

Appendix C Consultation

To whom it may concern,

Re: 250451 – Mulwala SF Mod Heritage Letter Final

As you are aware, you are a Registered Aboriginal Party (RAP) for the Mulwala Solar Farm project which is an approved State Significant Development (SSD) SSD-9093) located approximately two kilometres (km) north of the Mulwala township, within the Federation Council Local Government Area (LGA), such approval covering an 80MW solar farm and a Battery Energy Storage System (BESS) area.

Due to capacity constraints of the nearby Mulwala Substation, construction and operation of the solar arrays has been approved in Stages for this Project, as follows:

- Stage 1a road upgrades at the intersection of Lumbruck Lane and Savernake Road and site access points (works now completed)
- Stage 1b construction and operation of the solar arrays within the approved Development Footprint, north of Lumbruck Lane
- Stage 2 construction and operation of the solar arrays within the approved Development Footprint, south of Lumbruck Lane
- Stage 3 decommissioning of the Mulwala Solar Farm

The first solar panels to be installed would be located on Lots 11 and 14 in DP1316892 (Stage 1b). In progressing project development and detailed design, the approved BESS location is proposed to be relocated from Lot 4/DP1316892 (Stage 2) to Lot 11/DP1316892 (Stage 1b), adjacent to the approved switchyard compound. The relocation would allow for effective operation of Stage 1b until such time as Stage 2 solar panels are constructed. Importantly, the BESS would remain wholly within the approved Development Footprint and has been strategically placed to avoid Aboriginal Heritage items previously identified during the *Environmental Impact Statement (2018)* phase and documented in the *Aboriginal Cultural Heritage Assessment (ACHA) report* for the project completed by RPS Mandis Roberts Pty Ltd in 2018. The proposed BESS location is Figure 1 overleaf.

As such, NGH on behalf of European Energy Australia (the Applicant) is currently preparing a modification application under Section 4.55 1A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The specific changes to the Project are as follows:

1. Relocation of the approved Battery Energy Storage System (BESS)
2. Change to the approved BESS technology
3. Adjustment to the solar array layout

As part of the assessment of Aboriginal Heritage considerations in relation to the Modification application NGH have undertaken the following activity:

- 1) Completed an updated extensive search of the Aboriginal Heritage Information Management System (AHIMS) database.
- 2) Reviewed the relevant sections of the ACHA Report completed by RPS Mandis Roberts Pty Ltd (RPS) in 2018.
- 3) Considered the relocation of the project BESS from the approved location to proposed amended location and potential for impacting Aboriginal heritage values.

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Updated AHIMS Search

The updated AHIMS search (Client Service ID: 1077772) undertaken on the 17th of December 2025 found that no Aboriginal heritage sites have been registered on the AHIMS database within the Mulwala Solar Farm Project Area beyond those recorded during the 2018 ACHA for the project. All previously recorded sites are now located outside the development footprint for the project.

Review of RPS ACHA 2018 report

A review of relevant sections of the ACHA report revealed that the proposed amended location for the BESS was assessed during the field inspection as part of Survey Unit 3. Background research undertaken as part of the ACHA identified that the Project Area, including Survey Unit 3, had low archaeological potential and this was confirmed during the field inspection for the ACHA. No cultural material was identified at the proposed amended location for the BESS and the near horizontal plain landforms within Survey Unit 3 were also found to have been highly modified through the previous agricultural land use history, reducing any potential for archaeological deposits to be present.

Consideration of impacts on Aboriginal Heritage Values

Based on the findings of the above activities the relocation of the project BESS to the proposed amended location will not impact known Aboriginal heritage values recorded within the Project area. The relocation of the BESS also has negligible potential to impact previously unidentified Aboriginal heritage values within the Project Area. As such there are no constraints in regard to Aboriginal heritage values associated with proposed BESS relocation.

If suspected Aboriginal cultural heritage materials are identified during the project construction activity, they would be managed in accordance with recommendation 11 of the ACHA report for the project.

If you have any questions, please contact me or Matthew Barber on 02 9800 4036. We would be pleased to discuss any aspect of this project with you further.

Yours sincerely,

Glenn Willcox
Senior Heritage Consultant
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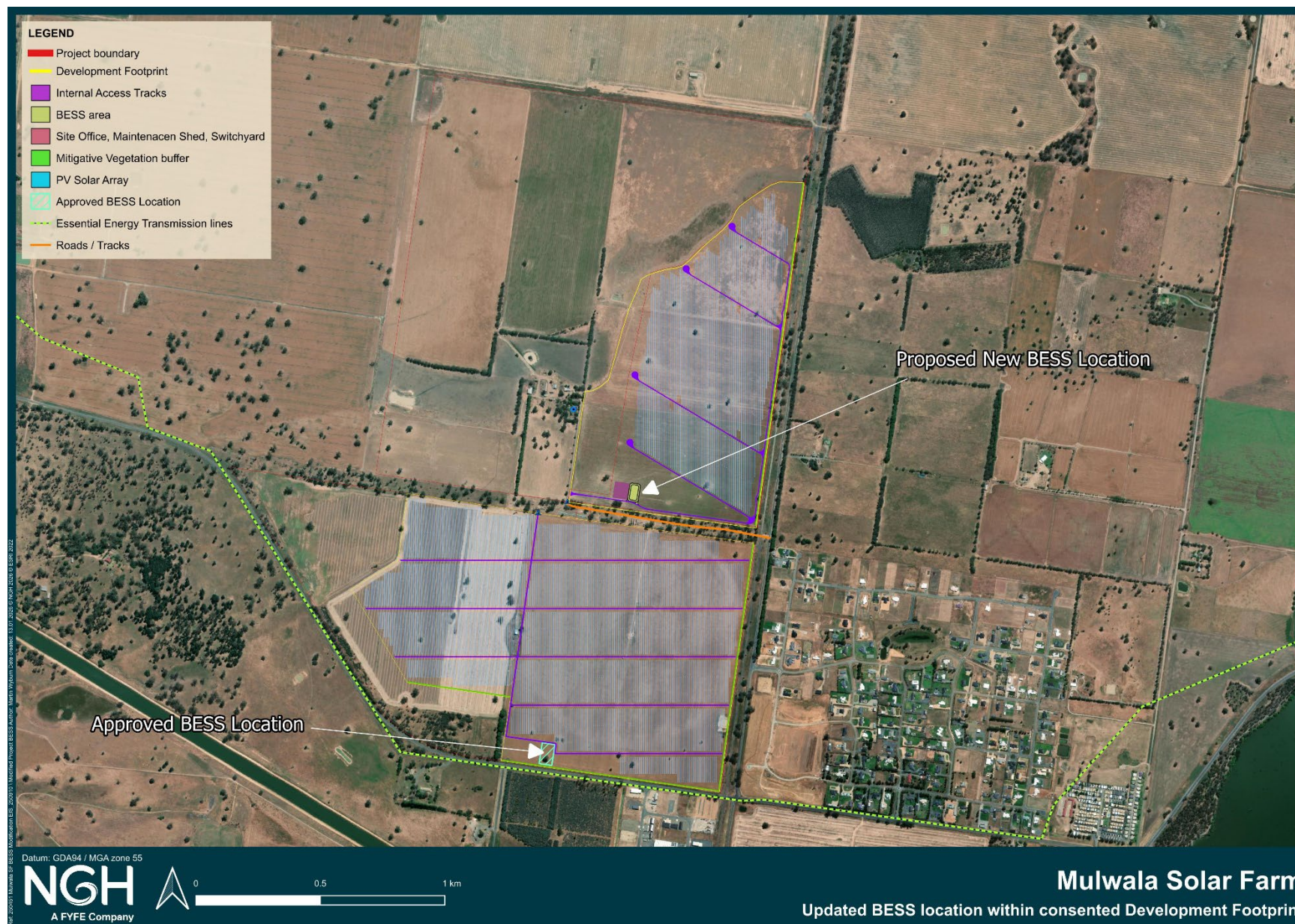


Figure 1 Proposed BESS location for the Modification application