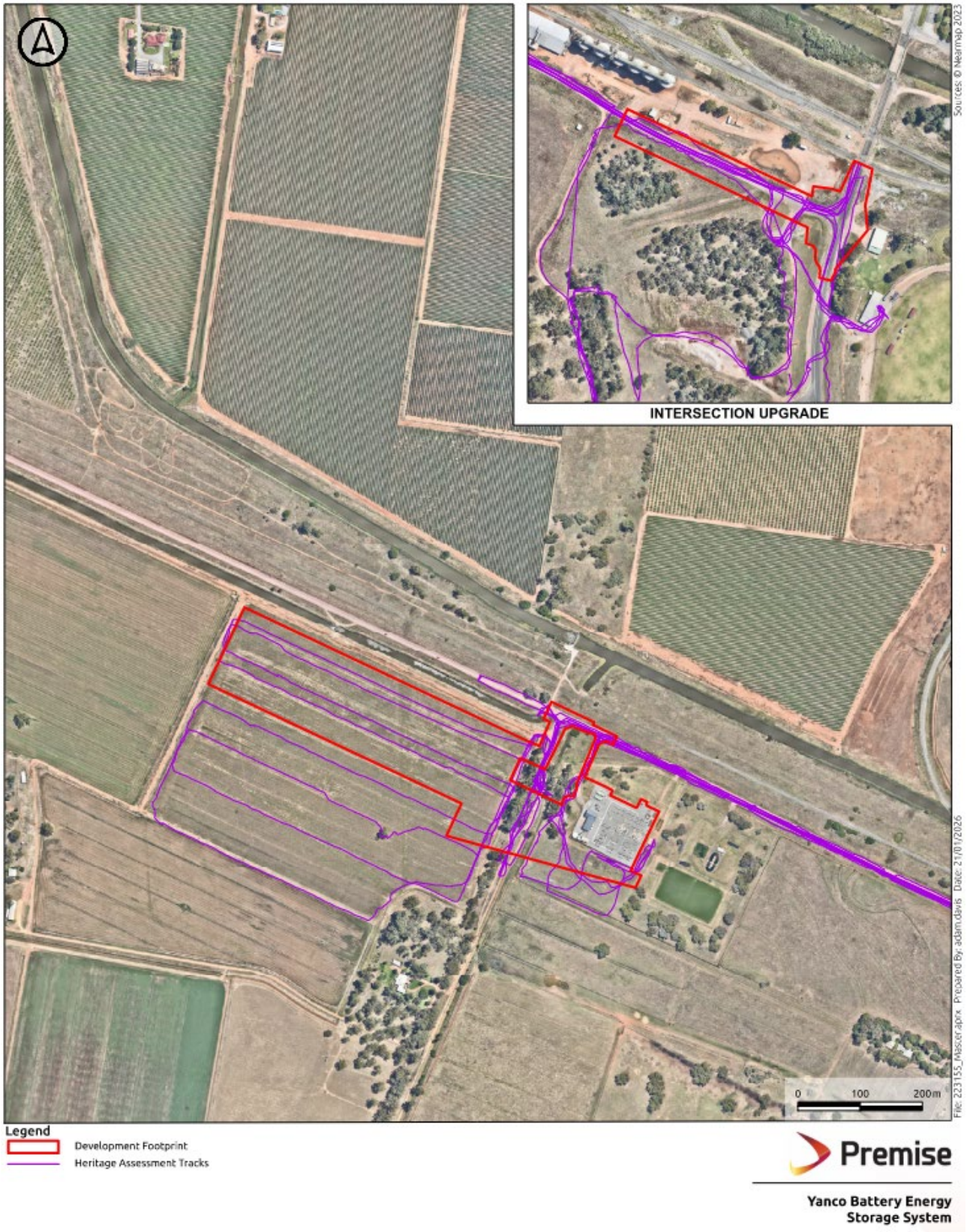


Figure 3 - Previous survey coverage



1.5.1 SUMMARY OF WORKS

1.5.1.1 Intersection upgrades Irrigation Way and Houghton Road

Proposed upgrades are to be located at the intersection of Houghton Road and Irrigation Way. Works will primarily be located within existing road corridors immediately adjacent to the previously assessed development footprint. All works will occur within landforms that have been subject to repeated mechanical disturbance associated with road construction, maintenance, compaction and vehicle use as well as disturbance through activities associated with the adjacent grain receival facility.

A number of minor changes to the development footprint of the southern end of the intersection upgrade at Irrigation Way and Houghton Road is proposed to accommodate the tie into the existing formation. This is a very small area (approximately 315 m^2) and essentially forms part of the formation of the existing road. This area was covered during survey efforts undertaken for the original ACHAR. There are no changes to the landform assessment or archaeological potential in this location. Therefore, survey has been adequately covered, and no further survey efforts are required.

A small addition to the northern side of Houghton Road (approximately 330 m^2) is also proposed where it intersects with Irrigation Way, to potentially relocate services (to be confirmed through final design) impacted by the intersection upgrade. Whilst not confirmed, the area has been included in this modification to ensure delays to the project are minimised. This area was not surveyed as part of the original ACHAR. However, it is characterised as highly disturbed through historic and current activities associated with the adjacent grain receival facility. The landform assessment remains consistent with the immediate locality and given the small scale of the additional impact area, levels of ground disturbance and high degree of visibility the archaeological potential and sensitivity is considered low and survey is not required.

No new landforms, undisturbed ground surfaces or intact soil profiles are proposed to be impacted.

1.5.1.2 TransGrid Substation access arrangements

The proposed modification involves inclusion of an access arrangement to the TransGrid substation to enable TransGrid access consent for augmentation works. This area provides the current access point to the TransGrid substation and is utilised by a range of vehicles accessing the substation. No physical works are required in this area as the current driveway is suitable for the required purpose. This area was covered during survey efforts undertaken for the original ACHAR. There are no changes to the landform assessment or archaeological potential in this location. Therefore, survey has been adequately covered, and no further survey efforts are required.

1.5.1.3 Property access point and development footprint

The proposed modification involves a small addition to the development footprint on the inside curve (western side) at the property access point, to accommodate a small laydown area (140 m^2). This area forms part of the existing road formation. This area was covered during survey efforts undertaken for the original ACHAR. There are no changes to the landform assessment or archaeological potential in this location.

The proposed modification will result in a small addition to the development footprint at the western end of Houghton Road to accommodate the tie into the existing formation (57 m^2). This area forms part of the existing road formation. This area forms part of the existing road formation. This area was covered during survey efforts undertaken for the original ACHAR. There are no changes to the landform assessment or archaeological potential in this location. This proposed change reduces the separation to the known AHIMS site.

There will be no proposed impacts to the AHIMS site as part of the modification change. All existing mitigation measures would remain applicable. No further survey efforts are required in this location.

1.6 Aboriginal Archaeological Context

The ACHAR determined that the broader study area has low archaeological potential due to extensive ground disturbance and a lack of intact surface and subsurface context. Current agricultural activities, irrigation channels road reserves, access corridors and service alignments were identified as among the most disturbed components of the landscape surrounding the study area.

Unsealed road corridors typically exhibit removal of original soil horizons, mixing of soils through grading and maintenance, compaction and erosion, importation of fill material and disturbance from underground and surface services. These conditions result in a loss of archaeological integrity and a negligible likelihood of intact Aboriginal archaeological deposits being present.

The ACHAR determined the broader study area has low archaeological potential due to extensive ground disturbance and a lack of intact subsurface contexts. Irrigated cropping surrounding road reserves, access corridors and service alignments were identified as the most disturbed components of the landscape.

Unsealed road corridors typically exhibit removal of original soil horizons, soil mixing, compaction, imported fill and disturbance from underground services. These conditions result in low archaeological integrity and a negligible likelihood of intact Aboriginal archaeological deposits.

1.7 Assessment of Additional Survey Requirement

The proposed intersection upgrades occur within highly disturbed road corridors and do not extend impacts into previously unassessed or intact landforms. It does not alter the archaeological sensitivity of the study area.

In addition to the intersection upgrade, several minor amendments to the approved development footprint are proposed. These include small additions to the footprint along Houghton Road, minor adjustments within the existing road formation, small laydown areas, relocation of services, and an access arrangement to the TransGrid substation (refer to **Section 1.5**). All of these areas are either located within previously surveyed land, form part of existing disturbed road infrastructure, or occur within highly disturbed environments. These amendments do not extend impacts into previously unassessed or intact landforms and do not alter the Aboriginal archaeological sensitivity of the study area.

On this basis, additional archaeological field survey is not considered necessary as it is unlikely to provide any new information beyond that already documented in the ACHAR.

1.8 Cultural heritage safeguards

All existing Aboriginal cultural heritage management measures remain applicable, including retention of the buffer to AHIMS site 49-5-0211, implementation of the unexpected finds protocol, stop work procedures in the event of unexpected Aboriginal objects or remains and notification requirements to Heritage NSW, RAPs and relevant authorities.

1.9 Conclusion

The proposed modification includes minor additions required for layout update, intersection upgrades, small road formation adjustments, minor laydown areas, relocation of services and an access to the TransGrid substation.

These areas either form part of the existing road formation, are immediately adjacent to previously surveyed areas, or occur within land that is already highly disturbed by road works, rail infrastructure, services, irrigation works and associated earthworks.

The proposed modification will occur in within previously disturbed contexts including an unsealed and previously disturbed road corridor immediately adjacent to the assessed study area, and areas surrounding existing access points and substation infrastructure It has been assessed that archaeological integrity has already been compromised through historic and ongoing disturbance.

The proposed modification will occur in areas either form part of the existing road formation, are immediately adjacent to previously surveyed areas, or occur within land that is already highly disturbed by road works, rail infrastructure, services, irrigation works and associated earthworks.

The level of disturbance and ground visibility is consistent with that recorded during the original ACHAR survey. Survey coverage is considered sufficient to characterise archaeological sensitivity.

This memorandum concludes that the proposed modifications will not alter the Aboriginal cultural heritage values previously assessed nor are there any changes to the conclusions or management recommendations of the approved ACHAR. This memorandum has been prepared to support Registered Aboriginal Party (RAP) consultation and review. No comment or feedback was provided by RAPs on the proposed modification or need for additional survey.

No impacts to the AHIMS site (49-5-0211) are proposed.

APPENDIX A

ABORIGINAL COMMUNITY CONSULTATION

Outlook

Draft Aboriginal Heritage Technical Memo for review - Intersection Upgrade

From Amber Hewson <amber.hewson@premise.com.au>
Date Tue 1/27/2026 3:25 PM
Cc Latisha Ryall <latisha.ryall@premise.com.au>
Bcc admin@ldlalc.com.au <admin@ldlalc.com.au>; marksad@live.com.au <marksad@live.com.au>; [redacted]; robert.carroll1971@gmail.com <robert.carroll1971@gmail.com>; neerim93@aol.com <neerim93@aol.com>; gamila_roi@yahoo.com.au <gamila_roi@yahoo.com.au>; dylancodyingram92@gmail.com <dylancodyingram92@gmail.com>; Lucy McDermott <lucy.mcdermott@premise.com.au>

1 attachment (636 KB)
223155_ACHAR_MEMO_001B_DRAFT.pdf;

Good Afternoon,

Please find attached a draft Aboriginal Heritage Technical Memo prepared in relation to the proposed intersection upgrade associated with the Yanco Battery Energy Storage System project.

This document is provided in draft form for your review. In accordance with Heritage NSW consultation timeframes, Registered Aboriginal Parties are provided with 28 days to review the memo and provide any comments or feedback.

All comments received within this period will be considered prior to finalisation of the memo.

If you require any clarification regarding the attached document, please do not hesitate to contact us.

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