Chapter 11

Cultural heritage

Acknowledgement of Country

Neoen Australia acknowledges the traditional custodians of the land in which we live, and pays its respects to their elders, past and present. The Gunditjmara are the original custodians of the Country on which the Project is located and we acknowledge them as the original custodians. We are committed to Aboriginal engagement and reconciliation and aim to bring Aboriginal and Torres Strait Islander people, local communities and the councils along for the journey to strengthen relationships and enhance local community outcomes.

Disclaimer

11 Cultural heritage

This chapter describes the potential impacts on Aboriginal and non-Aboriginal cultural heritage associated with the construction, operation and decommissioning of the Project, as well as the mitigation measures proposed to avoid, minimise and manage potential adverse impacts.

This chapter summarises the outcomes of the following technical reports:

- Aboriginal Cultural Heritage Technical Report, (see **Appendix J**)
- Historical Heritage Assessment (**Appendix K**).

11.1 Overview

Aboriginal cultural heritage is an important part of Australia's heritage and identity. Aboriginal places, objects and ancestral remains provide a tangible connection to the past, provide a sense of interconnectedness between past generations and present First Nations peoples, and facilitate a sense of belonging to the landscape. Intangible places underpin these physical elements of Aboriginal cultural heritage, where physical evidence of cultural heritage may not be present but hold spiritual significance. As well as historical importance, Aboriginal cultural heritage is of continuing significance; creating and maintaining continuous links with the people and the land.

The identification and conservation of places and objects of historical heritage significance is important, as these represent records of human interactions within the landscape. Historical heritage places can be significant to both the Victorian and Australian community more broadly and be an important part of national identity and sense of place.

Ground disturbance activities associated with construction of the Project, such as trenching and excavation, have the potential to impact on tangible Aboriginal cultural heritage and historical heritage places and values. There are 18 currently known Aboriginal places in the Project Area. Turbine and associated construction works are not anticipated to impact on these registered Aboriginal places as the Project design has been revised to avoid direct impacts on most of these places. There is potential for the required road and access networks to impact registered Aboriginal Places, where these impacts are identified, the Project will aim to avoid or mitigate impacts through altered construction design that will protect and preserve the Aboriginal places if possible. Construction of the Project may also result in impacts on intangible cultural heritage places and/or values.

Operation of the Project is not anticipated to impact on tangible Aboriginal cultural heritage as ground disturbance would largely cease and management processes in the Cultural Heritage Management Plan (CHMP) 17822, once approved, will help ensure that no direct or indirect impacts occur to previously registered Aboriginal places. The CHMP will outline the management processes to be followed during construction and operations to manage any potential impacts on known/registered Aboriginal places. CHMP 17822 will also include appropriate mechanisms and processes to manage any potential harm to unidentified Aboriginal places and cultural heritage values, including the potential for impacts on ancestral remains. Operation of the Project is also not considered to result in additional impacts on cultural view lines, cultural linkages and the sounds of Gunditj Mirring Country. Further consultation with the Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC) will also be maintained by the Project to facilitate the management and contingency measures of CHMP 17822.

Two historical sites are located in the Project Area: the Former Kentbruck School (H7121-0053), which was listed on the Victorian Heritage Inventory (VHI) as a result of Project investigations, and the Boiler Swamp Sawmill (D7121-0045), which has been delisted from the VHI. Construction activities have the potential to directly impact these sites, as well as any unknown historical heritage sites within the Project Area. Project infrastructure has been sited to avoid direct impacts on the known historical heritage sites. Implementation of mitigation measures, such as the demarcation of heritage sites within 10 m of Project works and historical heritage awareness inductions for all construction personnel, will further minimise the risk of impacts on known heritage sites. Unexpected finds procedures will also be implemented during construction to avoid and minimise potential impacts on any previously unidentified historical heritage sites.

11.2 EES evaluation objective

The specific environmental matters to be investigated and documented in this EES are set out in the *Scoping Requirements for Kentbruck Green Power Hub Environment Effects Statement* (the Scoping Requirements). The Scoping Requirements provide evaluation objectives that describe the desired outcomes to be achieved for each of the matters being addressed in this EES.

The following draft evaluation objective is relevant for the Aboriginal cultural heritage and historical heritage impact assessments:

***Cultural heritage** - To avoid or minimise adverse effects on Aboriginal and historic cultural heritage and associated values.*

This chapter and the Aboriginal cultural heritage and historical heritage technical reports: **Aboriginal Cultural Heritage Technical Report (Appendix J)** and **Historical Heritage Assessment (Appendix K)** address the Project's cultural heritage matters in response to the Scoping Requirements.

11.3 Assessment methodology

The following approach was undertaken for the Aboriginal cultural heritage assessment:

- Established the study area and characterised the existing Aboriginal cultural heritage conditions and environmental setting.
- Desktop review of relevant databases including the Victorian Aboriginal Heritage Register (VAHR), National Heritage List (NHL), and Commonwealth Heritage List (CHL), to identify registered Aboriginal cultural heritage places within the study area.
- Desktop assessment of relevant baseline reports and publicly available information, including archaeological reports, land use history, and relevant historical and ethnohistorical accounts of Aboriginal occupation in the region. This was undertaken prior to any CHMP fieldwork or site inspections as part of the standard assessment.
- Engagement with the relevant Registered Aboriginal Party (RAP), the GMTOAC, and nearby residents to gather local knowledge of the study area.
- A standard assessment as part of the CHMP process, completed over nine days from April to May 2021, involving the inspection of accessible locations within the study area for the presence of Aboriginal cultural heritage and archaeological sensitivity based on disturbance and landforms. This was undertaken by Aurecon.
- Development of a site predictive model in consultation with GMTOAC to better understand patterns of occupation and use of the landscape by First Nations people, and to identify landforms that have a greater potential to contain Aboriginal cultural heritage values. This engagement was undertaken by Andrew Long an + Associated (ALA) through both virtual and on Country meetings between September 2022 and April 2023.
- Field investigation through various stages during the EES process to define and build a robust predictive model guiding the EES and CHMP to avoid and mitigate construction impacts on potential Aboriginal cultural heritage.
- Prepared a complex assessment methodology based on outcomes from the **Aboriginal Cultural Heritage Technical Report (Appendix J)** and the predictive modelling, seeking endorsement of the methodology by GMTOAC prior to the complex assessment fieldwork phase. This methodology details the investigations that will be undertaken as part of the CHMP in parallel with the EES process.
- A Cultural Values Assessment (CVA) was sponsored by the Proponent and conducted at the request of the Gunditjmara native title holders to articulate their intangible cultural values within and around the Project Area. The intent of the CVA was to inform the preparation of an Indigenous Land Use Agreement (ILUA). A memo was prepared regarding the CVA and is included in Section 10.2 of the Aboriginal Cultural Heritage Technical Report (**Appendix J**).
- The methods undertaken to develop the CVA included:
    - Online community workshops and one-on-one online conversations lead by Gunditjmara.
    - On-Country community session at lake Mombeong hosted by GMTOAC.
    - Presentations and workshop with GMTOAC staff and previous one-on-one participants.
    - A review of and presentation of outcomes to Native Title.
    - Draft CVA presented to Gunditjmara community members.
- Identification and assessment of potential impacts on Aboriginal cultural heritage from construction, operation, and decommissioning of the Project.
- Development of mitigation measures to avoid, minimise and manage potential impacts.
- Assessment of the residual impacts on Aboriginal cultural heritage with the implementation of mitigation measures.

A Cultural Values Assessment (CVA) was sponsored by the Proponent and conducted at the request of the Gunditjmara native title holders to articulate their intangible cultural values within and around the Project Area. The intent of the CVA was to inform the preparation of an Indigenous Land Use Agreement (ILUA). A memo was prepared regarding the CVA and is included in Section 10.2 of the Aboriginal Cultural Heritage Technical Report (**Appendix J**).

The methods undertaken to develop the CVA included:

- Online community workshops and one-on-one online conversations lead by Gunditjmara.
- On-Country community session at lake Mombeong hosted by GMTOAC.
- Presentations and workshop with GMTOAC staff and previous one-on-one participants.
- A review of and presentation of outcomes to Native Title.
- Draft CVA presented to Gunditjmara community members.

- Several assumptions and limitations apply this methodology including:
    - Thebased assessment was extensive but not exhaustive, thus there remains the possibility that there a re Aboriginal places within the Project Area that have not been identified during the assessment.
    - Further revisions to the GMTOAC predictive model methodology are still in development in consultatio n with GMTOAC. As such, the methodology for subsurface investigations is subject to change through out the life of the assessment and potentially the Project.
    - Not all sections of the Project Area were accessible during the standard assessment. These areas wer e therefore assessed through the desktop assessment only.
    - Complexities of testing GMTOAC led iterative predictive model.
    - Highly variability across a small area (i.e. variability within the predicted archaeological sensitivity withi n a proposed turbine location). ALA approach is to look at proportions of ratings.

The following approach was undertaken for the historical heritage impact assessment:

- Established the study area and characterised the existing historical heritage conditions and environmental setting.
- Desktop review of relevant databases including the VHR and VHI and Heritage Overlays in the Glenelg Shire Planning Scheme (the Planning Scheme), the NHL, and CHL for any potential historic sites within the study area.
- Desktop-based research to identify and assess sites or precincts of potential archaeological sensitivity or historical cultural heritage value.
- Field investigation in March 2020 to assess cultural material that may be present and visible at historical heritage sites identified in the desktop analysis.
- Identification and assessment of potential impacts on historical heritage from construction, operation and decommissioning of the Project.
- Development of mitigation measures to avoid, minimise and manage potential impacts if required and address any specific permit issues where required by known or discovered historic places.
- Assessment of the residual impacts on historical heritage with the implementation of mitigation measures.

11.3.1 Study areas

The study area for the Aboriginal cultural heritage impact assessment includes the Project Area with a 2 km buffer, as shown in **Figure 11.1** and as per Section 6.2 of the ACH report. This study area was defined to enable a better understanding of the wider range of resources that may have been available for the Gunditjmara within and around the Project Area, which may have influenced past human activity. The study area is considered to contain a sufficient buffer around the Project Area to provide full consideration of potential impacts on Aboriginal cultural heritage.

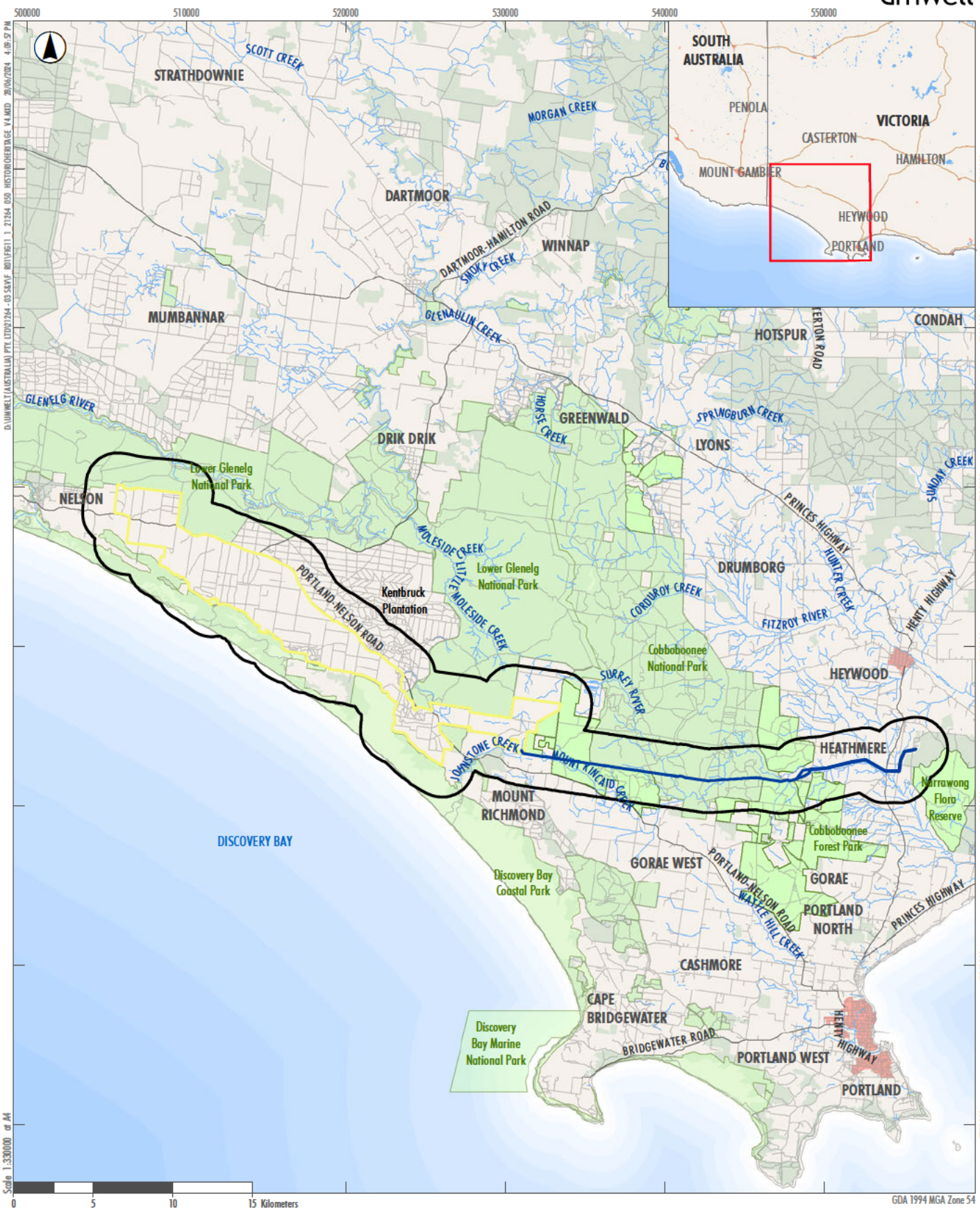
The study area for the historical heritage impact assessment was split into two ‘sub-areas’, as shown in **Figure 11.1**:

- Study Area 1 – the wind farm site
- Study Area 2 – the transmission line corridor.

11.4 Assumptions and limitations

Several assumptions and limitations are identified in the **Aboriginal Cultural Heritage Technical Report (Appendix J)**, which have been included here to give additional context to the information presented in this chapter:

- The desk based assessment was extensive but not exhaustive.
  There remains the possibility that there are Aboriginal places within the Project Area that have not been identifie d during the assessment.
- Further revisions to the GMTOAC predictive model methodology are still in development in consultation with G MTOAC. As such, the methodology for subsurface investigations is subject to change throughout the life of the assessment and potentially the Project.
- Not all sections of the Project Area were accessible during the standard assessment. These areas were therefo re assessed through the desktop assessment only.
- Complexities associated with testing the GMTOAC led iterative predictive model.
- Highly variability across a small area (i.e. variability within the predicted archaeological sensitivity within a propo sed turbine location). The approach taken by ALA in preparing the technical assessment)
  is to look at proportions of ratings.



Legend

- Aboriginal Cultural Heritage Study Area
- Historical Heritage Study Area 2
- Historical Heritage Study Area 1
- Parks and Reserves
- Roads
- Watercourses

FIGURE 11.1

Cultural Heritage Impact Assessment Study Areas

Image Source: Data source: Geoscience Australia; Forestry Corporation of NSW (2019); DSFI (2017); NPWS Estate (2019)

11.5 Aboriginal cultural heritage

Aboriginal cultural heritage places and objects are protected under the *Aboriginal Heritage Act 2006* (Vic) (AH Act). Under Section 49 of the AH Act, a CHMP is mandatory if the preparation of an EES is required. Therefore, to comply with the requirements of the AH Act, a CHMP (17822) is being prepared for the Project. Desktop and standard assessments have been undertaken to date, with the complex assessment to be completed in 2024. ALA are currently consulting with Gunditj Mirring regarding the complex assessment methodology based on the desktop and standard assessment outcomes (see **Aboriginal Cultural Heritage Technical Report (Appendix J).**

11.5.1 Existing conditions

11.5.1.1 Geomorphology and landforms

The geomorphological context of the study area provides insight into the resources that may have been available to Aboriginal people before contact with European people. This is important for determining the likelihood and potential for Aboriginal cultural heritage places to be present and the types of places that may occur. Certain landforms and land types are more strongly linked to human use and presence and are therefore more likely to contain Aboriginal cultural heritage.

The study area is located within four geomorphological units (GMUs) in the Western Plains and Coast geomorphological regions, as outlined in **Table 11.1** (see also **Figure 11.2**). The Western Plains major division comprises low-lying undulating plains formed on both volcanic and sedimentary material. More than half of the study area is situated on sub-division GMU 6.2.3, which is characterised by deep sands overlying clays along the limestone plain. The portion of the wind farm site located within pine plantation is situated on this GMU. The second largest GMU within the study area is GMU 6.2.1, which is characterised by sand slopes with surrounding low-relief plains and swamps. The eastern portion of the wind farm site which is on agricultural land, and the underground transmission line corridor, are both situated within this GMU. The underground transmission line corridor is primarily situated within GMU 6.1.4, which is characterised by undulating basalt stony rises with well-developed drainage and deep soils.

The smallest and southern-most portion of the study area is situated within the Coast geomorphological region, on GMU 8.5.2 which is characterised by a sandy surf beach which forms the long shoreline between the Glenelg River estuary and the basalt cliffs of Cape Bridgewater. This landform contains low open scrubby vegetation with exposed dune blowouts, outcrops, cliffs and rock platforms.

Table 11.1: Geomorphology of the study area

Major division	Sub-division GMU	Area		Indication of land use
		ha	% of study area	
Western Plains	6.1.4 Plains with well-developed drainage and deep regolith (Cressy)	4,300	16.7	Agricultural and pastoral land use, quarrying, road works
	6.2.1 Plains with ridges (Follett)	7,200	28	Forestry, road works and Agricultural and pastoral land use
	6.2.3 Karst plains with depressions (Warrnambool)	13,600	53	Forestry/Plantation works
Coast	8.5.2 Transgressive dunes – Sea level (Discovery Bay)	600	2.3	Beach fronts/recreational tracks
Total		**25,700**	**100**	

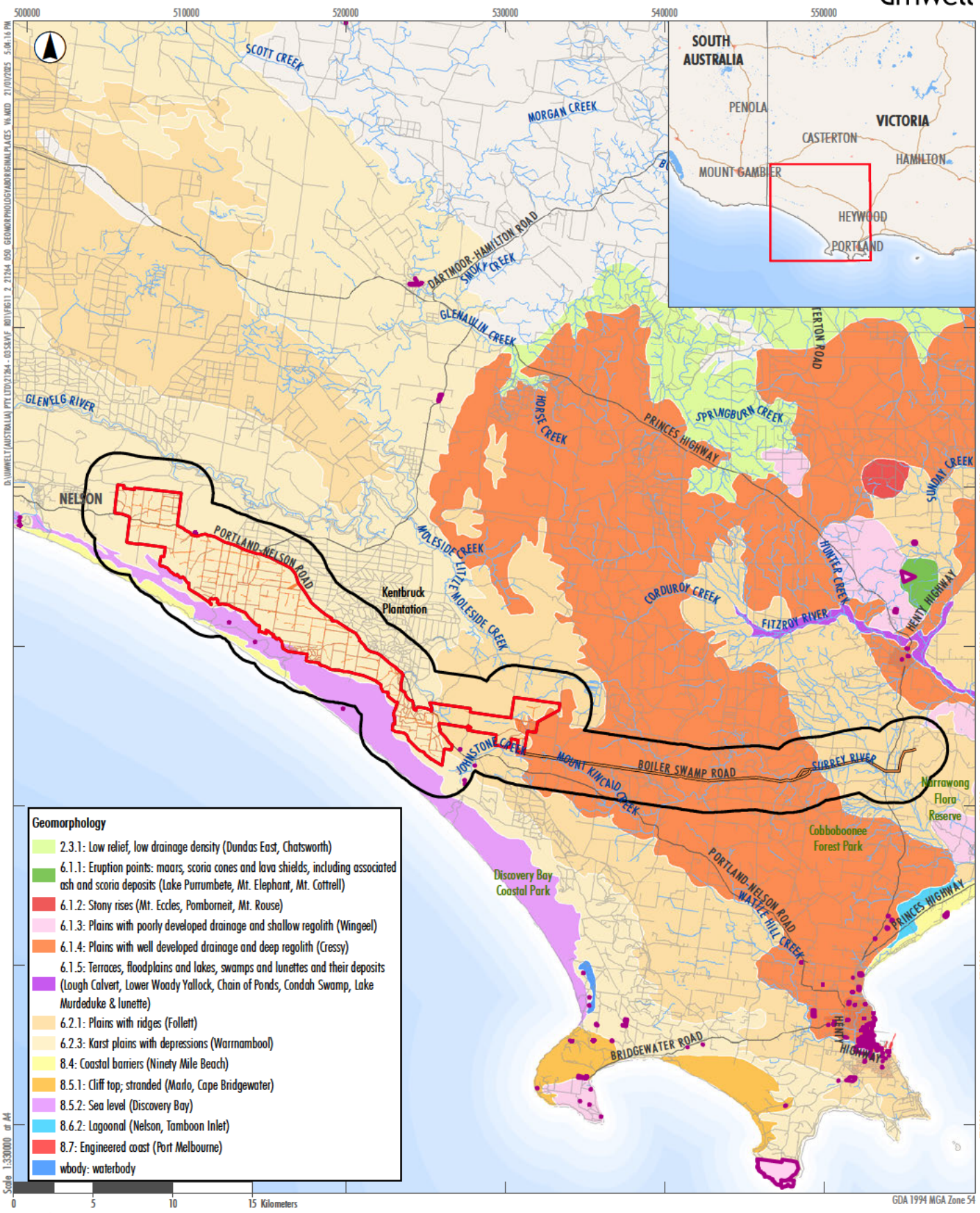


FIGURE 11.2

Geomorphology and Registered Aboriginal Places in the Study Area

Image Source: Data source: Geoscience Australia; Forestry Corporation of NSW (2019); DSFI (2017); NPWS Estate (2019)

11.5.1.2 Historical environment

The environmental context of the study area and the possible resources available to Aboriginal people before European contact provide an understanding of what areas may have served as a focus for Aboriginal use and occupation. A review of environmental datasets and modelled pre-1750 vegetation mapping of the area was undertaken to gain insight into the environment utilised by hunter-gatherer groups within the region. Aboriginal occupation was often centred around waterways and areas adjacent to water sources, including swamps. While there are no major watercourses present within the study area, there are several smaller rivers and creeks including the Surrey River. The swamp lands and wetlands that surround the study area, such as Long Swamp and Lake Mombeong, would have provided Aboriginal people with freshwater and abundant animal and plant resources.

Prior to European settlement, woodland complexes and grasslands were the dominant vegetation types within the study area. Along the ridges and escarpments, the study area was characterised by heathy and grassy dry forests comprising an overstorey of generally open Eucalypt forest. Grassy and herb-rich forests typically occurred on valley floors and plains on alluvial soils in proximity to intermittent streams or drainage lines. The array of plant resources available to Aboriginal people in and around the study area would have provided a range of tubers, fruits, berries, seeds, grasses, reeds, bark, and leaves. These would have been used for food, medicines, fibre for making string and weaving, reeds for making baskets, bark for shelters, canoes, and containers. In addition, some of the prominent faunal resources that would have been available to Aboriginal people in the study area include kangaroos, wallabies, possums, wombats, echidnas and platypus, and a range of bat, quoll, pygmy, glider, marsupial mice and birds species, including water birds such as pelicans, ducks and swans. Coastal resources would have also provided sources of fish and shellfish.

Vegetation within the Kentbruck land unit originally consisted of a dry sclerophyll forest or tall woodland predominantly of stringybark and manna gum, with some peppermint gum. Karst landforms generally general consist of impenetrable vegetation and that may not have been conducive for longer term occupation.

11.5.1.3 Historical and ethnohistorical accounts

A review of available ethnohistorical and historical information relating to Aboriginal people was undertaken to investigate Aboriginal subsistence and occupation patterns relevant to the study area. This information assisted in interpreting archaeological sites in the broader region, and in predicting the potential location of archaeological site types within the study area.

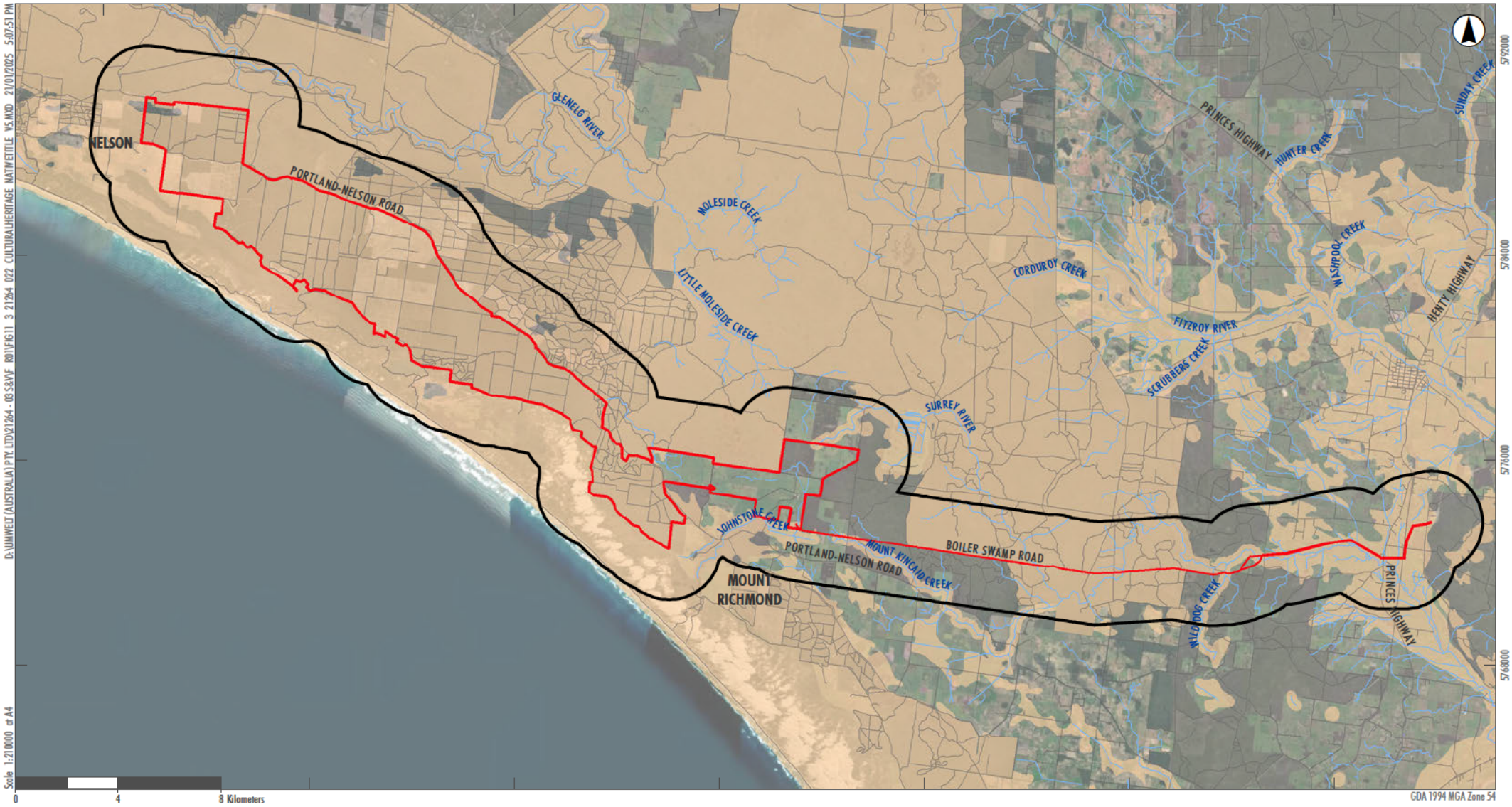
The information was gathered from several written sources based on language research and ethnohistoric observations. It was derived from publications and other surviving forms of documentation, which were compiled by early European settlers, missionaries and government officials who went to the region during the mid to late 19th century, so does not necessarily reflect the opinions of the Aboriginal community regarding their tribal affiliations and boundaries. The study area is situated within the traditional lands of the Dhauwurd wurrung speaking Gunditjmara, which extend across the region surrounding Portland and Lake Condah, as well as the Glenelg to Gellibrand River and inland for 50 miles or more. The Gunditjmara were divided into 59 clans, with the Narcurrer gundidj, Tarrerwung gundidj, and Tarngonene wurrer gundidj living in and responsible for the region surrounding the study area.

European settlement in the region had a significant effect on local Aboriginal populations. Steep declines in population were recorded soon after European settlement, with a 73 % decrease in the population of the *Gunditgmara* from 1850 to 1862. Disease and conflict took a heavy toll on the *Gunditjmara* after European people arrived, with further displacement occurring as a result of European settlement. In 1861, 3,500 ha of land on the Hopkins River was reserved by the government for the exclusive use of Aboriginal people. The site was managed by the Church of England from 1865 to 1866 before it was handed to the Central Board for Protection of Aborigines. In 1867, the Board decided to close the site and move the residents to the Lake Condah Mission. The passing of the *Aborigines Protection Law Amendment Act 1886* redefined the legal definitions of Aboriginality, which forced a number of people to leave the Lake Condah Mission who no longer met the definition criteria. Many of these people moved to Little Dunmore, just south of the mission.

11.5.1.4 Known Aboriginal places

The majority of the study area is within an area of cultural heritage sensitivity (see **Figure 11.3**). Areas of cultural heritage sensitivity are defined under the *Aboriginal Heritage Regulations 2018* (AH Regulations) and relate to landforms and soil types where Aboriginal places are more likely to be located. This includes land within 200 m of a named waterway and land within 50 m of a registered Aboriginal cultural heritage place.

A search of the VAHR was undertaken on 17 May 2023 and 20 February 2024 and found that there are a total of 228 registered Aboriginal cultural heritage places within the defined Study Area (2 km buffer around the Project Area). There are a total of six previously registered Aboriginal places within the Project Area, which are described in **Table 11.2**. The Aboriginal places within the Study Area comprise shell middens (n=156), artefact scatters (n=58), earth features (n=7), Low Density Artefact Distributions (LDADs) (n=5), and two scarred trees. The search results reveal a prevalence of Aboriginal places occurring within 500 m of the coastline. No Aboriginal places within the study area are listed on the NHL or CHL.



Legend

- Project Area
- Aboriginal Cultural Heritage Study Area
- Areas of Cultural Heritage Sensitivity

FIGURE 11.3

Areas of Cultural Heritage Sensitivity

Image source: ESRI Basemap (2021) Data source: NTTT (2020), Victorian Government (2022)

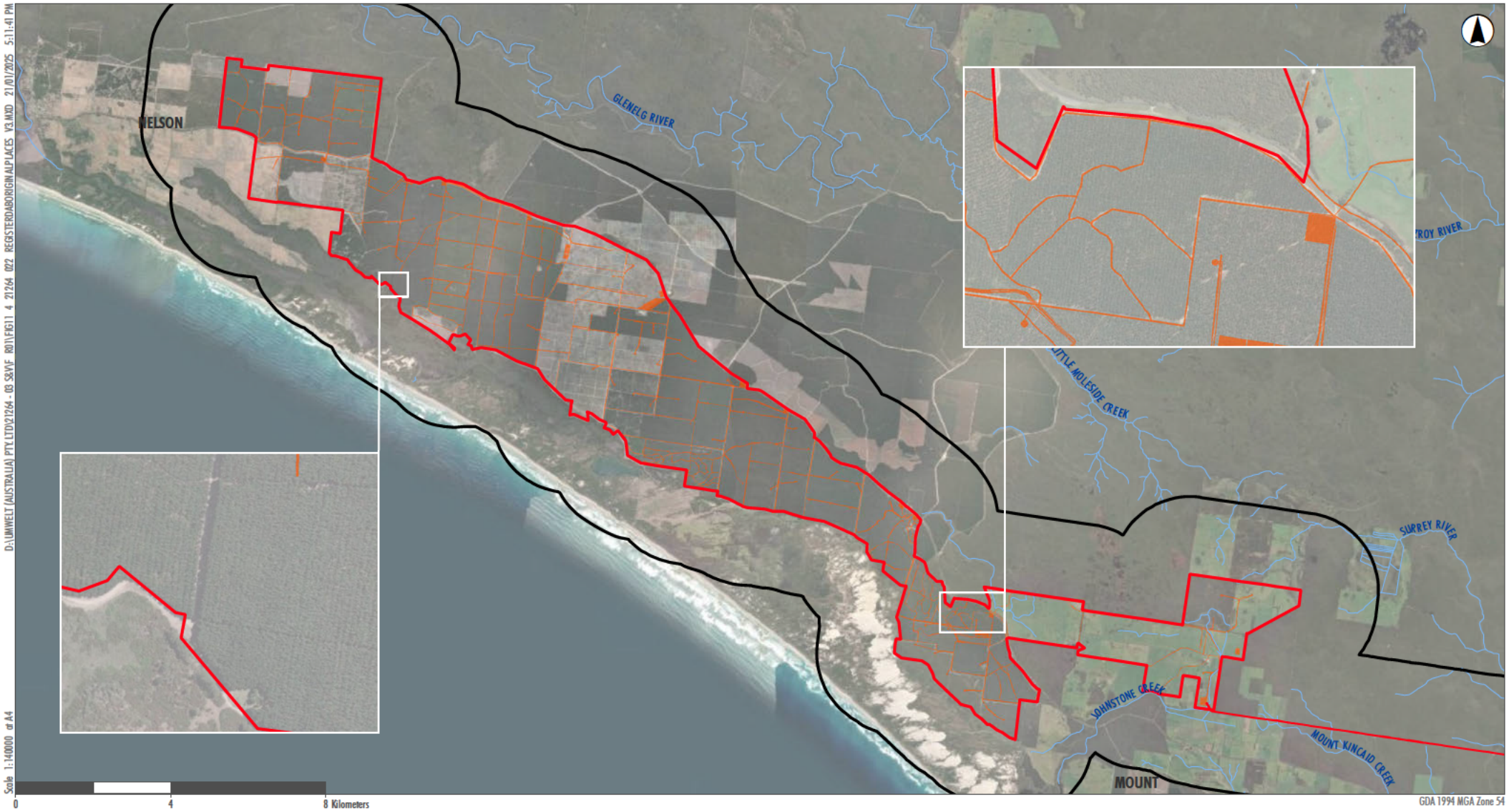


FIGURE 11.4

Registered Aboriginal Places in the Wind Farm Site

Image source: ESRI Basemap (2021) Data source: NTTT (2020), Victorian Government (2022)

[redacted]

[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]

11.5.1.5 Standard assessment results

A standard assessment was undertaken for the CHMP to understand the current ground conditions within the study area and assess the potential for any areas of significant archaeological interest. The standard assessment involved a combined pedestrian and vehicle survey and targeted the hardstand and foundation locations of the wind turbines, access tracks, laydown areas and underground transmission line. It should be noted that not all sections of the Project Area were accessible during the standard assessment. Inaccessible areas were therefore assessed through the desktop assessment only. Standard assessment survey works did not include digging.

Three new Aboriginal places were recorded within the Project Area during the standard assessment (see [redacted]):

- [redacted]

The locations of these Aboriginal places are disturbed, having previously been exposed to land clearance, utility installation, roadworks, and landscaping activities.

Given the presence of registered Aboriginal places and the potential for additional Aboriginal cultural heritage to be present within the study area, and that it is not possible to identify the extent, nature and significance of Aboriginal cultural heritage without subsurface investigation, complex assessment was determined to be required under Regulation 64(1)(b) of the AH Regulations.

The complex assessment is yet to be undertaken as part of the Project's CHMP. A proposed methodology for the complex assessment has been developed by ALA and is being discussed by Gunditj Mirring, with subsurface investigations commencing in May 2024. The complex assessment will enable the extent of known Aboriginal archaeological deposits to be determined, thereby ensuring that appropriate avoidance and minimisation measures can be developed. Refer to **Section 11.7** for the objectives of the complex assessment.

It should be noted that the standard assessment undertaken by Aurecon as part of the CHMP process, as detailed in the **Aboriginal Cultural Heritage Technical Report (Appendix J),** was based on an early layout of the Project. The complex assessment to be undertaken by ALA will be based on the final Project layout, which will maximise the opportunity for Aboriginal cultural heritage to be identified prior to construction commencing on the Project and will involve digging.

11.5.1.6 Site predictive model

A review of the VAHR against geomorphological mapping (see **Figure 11.2**) indicates that the Aboriginal cultural heritage place types likely to be present within the study area are influenced by landform. Areas considered to have the highest likelihood of containing Aboriginal cultural heritage were in the vicinity of the southern boundary of the GTFP pine plantation, predominantly within 500 m of waterbodies. This corresponds with the Discovery Bay landform (GMU 8.5.2) where shell middens will mostly likely be found (see **Figure 11.2**). Usually, but not always, artefact scatters will be found in association with the shell middens.

The next closest landform to the coastline (GMU 6.2.3) has a smaller number of shell middens present, which decreases to a minor number when the more northerly GMU 6.2.1 and GMU 6.1.4 landforms are encountered. This distance decline is to be expected for coastal shell midden distribution. It is also noted that the presence of shell middens upon GMU 6.2.3 may be slightly skewed as there is an area around Bridgewater and Nelson Bay where the landform meets the coastline, and several shell middens are recorded in these areas.

ALA developed a site predictive model in collaboration with the GMTOAC, to establish associations between Aboriginal cultural heritage material and the presence of chromosols or landform features and allow for a more detailed impact assessment for Aboriginal cultural heritage values. GMTOAC and ALA initially discussed several different approaches involving a focus on specific soils within the landscape to investigate the potential correlation between the likely presence of Aboriginal heritage places on leeward slopes through potential correlation with visible red chromosols (red soils that display a strong texture contrast between the surface and subsoil horizons). This led to three phases of testing and analysis in the field to provide data on the proposed correlation and known heritage values present within those landform determinations.

The first two phases of model testing (Section 8.4 of the ALA technical report) detailed the distribution of soils and landforms and their potential correlation to Aboriginal cultural heritage. The results indicate that elevation and landform have an impact on the occurrence of red soils (chromosols), in that they were identified in specific elevations and landform aspects along prominent karst ridges. It was concluded that chromosols likely cover the majority of the project area however dolines have been significantly covered by windblown sands and heavily overlain with material. At specific elevations and slope grades where sands were not deposited in this manner or where sands have been eroded, the chromosols are evidently apparent and shallow in profile. Phases one and two of model testing also identified a distinction between surface artefact appearances and subsurface artefact appearances correlating to those landform, elevation and slope elements. It appeared that the greatest potential for Aboriginal cultural heritage material is the shoulders or mid-slopes of karst landforms at moderate elevations associated with non-chromosol soils

At the completion of the phase one and two testing, the initial hypothesis of correlation between the presence of chromosols and surface Aboriginal cultural heritage material appeared to be incorrect, as more subsurface Aboriginal cultural heritage material was identified in non-chromosol locations. These results suggested that chromosol presence, elevation and landform elements contribute to the sensitivity for Aboriginal cultural heritage in a more complex manner.

Phase three testing (Section 8.5 of the ALA technical report) of the predictive model methodology considered the presence of chromosols as well as elevation and landform in terms of Aboriginal cultural heritage sensitivity. The preliminary function of the model was applied to 105 turbine locations which were assessed against the presence of chromosols, elevation, and landform element. Six subsurface excavations were conducted at eight turbine locations that were predicted to have 0 % archaeological sensitivity for subsurface artefacts. Of the 48 test pits excavated, 13 of the test pits were artefact positive, of which 10 were located within areas of predicted moderate archaeological sensitivity, one within an area of predicted low/moderate archaeological sensitivity, and within predicted low archaeological sensitivity.

Therefore, the findings of phase three testing aligned with its original hypothesis: areas of mapped moderate archaeological sensitivity were found to be largely artefact positive, with the areas mapped as being of low archaeological sensitivity were largely artefact negative.

11.5.1.7 Intangible values

Intangible values are specifically related to non-archaeological Aboriginal heritage places and/or values that may be situated within the activity area, greater landscape, and cultural understanding of the region.

The current draft CVA identified the following intangible values associated with the Project Area and surrounds:

- Resource and Gathering Places – surrounded by and linking, Nyamat Mirring (sea), Bochara Mirring (Glenelg river) and Woorrowarook Mirring (Cobbobboonee forest) country. Providing locations rich with resources and ancient cultural gathering spaces for Gunditjmara and Gunditj Mirring people.
- Sounds of Country – particular locations within the region that evoke specific auditory connections and spaces within the landscape that take you back to a pre-conquest understanding of land use and immersion.

- Sky Country – is linked to the major waterbodies and still waters that reflected the sky like a map of the above allowing for cultural knowledge of ecologies and Gunditjmara people within the landscape.
- View Lines and Cultural Linkages – are visual links across the country associated with points of elevation over the landscape noting cultural sites, teaching places and wayfinding. These often have a spiritual connection for Gunditjmara and form cultural linkages.
- Trauma lines – associated with the damage already done to Gunditjmara and Gunditj Mirring peoples as a result of European conquest and development, altering the landscapes gathering places, sounds, views and cultural knowledge.

During the CVA and EES process, specialist assessments were identified as being of interest when considering impacts and specific sites that could be viewed through a cultural lens. The **Flora and Fauna Existing Conditions Impact Assessment (Appendix C)** (could show impacts to cultural linkages on country through native vegetation impacts and listed species and ecological communities that marked these habitats. The **Surface Water Impact Assessment (Appendix F)**, **Groundwater impact Assessment (Appendix G)** and **Groundwater Dependent Ecosystem Impact Assessment (Appendix H)** highlight links to sky country and cultural linkages through stream flows, habitats and environs amongst others which could be impacted. The **Landscape and Visual Impact Assessment (Appendix L)** highlights potential links to cultural view lines and associated impacts. The **Environmental Noise Assessment (Appendix O)** may consider connections and adverse effects for community amenity and safety during the project works.

These chapters including their mitigation measures have been identified as a consideration for the CVA through indirect effects to the cultural values of Nyamat Mirring (Sea Country), Bochara Mirring (Glenelg River Country), and Woorrowarook Mirring (Forest Country – Cobbobboonee Forest).

The Proponent acknowledges that GMTOAC are the only people who can make an assessment about whether changes to the landscape from the operation or construction of the Project would effect the significance of intangible cultural values. Measures proposed to assist in managing potential impacts on intangible heritage during operations include ongoing consultation, engagement and involvement where practicable with GMTOAC. In addition, GMTOAC Research Principles and Guidelines will be employed to ensure that Gunditjmara Country and cultural values are respected and protected during the operational phase of works.

11.5.2 Construction impacts

Ground disturbing activities during construction may disturb or destroy known and unknown Aboriginal cultural heritage places present within surface and subsurface deposits in the Project Area. The proposed construction impacts are linked to the Project components which may impact Aboriginal cultural heritage. These construction impacts are linked to the following:

- **Wind turbines** – 105 turbines requiring hardstand areas and foundations impacting a 0.4ha surface per turbine location with rock anchor foundation impacting 25m diameter and minimum 4m depth of subsurface area.
- **Electrical reticulation** – Comprising of main substation impacting 3.3ha of hardstand and concrete area with subsurface impacts for utilities and services. Additional collector substations are proposed impacting a 1ha area in the same manner as the main substation.
- **Onsite wind farm powerlines** – Powerlines will be both underground and overhead with impacts expected to reach 190km worth of subsurface buried power lines and 27.8km of high voltage overhead powerline structures being installed.
- **Transition stations** – Transition station will support the high voltage overhead powerline impacting approximately 1ha of area along Portland-Nelson Road and Sandy Hill Road. Additional terminal poles, cable, termination structure and other equipment and switch gear will be installed with a potential auxiliary building (15 m x 4 m).
- **Transmission line** – Connecting into the existing transmission network, additional lines will impact 26.6 km of underground area with 17.6 km of subsurface lines along Cobboboonee National and Forest Park areas along Boiler Swamp Road. Trenching impacts are expected to be between 6.5 m and 9 m wide to facilitate the lines.
- **Site access and access roads** – Impacts comprise 10 proposed access points (9 of which are previously existing) they will largely piggy back on existing roads and plantation roads however individual access tracks to hard stand areas and construction will have to be created with the existing road network likely needing, roads are expected to be 5–10 m wide to facilitate access.
- **Onsite Quarry** – Quarry will seek to extract approximately 300,000 cubic metres of material out of a viable 450,000 cubic metres of material. The quarry will require an impact footprint of 18 ha with maximum depth of extraction to 14 m.
- **Meteorological monitoring masts** – A total of 8 masts will be required, impacts are to be localised but currently their placements is unknown.
- **Permanent site compound** – Predicted impact will be hardstand and footings up to 0.35 ha for a permanent on site compound including utilities, services and laydown areas.

- **Temporary ancillary infrastructure** – These will include 3 concrete batching plants of up to 1 ha area if impact, multiple laydown areas up to 1ha area of impact per site and 6 construction compounds of 2 ha area impacts per compound.

Construction may also impact on intangible Aboriginal heritage places and/or values. These are being reviewed through consultation with the RAP. The EES and CHMP are looking at managing the construction impacts through tailored management conditions and the application of an iterative cultural sensitivity model to help guide locations for construction impacts and management outcomes. The mitigation measures are further detailed in **Section 11.6** of this chapter.

11.5.2.1 Disturbance of known Aboriginal cultural heritage places

The majority of previously registered and identified places within the Project Area would not be impacted by the Project. Three components of Kentbruck 15 LDAD (VAHR No. pending) and Kentbruck LDAD 1 (VAHR No. pending) would potentially be impacted by the underground reticulation works. The mitigation measures for these places are still under consultation and subject to change with the completion of the CHMP, however the focus will be on avoiding impacts through realignment of reticulation.

The development of the mitigation measures is expected to reduce residual impact on known Aboriginal places where possible. Where impacts cannot be reduced the mitigation measures are expected to prevent the loss of information regarding impacted Aboriginal places.

11.5.2.2 Disturbance of unknown Aboriginal cultural heritage places

Although disturbance of unknown Aboriginal cultural heritage is not possible to quantify, there is potential for construction of Project infrastructure to impact on unknown Aboriginal cultural heritage. The **Aboriginal Cultural Heritage Technical Report (Appendix J)** provides various measures and approaches to assess the potential impacts from specific locations of Project infrastructure.

All locations are expected to have variable forms of surface and subsurface impacts on the landform in some capacity, although many of these impacts have been reduced through design refinement including revision of the turbine layout from 157 to 105 turbines. Specific mitigation measures have been put in place to further minimise risk including the development of the predictive model and impact resolution flow chart to assess the potential impact at each location and minimise unexpected impacts on Aboriginal cultural heritage through avoiding areas that have moderate to high archaeological sensitivities. This approach has been developed as it is not possible to accurately determine if any one specific location or impact would harm Aboriginal cultural heritage or if heritage material is present at that location. The provided modelling will inform the potential impacts and assist in applying appropriate measures to avoid, mitigate or protect unknown Aboriginal cultural heritage from potential harm.

No previously identified or recorded Aboriginal places are located within the underground transmission line from site to Heywood Terminal Station. The level of risk to unregistered Aboriginal cultural heritage places that may be situated within areas subject to construction and installation of the underground transmission line is expected to decrease as a result of preparation and implementation of an approved CHMP.

Once finalised and approved, CHMP 17822 will outline procedures, management conditions and contingency measures in the event that unrecorded Aboriginal cultural heritage material is encountered during the construction phase of the Project (see mitigation measure MM-AH01).

With implementation of the predictive model and flow chart in the first instance, followed by the implementation of mitigation measures as documented within the CHMP, the residual impact on unregistered Aboriginal places (if identified during works) within the Project Area would not be significant.

11.5.2.3 Impacts on intangible Aboriginal heritage places and/or values.

Construction of the Project may result in indirect effects on Nyamat Mirring (Sea Country), Bochara Mirring (Glenelg River Country), and Woorrowarook Mirring (Forest Country – Cobbobboonee Forest) as well as potential indirect effects to Sky Country, cultural view lines, the cultural linkages and the sounds of Gunditj Mirring Country.

This EES includes mitigation measures to avoid/minimise impacts on biodiversity and habitat, flora and fauna of the Project Area, aquatic environments, landscape and visual amenity, as well as noise and vibration, that will, in turn, avoid/minimise the indirect effects to the cultural values of Nyamat Mirring (Sea Country), Bochara Mirring (Glenelg River Country), and Woorrowarook Mirring (Forest Country – Cobbobboonee Forest).

Furthermore, GMTOAC, will continue to be consulted, and involved where practicable, before, during, and after the construction phase. GMTOAC Research Principles and Guidelines must be employed to ensure that Gunditjmara Country and cultural values are respected and protected during the operational phase of works (see mitigation measure MM-AH01). CHMP 17822 will provide processes to manage harm to intangible heritage during the construction phase by detailed conditions and contingency plans.

11.5.3 Operation impacts

Potential impacts on Aboriginal places, intangible cultural values, areas of cultural heritage sensitivity, and native title land would occur during the construction phase of works. Outside of this primary impact and after all the construction and associated infrastructure are completed it is anticipated that there will be no further impacts from the operational phase of works. The project seeks to manage impacts to view lines and cultural linkages prior to and during the construction phases to limit post construction and operations impacts to heritage and intangible values. There may still be residual impacts from noise, however these will be assessed through ongoing liaison with GMTOAC throughout the project. The overall risk to intangible, Aboriginal places and non-archaeological Aboriginal heritage is expected to be reduced to low or negligible results through the ongoing consultation with GMTOAC, development of the CHMP and establishment of the EES.

11.5.4 Decommissioning impacts

Decommissioning of the Project is unlikely to impact Aboriginal cultural heritage places and values, as areas of disturbance would be limited to the construction footprint. Any impacts would therefore occur during the construction phase of the Project.

11.6 Historical heritage

In Victoria, heritage places of state significance are recognised and protected through listing on the VHR under the *Heritage Act 2017* (Vic) (Heritage Act). The Heritage Act protects all archaeological sites, with known sites listed on the VHI. Places of local heritage significance are protected through Heritage Overlays in local planning schemes in accordance with the *Planning and Environment Act 1987* (Vic) (P&E Act).

11.6.1 Existing conditions

11.6.1.1 History of the region

The main industry within the study area has historically been agriculture. Forestry became more prevalent in the early 19th century. Sawmilling was particularly important as evidenced by the numerous townships that were established to directly support the industry, including at Portland, Heywood, Gorae, Gorae West, and Dartmoor. A delisted VHI site known as the Boiler Swamp Sawmill (D7121-0045) is located within Study Area 2. The site card indicates that the sawmill was located on the northern side of Boiler Swamp Road in a cleared area and the remains of the boiler have been relocated to the southern side of the road.

The economic base of the area had shifted by the 1880s and 1890s towards dairying, which saw the establishment of the Portland and Cape Bridgewater Cheese and Butter Factory. A fishing industry was also established at Cape Bridgewater during this time. A cattle and sheep market emerged around the turn of the century at Lower Cape Bridgewater.

In the 1920s, exotic softwood plantations were established in the region by the Forests Commission. Unemployed men were brought to the area in the 1930s to expand the plantations and many camps were established deep in the bush for these workers. Radiata pine continued to be planted at Kentbruck throughout the 1950s following the Second World War.

During the remaining decades of the 20th century there was a general shift away from rural self-sufficiency on primary production, to urban areas with larger scale industry and production. Today, the majority of landholders no longer make a living from small-scale farming. Instead, large industries such as the Portland aluminium smelter and forestry provide the main economic base. Tourism and holiday and retirement properties have also become important to the area.

11.6.1.2 Archaeological potential

An assessment of archaeological potential was undertaken to predict the levels of preservation of archaeological resources within the Study Area. Archaeological potential is influenced by the geographical and topographical location, level of development, subsequent impacts, levels of onsite fill, and factors such as soil type which can influence preservation.

Background research undertaken for the two study areas identified two potential historical heritage sites:

- A portable steam boiler in Study Area 2 associated with the Boiler Swamp Sawmill (see **Section 11.5.1.5** for further information).
- Archaeological relics associated with the former Kentbruck School in Study Area 1 (see **Section 11.5.1.4**).

11.6.1.3 Listed historical sites

Searches of the NHL and CHL and the State VHR and VHI were undertaken in March 2020. As shown on **Figure 11.5,** two heritage sites of significance were identified in the study area: The Former Kentbruck School (H7121-0053) and Boiler Swamp Sawmill (D7121-0045). The Boiler Swamp Sawmill has been delisted from the VHI and is located immediately adjacent to Study Area 1. A summary of these sites is provided in **Table 11.3**, with more detail provided in **Sections 11.5.1.4** and **11.5.1.5**.

It is noted that an additional site was identified in Study Area 1, Native Wells. The Native Wells site appears on early parish maps and disappears from the later map records. While the site is located within the study area, no historical evidence was identified at this site. There is a very low likelihood of European archaeological relics present at the site. Therefore, it has not been considered further in the **Historic Heritage Impact Assessment (Appendix K).**

Table 11.3: VHI listed and delisted historical heritage sites in the study area

Historical site	Listing ID	Location	Existing condition	Archaeological potential
Former Kentbruck School	H7121-0053	In the eastern section of the wind farm site (Study Area 1), within GTFP pine plantation, near the Portland-Nelson Road / Sandy Hill Road intersection. More than 145 m from the nearest Project infrastructure.	The exact location of the site could not be located during field surveys, but communication with a resident of the area confirmed that the location shown on **Figure 11.5** is correct. The area is overgrown and in poor condition. No archaeological remains are visible.	Low
Boiler Swamp Sawmill	D7121-0045 (delisted)	Adjacent to the underground transmission line corridor in Study Area 2, a few metres from the southern edge of Boiler Swamp Road.	Boiler remains are in a secondary location and the sawmill is no longer present. Boiler is in good condition.	Low

Several other heritage places listed on the VHI and Planning Scheme Heritage Overlay are located near the study area. As shown in **Figure 11.5**, these sites are not located within the study area and would not be impacted by the Project so are not discussed further in this chapter.

Legend

- Proposed Turbine Location
- Study Area 1
- Study Area 2
- Sites Listed on the Heritage Overlay
- Construction Footprint
- Roads
- Watercourses
- Historical Places

Image Source: ESRI Basemap (2021) Data source: DELWP (2021); Geoscience Australia (2021); Aurecon (2021)

FIGURE 11.5

Historical Heritage Assessment
Study Area 1

FIGURE 11.6

Historic Heritage Assessment Study Area 2

Image Source: ESRI Basemap (2021) Data source: DELWP (2021); Geoscience Australia (2021); Aurecon (2021)

11.6.1.4 Study Area 1

Based on local knowledge and background research undertaken to determine archaeological potential, the Former Kentbruck School site was identified as a potential historical site within Study Area 1.

A site inspection was undertaken on 19 March 2020 to assess the material culture that may be present and visible on the ground surface within Study Area 1. The exact location of the Former Kentbruck School site was unable to be identified due to a lack of surface visibility and no exposed footings from the original building (see **Plate 11.1**). However, the approximate location of the site was confirmed by a resident of the area.

The Former Kentbruck School was constructed in the 1880s but was subsequently demolished or removed. However, the site has further potential for evidence of occupation as attested by the presence of ceramic fragments from the c.1850s (see **Plate 11.2**). As a result of this assessment and in consultation with HV, a site card was submitted to HV for the Former Kentbruck School site. The site was determined to meet the threshold for listing under the Heritage Act and was subsequently listed as a heritage place on the VHI (H7121-0053).

The likelihood of further archaeological relics being present in the wider area surrounding the former Kentbruck School Site is considered low.

Plate 11.1: Photo looking west to Portland-Nelson Road showing the approximate location of the Former Kentbruck School (Biosis, 2020)

Plate 11.2: Photo of c.1850s blue and white ceramic found in Study Area 1 (Biosis, 2020)

11.6.1.5 Study Area 2

A site inspection was undertaken on 17 April 2020 to assess the material culture that may be present and visible on the ground surface in Study Area 2. A heritage site (Boiler Swamp Sawmill) was identified immediately adjacent to Study Area 2 (see **Figure 11.6**).

The Boiler Swamp Sawmill has been delisted from the VHI (D7121-0045). Site investigations identified a steam boiler on Boiler Swamp Road which is part of the delisted Boiler Swamp Sawmill heritage site (see **Plate 11.3**). The site was inspected for evidence of the original sawmill, however no visible archaeological remains or on to the environment from sawmill practices were identified. As the transmission line would be confined to Boiler Swamp Road, further surveys were not conducted within Cobboboonee National Park.

The boiler was found to be positioned on modern sleeper logs on the southern side of Boiler Swamp Road. It is unlikely that the boiler is in its original location. The likelihood of other archaeological relics being present in the area surrounding the boiler is therefore considered to be low.

A site card was submitted for the Boiler Swamp Sawmill at the request of HV, however HV determined that the site does not meet the threshold for listing on the VHI.

Plate 11.3: Photo of the steam boiler on Boiler Swamp Road, which is part of the Boiler Swamp Sawmill delisted heritage site (Biosis, 2020)

11.6.2 Construction impacts

11.6.2.1 Known heritage sites

During construction, ground disturbing activities have the potential to directly impact on historical heritage sites within the study area.

The Former Kentbruck School site is located within the wind farm site (see **Figure 11.5**), however Project infrastructure has been sited to avoid impacts on the historical heritage site. As Project activities would not impact the Former Kentbruck School site, a consent application under the Heritage Act would not be required.

The Boiler Swamp Sawmill site is located immediately adjacent to the underground transmission line. Delisted VHI sites such as the Boiler Swamp Sawmill do not have State significance and are not afforded any legislated protection under the Heritage Act. The Project would therefore not require consent from HV for carrying out works near the Boiler Swamp Sawmill. However, as the boiler on Boiler Swamp Road is of historical interest and located adjacent to the Project's construction footprint, mitigation measures will be implemented to avoid impacts on the boiler during construction. If impacts cannot be avoided, The Proponent will consult with HV to determine whether the boiler should be moved back to its original location, to a local museum, or to another safe location nearby.

Micrositing of Project infrastructure will be undertaken to avoid known heritage sites and ensure impacts are avoided. Heritage sites within 10 m of Project works would be marked with suitable exclusion fences, bunting or similar. Signage will be used to clearly indicate that marked sites are to be avoided (see mitigation measure MM-HH02). All employees/contractors involved in ground disturbing works would be provided with an historical heritage awareness induction (see mitigation measure MM-HH01).

The Project is not expected to have any residual impacts on known heritage sites during construction due to the siting of Project infrastructure to avoid impacts and implementation of mitigation measures.

11.6.2.2 Unknown heritage sites

Ground disturbance activities during construction also have the potential to impact on unknown historical heritage sites within the study area. An unexpected finds procedure will be included in the Project's Construction Environmental Management Plan (CEMP) and will include guidelines for the collection or salvage of historical heritage objects (see mitigation measure MM-HH03). All employees/contractors involved in ground disturbing works will be provided with an historical heritage awareness induction, which will describe the steps to be followed if unexpected archaeological material is encountered during construction activities (see mitigation measure MM-H01).

With the implementation of an unexpected finds procedure and onsite heritage awareness inductions, the residual impact on unknown heritage sites would be minor.

11.6.3 Operation impacts

No impacts on historical heritage places or values are expected to occur during operation of the Project.

11.6.4 Decommissioning impacts

Decommissioning of the Project is unlikely to impact any historical heritage places and values, as areas of disturbance would be limited to the construction footprint. Any impacts would therefore occur during the construction phase of the Project.

11.7 Mitigation measures

Table 11.4 outlines the mitigation measures developed to avoid, minimise, and manage impacts on Aboriginal cultural heritage and historical heritage from construction and operation of the Project.

In addition, CHMP 17822 will set out management conditions and contingencies to manage potential impacts on known and unknown Aboriginal places. These conditions will include (but is not limited to):

- Personnel involved in ground disturbing works will have an Aboriginal cultural heritage induction prior to the commencement of works. The induction will be conducted by the Gunditj Mirring with a Heritage Advisor.
- A copy of the CHMP management conditions will be kept on site for reference at all times.
- Use of the predictive model and impact resolution flow chart to guide designs and inform on impact mitigation measures.
- Ongoing consultation and liaison with GMTOAC regarding mitigation options and unexpected finds protocols.
- Contingency procedures for the management of unknown Aboriginal cultural heritage, including ancestral remains, discovered during construction of the Project.
- Contingency plans for the review of compliance and implementing mechanisms for remedying non-compliance within the CHMP.
- Procedures for dispute resolution to ensure that all parties are fully aware of their rights and obligations, and that full and open communication occurs between parties.
- Procedures for the collection and salvage of Aboriginal cultural heritage material identified during the CHMP or Project activities, including identifying appropriate custodianship.

  Intangible heritage impacted during the operational phase of works will be managed through ongoing consultation and stakeholder engagement with GMTOAC. GMTOAC will continue to be consulted, and involved where practicable, before, during, and after the operational phase. GMTOAC Research Principles and Guidelines will be employed to ensure that Gunditjmara Country and cultural values are respected and protected during the operational phase of works. However, the level of risk to intangible, non-archaeological Aboriginal heritage places and/or values that may be situated within the Project Area is expected to decrease to low or negligible as a result of the implementation of an approved CHMP.

Table 11.4: Aboriginal cultural heritage mitigation measures

ID	Mitigation measure	Works area	Project phase
Aboriginal cultural heritage			
MM-AH01	**GMTOAC Consultation** • Continue consultation and involvement where practicable with Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC), before, during, and after the construction phase. • GMTOAC Research Principles and Guidelines must be employed to ensure that Gunditjmara Country and cultural values are respected and protected. • Where reasonably practicable, consult and involve GMTOAC in future rehabilitation works. • Maintain meaningful and respectful consultation with GMTOAC in relation to potential project opportunities for further GMTOAC coordination and participation during rehabilitation works.	All areas	All phases
MM-AH02	**CHMP 17822** Prepare, gain approval, and implement contingencies of the CHMP in accordance with the *Aboriginal Heritage Act 2006 (Vic)*.	All areas	All phases
MM-AH03	**Exclusion zones** Avoidance of previously registered and identified Aboriginal places through establishing an exclusion zone around the known extent of the Aboriginal place via a buffer around the place extent with protective fencing. The extent of the buffer will be determined in further consultation with Gunditj Mirring Traditional Owners Aboriginal Corporation (GMTOAC). Furthermore, consultation with GMTOAC will determine if the protective temporary fencing must remain in place during operation and decommissioning/rehabilitation phases of works. Protective fencing will be suitable temporary fencing (e.g. with concrete pads and wire chain mesh (or similar)) that must be erected prior to the commencement of ground disturbing works associated with the construction phase in the Project Area. GMTOAC will further undertake an inspection of the protective fencing prior to the commencement of the construction phase of works in the Project Area to ensure that the Aboriginal places are avoided by proposed works.	All areas	Construction
Historical heritage			
MM-HH01	**Site induction** All employees/contractors involved in ground disturbing works will be provided with an historical heritage awareness induction. The inductions will be provided by a suitably qualified heritage practitioner who is knowledgeable about the history of the region and the Proponent's legal obligations for heritage protection, and will provide the following information: • Background history of the region. • Heritage sites in the vicinity of the Project Area. • Guidance on identifying small artefacts and archaeological deposits. • Employee/contractor obligations for heritage protection under the relevant legislation. • Steps to be taken if unexpected archaeological material is encountered during Project activities, including who to report these finds to (see MM-HH03).	All areas	Construction Decommissioning

ID	Mitigation measure	Works area	Project phase
MM-HH02	**Avoidance of historical heritage items** The Proponent will implement the following measures to ensure that impacts on identified historical heritage sites are avoided: • All employees/contractors involved in ground disturbing works within 100 metres (m) of a known heritage site will be provided with an historic heritage awareness induction (see MM-HH01). • All known heritage sites will be marked on design and construction plans. • Any micrositing of Project infrastructure will avoid direct impacts on heritage sites. • Heritage sites within 10 m of Project works will be marked with suitable exclusion fences, bunting or similar. Signage will be used to clearly indicate that marked sites are to be avoided. • A qualified heritage advisor will be engaged to inspect ground disturbing works to ensure that avoidance measures are being implemented. If impacts on the curtilage of recorded historical places such as the Former Kentbruck School (H7121-0053) cannot be avoided, the Proponent will seek to obtain the following approvals for the Project: • Consent approval from Heritage Victoria under the *Heritage Act 2017* (relevant to sites listed on the Victorian Heritage Inventory). Applications for the above approvals would be prepared by a qualified and experienced archaeologist. The applications would describe the Project's historical heritage investigative methodology, reporting requirements, and artefact discard and management policy. The Proponent will comply with any conditions required by the consent/planning approvals.	All areas	Construction Decommissioning
MM-HH03	**Unexpected discovery of historical sites** The *Heritage Act 2017* requires mandatory reporting of any archaeological site that is identified via the submission of site cards to Heritage Victoria (HV). If any excavation or damage occurs to an archaeological site, an application for Consent must be submitted to and approved by HV. In this event, the Proponent would not recommence works until a decision is made by HV and in accordance with any relevant heritage approval regarding the heritage status of the site. If any unexpected archaeological artefacts or features are identified during Project works, the Proponent will implement the following unexpected discovery procedure: • Works in the vicinity of the finds will cease. • The location of the finds will be marked off and no work will commence in the area until it has been assessed. • A qualified heritage professional will be engaged to assess the material and determine if it is a significant archaeological place. • If so, HV will be contacted, a site card will be submitted for listing of the site on the Victorian Heritage Inventory, and a Consent application will be submitted if the site cannot be avoided by the Project works. The Construction Environmental Management Plan will include procedures to be implemented if an unknown historical heritage site, value or object is identified during works associated with the Project. The procedures will include guidelines for the collection or salvage of historical heritage objects.	All areas	Construction Operation Decommissioning

11.8 Conclusion

Aboriginal cultural heritage

At the time of the EES and conclusion of the ACH technical report there are 18 known Aboriginal places within the Project Area.

Most previously registered and identified Aboriginal places within the Project Area would not be impacted. There is potential for components of Kentbruck 15 LDAD (VAHR No. pending) and Kentbruck LDAD 1 (VAHR No. pending) to be impacted by underground electrical reticulation installation works.

If avoidance of these places as a form of mitigation cannot be achieved then protection and design considerations to protect the places will be proposed as further mitigation measures. Ongoing consultation with GMTOAC will also form part of the mitigation measures for the Project.

Once finalised and approved, CHMP 17822 will outline the necessary management processes to be followed during construction to manage any potential impacts on known Aboriginal places. CHMP 17822 will also include appropriate mechanisms and processes to manage any potential harm to unidentified Aboriginal places and cultural heritage values, including the potential for impacts on ancestral remains. Operation and decommissioning of the Project are not expected to result in any impacts on Aboriginal cultural heritage.

The complex assessment stage of the CHMP has not yet commenced but will target specific locations which warrant further investigation to identify Aboriginal cultural heritage that may be present, as determined in consultation with the GMTOAC. The management of Aboriginal cultural heritage for the Project will comply with the management conditions and contingency plans in the approved CHMP which have been partially developed and guided by the iterative model from the EES.

Historic heritage

Two historical heritage sites are located within the Project Area. The Former Kentbruck School site is located within the wind farm site, however direct impacts on the site have been avoided through strategic placement of Project infrastructure, and indirect impacts will be avoided by implementing a range of mitigation measures including employee/contractor inductions, identifying the site on design and construction plans, onsite demarcation of the site, and avoidance of the site during any micrositing. Consent from HV under the Heritage Act would be required if any Project works are to be undertaken within the extent of the site.

While the delisted Boiler Swamp Sawmill site is not protected under the Heritage Act, the site will be afforded the same level of protection by the Project as other historical sites including the Former Kentbruck School. An exclusion zone will be placed around the site to help prevent impacts from occurring. If impacts are unavoidable, The Proponent will consult with HV to determine whether the boiler should be moved back to its original location, to a local museum, or to a safe location nearby.

The proposed works are considered unlikely to have a significant adverse impact on the historical, architectural, or archaeological values of known historical heritage places within the study area. The Project will not have a permanent impact on the built historical fabric or archaeological potential of the identified heritage items with the identified avoidance and management measures being applied.

It is therefore considered that the Project satisfies the relevant cultural heritage evaluation objective specified in the EES Scoping Requirements, to avoid or minimise adverse effects on Aboriginal cultural heritage and historical heritage and associated values.

NEOEN

Melbourne

Level 7
99 King Street
Melbourne, VIC 3000

P. 1800 966 206
E. contact@kentbruckgreenpowerhub.com.au

umwelt
Environmental & Social Consultants

Melbourne

Suite 2, Level 27
530 Collins Street
Melbourne 3000

P. 1300 793 267
E. info@umwelt.com.au
W. umwelt.com.au