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Heritage Management Plan EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2 45860-HSE-PL-D-0119

REV	DATE	GENERAL DESCRIPTION	PREPARED	REVIEWED	VERIFIED	APPROVED
1	15/03/2023	Revised to address DPE comments	R.Walker-Edwards	C.Curlewis	G.Crighton	S.Basanta
2	27/10/2023	Revised to reflect the Addendum ACHAR (Rev 6)	R.Walker-Edwards	C.Curlewis	G.Crighton	G.Arrien Echevarria
3	15/12/2023	Revised to reflect the Addendum ACHAR (Rev 8) and results of consultation	R.Walker-Edwards	C.Curlewis	G.Crighton	G.Arrien Echevarria
4	17/01/2024	Revised to reflect the Addendum ACHAR (Jan 2024) and results of consultation	R.Walker-Edwards	C.Curlewis	G.Crighton	G.Arrien Echevarria
5	7/02/2024	Revised to address DPE comments	 R.Walker-Edwards	 C.Curlewis	 G.Crighton	 G.Arrien Echevarria

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Revision History	
Rev.	Detailed Description
A	Issued for Transgrid review
B	Issued for Stakeholder review
0	Updated to consider stakeholder review
1	Revised to address DPE comments
2	Revised to reflect ACHAR1 (Rev 6)
3	Revised to reflect the Addendum ACHAR (Rev 8) and the results of consultation
4	Revised to reflect the Addendum ACHAR (Jan 2024)
5	Revised to address DPE comments

Key Document Stakeholders
To be communicated with during reviews and revisions of this document

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Abbreviations

Acronym	Definition
Aboriginal stakeholders	Registered Aboriginal Parties (RAPs) from the EIS (as defined in the Infrastructure Approval)
ACHAR, CHAR	Aboriginal Cultural Heritage Assessment Report
Addendum ACHAR	<i>Addendum Aboriginal Cultural Heritage Assessment Report</i> (Navin Officer, January 2024)
AHIMS	Aboriginal Heritage Information Management System
Amendment Report	<i>Amendment Report EnergyConnect (NSW – Eastern Section)</i>
APZ	Asset protection zone
BMEET	Barkindji Maraura Elders Environment Team
CCS	Community Communication Strategy
CEMP	Construction Environmental Management Plan
CSSI	Critical State significant infrastructure
Cth	Commonwealth of Australia
DAWE	(former) Department of Agriculture, Water and the Environment
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DECCW	(former) Department of Environment, Climate Change and Water
DPE or Department	NSW Department of Planning and Environment
DPIE	(former) NSW Department of Planning, Industry and Environment, now known as NSW Department of Planning and Environment
EIS	<i>Environmental Impact Statement EnergyConnect (NSW – Eastern Section)</i>
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	(Commonwealth) <i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPC	Engineering, procurement and construction
ER	Environmental Representative
HHIMS	DPE Historic Heritage Information Management System
HMP, this plan	Heritage Management Plan
HSSE	Health, Safety, Security and Environment
LEP	Local Environmental Plan
NPWS	National Parks and Wildlife Service
NSW	New South Wales
PAD	Potential archaeological deposit
PAD15	PEC-E-PAD15
PEC-E	Project EnergyConnect Eastern
PEC-E-H	Project EnergyConnect Eastern Historic
Planning Secretary	Planning Secretary under the EP&A Act, or nominee
project, the	EnergyConnect (NSW – Eastern Section)
RAPs	Registered Aboriginal Parties
Response to DPE Request for Information	<i>EnergyConnect (NSW – Eastern Section) Response to Department of Planning and Environment Request for Information</i> (30 August 2022)

Acronym	Definition
Revised ACHAR (dated May 2022)	<i>Revised Aboriginal Cultural Heritage Assessment Report, Navin Officer 2022</i> , included as Supplementary technical paper 2 to the Amendment Report and Submissions Report
RMMs	Revised mitigation measures
RNTBC	Barkandji Native Title Claim Group Aboriginal Corporation
SAPs	Sensitive area plans
SecureEnergy	Transgrid has engaged Elecnor Australia, trading as SecureEnergy, to design and construct the EnergyConnect project.
SSI	State significant infrastructure
Stage 1	Stage 1 of construction of the project. This includes establishment of three accommodation camps, establishment and operation of five construction compounds, site establishment and construction works for the upgrade of Wagga Wagga substation and Dinawan substation and water supply points.
Stage 2	All construction activities associated with EnergyConnect (NSW – Eastern Section). Once approved the Stage 2 CEMP and the relevant Stage 2 CEMP sub-plans will supersede the existing Stage 1 CEMP and Stage 1 CEMP sub-plans. The Stage 2 CEMP and Stage 2 CEMP sub-plans do not address the operational phase of the project.
Submissions Report	<i>Submissions Report EnergyConnect (NSW – Eastern Section)</i>
WMS	Work method statement

1 Introduction

Elecnor Australia would like to acknowledge the Traditional Custodians of this land and pay out respects to the Elders, both past and present, for they hold the memories, the traditions, the culture and hopes of their people.

1.1 Context

This Heritage Management Plan (HMP or this plan) forms part of the Construction Environmental Management Plan (CEMP) for Stage 2 of EnergyConnect (NSW - Eastern Section).

This document has been prepared for construction activities undertaken during Stage 2 of the project and supersedes the existing Stage 1 Heritage Management Plan. It does not address the operational phase of the project.

This plan has been prepared to address the requirements of the Infrastructure Approval (SSI 9172452), *Environmental Impact Statement the EnergyConnect (NSW - Eastern Section)* (EIS), the *Submissions Report EnergyConnect (NSW - Eastern Section)* (Submissions Report), and the *Amendment Report EnergyConnect (NSW - Eastern Section)* (Amendment Report).

1.2 Background

On 29 August 2019 the then New South Wales (NSW) Minister for Planning and Public Spaces declared the NSW component of EnergyConnect to be critical State significant infrastructure (CSSI) under the *Environmental Planning and Assessment Act 1979* (EP&A Act) on the basis that it is critical to the State for environmental, economic or social reasons. Within NSW, EnergyConnect is therefore subject to assessment under Part 5, Division 5.2 of the EP&A Act.

Transgrid have two environmental planning approval applications for the sections within NSW:

- EnergyConnect (NSW - Western Section) - SA/NSW border to Buronga and Buronga to the NSW/Victorian border; and
- EnergyConnect (NSW - Eastern Section) - Buronga to Wagga Wagga (the project).

A referral under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) was submitted on 25 August 2020. The Australian Department of Agriculture, Water and the Environment (DAWE) determined the project to be a controlled action on 30 September 2020 and thus, it would be assessed using the bilateral assessment process. As such, the project also requires approval from the Australian Minister for the Environment under the EPBC Act.

The EIS was prepared for the project in January 2022 and was placed on public exhibition from 19 January 2022 to 15 February 2022. A total of 75 submissions were received, with 17 from government agencies, five from special interest groups, nine from local councils and 44 from the public.

The Submissions Report was prepared for the project in response to the submissions received during the public exhibition of the EIS and includes the final set of revised mitigation measures (RMMs) that are to be applied. The Submissions Report was finalised in May 2022.

Transgrid also prepared a separate Amendment Report to document design changes and additional environmental assessment undertaken since exhibition of the EIS. The Amendment Report describes the updated project for which approval has been sought and was also finalised in May 2022.

On 2 June 2022, the Department requested additional information (Project EnergyConnect (NSW - Eastern Section) (SSI-9172452) Request for Additional Information (June 2022)) to assist with the assessment of the project. In response Transgrid prepared and provided the *EnergyConnect (NSW - Eastern Section) Response to Department of Planning and Environment Request for*

Information (Response to DPE Request for Information) to address the various requests for information raised by the Department. The Response to DPE Request for Information was dated 30 August 2022.

Approval for the project under the EP&A Act was granted by the NSW Minister for Planning (Infrastructure Approval SSI 9172452). Approval for the project under the EPBC Act was granted by the Australian Minister for the Environment.

Transgrid have engaged Elecnor Australia, trading as SecureEnergy, to design and construct their portion of the EnergyConnect project.

1.3 Staging

Condition A8 allows preparation of plans on a staged basis, with the approval of the Planning Secretary. Where a plan is staged, the scope of works can be carried out without addressing requirements of the Infrastructure Approval that are not applicable to that stage. This HMP is staged in accordance with condition A8. The two stages are as follows:

- Stage 1 - establishment of three accommodation camps, establishment and operation of five construction compounds, site establishment and construction works for the upgrade of Wagga Wagga substation and Dinawan substation, water supply points; and
- Stage 2 - Stage 1 and all other construction activities (i.e. all construction activities associated with EnergyConnect (NSW – Eastern Section)).

The plans for Stage 2 incorporate and supersede the Stage 1 plans and cover the entire construction phase of the project.

This HMP has been prepared specifically for EnergyConnect (NSW – Eastern Section) Stage 2 of construction and will be implemented for the duration of Stage 2 construction. The key project components of Stage 2 of construction include, but are not limited to, the activities provided in Table 1.1. The location of the key project components are presented in Figure 1.1.

Table 1.1 - Key project components of construction (Stage 2)

Key activity	Description of key activity
Pre-construction minor works permitted in accordance with the Infrastructure Approval.	The definition of 'construction' within the Infrastructure Approval excludes these activities. They will therefore not be subject to the Stage 2 CEMP and CEMP sub-plans. Irrespective of this, these activities will occur in accordance with the relevant conditions of the Infrastructure Approval. Key activities include: • environmental investigations, including biodiversity and heritage protection, salvage and recordings; • Aboriginal heritage assessment, mitigation (e.g. exclusion zones) and salvage activities including subsurface testing/test excavation, additional survey, and consultation with RAPs; • other survey work, such as road dilapidation surveys, and surveys of the general alignment and existing utilities; • installation of environmental management measures (including erosion and sediment controls), fencing, signage and security measures, enabling works; and • connections and pre-commissioning of utilities (wastewater treatment plant, electrical power, lighting etc.).
Continuation of any outstanding Stage 1 construction activities	Construction activities undertaken during Stage 1 of the project will continue where required. This includes, but is not limited to continuation of the following activities: • any outstanding construction activities at Dinawan and Wagga Wagga substations;

Key activity	Description of key activity
	- operation of earthworks material site, including the crushing and screening plant, where required; - operation of the construction compounds including offices and laydown area; and - use of traffic access route and access and egress points.
Establishment of ancillary facilities along the transmission line corridor	A number of minor staging, storage and laydown ancillary areas would be required within the project corridor for temporary storage of materials, plant and equipment required to construct the various elements of the proposal (in particular transmission line structures). Some temporary mobile batching plant locations may also need to be established to enable easy access to concrete. These sites would be in place for shorter periods at locations suitable to support the construction works as they move along the alignment.
Property adjustment work, including adjustments to property fencing	Installation or adjustment of gates and fences would be required at some locations along the alignment to enable access from the nearest roadway to construction areas. These would be constructed in consultation with the relevant council and/or affected landholder.
Water supply points - establishment and/or use	A number of water supply points have been along the length of the project to support construction water needs for the project. The proposed water supply points which are to be established and / or used include: - Lake Benanee*, Balranald Shire Council; 159 Church Street, Balranald Shire Council; 10 Perry Street, Euston*, Balranald Shire Council; 61-61 Bank Street, Balranald*, Balranald Shire Council; and - Carey Street/Sturt Highway, Euston*, Balranald Shire Council; - Ravensworth, Hay Shire Council [Ravensworth in Amendment Report]; - Moulamein Road 2, Edward River Council [Moulamein Road, Moulamein in Amendment Report]; - Burraburoon*, Edward River Council; - Carrathool Road, Four Corners*, Edward River Council; - Kidman Way*, Murrumbidgee Council; - Crosby Road*, Murrumbidgee Council; - Newell Highway, Morundah*, Federation Council; - Urana-Lockhart Road, Brookong*, Lockhart Shire Council; - Brookdale*, Lockhart Shire Council; - Federation Way/Coonong Road*, Federation Council; - Newell Highway/Arrawidgee Road*, Federation Council; - Federation Way*, Federation Council; - Red Hill Road, Wagga Wagga, Wagga Wagga City Council [Glenfield in Amendment Report]; 1254 Four Corners Road, Coleambally, Murrumbidgee Council [1254 Four Corners Road in Amendment Report]; - Carrathool Road, Four Corners, Edward River Council [shown in Figure 6-9 of the Amendment Report, however, unclear of name in Table 6-5]; - Wonga Station, Four Corners Road, Edward River Council [Wonga in Amendment Report]; - Four Corners Road Mabins Well; Edward River Council [Four Corners Road, Mabins Well in Amendment Report]; - Boooroorban-Tchelery Road*, Boooroorban, Edward River Council; - Strong's Lane*, Lockhart, Lockhart Shire Council; - Slys Lane*, Lockhart Shire Council; - The Rock - Collinguiellie Road*, The Rock, Lockhart Shire Council;

Key activity	Description of key activity
	• Bullenbung-the-Rock Road*, Lockhart Shire Council; • French Park-Bullenbung Road*, Lockhart Shire Council; • Napier Road*, Lockhart Shire Council; • Albury Road*, Lockhart, Lockhart Shire Council; • 3 Bencubbin Avenue, Coleambally, Murrumbidgee Council [3 Bencubbin Avenue in Amendment Report]; • Keri Keri Rd, Keri Keri, Murray River Council [Keri Keri in Amendment Report]; • 78 Murray Street, Tooleybuc*, Murray River Council; • Federation Way* (near corner Federation Way and Stephen Street), Federation Council; • Corner of Federation Way and Stephen Street*, Urana; • McLennons Bore Road, Coleambally, Murrumbidgee Council [McLennons Bore Road in Amendment Report]; • 8955 Newell Highway Bundure, Murrumbidgee Council [Newell Highway, Bundure in Amendment Report]; • Paraway at Four Corners Road*, Murrumbidgee Council; • Paraway at Cobb Highway*, Hay Shire Council; • North Boundary Road*, Murrumbidgee Council; • Off Sturt Highway* Wentworth Shire Council; • 16 Mile Gums*, Hay Shire Council; • 338 Cadell Street, Hay, Hay Shire Council; • Jerilderie Road*, Hay Shire Council; • 59 Thelangerin Road, Hay*, Hay Shire Council; • Court Street/Sturt Highway*, Balranald Shire Council; • Boiling Down Road*, Wagga Wagga City Council; and • continued use of the Stage 1 water supply points. 'The water supply points may require works to the existing infrastructure to enable connection and use by the water supply vehicles. The definition of 'construction' within the Infrastructure Approval excludes these activities. They will therefore not be subject to the Stage 2 CEMP and CEMP sub-plans. Irrespective of this, these activities will occur in accordance with the relevant conditions of the Infrastructure Approval. * The water supply points denoted above with an asterisk are additional to the water supply points identified in the EIS. Section 6.9.2 of Appendix B of the Amendment Report identifies potential sources of water for the project and notes that the final water sources, including any additions, would be confirmed in consultation with the water suppliers. Consultation with potential water suppliers has progressed and the list of proposed water supply points above has been amended accordingly. Prior to the use of each additional water supply point, the project would: • confirm that the water supply point could be accessed using the approved access routes identified in Appendix 3 to the Infrastructure Approval, or otherwise obtain the Planning Secretary's agreement in accordance with condition C32; • reach agreement with the water supplier regarding the use of the water supply point for the project; and • carry out any additional assessments which may be required (ie heritage or biodiversity).
Traffic access routes and access points	The construction vehicle movements will be required for a variety of activities (i.e. earthworks, clearing and grubbing activities). All construction vehicles associated with the development will travel via the access routes as identified in Appendix 3 of the Infrastructure Approval or as otherwise approved. The establishment of new access points would include:

Key activity	Description of key activity
	- establishing vehicle access and egress points to ensure safe vehicle movements. Existing access may also be used; and - establishing truck wheel wash or rumble grids. The definition of construction within the Infrastructure Approval does not include road upgrades (which includes access points). Road upgrade works are, however, incorporated within the Traffic and Transport Management Plan as required by condition C35.
Construct access tracks	Access to each tower would be required during construction. Access tracks would be required to be traversable by a range of vehicles. Access tracks would fall into two broad groups: - un-improved access tracks - using existing roads or tracks, or driving on existing soil or ground surface with minimal or no prior preparation; - improved access track - using existing roads or tracks where minor modification (such as grading or widening of the existing track) is required; and - constructed access tracks - around six metres wide and would generally follow the natural contour of the land as far as practicable to minimise the amount of cut and fill and soil disturbance. Access tracks would also include drainage control features such as table drains or cross banks to minimise erosion. Constructed access tracks would be required in areas, where there are no existing roads or tracks, or where terrain conditions prevent continuous access along the line easement between road crossings. Local waterway spans and causeways may be required, where alternative access routes are impractical, along the length of the proposal.
Temporary works	The project will require a significant quantity of temporary works during construction. The temporary works will include, but not limited to, the following: - earthworks, including trenches, excavations, temporary slopes, stockpiles, and embankments; - laydown and parking areas for the towers; - structures, such as formwork, shoring, edge protection, barriers and signage, temporary scaffold; and - equipment/plant foundations, such as work platforms, crane, and piling platforms.
Optical repeater sites	Three optical repeater site communication huts would need to be constructed at Balranald, Boorooban and Lockhart. The optical repeater sites are communication huts to ensure the stability of the communications system over great distances during the operation phase. The key activities for the construction of the optical repeater sites would consist of the following: - site establishment, including vegetation removal and establishment of temporary construction site office, if required; - earthworks and preparation of the site for concrete foundations; - construction of a new communication hut building at each site; - installation of new pole-mounted transformers; - installation of electrical cables and terminations (either through the installed conduits or stringing of the aboveground poles); - installation of site wiring and electrical control equipment within each building; - trenching for underground conduit between the Balranald optical repeater hut and transmission line; - installation of new above ground poles between the transmission line and the respective Boorooban and Lockhart optical repeater sites; - provision of power connections between the transmission line and associated optical repeater site; and - removal of waste and remediation of site areas.
Earthworks and	Excavation works and establishment of construction pads at each tower site would be required for the installation of foundations, levelling around the individual tower

Key activity		Description of key activity
Transmission line construction	transmission tower footing construction	foundations, drainage and grading or preparation for construction at the tower site. Excavations would typically be up to five metres in depth. Construction of footings and foundation works for the new transmission line towers includes: - piling. Typical transmission line tower piling depth would be generally up to 6-15 metres below ground level and would depend on ground conditions (e.g. greater piling depths would be required where soft soil types are present). The foundation type would also vary (subject to detailed design) but would consist of either: - bored pile (reinforced concrete); - driven or screw pile (concrete or steel); and - helical screw anchor, or cast in-situ reinforced concrete. - excavation to create bench sites (stepped ground excavation) where required to provide a level platform for equipment setup, the erection of the tower and other construction activities. Benching would be constructed by use of earthing equipment such as graders and excavators; - steel fabrication works; and - concrete pours.
	Assembly and erection of transmission line towers	The transmission line towers would typically be erected by assembling in sections on the ground and hoisting or lifting successive sections into place using cranes. Alternatively, towers may be erected in place on the footings by installing individual members. These towers would include infrastructure such as step bolts, climbing attachment plates, ladders, platforms, climbing barriers, identification plates, warning plates, other fixtures and fittings for the attachment of earth wires and insulators.
	Stringing of transmission lines including conductors and overhead earth wires and optical ground wire	Following erection and securing of the tower, the transmission line would be strung by either a ground pulled draw wire (with brake/winch sites) or a line stringing drone. The area required for the construction of each tower would require access for tower assembly and stringing works. Where a transmission tower is proposed to allow for a direction change of the transmission line, a larger area would be required (to allow for brake and winching sites). At a typical site, this would include a temporary area of up around 60 metres by 80 metres at each transmission line tower location. Stringing of the transmission line would also be required across several major watercourses, railway lines and roads / highways. The general construction methodology is to assemble and erect a transmission line structure on either side of each river, road or rail crossing. A drone would then be used to take a lead wire over the river to allow cables to then be pulled and strung tower to tower.
	Installation of earthing conductors	The following key activities will be undertaken: - installation of earthing conductors at each of the transmission tower arms; and - installation of earthing or isolation sections of fences and gates where the transmission line crosses or closely runs parallels to a metallic fence.
Utility adjustments and protection		General utility protection and adjustment works, where required, to allow for the Wagga Wagga substation expansion and upgrades works to occur, the optical repeater sites, the establishment and operation of the construction compounds and accommodation camps, and elsewhere as required.
Site rehabilitation and landscaping		Site rehabilitation would be carried out progressively along completed sections of the transmission line as well as the substation sites. This phase would occur following the completion of construction. This phase would include the removal/remediation of the construction compounds and camp sites, removal of temporary facilities and site buildings and temporary environmental controls. Works may also be undertaken to restore: water infrastructure facilities to pre-existing conditions before arrival on site in consultation with landowners;

Key activity	Description of key activity
	- natural drainage in areas where temporary facilities were provided; and - fences, gates, etc., which may have been damaged during construction. Installation of the permanent TransGrid property boundary fence surrounding the new and expanded substation sites would also likely occur during this phase.
Demobilisation	Elecnor Australia (Elecnor) will start to downsize the construction team with gradual demobilisation as particular key construction activities are completed.

Some activities nominated in this stage will have already commenced as part of the pre-construction minor works permitted in accordance with the Infrastructure Approval. These works will remain excluded from the definition of 'construction' and will therefore not be subject to the Stage 2 CEMP and this HMP. Activities that were approved to be carried out under the Stage 1 HMP will continue under this HMP.

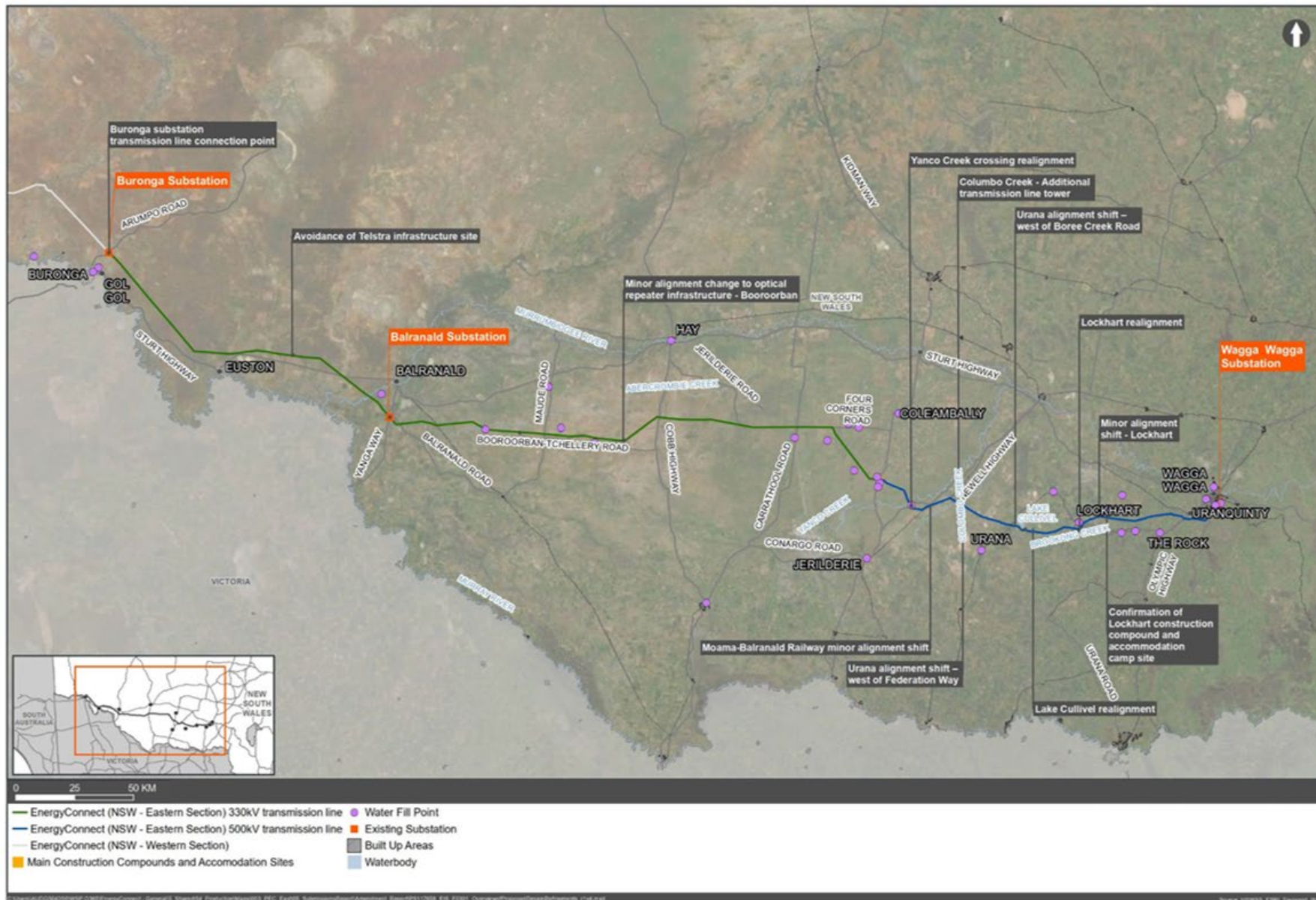


Figure 1.1 - Key features of EnergyConnect (NSW - Eastern Section)

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1.4 Environmental management system

The overall environmental management system for the project is described in Section 4 of the CEMP.

This HMP is a sub-plan that forms part of the CEMP and is also part of the environmental management framework for the project, as described in the CEMP. Figure 1.2 shows the CEMP framework for the project.

Management measures identified in this plan will be incorporated into relevant site-based documents including, but not limited to, site or activity specific work packs or work method statements (WMS), the geographical information system (GIS)/sensitive area plans (SAPs) or training and awareness material.

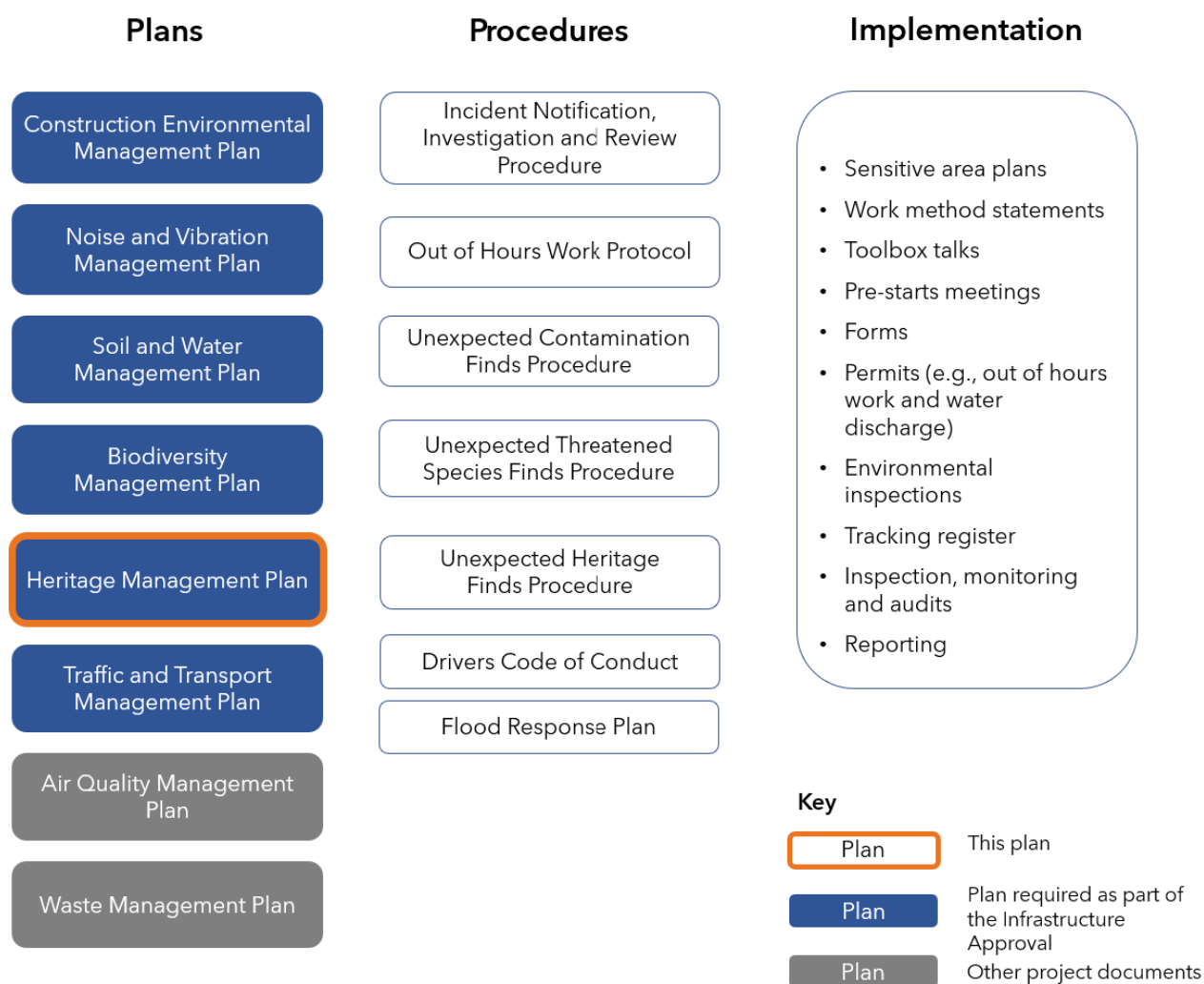


Figure 1.2 - CEMP framework

1.5 Purpose and objective

The purpose of this HMP is to describe the approach to manage potential impacts to Aboriginal and non-Aboriginal heritage that will be adopted during construction of the project.

The key objective of this HMP is to avoid, where possible, or minimise impacts to Aboriginal and non-Aboriginal heritage. To achieve this objective, the following will be undertaken:

- identify and implement measures to minimise the impact to heritage objects, items and sites throughout the construction of the project;
- provide staff with an increased level of understanding and awareness of heritage values within and adjacent to the project alignment and the management approach that will be adopted to minimise potential impacts;
- implement appropriate measures to address the requirements outlined in the Infrastructure Approval, EIS, Submissions Report and Amendment Report; and
- implement appropriate measures to comply with relevant legislation.

As a means of assessing environmental performance, environmental objectives (performance measures), targets (criteria) and performance indicators have been established for the project and are provided within Section 4.2 of the CEMP. The performance measures and indicators relevant to heritage management are detailed within Table 1.2.

Table 1.2 - Environmental objectives, targets and performance indicators relevant to heritage

Aspect	Objectives (performance measures)	Targets (criteria)	Performance indicators
Heritage	Minimise and manage the impacts of the project on Aboriginal objects and non-Aboriginal heritage items within the approved project corridor.	No unlawful harm to known Aboriginal and known non-Aboriginal heritage.	Number of incidents involving harm to known Aboriginal heritage objects or known non-Aboriginal heritage items.

1.6 Preparation of this plan

This plan has been jointly prepared by suitably qualified and experienced people. This plan was prepared by Alison Kriegel of bd infrastructure and Vanessa Edmonds of Everick Heritage.

Vanessa Edmonds is suitably qualified and experienced in the field of Aboriginal and non-Aboriginal cultural heritage. Vanessa is a full and active member of Australian Association of Consulting Archaeologists Inc.

1.7 Consultation

1.7.1 Development of this plan

In accordance with condition B1(d) of the Infrastructure Approval, this plan has been prepared in consultation with:

- Heritage NSW;
- Heritage Council;
- Aboriginal stakeholders (the Registered Aboriginal Representatives (RAPs) identified in Appendix B); and
- National Parks and Wildlife Service (NPWS).

RAPs were identified during the development of the EIS. Public notices were placed in local newspapers and letters sent to various groups and agencies. The closing date for expressions of interest was 4 September 2020. Registrations of interest were received from the groups and individuals (and are the RAPs) identified in Appendix B. Additional information is included in Section 5 of the *Revised Aboriginal Cultural Heritage Assessment Report, Navin Officer 2022*, included as Supplementary technical paper 2 to the Amendment Report and Submissions Report (Revised ACHAR).

The plan was issued to relevant stakeholders for review and comment. Comments were received from stakeholders including RAPs, Heritage NSW, Heritage Council and NPWS. Details of all consultation with relevant stakeholders will be submitted to DPE along with the submission of this management plan.

1.7.2 Ongoing communication and consultation

The project area intersects with the Barkindji Traditional Owners #8 (Part A) native title area (determined) administered under the *Native Title Act 1994*. Barkindji Traditional Owners have been included in consultation undertaken during the development of the EIS and are included in the RAPs identified in Appendix B who will be consulted throughout the project.

Consultation with the RAPs and Heritage NSW was also undertaken through the development of the *Addendum Aboriginal Cultural Heritage Assessment Report* (Addendum ACHAR), required in accordance with condition C27 of the Infrastructure Approval and described in Section 5.1.

The revised version of this management plan (Revision 2) was also issued to the RAPs, Heritage NSW, Heritage Council and NPWS for review and comment. Revision 2 of the HMP was prepared to reflect the outcomes of the Addendum ACHAR.

Ongoing communication with the RAPs will occur through:

- the test excavation activities in the field;
- the surface collection (subsurface salvage) activities;
- the excavation salvage activities;
- delineation of exclusion zones will be undertaken in consultation with the RAPs;
- repatriation of artefacts; and
- any consultation required with RAPs in relation to unexpected finds will be undertaken in accordance with the *Unexpected Heritage Finds Procedure* (45860-HSE-PR-D-0013).

In the event that any potential Aboriginal objects or human remains are identified, notification and consultation will be undertaken as outlined in the *Unexpected Heritage Finds Procedure* (45860-HSE-PR-D-0013).

Elecnor will use a range of tools in accordance with the *Community Communication Strategy* (CCS) (45860-HSE-DOC-D-0024) to facilitate ongoing consultation and communication with the community and stakeholders regarding the project. Communication tools include, but are not limited to, stakeholder briefings, project website, community drop-in sessions, door knocks and project factsheets. Notifications will be issued for, but not limited to the following:

- commencement of construction;
- significant milestones; and
- changes to the scope of work.

Refer to the CCS for further information.

In accordance with condition D12 a) of the Infrastructure Approval, project documents including the EIS, approved strategies, plans or programs required under the conditions of approval and independent reports will be publicly available on the project website. The project website is <https://www.transgrid.com.au/projects-innovation/energyconnect>. A 24-hour toll-free telephone number (1800 490 666) is also available for any project enquiries. In accordance with condition D12 b) the information will be kept up to date.

1.7.3 Complaints

Complaints will be managed by the Engagement Team with the use of Consultation Manager. Complaints will be received via phone calls, emails and letters. Any complaint received is regarded as a high priority and will be recorded, tracked and responded to in accordance with the CCS. Complaints will be investigated and dealt with impartially. The key principles of the complaint management process include:

- acknowledge - Elecnor staff should respect the communities' right to voice their concerns. All complaints received should be acknowledged to the complainant either by telephone or in writing;
- resolve - Elecnor staff should aim at first contact, resolution for all community concerns. Elecnor staff should investigate community concerns in detail before negotiating a resolution. All Elecnor staff should use their relevant discretions to achieve a mutually acceptable resolution to complaints;
- escalate - all Elecnor staff should aim to escalate the complaint if the community member remains dissatisfied with the investigation and/or resolution offered by their first point of contact at Elecnor. All complaints where a community member requests to speak to a higher-level representative, should also be escalated;
- record - Elecnor staff should aim through the Engagement Team, to record all relevant information, on the community account in Consultation Manager, regarding customer concerns along with details of all discussions had with the community member in the process of investigating and/resolving the complaint. Detailed information on the resolutions offered to address community concerns should also be clearly recorded;
- communicate - Elecnor staff should remain in constant touch with the community member while their concerns are being investigated. The community member should be informed of all steps of the investigation and the resulting outcome at appropriate times;
- report - Elecnor should report on all complaints received to the Elecnor Management Team and Transgrid. The reporting should include information on the number as well as type of complaints being received, the status of these complaints from time to time and the resulting outcomes or resolutions offered to close them;
- feedback - the Elecnor Engagement Team should aim at regular and intensive reviews to identify possible trends in the complaints being received. These reviews should be aimed at highlighting improvements required to avoid complaints being repeated;
- action - Elecnor should aim to effectively implement improvements suggested directly by the community or highlighted by complaint trends.

Wherever possible, complaints will be resolved directly between Elecnor and the stakeholder. If a complaints management process has been followed and the issue cannot be resolved, dispute resolution will be undertaken in accordance with the CCS. DPE may request the Environmental Representative (ER) to assist in dispute resolution of community complaints.

All complaints will be provided to the ER in accordance with condition A13 on the day they are received and a summary of complaints received, such as a complaints register, will be updated monthly on the project website in accordance with condition D12.

1.8 Submission and approval

Prior to submission to DPE, the HMP was reviewed by the ER to ensure that the plan was consistent with the requirements of the Infrastructure Approval. A written statement to this effect was prepared and submitted to DPE. This review was undertaken in accordance with condition A19 of the Infrastructure Approval.

This HMP was then submitted to DPE for review and approval by the Planning Secretary prior to the commencement of Stage 2 of construction.

Stage 2 of construction did not commence until the CEMP and all sub-plans required under condition B1, or where staging is proposed the plans required for that stage, were approved by the Planning Secretary. The approved HMP will be implemented for the duration of the Stage 2 construction activities. The Department will be notified in writing via the Major Projects portal of the proposed date of commencement of Stage 2 of construction.

1.9 Periodic review

This HMP will be reviewed at least annually and updated, if required, in accordance with Section 1.10 of the CEMP – Updating the CEMP. This includes the review and, if necessary, revision of this HMP within three months of the following:

- submission of an incident report under condition D6 of the Infrastructure Approval;
- submission of an audit report under condition D11 of the Infrastructure Approval; or
- any modifications of the Infrastructure Approval.

Any updates to the HMP will be approved as described in Section 1.10 of the CEMP.

2 Environmental requirements

2.1 Legislation

Legislation relevant to the management of Aboriginal and non-Aboriginal heritage includes:

- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Commonwealth (Cth));
- *Environmental Planning and Assessment Act 1979*;
- *Heritage Act 1977*;
- *National Parks and Wildlife Act 1974*;
- *Native Title Act 1994* (NSW); and
- *Native Title Act 1993* (Cth).

Relevant provisions of the above legislation are detailed within the register of legal and other requirements included in Appendix A1 of the CEMP.

2.2 Conditions of Approval

The conditions of the Infrastructure Approval relevant to heritage are presented in Table 2.1. A cross reference is also included to indicate where the condition is addressed within this plan or other project management documents.

Table 2.1 - Conditions of Approval relevant to heritage

Condition no.	Requirement	Where addressed	How addressed						
B1	Prior to commencing construction, an Environmental Management Plan (EMP) comprising the Sub-plans listed in Table 1 must be prepared by suitably qualified and experienced persons, to the satisfaction of the Planning Secretary. Following the Planning Secretary's approval, the Proponent must implement the Environmental Management Plan. Table 1: CEMP Sub-plans <table><tr><th></th><th>Required EMP Sub-plan</th><th>Relevant government agencies and stakeholders to be consulted for each EMP Sub-plan</th></tr><tr><td>(d)</td><td>Heritage</td><td>Heritage NSW Heritage Council Aboriginal stakeholders NPWS</td></tr></table>		Required EMP Sub-plan	Relevant government agencies and stakeholders to be consulted for each EMP Sub-plan	(d)	Heritage	Heritage NSW Heritage Council Aboriginal stakeholders NPWS	This HMP Section 1.6 Section 1.7 The CEMP	The HMP has been prepared by suitably qualified and experienced persons and has been provided to Heritage NSW, Heritage Council, Aboriginal stakeholders and NPWS for consultation. The HMP will be implemented during construction.
	Required EMP Sub-plan	Relevant government agencies and stakeholders to be consulted for each EMP Sub-plan							
(d)	Heritage	Heritage NSW Heritage Council Aboriginal stakeholders NPWS							
B2	The EMP Sub-plans must be prepared in accordance with relevant guidelines and in consultation with relevant government agencies identified for each Sub-plan in Table 1, and include:	Section 1.7	This HMP has been prepared in accordance with relevant guidelines. This HMP has been developed in consultation with Heritage NSW, Heritage Council, Aboriginal stakeholders and NPWS. Details of all consultation will be						

Condition no.	Requirement	Where addressed	How addressed
			submitted to DPE along with the submission of this HMP.
	a) a summary of relevant background or baseline data;	Section 3 Appendix D	The existing known Aboriginal and historic heritage in close proximity to the project disturbance area is outlined in Section 3. The recorded Aboriginal heritage is visually represented in Appendix D.
	b) details of:		
	(i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);	Section 2	The relevant legislation, conditions, RMMs and guidelines applicable to heritage are outlined in Section 2.
	(ii) any relevant limits or performance measures and criteria;	Section 1.5 Section 4.2 of the CEMP - Objectives and targets	The objectives (performance measures) and targets (criteria) relevant to heritage management are outlined in Section 1.5 of this HMP. The CEMP also provides project-wide environmental objectives (performance measures) and targets (criteria).
	(iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; and	Section 1.5 Section 4.2 of the CEMP - Objectives and targets	The performance indicators relevant to heritage management are outlined in Section 1.5 of this HMP. The CEMP also provides project-wide performance indicators.
	(iv) any relevant commitments or recommendations identified in the EIS;	Section 2.3	Relevant heritage commitments and recommendations identified in the EIS, known as RMMs, have been outlined in Section 2.3.
	c) a description of the management measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 5	Specific heritage related safeguards and management measures to address potential impacts associated with the project to comply with the relevant statutory requirements, limits and performance measures are outlined in Section 5.
	d) a program to monitor and report on the:		
	(i) impacts and environmental performance of the development (including a table summarising all the monitoring and reporting obligations under the conditions of this approval); and	Section 6, including: Section 6.3 Section 6.4 Section 6.5 Section 6.6	Monitoring, inspections, auditing and reporting is outlined in Section 6.3 to 6.6 of this HMP.
	(ii) effectiveness of the management measures set out pursuant to paragraph (c);	Section 6	Monitoring of the effectiveness of the management measures is outlined in Section 6 through compliance management.

Condition no.	Requirement	Where addressed	How addressed
	e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 6.8 Appendix A Section 8 of the CEMP - Incidents and emergencies Section 10 of the CEMP - Reporting Section 11 of the CEMP - Non-compliance, non-conformance, corrective and preventative action	Section 6.8 outlines a contingency plan in the event that unpredicted impacts are identified. In the event of the discovery of any unexpected heritage find, the Unexpected Heritage Finds Procedure (Appendix A) will be followed. The CEMP also provides additional detail regarding incidents and emergencies, reporting, non-compliance, non-conformance, corrective and preventative actions.
	f) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 1.9 Section 6 Section 1.9 of the CEMP - Continuous improvement	Section 6 of this HMP outlines procedures for compliance management, including details for monitoring, inspections, auditing and reporting. This HMP will reviewed at least annually as described in Section 1.9 of this HMP and Section 1.9 of the CEMP. The continuous improvement process, also outlined in Section 1.9 of the CEMP.
	g) a protocol for managing and reporting any: (i) incident, non-compliance or exceedance of any impact assessment criterion and performance criterion;	Section 6.7 Section 6.8 Section 8 of the CEMP - Incidents and emergencies Section 10 of the CEMP - Reporting Section 11 of the CEMP - Non-compliance, non-conformance, corrective and preventative action	Section 6.7 and 6.8 describes the procedures for emergencies, incidents and non-compliances, including those related to heritage. Additional detail for managing incidents and emergencies, non-compliances and non-conformances is included in the CEMP. The protocol for reporting of any incidents, non-compliances or non-conformances is included in Section 10 of the CEMP.

Condition no.	Requirement	Where addressed	How addressed
	(ii) complaint; or	Section 1.7.3 Community Communication Strategy	A summary of the complaints management procedure and reporting of complaints is included in Section 1.7.3 of this HMP. A summary of complaints received will be updated monthly on the project website in accordance with condition D12. The procedure for managing and reporting any complaints is described in the <i>Enquiries, Complaint and Dispute Resolution Management Procedure</i> provided in the CCS. The procedure includes a complaints management process which outlines how Elecnor will respond to complaints related to the project.
	(iii) failure to comply with other statutory requirements;	Section 6.7 Section 8 of the CEMP - Incidents and emergencies Section 10 of the CEMP - Reporting Section 11 of the CEMP - Non-compliance, non-conformance, corrective and preventative action	In the event of failure to comply with statutory requirements, the procedures summarised in Section 6.7 of this HMP and described in more detail in the CEMP would be followed.
	h) public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and	Section 1.7.2 Community Communication Strategy	The local community and relevant agencies will be kept informed of construction progress and environmental performance through communication tools such as notifications, the project's mobile van and the project website as summarised in Section 1.7.2 of this HMP. Detailed information regarding project communication is found in the CCS.
	i) a description of the roles and environmental responsibilities, authority and accountability for all relevant employees, as well as training and awareness; and	Table 5.1 Section 6.1 Section 6.2 Section 4.9 of the CEMP - Roles and	Section 6.2 identifies that Elecnor's organisational structure and overall roles and responsibilities are outlined in the CEMP. Specific responsibilities for the implementation of mitigation

Condition no.	Requirement	Where addressed	How addressed
		responsibilities	measures are detailed in Section 5 of this HMP. Training and awareness for all site personnel is outlined in Section 6.1.
	j) a protocol for periodic review of the EMP Sub-plans.	Section 1.9 Section 1.10 of the CEMP - Updating the CEMP	This HMP will be reviewed at least annually in accordance with the CEMP.
	The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	Noted	Noted
Unsurveyed areas			
C27	Prior to carrying out any construction within the unsurveyed areas of the development area identified in the EIS, or any potential archaeological deposits (PADs) identified for impact during detailed design, the Proponent must provide an Addendum Aboriginal Cultural Heritage Assessment Report (Addendum ACHAR), prepared in consultation with the Aboriginal stakeholders and Heritage NSW, to the satisfaction of the Planning Secretary. The report must: a) include details of consultation with the Aboriginal stakeholders; b) describe the additional Aboriginal heritage surveys that were undertaken including test excavation and PADs; c) describe any potential additional impacts to heritage items; d) identify further mitigation measures, including avoidance or salvage; e) include detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and f) provide an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative locations. <i>Note: This condition does not apply to potential archaeological deposits (PADs) identified as "Area cleared for identified impact level per the category of Construction Impact Footprint" in the Revised Aboriginal Cultural Heritage Assessment Report (dated May 2022).</i>	Section 5.1 Table 5.1- H10 to H12	The majority of the project disturbance area was previously surveyed (primarily along the project easement and key access tracks), with the results reported within the <i>Revised Aboriginal Cultural Heritage Assessment Report</i> dated May 2022 (Revised ACHAR (dated May 2022)). A portion of the project disturbance area, is located outside of previously surveyed areas and requires additional assessment. An <i>Addendum Aboriginal Cultural Heritage Assessment Report</i> (Addendum ACHAR), has been prepared by Navin Officer. The Addendum ACHAR included the results of the additional Aboriginal heritage survey which occurred in unsurveyed areas and provides an updated and consolidated list of sites as required by subsection f) of condition C27. No construction will occur within the unsurveyed areas, until the Addendum ACHAR is prepared to the satisfaction of the Planning Secretary, unless otherwise approved.
Protection of Heritage Items			
C28	The Proponent must: a) ensure the development does not cause any direct or indirect harm to Aboriginal heritage items located outside the development area;	This HMP Section 5 Table 5.1 Section 6	Mitigation measures identified in Section 5 of this HMP will be implemented to avoid any harm to any heritage items (including

Condition no.	Requirement	Where addressed	How addressed
	b) implement all reasonable and feasible measures to avoid and minimise harm to Aboriginal heritage items and PADs within the development area; and c) salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.		PADs) located outside the project development area. Monitoring, inspections and auditing described in Section 6 of this HMP will check the implementation and effectiveness of the management measures identified in Section 5. Salvage and relocation of cultural material will be undertaken in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010) and in line with Section 5.6.
C29	The Proponent must: a) ensure the development does not cause any direct or indirect harm to any heritage items located outside the development area; and b) implement all reasonable and feasible measures to avoid and minimise harm to PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards and PEC-E-H3 (Bundure railway station dwelling artefact scatter), prior to carrying out any development that could harm the items or deposits.	This HMP Section 5 Table 5.1 Section 6	Mitigation measures identified in Section 5 of this HMP will be implemented to avoid any direct or indirect harm to any heritage items located outside the development area. Monitoring, inspections and auditing described in Section 6 of this HMP will check the implementation and effectiveness of the management measures identified in Section 5.
C30	The Heritage EMP Sub-Plan required under condition B2 must: a) include a description of the measures that would be implemented for: (i) protecting the Aboriginal heritage items and PADs in accordance with conditions C28 a) and C28 b); (ii) minimising and managing the impacts of the development on heritage items within the development area, including: - salvaging and relocating the Aboriginal heritage items identified in accordance with condition C28 c);	Table 5.1 Section 5.6 Table 5.1 Appendix C	The management measures identified in Section 5 will be implemented to protect any Aboriginal heritage items and PADs located outside the development area, and to avoid and minimise harm to the Aboriginal heritage items and PADs located within the development area. Salvaging and relocating Aboriginal heritage items is described in Section 5.6 and identified in Appendix C.

Condition no.	Requirement	Where addressed	How addressed
	- archival recording and/or salvage of the heritage items and sites identified in condition C29, where impacts cannot be avoided, including consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 (Bundure railway station dwelling artefact scatter);	Section 5.6 Section 5.3	Impacts to PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards and/or PEC-E-H3 (Bundure railway station dwelling artefact scatter) would be avoided if possible. If impacts are unavoidable, the measures described in Section 5.6.6 (Sheep yards) and/or 5.6.7 (PEC-E-H3) would be undertaken. If impacts to PEC-E-H1 are unavoidable, mitigation measures would be identified during the development of the Addendum historic heritage assessment (Section 5.3).
	- a strategy for the long-term management of any heritage items or material collected during the test excavation or salvage works;	Section 5.8	Consultation regarding the long-term management of any recovered cultural material has commenced. The proposed strategy is described in Section 5.8.
	(iii) a contingency plan and reporting procedure if: - heritage items outside the approved disturbance area are damaged;	Section 6.8 Appendix A	Section 6.8 outlines a contingency plan in the event that unexpected impacts are identified. In the event of any unexpected heritage find, the Unexpected Heritage Finds Procedure will be followed.
	- previously unidentified heritage items are found; or - skeletal material is discovered;	Table 5.1 - H28 Appendix A	If an unexpected heritage find or Aboriginal skeletal material is discovered, the Unexpected Heritage Finds Procedure will be followed.
	(iv) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and	Table 5.1 - H1 Section 6.1	All site personnel will undergo a site induction which addresses elements related to heritage management. In addition, toolbox talks will be delivered for personnel with key roles in heritage management. Records will be retained by Elecnor.
	(v) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and	Section 1.7	Consultation with Aboriginal stakeholders is outlined in Section 1.7.
	b) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the development.	Section 6.3 Section 6.4 Section 6.6	The effectiveness of the management measures identified in Section 5 of this HMP will be monitored and reported through the program provided in Section 6.3, 6.4 and 6.6.

2.3 Revised mitigation measures

The revised mitigation measures (RMMs) for the project are provided in Appendix B of the Submissions Report. The RMMs relevant to heritage management are presented in Table 2.2 below.

A cross reference is also included to indicate where the measure is addressed within this plan or other project management documents. The management measures that will be implemented for the project are provided in Section 5 of this plan.

Table 2.2 - Revised mitigation measures relevant to heritage

Reference	Revised mitigation measures	Application locations (from RMMs)	Where addressed	How addressed
Aboriginal heritage				
AH1	The finalisation of the proposal design and construction methodology, and associated final disturbance areas, would be developed to avoid harm to features/items of moderate or above Aboriginal heritage significance as far as practical. The objective is to further reduce potential impacts through tower location and design refinement and construction methodology. Avoidance and minimisation of harm to features/items and Potential Archaeological Deposits (PADs) are to be prioritised.	All locations	Section 5.1	The location of project features has been refined to avoid or minimise impacts on recorded Aboriginal heritage as far as practical. Detailed design and the construction methodology will continue to be developed to avoid or minimise impacts, where practical.
AH2	Aboriginal stakeholder consultation would be carried out in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW, 2010a). Engagement with Registered Aboriginal Parties (RAPs) will consist of the following: - Aboriginal heritage site surveys (AH3) -review of proposed methodologies and involvement in the survey activities in the field (for ground or vegetation disturbance outside of previously surveyed areas) - test excavation activities (AH4) - review of proposed methodologies and involvement in the test excavation activities in the field - review of the draft addendum report/s to the ACHAR (relating to surveys (AH3), test excavations (AH4) and scar trees (AH5)), and consultation on the draft reports - provision of final addendum report/s to the ACHAR to RAPs (AH3, AH4, AH5)	All locations	Section 1.7	Consultation with Aboriginal stakeholders is described in Section 1.7 of this HMP. Methodologies for site survey (AH3) and test excavation activities (AH4) have been prepared and provided to RAPs for comment and discussion. Local RAPs will be invited to participate in additional survey and/or any required test excavation activities and all RAPs will be provided with the draft addendum report/s for review and comment. Any consultation required with RAPs in relation to unexpected finds will be undertaken in accordance with the <i>Unexpected Heritage Finds Procedure</i> (45860-HSE-PR-D-0013).

Reference	Revised mitigation measures	Application locations (from RMMs)	Where addressed	How addressed
	involvement in establishment of Aboriginal heritage exclusion zones prior to construction commencing at each location (AH7). Further cultural information would be gathered during consultation undertaken in association with these activities.			
AH3	Additional assessment would occur in accordance with the <i>Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW</i> (2010) for areas where ground disturbing activities and/or where hazard/high risk tree removal are required in locations outside of the previously surveyed heritage survey area. Where required, additional heritage surveys would be carried out with the RAPs prior to ground disturbing activities occurring in any such areas. If no Aboriginal objects are found or if Aboriginal objects are found and they would not be impacted, then a clearance letter would be prepared by an archaeologist that documents the findings and gives clearance to proceed. Where Aboriginal objects, scarred trees or area of PAD are located and would be impacted, a draft survey addendum report/s to the ACHAR would be prepared for the survey areas. The report(s) would: - detail findings of the survey activities - detail where test excavation is required in accordance with AH4 - outline any additional mitigation strategies beyond those required by AH4 to AH13 - be presented to the RAPs for comment. Final reports would be provided to RAPs and to Heritage NSW for their information prior to the commencement of ground disturbing activities in these locations.	All locations (outside of the previously surveyed heritage survey area) and in identified areas of hazard/high risk tree removal	Section 5.2 Section 5.4 Table 6.2	The majority of the project's disturbance area has been previously surveyed. The results of the survey are reported in the Revised ACHAR (dated May 2022). Some areas where ground disturbing activities and/or where hazard/high risk tree removal is needed require additional assessment, which has occurred as part of the Addendum ACHAR. The Addendum ACHAR has been prepared in accordance with condition C27 to describe any additional Aboriginal heritage surveys that were undertaken. Where any further survey may be required, local RAPs would be invited to participate.
AH4	An archaeological subsurface test excavation program would be carried out in parts of any PADs where project activities would have direct impact and a test excavation program has not already been completed in the area of impact (unless an ACHAR indicates that additional test	PAD areas	Section 5.2 Section 5.5	An initial test excavation program was undertaken and documented in the Revised ACHAR (dated May 2022). The Revised ACHAR (dated May 2022) provides guidance about disturbance

Reference	Revised mitigation measures	Application locations (from RMMs)	Where addressed	How addressed
	excavation is not required). Direct impacts include grading of tracks and construction areas, excavation for tower construction and tree removal that includes the root ball. Should the finalisation of the project design and construction methodology identify activities that would result in direct impacts in any PADs, archaeological subsurface test excavation would need to occur before there is any direct impact within the relevant PAD. The purpose of the test excavations would be to determine the presence or absence and significance of intact subsurface archaeological deposits to inform design development and construction planning and/or requirements for salvage activities. If test excavation confirms that intact subsurface archaeological deposits will be harmed by project activities then salvage excavation can commence immediately following the test excavation, see AH6. Test excavations works would be carried out in accordance with a methodology that is presented to and consulted on with the RAPs. Reports would be prepared to detail the findings of the test excavation activities and any associated salvage excavation.			permitted within each PAD without the need for further assessment. The Addendum ACHAR has further described when test excavation may be required within each PAD. If required, additional test excavations will be undertaken in parts of PADs where project activities would have direct impact (e.g. grading of tracks and construction areas, excavation for tower construction and tree removal that includes the root ball) and a test excavation program has not already been completed (unless an ACHAR indicates that additional test excavation is not required). Local RAPs would be invited to participate. The project has a test excavation methodology developed in consultation with RAPs.
AH5	Harm to scarred trees (including those of cultural significance) would be avoided where possible through construction planning. Scarred trees must only be removed to directly facilitate construction of permanent infrastructure and/or to meet <i>Vegetation Clearance Requirements at Maximum Line Operating Conditions</i> (Transgrid, 2003). If the removal of a scarred tree cannot be avoided, the tree would be subject to 3D scanning, followed by salvage of the scarred trunk. The results of this assessment would be reported on in addendum reports. Reports would be provided to RAPs for comment and to Heritage NSW.	PEC-E-03 PEC-E-42 PEC-E-77 PEC-E-76 PEC-E-17 PEC-E-48 PEC-E-49 Boiling Down Road 1 (AHIMS #56-1-0001) D-B#22; Boooroorban (AHIMS #48-5-0022) (confirmation required may already be destroyed)	Section 5.1 Section 5.7.2 Section 5.6.5 Section 5.2	Harm to scarred trees would be avoided where possible through design development (Section 5.1) and on-site management, particularly Sections 5.7.1 and 5.7.2. If removal of a scarred tree cannot be avoided, the tree would be subject to 3D scanning and salvage (Section 5.6.5). [Note: PEC-E-03 is identified in the Revised ACHAR (dated May 2022) as a midden, and therefore RMM AH5 is not applicable to that site.]

Reference	Revised mitigation measures	Application locations (from RMMs)	Where addressed	How addressed
AH6	All portions of artefact scatters and isolated finds that are to be directly impacted would require surface collection and salvage prior to construction commencement in those areas. Hearths would be the subject of photographic recording and samples taken of hearth material prior to disturbance. Additionally, based on the outcomes of the test excavations, the parts of PADs with confirmed intact subsurface archaeological deposits that would be harmed by project activities would be subject to salvage excavation prior to those activities commencing. Items of archaeological significance would be managed in accordance with measures set out in AH12. The activities would be documented in a salvage report.	All artefact scatters, hearths and PADs PADs requiring salvage excavations: to be determined following the result of AH4 test excavations	Section 5.6	All portions of artefact scatters and isolated finds that are to be directly impacted would require surface collection prior to commencement of construction in those areas. A representative sample of hearths would be subject to photographic recording and material collection prior to disturbance. Where recommended by the outcomes of test excavation or the Addendum Aboriginal Cultural Heritage Assessment Report, salvage excavations would be undertaken.
AH7	Aboriginal heritage exclusion zones would be established to protect: - known features/items of significance that have been identified to remain in-situ throughout construction (and not subject AH6) - scarred trees that are to remain in-situ - any portions of PADs that become a known site following subsurface testing and which are identified for no impact. Suitable controls would be identified in the Heritage Management sub-plan, which may include temporary site fencing and sediment control. The sites on Benanee Rd and Holbrook Rd may be identified through the use of signage due to the proximity to the road. Aboriginal heritage zones would be demarcated by a suitably qualified archaeologist in consultation with the RAPs prior to the commencement of construction at each location. PADs in locations where vegetation clearance is required but there would be no ground disturbance would be managed through construction methodologies and would not be delineated as exclusion zones. These methodologies will be developed in the heritage sub-plan.	All sites confirmed with the final construction impact area and disturbance areas to not be directly impacted Benanee Rd sites: PEC-E-106 PEC-E-107 PEC-E-108 PEC-E-109 Holbrook Road site: PEC-E-118	Section 5.1 Section 5.7.1 Section 5.7.2 Section 5.7.4 Table 5.1 - H4, H7	Measures to protect recorded sites, scarred tree and PADs that are to remain in-situ are identified throughout this HMP, particularly Sections 5.1, 5.7.1, 5.7.2 and 5.7.4.

Reference	Revised mitigation measures	Application locations (from RMMs)	Where addressed	How addressed
AH8	Any new or existing tracks in areas of PAD for which an ACHAR does not indicate clearance for the identified impact level or recommend salvage (without test excavation) would not be the subject of direct ground disturbance such as grading. The methodology to be used for the upgrade and installation would be designed to avoid this disturbance and may include laying of geotextile on the surface. If avoidance is not possible, then additional test excavation would be required and salvage completed as necessary prior to works commencing (in accordance with AH4 and AH6).	Access tracks within PADs	Section 5.7.5 Section 5.5 Table 5.1 - H8	Direct ground (i.e. sub-surface) disturbance of existing access tracks in areas of PAD would be avoided where possible. If direct ground disturbance is required, test excavation and salvage, if necessary, would be undertaken.
AH9	Construction planning and management would make sure that indirect impacts that could potentially result in a loss of known heritage values due to harm would not occur. Indirect harm could result from physical disturbance from surface water drainage or construction workers driving over sites that are not protected.	All locations	This HMP, particularly Section 5 Table 5.1 - H2, H6	Indirect impacts to Aboriginal heritage objects/areas will be avoided through the implementation of both awareness and physical management measures.
AH10	Cultural heritage awareness training would be carried out for all personnel working on the proposal prior to the personnel participating in construction activities. The training shall cover features of heritage significance within and adjacent to proposal locations and proposal protocols that must be complied with to minimise and manage potential impacts to those features. Specific cultural awareness training would occur for relevant project personnel prior to activities along Benanee Rd. The training would cover the sites and associated access restrictions.	All locations Benanee Rd sites: PEC-E-106 PEC-E-107 PEC-E-108 PEC-E-109	Table 5.1 - H1 to H2 Section 6.1	Site personnel will undergo a site induction which includes cultural awareness training and addresses elements related to heritage management. In addition, toolbox talks will be delivered for personnel with key roles in heritage management. RAPs along the alignment will be engaged to conduct face-to-face cultural heritage training at various times throughout the duration of the project.
AH11	If at any time during construction, any items of potential Aboriginal archaeological or cultural heritage significance, or human remains are discovered outside of previously recorded sites or PAD, they would be managed in accordance with an Aboriginal heritage unexpected finds protocol (aligned with the protocol in Appendix 3 of the Revised Aboriginal Cultural Heritage Report).	All locations	Table 5.1 - H28 Appendix A	If an unexpected Aboriginal heritage find or Aboriginal skeletal material is discovered, the Unexpected Heritage Finds Procedure will be followed.

Reference	Revised mitigation measures	Application locations (from RMMs)	Where addressed	How addressed
AH12	Retrieved archaeological materials would be stored in appropriate, secure facilities confirmed in consultation with the relevant Aboriginal stakeholders. The strategy for the long-term conservation of salvaged or collected Aboriginal objects would be determined in consultation with RAPs.	As relevant	Section 5.8 Table 5.1 - H17	Temporary, secure facility(s) will be identified to store any Aboriginal objects and/or non-Aboriginal items recovered during the project works. Any cultural material recovered within the Yanga Pastoral Station Complex will be stored within the Yanga Pastoral Station Complex in line with <i>Technical Memo - Variation to Methodology for Aboriginal Subsurface Testing: EnergyConnect (NSW - Eastern Section) Nov 2021</i>. Consultation regarding the long-term conservation of salvaged or collected cultural material has commenced and the strategy will continue to be developed throughout the test excavation and subsequent salvage (if required) activities.
AH14	No widening of Benanee Road. If regrading of Benanee Road is required, spoil would be pushed to the opposite side of the road to the sites present.	PEC-E-106 PEC-E-107 PEC-E-108 PEC-E-109	Table 5.1 - H20	There will be no widening of Benanee Road. Management of the Benanee Road sites is included within Table 5.1.
AH15	Limit ground disturbance associated with road maintenance/surface rectification of Benanee Road and Holbrook Road to within the existing graded paved/unpaved road surface. Site PEC-E-106 will be fenced during all construction activities in the area.	PEC-E-106 PEC-E-107 PEC-E-108 PEC-E-109	Table 5.1 - H21	Ground disturbance works will be limited on Benanee Road to within the existing road surface, other than for PEC-E-107 which is subject to RMM AH16. Management of the Benanee Road and Holbrook Road sites is included within Table 5.1.
AH16	Avoid project-related vehicles and plant accessing the wayside/verge and any project activities which could cause ground disturbance, except as necessary to install and use site access points at the transmission line crossing and install traffic management signage.	PEC-E-107	Table 5.1 - H22	PEC-E-107 will be managed in accordance with this requirement. Management of the Benanee Road and Holbrook Road sites is included within Table 5.1.

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Reference	Revised mitigation measures	Application locations (from RMMs)	Where addressed	How addressed
AH17	Include sites on Sensitive Area Plans and project GIS/GPS systems.	All sites and PADs	Table 5.1 - H2	Management of the Benanee Road and Holbrook Road sites is included within Table 5.1.
Historic heritage				
NAH1	The final construction methodology would be developed to avoid or minimise harm to heritage items PEC-E-H1 (Survey Marker Tree) and the sheep yards on the Yanga Pastoral Station Complex as far as practicable. If harm to these items can be avoided, temporary exclusion fencing would be installed to protect any elements of these items to be retained during construction. If harm to the sheep yards on the Yanga Pastoral Station Complex cannot be avoided, consultation would occur with NPWS. Where requested, archival recording of the sheep yards would occur, and the records would be provided to NPWS.	Transmission line	Section 5.1 Section 5.6.6 Section 5.7.3 Table 5.1 - H3, H23, H25	The location of the nominated historic heritage objects would be considered during the development of the final construction methodology. Harm to these objects would be minimised or avoided, as far as practical. Management of these objects is addressed in Section 5.6.6 and 5.7.3.
NAH2	The final construction methodology would be developed to avoid ground disturbance within the curtilage of PEC-E-H3 (Bundure railway station dwelling artefact scatter) where practicable. If ground disturbance within the curtilage can be avoided, temporary exclusion fencing would be installed to protect relevant parts of the item from harm during construction. If ground disturbance within the curtilage cannot be avoided during construction, the parts of the artefact scatter that could be harmed would be salvaged and analysed and managed in accordance with their determined significance, prior to the commencement of any activity that could harm the heritage items present.	Transmission line	Section 5.1 Section 5.6.7 Section 5.7.3 Table 5.1 - H3, H23, H27	The location of the nominated historic heritage objects would be considered during the development of the final construction methodology. Harm to these objects would be minimised or avoided, as far as practical. Management of these objects is addressed in Section 5.6.7 and 5.7.3.

Reference	Revised mitigation measures	Application locations (from RMMs)	Where addressed	How addressed
NAH3	The locations of known heritage items in close proximity to the construction impact area and the relevant protocols to avoid and manage any potential harm to the items would be communicated to all relevant construction personnel prior to construction commencing in that area.	Transmission line	Section 6.1 Table 5.1 - H2	The locations of known heritage items in close proximity to the construction impact area would be identified would be communicated to construction personnel through measures, which may include training and awareness, sensitive area plans, GIS, and/or toolbox talks, as appropriate.
NAH4	During design refinement, the final location of transmission line structures and construction facilities would be determined with the aim to avoid or minimise impacts on all items assessed as having heritage significance, where feasible and reasonable. Items of moderate or high significance would be prioritised for avoidance or impact minimisation. Where impacts are not avoided, further assessment by an archaeologist would occur and be documented in an addendum non-Aboriginal heritage assessment.	All locations	Section 5.1 Section 5.3	The location of the recorded historic heritage objects would be considered during the development of detailed design. Harm to these objects would be minimised or avoided, as far as practical with a priority on items of moderate or higher significance. To date, no objects of high significance have been identified in close proximity to the project. Only the Yanga Pastoral Station Complex sheep yards have been identified to have moderate heritage significance.
NAH5	If at any time during construction, any items of potential historic heritage archaeological significance, or human remains are discovered, they would be managed in accordance with an unanticipated discovery protocol that is aligned with the protocol in Appendix 1 of Technical paper 3.	All locations	Table 5.1 - H28 Appendix A	If an unexpected heritage find or human remains are discovered, the Unexpected Heritage Finds Procedure will be followed.

2.4 Guidelines

The main guideline relevant to this plan is:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (Department of Environment, Climate Change and Water (DECCW) 2010); and
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010).

The documents identified above are considered by the project as described and referenced throughout this HMP.

3 Existing environment

The following section summarises the existing Aboriginal and historic heritage within and adjacent to the project. The key reference documents include:

- Section 10 and Section 11 of the EIS;
- Section 6.3 of the Amendment Report;
- Technical paper 3 – Historic heritage (Technical paper 3) of the EIS;
- *Revised Aboriginal Cultural Heritage Assessment Report*, May 2022 (Revised ACHAR (dated May 2022)); and
- Supplementary technical assessment 3 (Historic heritage addendum memo, Navin Officer 2022).

3.1 Terminology

The following terminology is used in the context of this HMP regarding the desktop and on-site surveys that were undertaken:

- **disturbance area:** area required to construct and operate the proposal, which would be within the proposal study area and the heritage survey area (below). The disturbance area is sub-divided into distinct areas, which are visually represented in Figure 3.1 and Figure 3.2. The sub-divided areas are:
 - **Disturbance Area A:** areas subject to ground disturbance across the defined area due to construction and/or operation (e.g. construction compounds and accommodation camp sites, proposed and expanded substations, upgraded and/or new access tracks, areas around transmission towers, brake and winch sites);
 - **Disturbance Area A (centreline clearing):** refers to areas between the proposed transmission towers in which all vegetation would be removed during construction to ground level.

In areas of known or potential heritage subsurface sensitivity (i.e. potential archaeological deposits (PADs)), Disturbance Area A (centreline) is subject to the following:

- vegetation would be cut to ground level and root balls would be retained as necessary to minimise subsurface impacts;
- unless indicated as a construction access track, slashing or mulching of vegetation to ground level (only if necessary) to facilitate stringing and vehicle/plant movements;
- clearing will be required of trees/woodland vegetation from centreline through the following PADs (as a minimum):
 - PAD22;
 - PAD23;
 - PAD26;
 - PAD31;
 - PAD35;
 - PAD36;
 - PAD37;
 - PAD38/39;
 - PAD40;

- PAD42;
- PAD43.

As previously described, in these PADs, vegetation would be cut to ground level and root balls would be retained as necessary to avoid subsurface impacts;

- vehicles/tractors/plant pulling draw wires and conductors along the centreline;
- movement/tracking of other plant (like drill rigs) along the centreline;
- **Disturbance Area B:** area between and around transmission towers in which removal of vegetation (including trees) would be undertaken where they have the potential to exceed vegetation clearance heights. The removal (which may include the removal of vegetation root-balls) may result in temporary ground disturbance. Plant and equipment movements would occur in this area during vegetation clearing activities.

In areas of known or potential heritage subsurface sensitivity (i.e. potential archaeological deposits (PADs)), Disturbance Area B is subject to the following:

- vegetation would be cut to ground level and root balls would be retained as necessary to avoid subsurface impacts, unless removal is expressly requested by the relevant landholder;
- movement and tracking of vehicles will be required to access the vegetation which requires removal; and
- **Disturbance Area - hazard/high risk trees:** refers to discrete areas alongside the proposal alignment where trees located outside of the easement have been assumed to potentially meet the definition of hazard/high risk trees (and therefore would eventually require vegetation removal or trimming) and, therefore, have had an impact assumed. The impact has been assumed as partial vegetation clearing. The root balls retained and management restricted to pruning, both where practicable.

Vegetation clearing has been identified as being limited to maintenance of hazard/high risk trees which are outside of the Disturbance Area B10 zone and within the adjacent 10 metre area where trees within vegetated areas exceed defined height thresholds of 30 metres for the 330 kV line and 20 metres for the 500 kV line; and

- **Asset Protection Zone** - Condition C45 j) requires maintenance of an Asset Protection Zone (APZ) with vegetation at a height of 100 millimetres or less at construction compounds and accommodation camps. The vegetation within PEC-E-PAD45 requires management to maintain the required APZ. Clearing of the APZ will occur in a similar manner as centreline clearing in areas that feature ground cover, grasses, shrubs and other forms of low height vegetation (i.e., with a tractor fitted with a slasher (or similar)). Clearing of the APZ within the PAD will disturb any vegetation present and the top level of soil (surface disturbance), but no direct excavation (i.e. with graders, excavators or similar) will occur;
- **heritage survey area:** approximately 100m corridor subject to archaeological survey along the length of the proposal, as described in the Revised ACHAR (dated May 2022) and Technical paper 3 (Historic heritage impact assessment). An additional heritage survey area has been assessed as part of the Addendum ACHAR;
- **proposal study area:** comprises an approximately 1km wide corridor between the existing Buronga and Wagga Wagga substations.

As described in the Revised ACHAR (dated May 2022), the proposal study area encompasses the disturbance area and a buffer zone which has been applied to identify the constraints nearby to the proposal which may or may not be indirectly impacted by the proposal.

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The historic heritage study area is further described in Technical paper 3 (Historic heritage impact assessment). The historic heritage study area is located in regional western NSW across a number of Local Government Areas (LGAs) being: Wentworth Shire, Balranald Shire, Murray River, Edward River, Hay Shire, Murrumbidgee, Federation, Lockhart Shire, and Wagga Wagga;

- **heritage study corridor:** 10km site search corridor used in the Revised ACHAR (dated May 2022) to develop a preliminary predictive model focused on Aboriginal site locations. This area is based on the proposal study area centreline between the Buronga and Wagga Wagga substations (approximately five kilometres either side).

It is noted that the disturbance area may shift/change as detailed design and construction planning progresses. The disturbance areas shown on the figures included in Appendix D and used to inform Appendix C, are current at the time of the Addendum ACHAR.

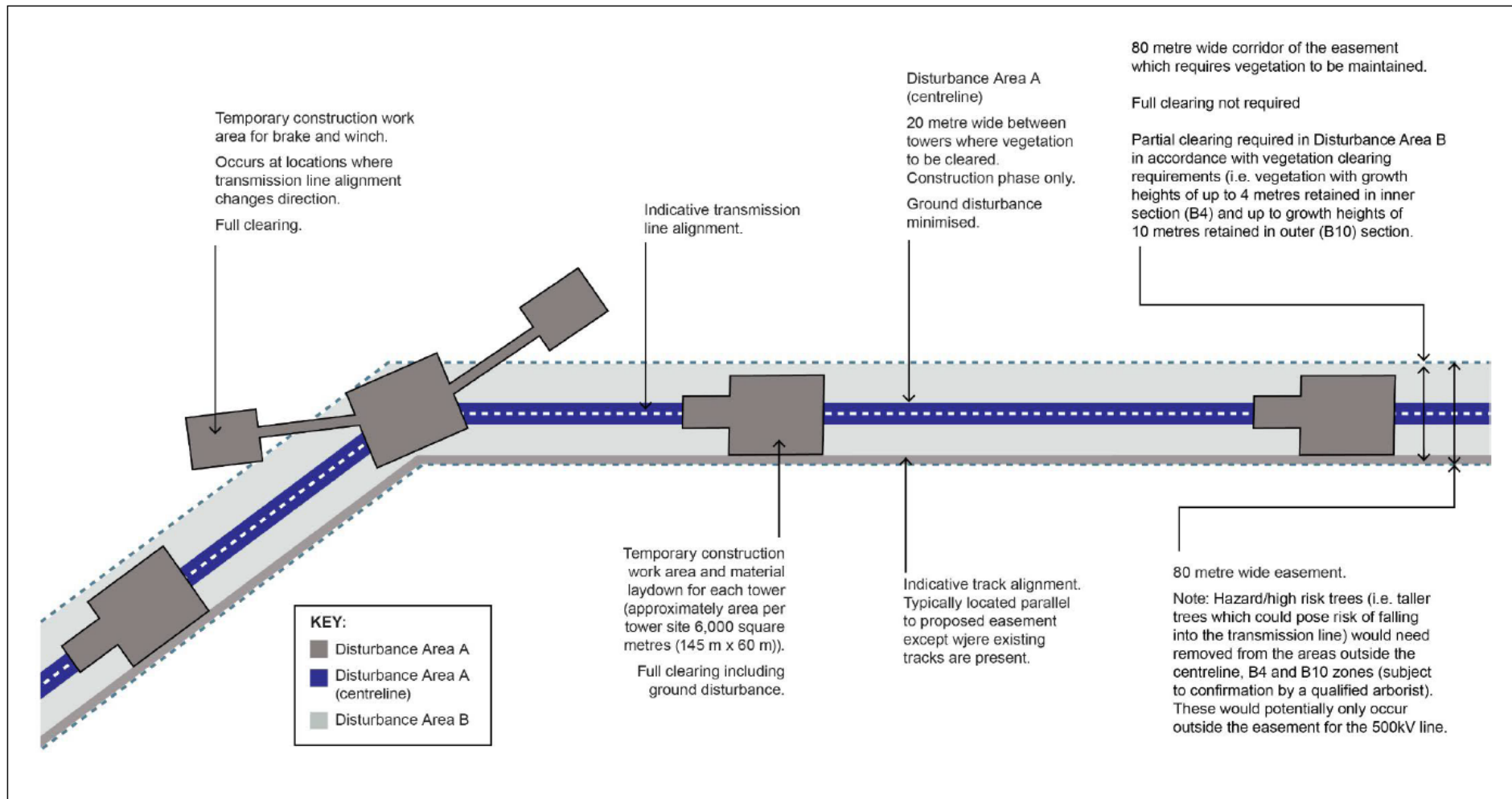


Figure 3.1 - Disturbance Area A and B (typical 500kv transmission line section) (source: Figure 3.1 of the Revised ACHAR (dated May 2022))

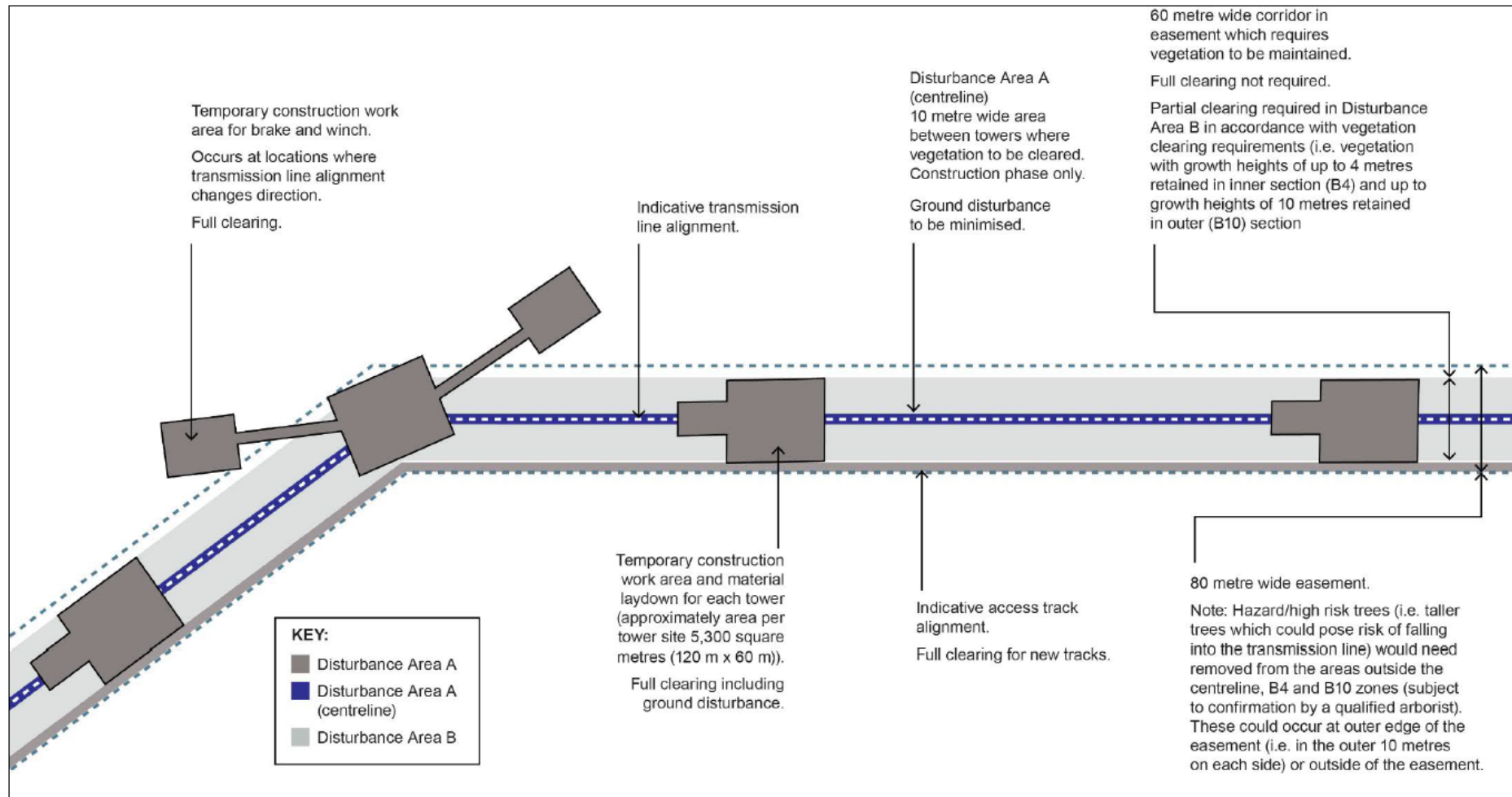


Figure 3.2 - Disturbance Area A and B (typical 330kv transmission line section) (source: Figure 3.2 of the Revised ACHAR (dated May 2022))

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3.2 Aboriginal heritage

The project area intersects with the Barkindji Traditional Owners #8 (Part A) native title area (determined) administered under the *Native Title Act 1994*. Barkindji Traditional Owners are identified in the list of RAPs included in Appendix B of this HMP. There are no other native title claims.

3.2.1 Aboriginal heritage context

As described in the EIS, archaeological material evidence has been identified across the regions associated with the project indicating a long history of Aboriginal occupation near or within the vicinity of the whole of the length of the project. The EIS summarised the ethnohistory of the Aboriginal people for each of the main regions identified along the length of the project. The below sections, including identified references, are directly from the EIS.

- **Murray Darling Depression:** The Murray Darling Depression landscape is defined by contrast. At the western end of the proposal, the landscape comprises a diverse setting compared to other areas along the alignment. The region contains a number of cemeteries, riverside burials and greater mortuary complexity (Bonhomme, 1990), noting these features would not be impacted by the proposal.

Further east, the Murray River corridor is a rich and relatively stable environment with permanent water and a variety of concentrated resources available throughout the year. These rich river resources are bordered by semi-arid country that is unpredictable in resource availability; resources are widely distributed (Pardoe, 2003). The Murray Darling Depression is home to the Barkanji language group (also Barkinji, Barinji, Danggali, Maraaura, and Wilyakali) to the north of the Murray and the lower Darling River, and the Kulin language group (Mathi Mathi, Wathi Wathi, Nari Nari and Wemba Wemba) to the east.

- **Riverine Plains:** As the Murrumbidgee River moves further west, away from the western slopes of the Wagga Wagga region and through the wide plains of the Hay and Griffith areas, the landscape becomes increasingly arid with the western flow of the river shifting to an open plain dominated by grasslands and woodlands. The Aboriginal heritage of the region consists of numerous burials, mounds, campsites, artefact scatters, scarred trees, natural/mythological sites and post-contact sites such as missions, fringe camps and stations.

Within the Riverine Plains region are three major language groups, the Kulin language group (Mathi Mathi, Wathi Wathi, Nari Nari and Wemba Wemba) which cover the western side of the region, the Wiradjuri language groups which covers the northern portion of the region, and the Murray River language group (Yita Yita, Yota Yota and Pangerang) covering the southern portion of the region (Pardoe and Martin, 2011).

- **NSW South Western Slopes:** In the eastern end of the study area the Murrumbidgee River basin would have been a focus of occupation in the region. An abundance of resource have been found along the river in addition to its waters; it supported wood and forest habitats that housed a wide range of plants and animals used by Aboriginal populations. The frequent floods of the Murrumbidgee River also provided Aboriginal peoples with an abundance of resources, as pools left by the receding floodwaters would be filled with freshwater mussels, fish, yabbies, and aquatic plants (Kabaila, 1998).

The NSW South Western Slopes are home to the Wiradjuri people. The Wiradjuri people are the largest Aboriginal group in NSW, known as 'the people of three rivers', for the Wambool (the Macquarie River), the Kalari (the Lachlan River) and the Murrumbidjeri (the Murrumbidgee River) which border their country. Within the south of Wiradjuri country three local groups are known, the Murringbulla at Murrumburrah, the Kutamundra at Cootamundra, and the Narrungdera at Narrandera. (Howitt, 1884, Wood, 1992).

Additional detail and specific references regarding the above information is included in Chapter 6 of the Revised ACHAR (dated May 2022).

3.2.2 AHIMS sites

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3.2.3 Sites identified during archaeological field survey

During the preparation of the EIS, 105 new Aboriginal sites were identified during the field surveys. The recorded site features included:

- isolated finds;
- middens;

- hearths;
- artefact scatters;
- modified trees; and
- earth mounds.

Sites with multiple site typologies included:

- artefact scatter with hearth;
- artefact scatter with modified tree;
- isolated find with hearth;
- modified tree with artefact scatter
- artefact scatter with hearth with modified tree; and
- isolated find with earth mound with hearth.

The location of previously recorded (Section 3.2.2) and newly recorded (Section 3.2.3) Aboriginal heritage sites is depicted in Figure 3.3. More detailed maps are also provided in Appendix D.

A total of 45 areas of PAD were identified in the survey area during the surveys undertaken for the EIS. PADs were originally numbered to 46, however, following further survey, two PADs (PEC-E-PAD38 and PEC-E-PAD39) have been combined into one PAD (PEC-E-PAD38/39). Select PADs have been subject to an initial test excavation program (Section 3.2.5) and some PADs have been refined or removed altogether. The refined PADs are shown in Appendix D.

3.2.4 Sites identified during additional survey

In accordance with condition C27 and RMM AH3, additional heritage survey was undertaken from 20 March to 1 April 2023, 16 May to 18 May 2023, 4 September 2023 and 8 December 2023 in locations where ground or vegetation disturbance activities are proposed outside of the previously surveyed areas.

The following sites were identified:

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Six of these sites were also recorded as PADs.

These sites are described in the *Addendum Aboriginal Cultural Heritage Assessment Report*, which has been provided to the RAPs and Heritage NSW for review and comment.

These sites have been included within the figures in Appendix D.

3.2.5 Analysis of Archaeological survey

Artefact isolated finds were the most common site type identified throughout the extent of the study area. Artefact scatters were the second most common site identified.

The relation between sites and landforms is intrinsically associated with proximity to water sources as the majority of the sites were identified within landform elements located near water resources. Distance to water appears to be a determinant for site density. Clusters of sites were identified in areas located within close proximity and across perennial and non-perennial watercourses and lakes. In areas where the alignment extended further away from watercourses, sites identified were more scattered and in lower numbers.

The general moderate to high degree of ground surface visibility enabled reliable site identification during the archaeological field survey. Ground surface visibility also contributed to reliable identification of definition of PADs. PADs were defined in areas in close proximity to water likely to contain subsurface archaeological material. Some of these PADs were defined within areas where sites were identified during the survey and some were defined based on landform and proximity to water following the predictive model.

Additional detail is included in the Revised ACHAR (dated May 2022) and Addendum ACHAR (dated January 2024).

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Figure 3.3 - Overview of recorded Aboriginal sites (Figure 7.1 of the Revised ACHAR (dated May 2022))

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3.2.6 Test excavation

Since the preparation of the EIS, an initial archaeological subsurface testing program was undertaken in consultation with RAPs between 17 January and 1 April 2022. Of the 45 PADs identified during the field survey, 26 were assessed as being directly impacted by the project (tower installation or new access track) at the time of the Amendment Report.

Some PAD sites subject to subsurface archaeological test excavation were confirmed as not having archaeological potential and therefore the PAD classification was removed completely or partially from a site. Other sites have retained PAD status with recommendations made in relation to the potential impact of the project based on the assumed disturbance model, and the need for additional assessment (if required).

The recommendations for the PADs has been revised within the Addendum ACHAR.

The refined PADs are shown in the maps in Appendix D.

3.2.7 Significance of Aboriginal heritage

The significance of the recorded Aboriginal sites was undertaken in accordance with the criteria of the Burra Charter which considers the historic value, scientific (archaeological value), aesthetic value and social (cultural) value of a place.

The Revised ACHAR (dated May 2022) states that no information has been provided by Aboriginal stakeholders to suggest the project study area is historically important in terms of persons, events, phases or activities in the Aboriginal community. The report goes on to state that this is not to say that they do not have such significance, but that no evidence has been forthcoming.

A total of 45 PADs have been identified and archaeological subsurface test excavation has been undertaken at 26 of these PADs. Following the results of the test excavation program, any portions of PADs that yield artefacts or cultural material could be assessed from a scientific perspective. Eight of these PADs did not yield artefacts or cultural material and have been reassessed and deemed to be 'not a PAD'. All remaining PADs (not subject to test excavation) have been identified as having moderate to high archaeological potential.

Moderate to high (local) scientific significance has been attributed to all surface sites that are associated with areas of moderate to high or high potential for subsurface archaeological deposits and have a range of site features such as hearths, scarred trees, and artefacts in the one site area.

Moderate (local) scientific significance has been attributed to all surface sites with areas of moderate to high or high potential for subsurface archaeological deposits and rarer site types such as modified trees and middens.

Low scientific significance has been attributed to all surface sites which are highly disturbed or have been assessed as having low or low to moderate subsurface archaeological potential.

The Revised ACHAR (dated May 2022) states that to date, RAPs have not identified any cultural landscape values/aesthetic values in the project area.

All archaeological objects and sites have cultural value to present-day Aboriginal people as they were created by ancestral Aboriginal people and provide tangible evidence of past occupation of the landscape. All sites have cultural significance to present-day Aboriginal groups as manifestations of their ancestors' past occupation of the area.

3.3 Historic heritage

3.3.1 Historic heritage context

European explorers first travelled through the Wagga Wagga area in 1824-1825, with exploration of the NSW river systems in 1829. From the late 1830s to 1850s, large tracts of land along the Murrumbidgee and Murray Rivers began to be taken up by European settlers. Pastoral runs were established along river and creek frontages.

Steamboat navigation of the Murray River commenced in mid-1853, and the Murrumbidgee by mid-1858. Pastoral leases were granted along the length of the historic heritage study area with the management of them changing in 1884. The importance of river transport declined following the advent of the railways, which opened up new social and economic opportunities for rural communities.

The towns and villages, due to the marginal climatic conditions across much of the heritage study area, have swelled and shrunk over the years due to changes in economic production, drought and transport changes. Stores and services developed around the railway station, where local farmers would bring their wheat to be shipped to Sydney.

Wagga Wagga was gazetted as a village on 23 November 1849. Before that during the 1830s and 1840s many of the first settlers to the Wagga Wagga area were convicts. The extension of the NSW railway line to Wagga Wagga during the late 1870s and early 1880s increased wheat production. The extension of the railway line made it possible to export wheat, as wheat is bulky and heavy, out of the region for sale in Sydney. The wheat belt was established by 1901 as the main producer of the grain in NSW.

3.3.2 Listed heritage items

No items of World, National, Commonwealth or State Heritage significance were identified in the historic heritage study area.

One item on the DPE Historic Heritage Information Management System (HHIMS) is located partially within the heritage study area. Five additional items listed on Local Environmental Plans (LEPs) as having heritage significance are located within the historic heritage study area. All LEP listed items are described as having local heritage significance. The items are identified in Table 3.2, which is based information provided in Technical paper 3 (Historic heritage impact assessment).

Distances to the project disturbance area are indicative, and are based on the design at the time of the EIS.

Table 3.2 - Listed heritage items within 1km of the construction area

Listing instrument	Locality	Item name (Item no.)	Item type	Address	Property description	Approx. distance to impact area
Wagga Wagga LEP 2010	Gregadoo	Ivydale (I72)	Item - General	10 Ivydale Road	Lot 2 DP333046	150m
	Gregadoo	Ivydale Woolshed (I73)	Item - General	9 Ivydale Road	Lot 66 DP757231	340m
	Uranquinty	Wyadra Grave Site (I285)	Item - General	12 South Boundary Road	Lot 48 DP754563	380m
	Uranquinty	Liquid Explosives Store	Item - General	88 Hanging Rock Road	Lot 11 DP228780	40m

Listing instrument	Locality	Item name (Item no.)	Item type	Address	Property description	Approx. distance to impact area
Balranald LEP 2010	Lake Benanee	Burial Ground (I7)	Item - Aboriginal	Sturt Highway, east of Euston	Lot 1 DP92444	252m
S170 of the <i>Heritage Act</i> 1977 National Parks and Wildlife Service	Balranald	Yanga Pastoral Station Complex (10607)	Complex	Yanga National Park	Multiple, including Lot 20 DP134424	0m
S170 of the <i>Heritage Act</i> 1977 National Parks and Wildlife Service	Willow Precinct	Parkers Sheep Yards, Willow Precinct (10626)	Item - General	Yanga National Park	Lot 19 DP727956	800m

3.3.3 Previously unrecorded heritage items

In addition to the listed heritage items identified, three new potential historical heritage items and two new historical archaeological sites were identified during the field survey and historical research as being located within the historic heritage survey area. The items and sites are identified in Figure 3.4 and Figure 3.5 and include:

- survey marker tree (PEC-E-H1);
- survey marker tree (PEC-E-H2);
- Bundure railway station artefact scatter (PEC-E-H3); and
- hut site, Nyangay pastoral holding (PEC-E-H4).

3.3.4 Archaeology

Technical paper 3 of the EIS stated that based on the review of the historical context of the historic heritage study area and that no previously unrecorded archaeology was identified during the field survey, the potential for archaeology is considered to be low.

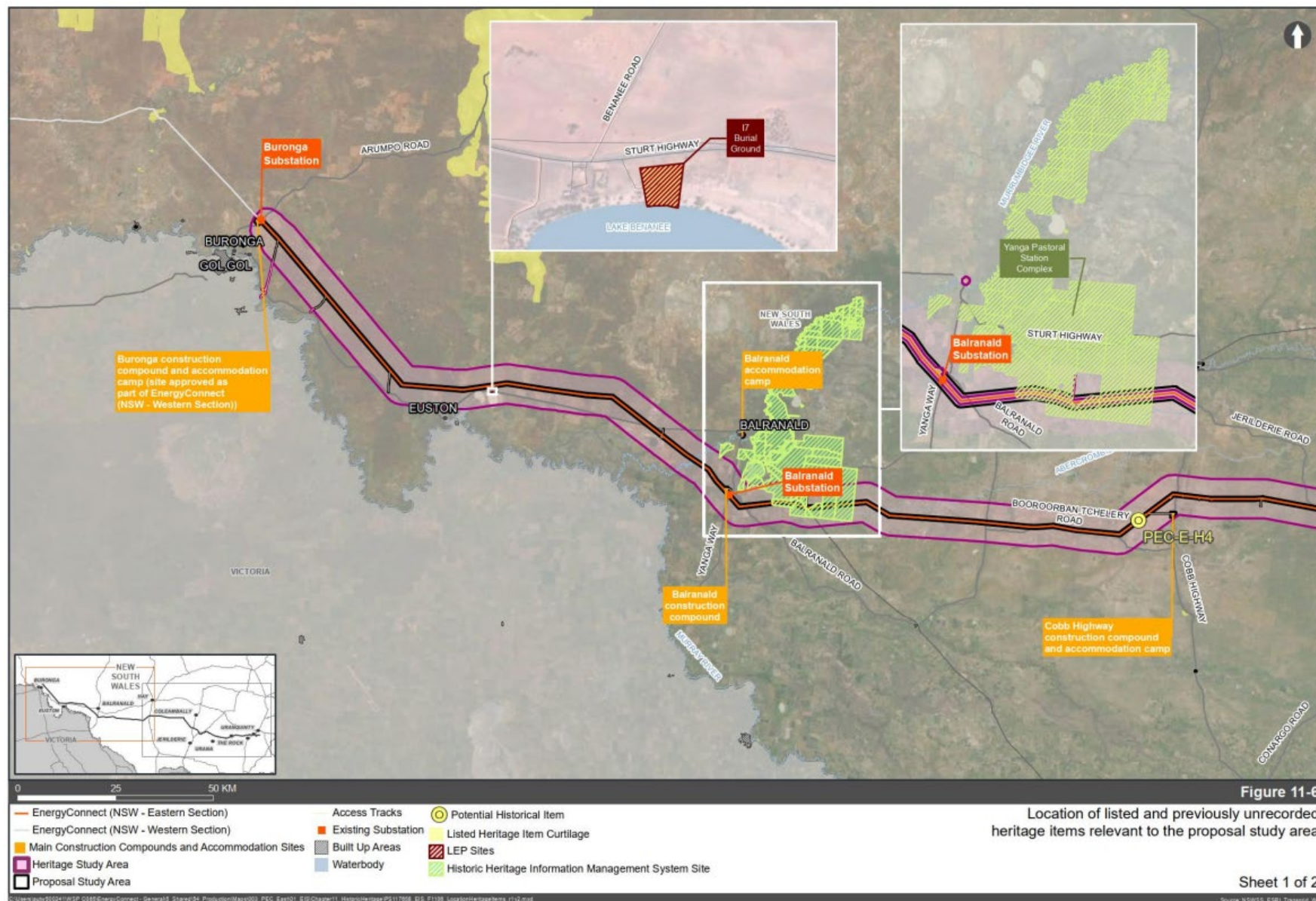


Figure 3.4 - Location of historical heritage items - Overview 1 of 2 (source: EIS Figure 11-6)

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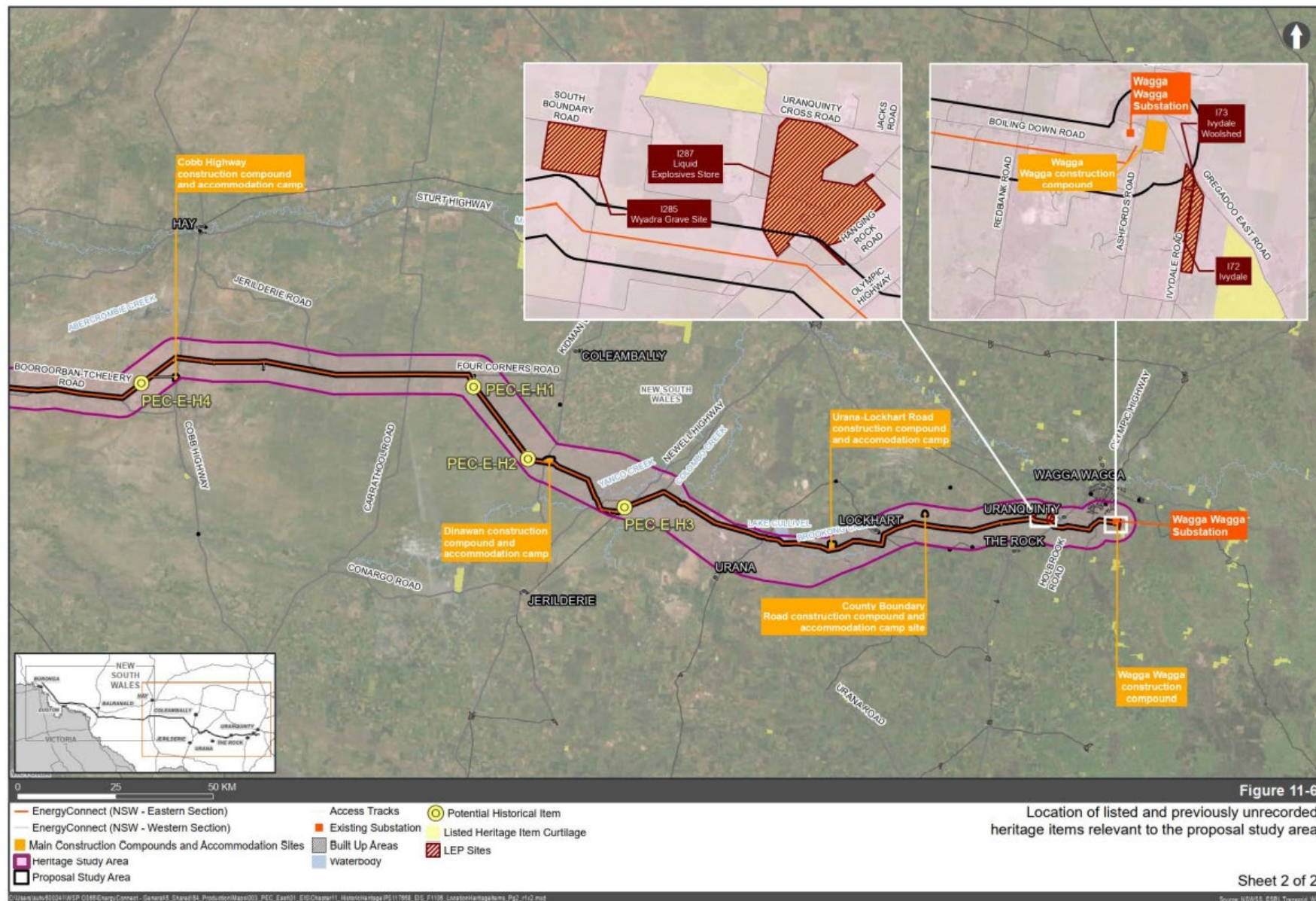


Figure 3.5 - Location of historical heritage items - Overview 2 of 2 (source: EIS Figure 11-6)

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4 Environmental aspects and impacts

4.1 Construction activities

An environmental aspect is an element of an organisation's activities, products, or services that has or may have an impact on the environment (ISO 14001 Environmental Management Systems). The relationship of aspects and impacts is one of cause and effect.

Key aspects of the project that could result in adverse impacts to heritage include:

- surface and/or ground disturbance as a result of vegetation clearing and grubbing;
- surface and/or ground disturbance as a result of ground excavation and earthworks;
- surface and/or ground disturbance as a result of vehicular movements or vibration-producing equipment; and
- surface disturbance as a result of surface water runoff from the active worksite.

4.2 Impacts

The potential for impacts on heritage will depend on a number of factors. Primarily impacts will be dependent on the nature, extent and magnitude of construction activities and their interaction with the natural environment.

4.2.1 Aboriginal heritage

Potential impacts were assessed in the Revised ACHAR (dated May 2022) based on the Amendment Report design and proposed construction methodology. The impacts were further clarified within the Addendum ACHAR (dated January 2024). The type of impacts attributable to construction described in the Addendum ACHAR include:

- **direct impacts:** impacts that move or physically alter items, objects, or features of a site. This includes, but is not limited to, direct physical impacts to midden/shell, hearths, stone artefacts, and scarred trees. Also, as impacts that directly and physically disturb the sediments and deposits of PADs. Impacts are further described as:
 - direct impacts associated with tower locations;
 - potential direct impacts to ground surface from brake and winch sites, grading existing or constructing new vehicle access tracks within Disturbance Area A;
 - potential direct impacts associated with vegetation clearance in centreline (Disturbance Area A – centreline); and
 - potential direct impacts to some sites and scarred trees where vegetation clearance to certain heights is required in Disturbance Area B;
- **indirect impacts:** include inadvertent direct impacts during vegetation clearance activities, physical disturbance from surface water drainage and project vehicles traversing sites outside of access tracks.

The expected direct and potential direct impacts for Aboriginal heritage sites/features identified in the Addendum ACHAR (dated January 2024) are defined in Appendix C of this HMP.

Indirect impacts to items/features are dependent on several factors, including the extent of the site, depth of deposits, and the works being conducted adjacent to these areas. Management measures identified in Section 5 will minimise the potential for indirect impacts that could potentially result in a loss of heritage values due to physical disturbance.

As far as practical, impacts to items/features of Aboriginal archaeological significance have been, and will continue to be, avoided. It is noted, however, that changing the location of a single

transmission tower/pole (for example, to avoid one area/PAD/item) may result in a flow-on effect that may change the location of multiple other towers in either direction, which will change the potential impacts of those now altered transmission towers. Tower location/spacing changes can also have engineering implications that must be resolved. The process of altering tower locations to avoid and minimise impacts to features of significance must consider many factors. The potential impacts described in Appendix C and shown in the maps in Appendix D are indicative and current as at the time of the Amendment Report.

The environmental management described in Section 5 (particularly Table 5.1) has been developed to address the potential impacts to Aboriginal heritage items/features described in Appendix C.

4.2.2 Historic heritage

Potential impacts to historic heritage items were assessed in Technical paper 3 (Historic heritage) of the EIS. The type of impacts attributable to construction described in Technical paper 3 (Historic heritage) of the EIS are:

- **direct harm:** disturbance to all or part of surface and/or subsurface features of an item, which would generally result in loss of heritage value at the site; and
- **indirect impacts:** this could include impacts from vegetation clearance and visual impacts to cultural values and views.

The expected impacts for historic heritage items defined in Technical paper 3 of the EIS are based on the design described within the Amendment Report and are identified in Table 4.1 and are visually represented in Figure 4.1 to Figure 4.5.

Table 4.1 - Impact assessment of historic heritage items (primary source EIS Table 11-3)

Site name	Item ID	Significance	Potential impacts
Burial Ground	Balranald LEP 2010 (17)	Local	No impact expected. This heritage item is 250m away from the construction impact area and would not be impacted by the proposal. No visual impact is expected due to the existing vegetation screening.
Yanga Pastoral Station Complex	HHIMS Item ID 10607	Local (State threshold met but not formally listed) Note: The sheep yard is also identified to have moderate heritage significance in Section 6.2.1 of Technical paper 3 (Historic heritage) of the EIS.	Potential partial impact. The construction impact area traverses the Willows and Yanga Homestead precincts of this s(170) heritage listed property. Technical paper 3 of the EIS notes that impact to the Yanga Pastoral Station Complex is indirect with minor impact to the significance of the item. The major historical elements such as the homestead complex would not be directly impacted by the proposal and would only have a minor impact on the heritage significance of this item. Technical paper 3 of the EIS notes that impact to the Yanga Pastoral Station Complex sheep yards is direct with impact to the significance of the item. The sheep yards within the Willows Precinct (items not specifically listed on the HHIMS) would be located within the construction impact area (Disturbance Area A and B) and there would be an impact on the significance of the item. The sheep yards would be located in the proposed easement section (Disturbance Area B subset). The item is identified as being set back from the proposed tower locations based on the current design however depending

Site name	Item ID	Significance	Potential impacts
			on the finalisation of design and easement requirements direct impact to this item is possible. The proposed alignment would avoid visual impact to the Yanga homestead which is some distance away and its location adjacent to the existing easement means that any long-term visual impact is minimised and confined to the southern portion of the property.
PEC-E-H1 (survey marker tree)	Previously unrecorded	Local	Potential partial or full (significant) impact. The tree is within the construction impact area and on the boundary between the disturbance area A and B subset areas. Depending on the design finalisation this tree may require removal or trimming to a height required to meet vegetation clearing requirements (noting that the tree is dead and future growth not expected). The transmission line would be visible following construction, however the impact would have negligible impact which would further reduce over time as revegetation occurs.
PEC-E-H2 (survey marker tree)	Previously unrecorded	Local	No impact expected. This tree is about 50 metres outside the construction impact area and would be protected from accidental damage during construction. Visual impact is considered negligible.
PEC-E-H3 (Bundure Railway Station dwelling artefact scatter)	Previously unrecorded	Local	Potential full (significant) impact (subject to design finalisation). The site is located on the edge of the construction impact area, impact would be avoided by creating a fenced exclusion zone around the artefacts scatter during construction. If impact cannot be avoided as a result of design finalisation the site should be subject to archaeological salvage. The visual impact would not affect the significance of the archaeological deposit.
PEC-E-H4 (Hut site, Nyngay pastoral holding)	Previously unrecorded	Local	The <i>Historical Heritage Impact Assessment Addendum Report - Hut site, Nyngay pastoral holding (PEC-E-H4)</i> found that the visible remnant of PEC-E-H4 lies outside the project disturbance area and will not be impacted by the project. No impact to the item is expected and it will not impact the significance of the item.
Wyadra grave site	Wagga Wagga LEP 2010 (I285)	Local	No impact expected. This site is located within a rural paddock and could not be sighted from the nearest vantage point along the paddock boundary. It is over 500 metres from the construction impact area. The proposal would, as is the case with the current transmission line X5 in the area, be barely visible from this heritage item resulting in no indirect impacts.
Liquid explosives store, Uranquinty	Wagga Wagga LEP 2010 (I287)	Local	No impact expected. The item is 40 metres from the construction impact area. The survey team did not have access to this property so was unable to confirm whether or not the physical structure still exists. The property was however viewed from the road/property fence line and no structure as described on the heritage listing was visible. Regardless of whether or not the structure still exists, the proposal location would have no direct or indirect impact (including visual) on this item.

Site name	Item ID	Significance	Potential impacts
Ivydale woolshed	Wagga Wagga LEP 2010 (I73)	Local	No impact expected. The woolshed is located close to the existing Wagga Wagga substation which is proposed for expansion. The property is 340 metres from the construction impact area. The item would not be directly or indirectly impacted by the proposal
Ivydale	Wagga Wagga LEP 2010 (I72 & I73)	Local	No impact expected. The homestead is close to the existing substation which is proposed for expansion. The property is 150m away from the construction impact area. The item would not be directly or indirectly impacted by the proposal. The substation is likely to be visible from parts of the Ivydale property, however due to existing vegetation it would not be visible from the homestead.

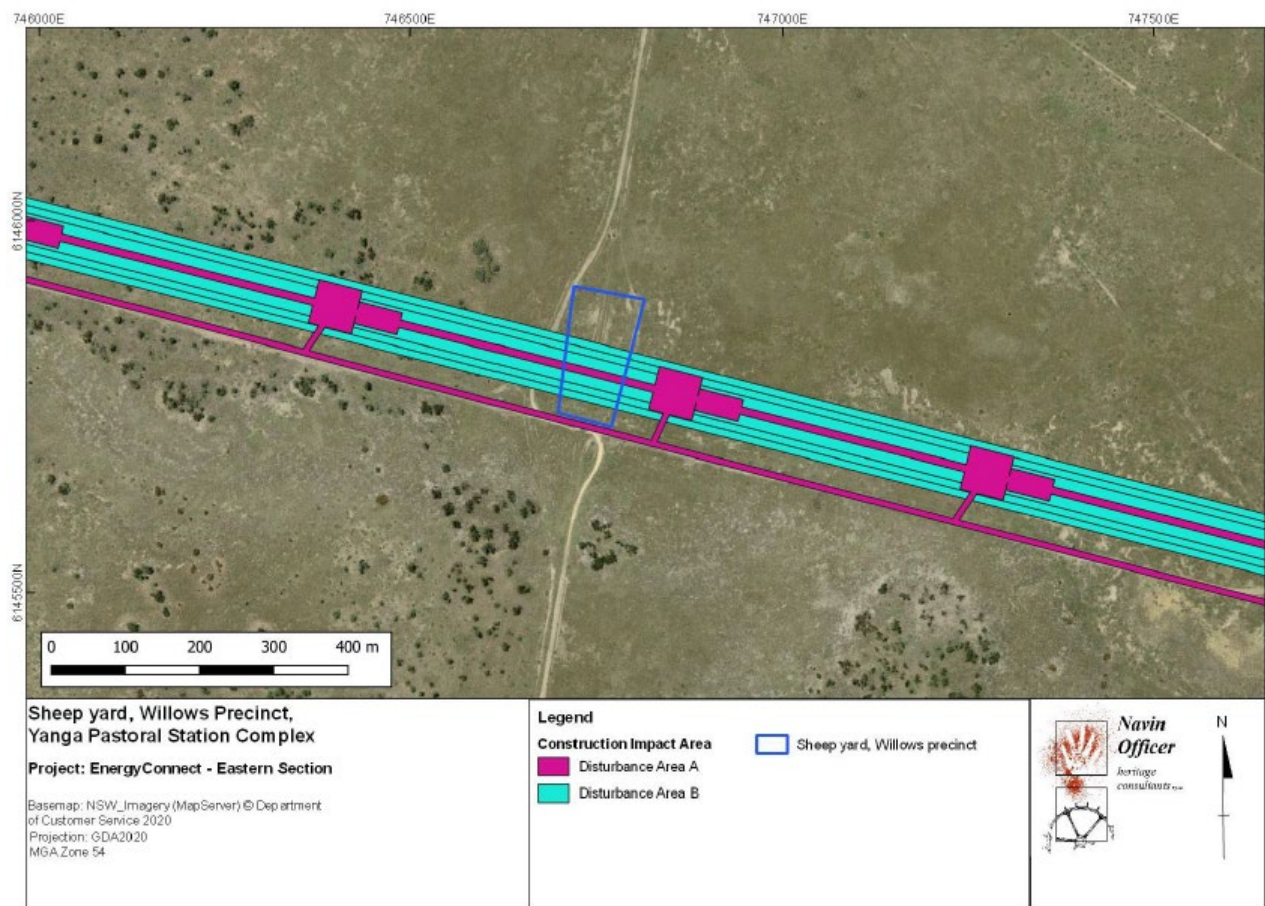


Figure 4.1 - Yanga Pastoral Station Complex sheep yards in relation to the construction impact area (source Technical paper 3 of the EIS)

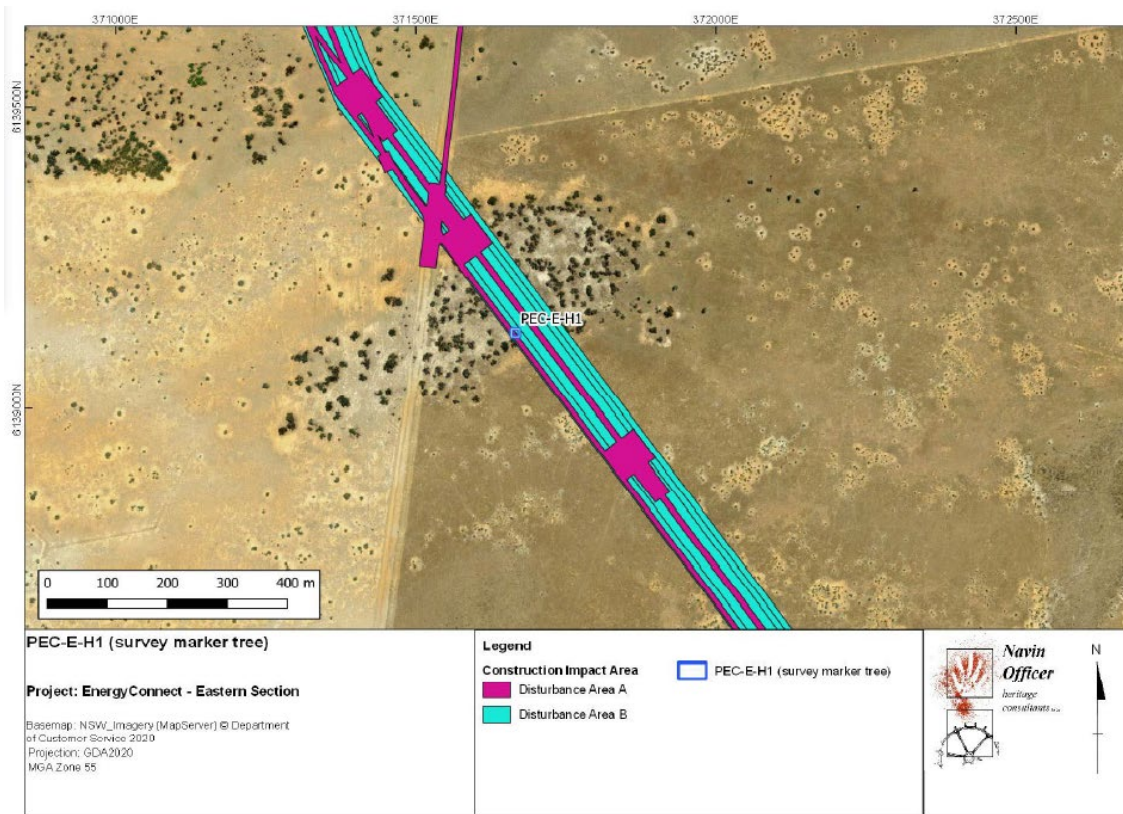


Figure 4.2 - PEC-E-H1 in relation to the construction impact area (source: Technical paper 3 of the EIS)

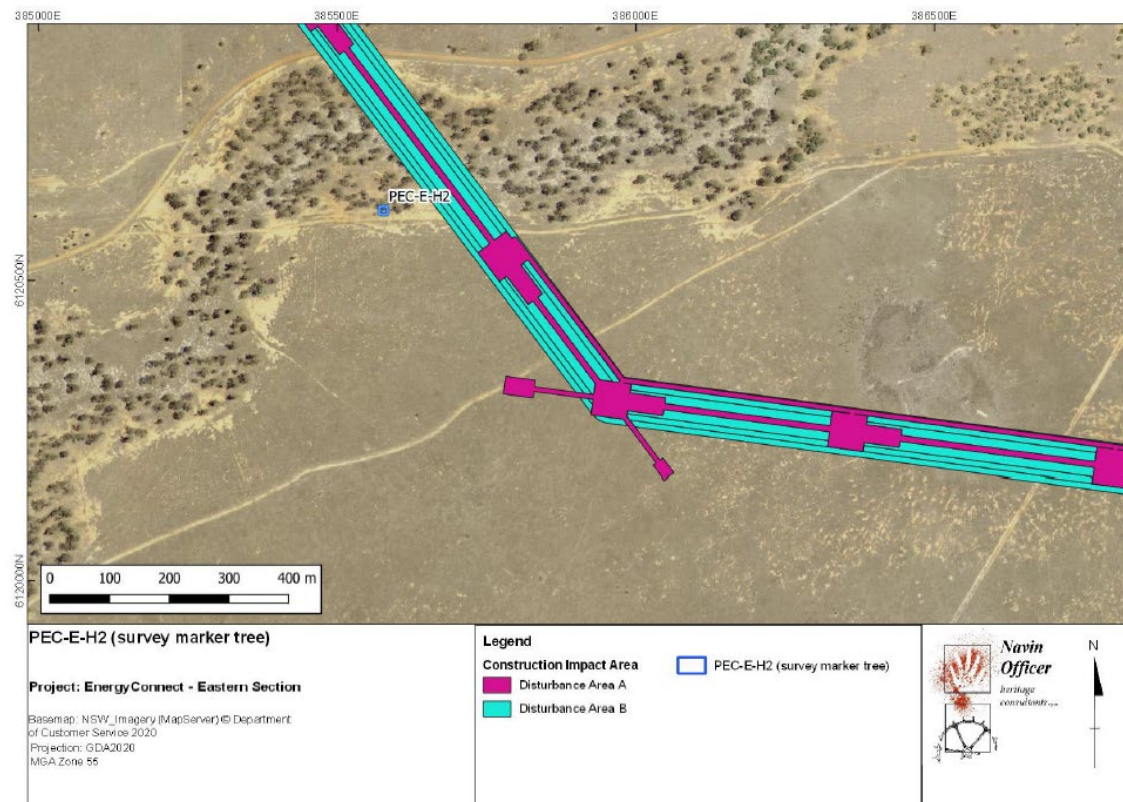


Figure 4.3 - PEC-E-H2 in relation to the construction impact area (source: Technical paper 3 of the EIS)

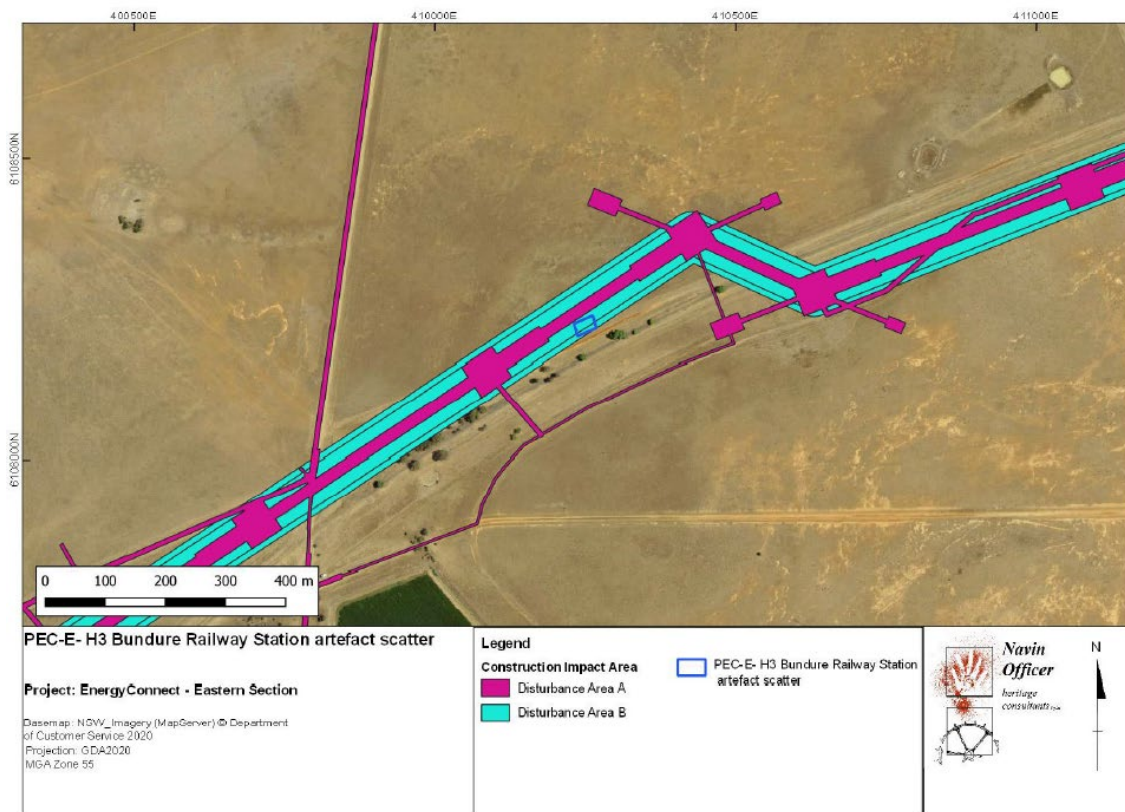


Figure 4.4 - PEC-E-H3 in relation to the construction impact area (source: Technical paper 3 of the EIS)

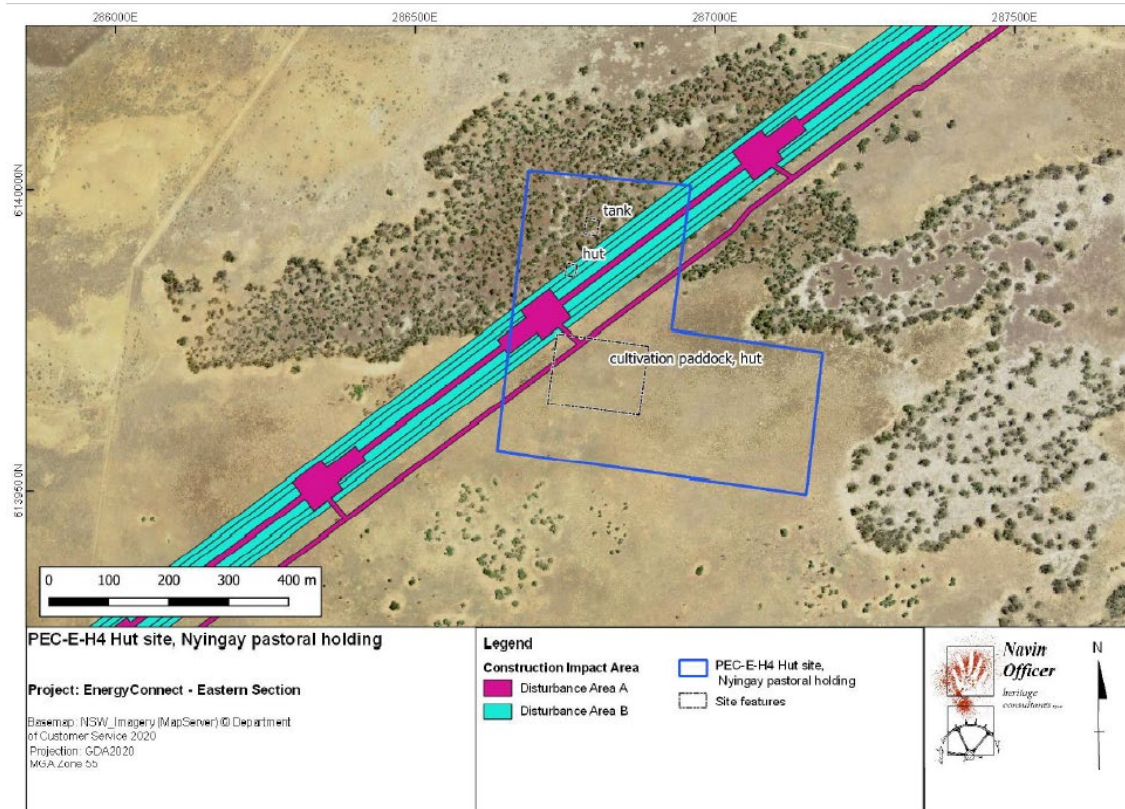


Figure 4.5 - PEC-E-H4 in relation to the construction impact area (source: Technical paper 3 of the EIS)

The environmental management described in Section 5 (particularly Table 5.1) has been developed to address the potential impacts to historic heritage items described here.

In the event of any unexpected historic heritage find, the *Unexpected Heritage Finds Procedure* (45860-HSE-PR-D-0013) (Appendix A) will be implemented as described in Table 5.1.

5 Management measures

5.1 Detailed design and construction methodology

The detailed design and construction methodology will be developed to avoid harm to Aboriginal heritage items and PADs (RMM AH1, condition A1 and condition C28 b), and scarred trees (RMM AH5) as far as practical. Avoidance and minimisation of impact to features/items and PADs of moderate or higher archaeological significance will be prioritised (RMM AH1). Further to this, the design and construction methodology would also consider the locations of PEC-E-H1 (historic survey marker tree), the Yanga Pastoral Station Complex sheep yards and the curtilage of PEC-E-H3 (Bundure railway station dwelling artefact scatter), and minimise or avoid harm as far as practicable in accordance with RMM NAH1, NAH2 and NAH4.

The location of scarred trees will be considered during detailed design. Scarred trees may only be removed to directly facilitate construction of permanent infrastructure and/or to meet Vegetation Clearance Requirements at Maximum Line Operations Conditions (Transgrid, 2003) (RMM AH5).

The avoidance/minimisation of impacts will occur primarily through the formal multi-disciplinary design review process and may result in a feedback loop between design and the results of activities identified in this HMP, including further survey and test excavation. The avoidance/minimisation of impacts also occurs through more informal design reviews/discussions and development and also through on-site management as described in Section 5.7.

It is noted that some design changes are more practical than others (e.g. the location for an access track may be more flexible than the location of a tower, which is generally constrained to minimal longitudinal movements along the alignment), and that impacts to other aspects, including biodiversity, property, etc. must also be considered. Changing the location of a single transmission tower/pole to avoid a site/PAD/object, may result in a flow-on effect that may change the location of multiple other towers, in either direction along the alignment, which would change the potential impacts at the altered tower locations. Tower location/spacing changes can also have engineering implications that must be resolved. The process of altering tower locations must consider many factors. In some instances, impacts may be practically unavoidable.

5.2 Addendum Aboriginal Cultural Heritage Assessment Report

An Addendum Aboriginal Cultural Heritage Assessment Report has been prepared for the project in accordance with condition C27. The Addendum Aboriginal Cultural Heritage Assessment Report was prepared in consultation with the RAPs and Heritage NSW, to the satisfaction of the Planning Secretary.

The project requested to stage condition C27 to allow certain activities to commence progressively across the project site as heritage-related activities (e.g. additional assessment and/or test excavation) are completed.

In accordance with RMM AH3, if the additional assessment finds that no Aboriginal objects are found or if Aboriginal objects are found and they would not be impacted, then a clearance letter would be prepared by an archaeologist that documents the findings and gives clearance to proceed.

The project disturbance area is primarily within previously surveyed areas. A portion of the disturbance area is within previously unsurveyed areas and requires additional assessment, which has occurred. The locations consist of; sections of the alignment where access was not available during the development of the EIS, minor changes associated with access tracks (new, alternative and upgrades to existing), site access points and road signage installation within road reserves,

additional water supply points and areas immediately adjacent to locations already assessed in the Revised ACHAR.

The *Addendum Aboriginal Cultural Heritage Assessment Report* summarises the additional heritage surveys undertaken from 20 March to 1 April 2023, 16 May to 18 May 2023, 4 September 2023 and on 8 December 2023.

In accordance with condition C27, it also includes the following information:

- describes the additional Aboriginal heritage surveys that were undertaken, including test excavations of PADs;
- describes any potential additional impacts to heritage items;
- identifies further mitigation measures, including avoidance or salvage;
- includes detailed justification where the final transmission line alignment is not able to avoid impacts to heritage items; and
- provides an updated and consolidated list of sites that would be protected and remain in-situ throughout construction and sites that would be salvaged and relocated to suitable alternative locations.

This Heritage Management Plan has been revised to address the findings and recommendations of the *Addendum Aboriginal Cultural Heritage Assessment Report*.

As detailed design and construction planning progresses, additional areas that require assessment may be identified. Where additional survey is required, local RAPs will be invited to participate in additional heritage surveys.

5.3 Addendum historic heritage assessment

Where impacts to recorded historic heritage items (refer Section 4.2.2) are not avoided, further assessment by an archaeologist would occur and be documented in an addendum non-Aboriginal heritage assessment.

5.4 Additional Aboriginal heritage survey

Aboriginal heritage survey was undertaken as part of the EIS and Amendment Report along an approximately 100m wide corridor and at the proposed locations for substations, the main construction compounds and accommodation camps.

In accordance with RMM AH3 and condition C27, additional Aboriginal heritage survey has been undertaken in areas which were not surveyed during the EIS, or where ground or vegetation disturbance activities are required outside of the areas previously surveyed. The results of these surveys are summarised in Section 3.2.4 and are included in Appendix C and Appendix D.

As detailed design and construction planning progresses, additional areas that require assessment may be identified.

These surveys, and any others that are identified, will be carried out in accordance with the *Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW* (2010).

Briefly, the survey process includes:

- local RAPs will be invited to participate in the surveys;
- if no sites are found, or they will not be impacted, a letter report (or similar) will be prepared that gives notification of this and clearance to proceed with nominated activities;

- an *Addendum Aboriginal Cultural Heritage Assessment Report* will be prepared prior to carrying out construction in unsurveyed areas to document the findings of any survey activities. The draft report(s) was presented to the RAPs for comment; and
- the finalised reports will be provided to the RAPs and Heritage NSW for information.

5.5 Test excavation

An archaeological subsurface test excavation program would be carried out in parts of any PADs where project activities would have direct impact and a test excavation program has not already been completed in the area of impact (unless an ACHAR indicates that additional test excavation is not required).

Additional subsurface test excavation will be undertaken in line with the approach detailed within the *Methodology for Aboriginal Subsurface testing: EnergyConnect (NSW – Eastern Section)* (November 2021) (test excavation methodology). The long term management of heritage items and materials will be managed in accordance with Section 5.8 of this plan which has been developed in consultation with the RAPs (instead of being stored at Canberra as stated within the test excavation methodology).

Any change to the approach to test excavation, which would result in the need to update the test excavation methodology, will be consulted with the RAPs and Heritage NSW.

The additional subsurface test excavation will be undertaken:

- with the participation of local RAPs;
- the test excavation results will be used to determine the need for salvage based on the presence or absence of subsurface archaeological deposits and the significance of the deposits;
- if salvage is required, this will commence immediately following the test excavation;
- a final report will be prepared that details the result of test excavation and salvage excavation.

It is noted that condition C27 does not apply to PADs identified as “Area cleared for identified impact level per the category of Construction Impact Footprint” in the Revised Aboriginal Cultural Heritage Assessment Report (dated May 2022).

5.6 Collection/salvage and recording

5.6.1 Artefacts

All portions of artefact scatters and isolated finds that are to be directly impacted would require surface collection prior to commencement of construction in those areas in line with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010) or its latest version and the *EnergyConnect (NSW – Eastern Section) Aboriginal Archaeological Salvage Methodology* (December 2023) (salvage methodology).

Any change to the approach to surface collection (salvage), which would result in the need to update the salvage methodology, will be consulted with the RAPs and Heritage NSW.

Further to the above, condition C28 c) requires the project to salvage and relocate item(s) that would be impacted to a suitable alternative location.

It is noted that during surface collection/salvage, additional material may be identified for surface collection/salvage by the participating RAPs (e.g. artefacts within Disturbance Area B or immediately outside of the disturbance area). In these instances, the project will defer to the opinion of the archaeologists and/or the RAPs on site. Any additional cultural material that is

collected will be recorded and reported upon in the surface collection/salvage report and be managed in line with all other recovered material (refer to Section 5.8).

5.6.2 Hearths

A representative sample of hearths would be subject to photographic recording and material collection prior to disturbance.

5.6.3 Earthen mounds

Earthen mounds subject to impact will require salvage excavation as detailed within the *EnergyConnect (NSW - Eastern Section) Aboriginal Archaeological Salvage Methodology* (December 2023).

5.6.4 Salvage excavation

Where recommended by the outcomes of test excavation, the parts of PADs with confirmed intact subsurface archaeological deposits that would be harmed by project activities, would be subject to salvage excavation prior to those activities in the relevant area. Salvage can commence immediately following test excavation and would be undertaken in line with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010) and the *EnergyConnect (NSW - Eastern Section) Aboriginal Archaeological Salvage Methodology* (December 2023) (salvage methodology).

Any change to the approach to salvage excavation, which would result in the need to update the salvage methodology, will be consulted with the RAPs and Heritage NSW.

5.6.5 Aboriginal scarred trees

If the removal of a scarred tree cannot be avoided, the tree would be subject to 3D scanning, followed by salvage of the scarred trunk.

5.6.6 Sheep yards

If harm to the Yanga Pastoral Station Complex sheep yards cannot be avoided, archival recording and/or salvage of the sheep yards will occur, including consultation with NPWS. The records of the archival recording and/or salvage would be provided to NPWS.

5.6.7 PEC-E-H3 (Bundure railway station dwelling artefact scatter)

If impacts to PEC-E-H3 cannot be avoided during construction, archival recording and/or salvage would occur, including consultation with Heritage Council (condition C30 a)(ii)). The parts of the artefact scatter that could be harmed would be salvaged and analysed and managed in accordance with their determined significance, prior to the commencement of any activity that could harm the heritage items present.

Initial consultation with Heritage Council during the preparation of this Heritage Management Plan indicated that Heritage Council would request the following if ground disturbance within the curtilage of PEC-E-H3 is required:

- a suitably qualified and experienced historical archaeologist, who fulfills the Heritage Council's Excavation Criteria 2019 for the excavation of locally significant archaeology, to manage the historical archaeological program;
- an archaeological research design and excavation methodology to be prepared according to Heritage Council of NSW guidelines, to guide the archaeological program;
- a final archaeological excavation report to be prepared within 12 months of the completion of archaeological excavation, which includes details of any significant artefacts recovered, where

they are located and details of their ongoing conservation and protection in perpetuity by the landowner; and

- copies of the final excavation report to be provided to the Department of Planning and Environment (DPE), the Heritage Council of NSW and to the local council's local studies unit.

If ground disturbance within the curtilage of PEC-E-H3 is required, additional consultation will be undertaken to confirm the project's actions.

5.7 On-site management

5.7.1 Clearing and land disturbance

The project utilises a clearing and land disturbance permit which is completed and signed off prior to clearing or land disturbance. The clearing and land disturbance permit includes a section on heritage constraints such as the presence of recorded sites and PADs and appropriate management measures (e.g. surface collection, exclusion fencing).

The approval to clear is granted by the Environmental Manager or delegate.

5.7.2 Exclusion zone (or equivalent) - Aboriginal heritage

Aboriginal heritage exclusion zones (or equivalent) would be established to protect:

- recorded sites that have been identified to remain in-situ (and not subject to RMM AH6);
- scarred trees that are to remain in-situ; and
- any portions of PADs that become a recorded site following subsurface testing and which are identified for no impact.

Exclusion may be achieved by:

- on-site/physical exclusion zone (e.g. fencing, flagging, signage or similar). Where an on-site/physical exclusion zone is necessary for the above features, zones will be demarcated by a suitably qualified archaeologist in consultation with RAPs prior to the commencement of construction in the relevant location. Exclusion zones may be established as a large exclusion zone or as multiple, smaller exclusion zones, depending on the nominated site and consultation with RAPs;
- delineation of the disturbance area (e.g. fencing or star pickets and flagging, etc.) in the vicinity of a particular heritage item or feature located outside of the disturbance area;
- identification of features/items within GIS systems or other equivalent systems;
- identification on sensitive area plans;
- toolbox personnel working in the area regarding the retained features/items and associated controls; and/or
- regular environmental inspections, and maintenance of controls as required.

If temporary access to an exclusion area is required, this will be managed as described in Section 5.7.4.

5.7.3 Exclusion zone (or equivalent) - historic heritage

If harm to historic heritage items PEC-E-H1 (Survey Marker Tree), the Yanga Pastoral Station Complex sheep yards and/or PEC-E-H3 (Bundure railway station dwelling artefact scatter) can be avoided, temporary exclusion fencing (or equivalent) would be established to protect any elements of these items to be retained during construction.

Exclusion may be achieved by:

- on-site/physical exclusion zone (e.g. fencing, flagging, signage or similar);
- delineation of the disturbance area (e.g. fencing or star pickets and flagging, etc.) in the vicinity of a particular heritage item or feature located outside of the disturbance area;
- identification of features/items within GIS systems or other equivalent systems;
- identification on sensitive area plans;
- toolbox personnel working in the area regarding the retained features/items and associated controls; and/or
- regular environmental inspections, and maintenance of controls as required.

If temporary access to an exclusion area is required, this will be managed as described in Section 5.7.4.

5.7.4 Access to exclusion/no-go zones

If access is required into an exclusion/no-go zone, a *Permit to Enter No-Go Areas* (45860-HSE-FO-G-1005) must be obtained from the Environment Team. The permit must be signed off by the Environmental Manager or their delegate.

Where access is permissible, the permit will be approved for the applicable activity. Where access is not permissible, the permit will not be approved. Where the sensitive area/site is to be retained following cessation of the activity, the no-go zone will be immediately re-established with delineation reinstalled.

5.7.5 Existing access tracks

Any existing access tracks located in areas of PAD that require upgrading for use, would not be subject to ground disturbance (e.g. grading). The methodology to be used for upgrading would avoid direct ground disturbance (i.e. sub-surface disturbance) and may include laying of geotextile on the surface or other equivalent technique and, potentially, building the track surface up to avoid sub-surface disturbance to in-situ soils.

If direct ground disturbance is not avoidable, test excavation (refer Section 5.5) would be undertaken, and salvage (refer Section 5.6.4) if recommended by the outcomes of the test excavation, would be undertaken prior to ground disturbing upgrade works.

5.7.6 Material remaining in situ

During the consultation period for the Stage 2 Heritage Management Plan, one of the RAPs suggested an opportunity to add some protection to cultural material (e.g. hearths) that were within the disturbance footprint and were not recommended for any mitigation. The individual suggested additional material/soil be built-up on top of the site, to allow for it to remain in situ with a reduced impact. This methodology may be appropriate in locations such as centreline or Disturbance area B, only when rootball clearing or other sub-surface excavation is not required.

This methodology is under consideration and would be undertaken in consultation with the local RAPs.

5.7.7 Expected finds

In the event that suspected cultural material is encountered during the works, where it is not unexpected, e.g. within a PAD (after test excavation and salvage activities, if required) or within an Aboriginal site area/extent with the potential for subsurface context (as indicated in an

Aboriginal Cultural Heritage Assessment Report), the Unexpected Finds Procedure in Appendix A will not be adopted. The following protocol would be implemented:

- works in the area that could potentially harm the cultural material (Artefact) would stop;
- a no-go zone would be established to avoid the potential for accidental harm;
- Transgrid would be notified;
- the nature and significance of the suspected cultural material encountered would be determined in consultation with the heritage consultant and RAPs;
- await Instructions from Transgrid (Transgrid to provide Instructions for dealing with the cultural material); and
- the cultural heritage find/s would be managed in consultation with the RAPs. This could include collection and repatriation, depending on the nature and significance of the material.

If the discovery is suspected human remains, the Discovery of Suspected Human Remains Procedure would be implemented.

5.8 Long-term management of heritage items or material

Early consultation regarding the long-term management of any Aboriginal heritage objects or material recovered during the test excavation or salvage works (if required) has commenced. Early feedback received from select RAPs is the desire for cultural material to be returned to country, as close as possible to the original location.

An off-site repository(s) will be required to catalogue and temporarily store any Aboriginal objects and/or non-Aboriginal heritage items or material collected during project activities. The material will be stored temporarily until that material can be repatriated to appropriate locations within the transmission line easement. Feedback from further select RAPs has also indicated a preference to repatriate cultural material after test excavation and / or salvage, therefore eliminating the step of secure storage of an object or item away from the test excavation site. This process of more immediate repatriation will continue to be reviewed as an option in the repatriation process to determine if (1) an item can remain safe and unharmed if repatriated whilst construction is still required to occur, and (2) if it is possible for artefact recording and cataloguing to occur whilst on-site. This option of more immediate repatriation may be used on a site-specific basis depending on the amount of material identified. In particular, at PAD03, the option for repatriation of artefacts in the adjacent remediation site will be discussed with the relevant RAPs and implemented if this approach is preferred by the RAPs and acceptable to the landowner.

Cultural material recovered within the Yanga Pastoral Station Complex will be managed, processed and stored in line with *Technical Memo – Variation to Methodology for Aboriginal Subsurface Testing: EnergyConnect (NSW – Eastern Section)* Nov 2021.

If material is to be returned to country, the location of the repatriated/relocated cultural material recovered during project activities will consider areas least likely to be subject to future harm or risk of harm caused by disturbance, such as:

- construction activities;
- operational vegetation maintenance of the easement and/or operational access routes;
- operational maintenance of transmission line infrastructure (towers, footings, guys, earthing, conductor, earth-wire);
- maintenance of operational access tracks; and
- landowner activities, such as access tracks, fences, cultivation, etc.

Information redacted for public display

Figure 5.1 - Recommended location for repatriation of cultural material (green boxes) within the easement

The final location(s) for repatriation of material will be selected on site, based on the recommended locations (Figure 5.1, green boxes), landform/topographic constraints and RAP consultation. Potential locations will be identified during the additional test excavation program.

The number of repatriation locations will depend on the quantity and significance of material recovered. Material from multiple towers/locations may be combined into a single repatriation location.

The timing for the repatriation of material will depend on the salvage program, construction activities and infrastructure at the selected locations, and construction programming. The repatriation of material may need to occur at the completion of construction in some or all locations.

The strategy for the management of that material will continue to be developed in consultation with the RAPs throughout any test excavation and salvage activities (if required).

5.9 Heritage management measures

A range of environmental requirements and mitigation measures are identified in the EIS, Appendix B of the Submissions Report and Infrastructure Approval. Safeguards and management measures will be implemented to minimise or manage impacts to Aboriginal objects and historic heritage items/features.

Specific heritage related safeguards and management measures to address impacts associated with the project are outlined in Table 5.1.

Table 5.1 - Heritage management measures

ID	Measurement/Requirement	When to implement	Responsibility	Source document
General				
H1	Training will be provided to all project personnel, including relevant sub-contractors, on heritage practices through inductions, toolboxes and targeted training. Cultural awareness training will be carried out for all personnel working on the project participating in construction activities. Specific cultural awareness training would occur for relevant project personnel prior to activities along Benanee Road. The training would cover the sites and associated access restrictions.	Pre-construction Construction	Onboarding, Training and Compliance Manager	RMM AH10 Condition C30a)(iv)
H2	Identify recorded Aboriginal sites and PADs and historic heritage objects on the geographical information system (GIS) and/or sensitive area plans (SAPs) (or other equivalent system), which will be communicated and made available to personnel working in the proximity of the relevant items.	Pre-construction Construction	Environmental Advisor Environmental Manager GIS Manager	RMM AH10 RMM NAH3 RMM AH17 Condition C28 Condition C29 Condition C30a)(i)
H3	During the development of detailed design and construction methodology, the location of recorded Aboriginal sites and PADs and historic heritage objects will be reviewed. Detailed design and the construction methodology will be developed to avoid or minimise impacts, where practical. Avoidance and minimisation of impacts to items/objects/PADs of moderate or higher significance will be prioritised.	Pre-construction Construction	Engineering Manager Supervisor Environmental Manager	RMM AH1 RMM NAH1 RMM NAH2 RMM NAH4 Condition C28b) Condition C29b) Condition C30a)(i)
H4	An approved <i>Permit to Enter No-Go Areas</i> (45860-HSE-FO-G-1005) is required prior to accessing any identified no-go/exclusion zone (e.g. for approved vegetation clearing that does not require ground disturbance, maintenance of environmental controls or fencing, etc.)	Pre-construction Construction	All personnel	RMM AH7 RMM NAH1 RMM NAH2 Condition C30a)(i)

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
Aboriginal heritage				
H5	Aboriginal stakeholder consultation will be carried out in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW, 2010a). Engagement with Registered Aboriginal Parties (RAPs) will consist of the following: - Aboriginal heritage site surveys (RMM AH3) - involvement in the survey activities in the field (for ground or vegetation disturbance outside of previously surveyed areas); - test excavation activities (RMM AH4) - involvement in the test excavation activities in the field; - review of the draft addendum report/s to the ACHAR (relating to surveys (RMM AH3), test excavations (RMM AH4) and scar trees (RMM AH5)), and consultation on the draft reports; - provision of final addendum report/s to the ACHAR to RAPs (RMM AH3, AH4, AH5); and - involvement in establishment of Aboriginal heritage exclusion zones prior to construction commencing at each location (RMM AH7).	Pre-construction Construction	Environmental Manager (or delegate)	RMM AH2 Condition C30a)(v)
H6	Potential indirect harm to recorded heritage items and PADs resulting from physical disturbance due to surface water run-off will be minimised in accordance with the <i>Soil and Water Management Plan</i> (45860-HSE-PL-D-0112).	Pre-construction Construction	Environmental Manager Environmental Advisor	RMM AH9 Condition C28a) Condition C30a)(i)
H7	Exclusion (no-go) zones (or equivalent) will be established to avoid direct harm to recorded Aboriginal heritage sites/items and PADs located outside of the development area or within the area, but remaining in-situ. Exclusion may be achieved by: - on-site/physical exclusion zone (e.g. fencing, flagging, signage or similar). Where an on-site/physical exclusion zone is necessary for the above features, zones will be demarcated by a suitably qualified archaeologist in consultation with RAPs prior to the commencement of construction in the relevant location. Exclusion zones may be established as a large exclusion zone or as multiple, smaller exclusion zones, depending on the nominated site and consultation with RAPs; - delineation of the disturbance area (e.g. fencing or star pickets and flagging, etc.) in the vicinity of a particular heritage item or feature located outside of the disturbance area; - identification of features/items within GIS systems or other equivalent systems; - identification on sensitive area plans; - toolbox personnel working in the area regarding the retained features/items and associated controls; and/or - regular environmental inspections, and maintenance of controls as required.	Pre-construction (in the relevant areas)	Environmental Manager Superintendent/Superintendent Advisor	RMM AH7 Condition C28 Condition C30a)(i)

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
	Site PEC-E-106 on Benanee Road will be fenced during all construction activities in the area. The sites on Benanee Road and Holbrook Road may be identified through the use of signage due to the proximity to the road.			
H8	Any new or existing tracks located in areas of PAD for which an ACHAR does not indicate clearance for the identified impact level or recommend salvage (without test excavation), would not be subject to ground disturbance (e.g. grading). The methodology to be used for upgrading and installation would avoid direct ground disturbance (i.e. sub-surface) and may include laying of geotextile on the surface or other equivalent technique and, potentially, building the track surface up to avoid sub-surface disturbance to in-situ soils. If ground disturbance is not avoidable, test excavation would be required.	Pre-construction	Superintendent/Supervisor Environmental Manager	RMM AH8 Condition C28b) Condition C30a)(i)
H9	Vegetation trimming for any asset protection zones (APZ) that are within a recorded PAD, will be undertaken to avoid direct subsurface impact (e.g. no rootball clearance).	Pre-construction Construction (in relevant areas)	Superintendent/Supervisor	Condition C28 Condition C30a)(i)
H10	Additional Aboriginal heritage assessment will be undertaken for areas where ground disturbing activities is required prior to the ground disturbing activities. Where survey is required, local RAPs will be invited to participate in the survey.	Pre-construction (in the relevant areas)	Environmental Manager Superintendent/Supervisor	RMM AH3 Condition C27
H11	If no sites are found in the additional Aboriginal heritage assessment, or if sites are found and they will not be impacted, then a letter report will be prepared that gives notification of this and clearance to proceed.	Pre-construction Construction (in relevant areas)	Environmental Manager	RMM AH3 Condition C27
H12	An Addendum Aboriginal Cultural Heritage Assessment Report has been prepared in consultation with RAPs and Heritage NSW, and will be prepared to the satisfaction of the Planning Secretary. The project has requested approval to stage condition C27 to allow for progressive commencement of certain activities across the project site as heritage-related activities are completed.	Pre-construction (in relevant areas)	Heritage consultant	RMM AH2 RMM AH3 RMM AH4 RMM AH5 Condition C27
H13	Subsurface testing/test excavation will be undertaken in parts of any PADs where project activities would have direct impact and a test excavation program has not already been completed in the area of impact (unless an ACHAR indicates that additional test excavation is not required). Direct impacts include grading of tracks and construction areas, excavation for tower construction and tree removal that includes the root ball. If test excavation confirms that intact subsurface archaeological deposits will be harmed by project activities then salvage excavation can commence immediately following the test excavation. Local RAPs will be invited to participate in the test excavation activities.	Pre-construction (in relevant areas)	Environmental Manager (or delegate) Heritage consultant	RMM AH4 Condition C27 Condition C30a)(ii)

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EnergyConnect (NSW - Eastern Section) Stage 1 and Stage 2 Heritage Management Plan

ID	Measurement/Requirement	When to implement	Responsibility	Source document
H14	Surface collection (salvage) will be undertaken in parts of artefact scatters and isolated finds that are to be directly impacted. Surface collection would be undertaken in line with the <i>EnergyConnect (NSW - Eastern Section) Aboriginal Archaeological Salvage Methodology</i> (December 2023) (salvage methodology). Surface collection (salvage) will be undertaken prior to commencement of construction in those areas.	Pre-construction (in relevant areas)	Environmental Manager (or delegate) Heritage consultant	RMM AH6 Condition C28c) Condition C30a)(11)
H15	A representative sample of hearths would be subject to photographic recording and material collection prior to disturbance.	Pre-construction (in relevant areas)	Environmental Manager (or delegate) Heritage consultant	RMM AH6 Condition C28c)
H16	Salvage excavations will be undertaken in designated areas of PADs where recommended by the outcomes of test excavation. Salvage excavations can commence immediately following test excavation. Salvage excavations will be undertaken prior to the commencement of activities that could harm the relevant areas of PAD. Any salvage and relocation of cultural material will be undertaken in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010) or its latest version and the <i>EnergyConnect (NSW - Eastern Section) Aboriginal Archaeological Salvage Methodology</i> (December 2023) (salvage methodology). The outcomes will be documented in a salvage report.	Pre-construction Construction (in relevant areas)	Environmental Manager (or delegate) Heritage consultant	RMM AH6 Condition C28c) Condition C30a)(ii)
H17	A temporary, secure facility(s) will be identified to store any retrieved cultural material recovered during the works. The strategy for long-term conservation of recovered material will continue to be developed in consultation with RAPs.	Construction	Transgrid	RMM AH12 Condition C28c) Condition C30a)(ii)
H18	Scarred trees may only be removed to directly facilitate construction of permanent infrastructure and/or to meet Vegetation Clearance Requirements at Maximum Line Operating Conditions (Transgrid, 2003).	Pre-construction Construction	Design Manager Construction Manager Environmental Manager	RMM AH5 Condition C28b) Condition C30a)(i)
H19	If removal of a scarred tree cannot be avoided, the tree would be subject to 3D scanning, followed by salvage of the scarred trunk.	Pre-construction Construction	Environmental Manager (or delegate) Heritage consultant	RMM AH5 Condition C28c) Condition C30a)(ii)

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
H20	There is to be no widening of Benanee Road. If regrading of this road is required, spoil is to be pushed to the opposite side of the road to the sites present.	Construction	Superintendent Construction Manager	RMM AH14
H21	Ground disturbance associated with road maintenance or surface rectification of Benanee Road is to be limited to within the existing graded paved/unpaved road surface.	Construction	Superintendent Construction Manager	RMM AH15
H22	Project-related vehicles and plant accessing the wayside/verge and any project activities which could cause ground disturbance will avoid PEC-E-106. The following sites will also be avoided: • PEC-E-108; • PEC-E-109; and • PEC-E-118. PEC-E-107 will be avoided except as necessary to install and use site access points at the transmission line crossing and install traffic management signage.	Construction	Superintendent Construction Manager	RMM AH16
Historical heritage				
H23	Exclusion zones (or equivalent) will be established to avoid direct harm to recorded historic heritage sites/objects located within the development area, but remaining in-situ. Exclusion may be achieved by: • on-site/physical exclusion zone (e.g. fencing, flagging, signage or similar); • delineation of the disturbance area (e.g. fencing or star pickets and flagging, etc.) in the vicinity of a particular heritage item or feature located outside of the disturbance area; • identification of features/items within GIS systems or other equivalent systems; • identification on sensitive area plans; • toolbox personnel working in the area regarding the retained features/items and associated controls; and/or • regular environmental inspections, and maintenance of controls as required.	Pre-construction (in relevant areas)	Environmental Manager	RMM NAH1 Condition C29 Condition C30a(i)
H24	Where harm to recorded historic heritage objects/sites is not avoidable, further assessment by an archaeologist would occur and be documented in an addendum historic heritage assessment.	Pre-construction Construction (in relevant areas)	Environmental Manager Heritage consultant	RMM NAH4 Condition C30a(ii)
H25	Archival recording and/or salvage of • PEC-E-H1 (Survey Marker Tree);	Pre-construction	Environmental Manager	RMM NAH1

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ID	Measurement/Requirement	When to implement	Responsibility	Source document
	- the Yanga Pastoral Station Complex sheep yards; and/or - PEC-E-H3 (Bundure railway station dwelling artefact scatter) will occur where impacts cannot be avoided, including consultation with NPWS for the Yanga Pastoral Station Complex sheep yards and Heritage Council for PEC-E-H3 (Bundure railway station dwelling artefact scatter).	Construction (in relevant area)	Heritage consultant	Condition C30a(ii)
H26	If impacts to the Yanga Pastoral Station Complex sheep yards can be avoided, temporary exclusion fencing will be installed during construction. If impacts to the Yanga Pastoral Station Complex sheep yards cannot be avoided (as detailed in measure H22), archival recording and/or salvage of the sheep yards will occur, including consultation with NPWS. The records of the archival recording and/or salvage would be provided to NPWS.	Pre-construction Construction (in relevant area)	Environmental Manager Heritage consultant	RMM NAH1 Condition C30a(ii)
H27	If impacts to PEC-E-H3 (Bundure railway station dwelling artefact scatter) can be avoided, temporary exclusion fencing will be installed during construction. If impacts to PEC-E-H3 (Bundure railway station dwelling artefact scatter) cannot be avoided (as detailed in measure H22), archival recording and/or salvage of the part of the artefact scatter that could be impacted will occur, including consultation with Heritage Council.	Pre-construction (in relevant area)	Environmental Manager Heritage consultant	RMM NAH2 Condition C30a(ii)
Unexpected finds				
H28	If at any time during construction, any potential Aboriginal objects, or human remains or any items of potential non-Aboriginal archaeological significance are discovered, stop all work in the immediate vicinity of the find and notify the Site Supervisor and Environmental Manager. The <i>Unexpected Heritage Finds Procedure</i> (45860-HSE-PR-D-0013) will be followed.	Pre-construction Construction	All personnel	RMM AH11 RMM NAH5 Condition C30a(iii) <i>Heritage Act 1977</i> <i>National Parks and Wildlife Act 1974</i> <i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)</i>

6 Compliance management

6.1 Training and awareness

All site personnel will undergo the Elecnor site induction prior to the personnel participating in on-site construction activities. The induction training addresses elements related to heritage management including, but not limited to:

- the environmental management system, including the CEMP;
- cultural awareness training, including features of heritage significance within and adjacent to project locations;
- management measures that are necessary to comply with to minimise and manage potential impacts to those features such as heritage exclusion zones; and
- the Unexpected Heritage Finds Procedure (45860-HSE-PR-D-0013).

Targeted training in the form of toolbox talks or specific training will also be delivered to personnel with a key role in heritage management. Examples of training topics include:

- establishment of heritage exclusion zones;
- details of specific features of heritage significance within or adjacent to the proposed work area; and
- discovery of any unexpected finds.

Any test excavation (refer to Section 5.5) or collection/salvage activities (refer Section 5.6) undertaken within Yanga State Conservation Area will include relevant information from the NPWS site-specific template induction (provided by NPWS DOC22/1105889).

RAPs along the alignment will be engaged to conduct face-to-face cultural heritage training at various times throughout the duration of the project. This will supplement the cultural awareness training undertaken by all site personnel.

Records of training, including attendance, will be retained by Elecnor.

6.2 Roles and responsibilities

Elecnor's organisational structure and overall roles and responsibilities are outlined in Section 4 of the CEMP. Specific responsibilities for the implementation of mitigation measures are detailed in Section 5 of this HMP.

6.3 Monitoring

The impacts and environmental performance of the project relevant to Aboriginal and historic heritage, and the effectiveness of the management measures identified in Section 5 will be monitored through the proposed monitoring program in Table 6.1.

Table 6.1 - Monitoring program

Item	Scope	Frequency	Responsibility	Records/ reporting
Weekly inspection	Inspection of the environmental controls and implementation of the heritage mitigation measures outlined in Table 5.1.	Weekly	Environmental Advisor Site Supervisors	Weekly environmental inspection checklist

6.4 Inspections

Weekly inspections will be performed by the Environmental team and documented in a weekly environmental checklist. Visual inspection of areas such as established exclusion zones, delineated/fenced disturbance boundaries and any known heritage objects/items/features immediately adjacent to the work area will be undertaken.

6.5 Auditing

No heritage-specific audits are identified in the Infrastructure Approval or the RMMs.

Audits will be undertaken to assess the effectiveness of the management measures and overall compliance with this plan, and other relevant approvals, licences and guidelines. Audit requirements are detailed in Section 9.3 of the CEMP.

6.6 Reporting

Reporting which will be undertaken in accordance with the HMP is summarised in Table 6.2.

Table 6.2 - Reporting program

Item	Scope	Frequency	Responsibility	Recipient
Aboriginal Cultural Heritage Assessment Report	As defined in condition C27.	Prior to construction in relevant areas	Elecnor/Transgrid	RAPs Heritage NSW DPE ER Project website
Salvage report(s)	RMM AH6	Completion of salvage activities	Elecnor	Transgrid ER
Unexpected finds report	Unexpected heritage finds identified during project activities will be managed and reported upon in accordance with the <i>Unexpected Heritage Finds Procedure</i> (45860-HSE-PR-D-0013).	As required	Environmental Manager Transgrid	Transgrid RAPs DPE Heritage NSW AHIMS register ER (all as required in accordance with procedure)
Audit reports	Independent audits undertaken in accordance with the Infrastructure Approval will include audits of heritage measures (based on the Independent Auditor's program). Audit reports will be prepared. Further detail in relation to auditing is provided within Section 9.3 of the CEMP.	At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Secretary.	Environmental Manager / Independent Auditor	Transgrid DPE Project website

6.7 Emergencies, incidents and non-compliances

Emergency management and planning including emergencies related to Aboriginal and historic heritage will be undertaken in accordance with the management system and relevant procedures. Emergencies will be managed in accordance with the relevant Health, Safety, Security and Environment (HSSE) Plan as identified in Section 8.1 of the CEMP - Emergency preparedness and emergency response.

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Environmental incidents, including incidents related to Aboriginal and historic heritage (e.g. unauthorised/unapproved impact to heritage objects, items, artefacts or sites) will be managed as described in Section 8.2 of the CEMP - Environmental incidents and the Incident, Notification and Investigation Procedure Flowchart provided in Appendix A4 of the CEMP. The Unexpected Heritage Finds Procedure will also be followed to prevent any further damage and to notify the appropriate authorities.

Incident reporting is described in Section 8.3 of the CEMP - Incident notification and reporting.

Where a non-compliance has been identified, including those relevant to Aboriginal and historic heritage (e.g. not following the notification or reporting requirements in the Unexpected Finds Procedure), corrective actions will be developed as required and implemented to address the non-conformance that occurred as described in Section 11 of the CEMP - Non-compliance, non-conformance, corrective and preventative action. Reporting of non-compliances will be undertaken as described in Section 10.1 of the CEMP - Reporting non-compliances.

6.8 Contingency plan

Although the project has been assessed through the environmental impact assessment process and potential impacts identified, unpredicted impacts may occur as the project progresses. In the event that unexpected impacts are identified, the action or cause will be categorised and as required will be managed as:

- an emergency or environmental incident in accordance with Section 8 of the CEMP - Incidents and emergencies; and/or
- a non-compliance or non-conformance in accordance with Section 11 of the CEMP - Non-compliance, non-conformance, corrective and preventative action.

Reporting of the unpredicted impacts would be in line with the above processes and as described in Section 10 of the CEMP - Reporting.

Through the identification of corrective and/or preventative actions through the above processes, the following steps will be considered as relevant:

- a) determine the relevant impact assessment criterion/criteria, below which the impact should be reduced, consistent with the requirements of this HMP;
- b) identify options to reduce the unexpected impacts to below the relevant criterion/criteria and appropriate timeframe for implementation;
- c) implement the selected measure(s) to reduce the unexpected impacts; and
- d) identify and implement an appropriate monitoring program to determine the effectiveness of the selected measure(s) to reduce the unexpected impact.

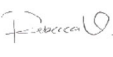
If the above monitoring program identifies that the unexpected impacts have not been reduced to below the nominated criterion/criteria, items b) to d) of the contingency process will be repeated.

This section does not apply to unexpected heritage finds. These will be managed in accordance with the Unexpected Heritage Finds Procedure included in Appendix A of this HMP.

Appendix A - Unexpected Heritage Finds Procedure

Unexpected Heritage Finds Procedure EnergyConnect (NSW - Eastern Section)

45860-HSE-PR-D-0013

REV	DATE	GENERAL DESCRIPTION	PREPARED	REVIEWED	VERIFIED	VERIFIED	APPROVED
0	20/10/2022	Issued to DPE	A.Kriegel / V.Edmonds	R. Walker- Edwards	A.Boyd	B.Calligeros	S.Basanta
1	23/01/2023	Updated for Stage 2 consultation with stakeholders	R. Walker- Edwards / V.Edmonds	C.Curlewis	A.Boyd	B.Calligeros	S.Basanta
2	27/10/2023	Updated for Elecnor branding	 R. Walker- Edwards	 CATHERINE CURLEWIS (Oct 27, 2023 15:54 GMT+11) C.Curlewis	 G. CRIGHTON (Oct 27, 2023 15:54 GMT+11) G.Crighton	-	 G.Arrien Echevarria

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Revision History	
Rev.	Detailed Description
A	Issued for internal review
B	Issued for Transgrid's review
C	Issued for consultation to relevant councils. Includes v1 draft conditions.
D	Issued for consultation to Heritage NSW, Heritage Council, RAPs and NPWS. Includes v3 draft conditions.
0	Updated to consider consultation responses. Updated to address the Infrastructure Approval.
1	Updated to consider Stage 2 consultation responses.
2	Revised with updated HMP to reflect Elecnor branding

Key Document Stakeholders
To be communicated with during reviews and revisions of this document

1 Introduction

This procedure explains the actions to be undertaken in the event that an unexpected actual or potential Aboriginal object or non-Aboriginal heritage item is identified during project activities.

1.1 Purpose

The purpose of this procedure is to detail the actions to be taken in the event that an unexpected actual or potential heritage find is encountered during EnergyConnect (NSW - Eastern Section).

This procedure has been prepared to address a select portion of the requirements of condition C30 a)(iii) of the Infrastructure Approval (SSI-9172452) granted by the Minister for Planning and the revised mitigation measures (RMMs) AH11 and NAH5 identified in the *Submissions Report EnergyConnect (NSW - Eastern Section)* (Submissions Report).

2 Induction/Training

Personnel involved in any aspect of the project works will undertake an induction which will include details relating to this procedure. Training may also occur through toolbox talks, pre-starts and targeted training as required.

3 Scope

This procedure applies to the discovery of any unexpected Aboriginal object or non-Aboriginal heritage item (usually during construction activities, such as clearing, access track construction and tower pad construction), not identified and assessed in the environmental impact assessment of the project (excluding any site(s) identified during test excavations and salvage activities carried out in accordance with project commitments and approval).

3.1 Heritage objects/items

A heritage object or item can be found anywhere along the project corridor.

Examples of Aboriginal objects and sites include middens, Aboriginal burial sites, hearths, scarred trees and artefacts. An artefact is a normally portable object made or modified by human hand (*Revised Aboriginal Cultural Heritage Assessment Report* (Navin Officer 2022)). An artefact can be found as an isolated find without associated evidence of occupation in a 60m radius, or as an artefact scatter when there are two or more artefacts within a 60m radius of each other.

Examples of non-Aboriginal heritage items include historic non-Aboriginal graves, old fence lines, survey marker trees and farm dwellings or outbuildings. All items will have their own respective cultural significance.

Some examples of heritage items and objects that have been identified within the project survey area are displayed in Table 3.1 below.

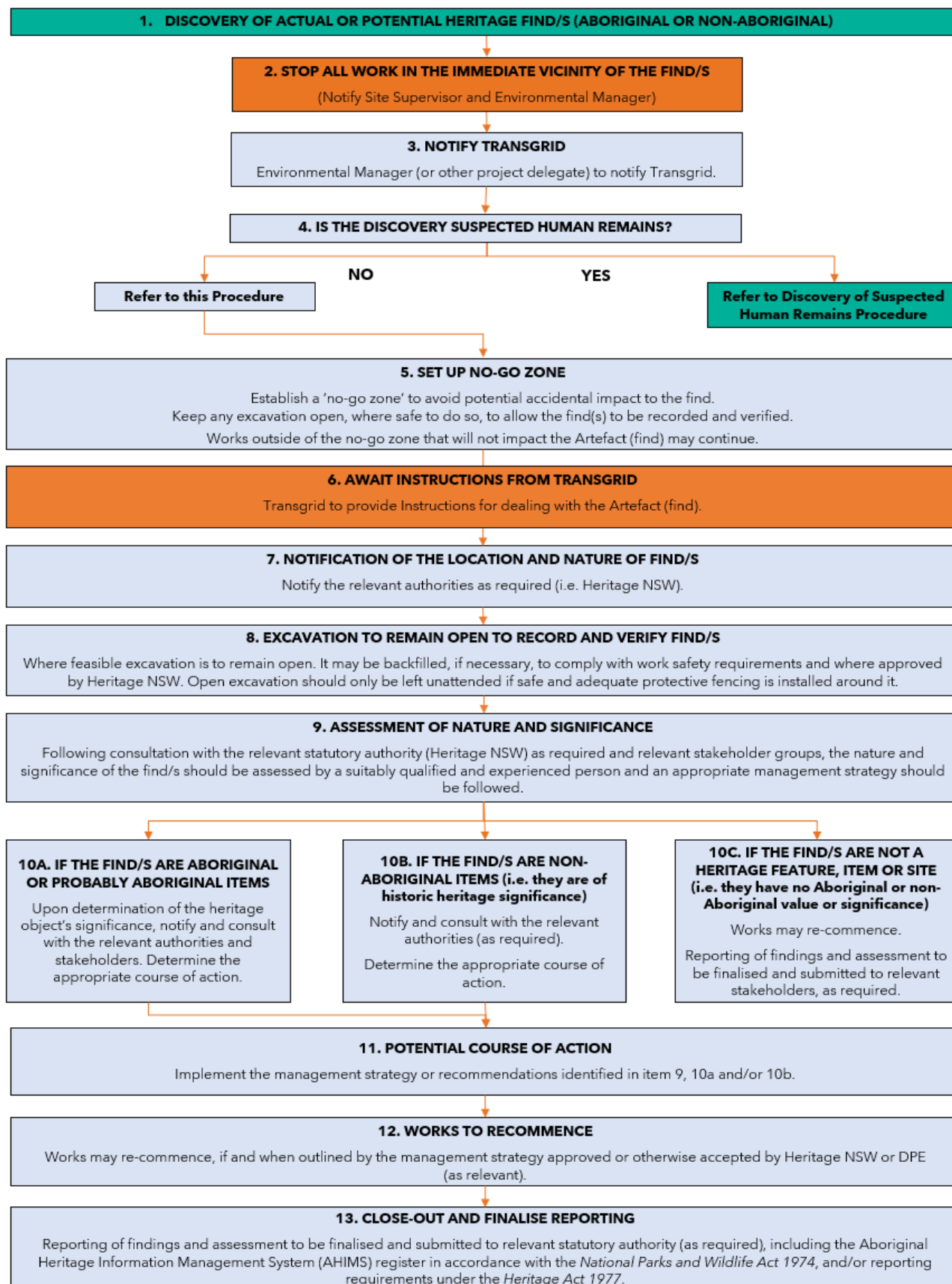
Table 3.1 - Examples of Aboriginal objects and sites and heritage items found in the project area

Item	Description	Photographs
Hearth	Hearth is a firepit or other fireplace features that are often made of fired clay balls, termite nest or occasionally ironstone and sometimes reflect multiple use.	
Midden	Middens are a concentration of artefactual debris that includes freshwater shells. Usually the result of interim or base camp activities and are normally situated within riparian zones. Lenses of freshwater mussel shells are also common in the dunes north of Lake Victoria.	
Artefacts scatters / isolated finds	Artefacts scatters are items associated with hunting or gathering activities, domestic camps or the manufacture and maintenance of stone tools. Isolated finds are artefacts that occur without any associated evidence of occupation. Defined as a single artefact located more than 60m from any other artefact. Isolated finds may also be indicative of subsurface archaeological deposit.	

Item	Description	Photographs
Scarred trees	A scarred tree is a tree from which bark has been removed by Aboriginal people for the creation of bark canoes, shelters, weapons such as shields, tools, traps, containers or other artefacts. Scars may include footholds cut in the tree to access birds nest etc. or holes cut in the tree to access honey or possums.	
Earth mounds	Earth mounds can result from a number of Aboriginal uses, in some areas of eastern Australian ceremonial rings (bora rings) are made by forming earth into shallow circular ridges and pathways. In the proposal study area however, earth mounds have been recorded that are related to a variety of uses including food preparation and camping.	

Heritage Management Procedure

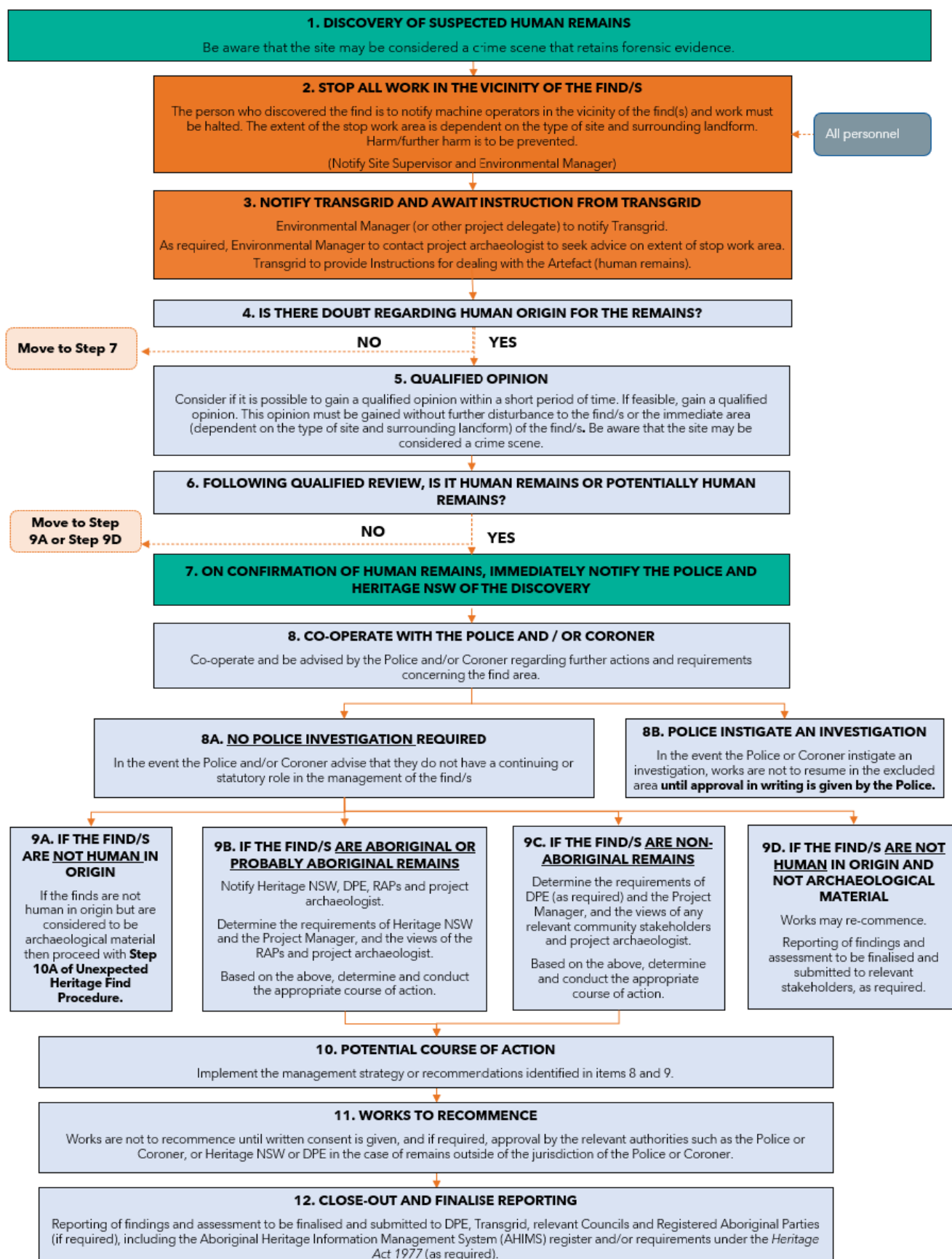
UNEXPECTED HERITAGE FINDS PROCEDURE



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Heritage Management Procedure

DISCOVERY OF SUSPECTED HUMAN REMAINS PROCEDURE



Appendix B - Registered Aboriginal Parties

Registered Aboriginal Parties were identified during the EIS process in accordance with *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010). The closing date for expressions of interest was 4 September 2020. Additional information is included in Section 5 of the Revised ACHAR.

Registrations of interest were received from:

- Dareton Local Aboriginal Land Council
- Griffith Local Aboriginal Land Council
- Murray Lower Darling Rivers Indigenous Nations
- Barkandji Native Title Group Aboriginal Corporation RNTBC
- Wagga Wagga Local Aboriginal Land Council
- Balranald Local Aboriginal Land Council
- Deniliquin Local Aboriginal Land Council
- Hay Local Aboriginal Land Council
- Narrandera Local Aboriginal Land Council
- Miyagan Culture and Heritage
- Roley Williams
- Sandhills Artefacts
- Muragadi
- Merrigarn
- Murrabidgee Mullangari
- Ian Woods
- Jamie Woods
- Richard Dixon
- Tara Dixon
- Kerrie Parker
- Mabel Fitzpatrick
- Tiem Wilson
- Jermaine Dixon
- Cherokee Dixon
- Bundyi Aboriginal Cultural Knowledge
- Balranald Mutthi Mutthi Traditional Owners
- Barkindji Maraura Elders Environment Team Limited (BMEET)
- Brian Gash
- Riverina Murra Regional Alliance
- Sissy Pettit Havea

- Terrence Singh
- Dallas Togo Singh
- Zakk Togo Singh
- Jed Pettit
- Alvira Wighton
- Alice Pettit
- Marie Murray
- Edward Smokey Murray Snr
- Ruth Murray
- Edward Murray Smith
- Daryl Singh
- Ray Woods
- Hay Aboriginal working party
- Yalmambirra
- Kureinji Nation
- Cheryl Penrith
- Will Carter
- John Winch*
- Mary Pappin*
- Verna Eades*
- Cynthia Pappin*.

*After submission of the EIS, this stakeholder also registered interest in the project.

'Aboriginal stakeholders' are defined in the Infrastructure Approval as the Registered Aboriginal Parties (RAPs) from the EIS.

Appendix C - Aboriginal sites and PADs

Aboriginal sites

Refer to Table C.1 for a list of Aboriginal sites identified in the Revised ACHAR (dated May 2022) and the Addendum ACHAR (dated January 2024).

Please refer to Table C.2 for a list of Potential Archaeological Deposits.

Table C.1 - List of Aboriginal sites

Information redacted for public display

Appendix D - Aboriginal heritage mapping

Information redacted for public display