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Proposed Battery Energy Storage System, Tramway Rd, Hazelwood North

Cultural Heritage Management Plan 20325

Draft Desktop Assessment

6 December 2024

Sponsor: Eku Energy Australia Pty Ltd (ABN: 99 662 797

382) Heritage Advisors: Leah Tepper and Briannon Dudek

Authors: Briannon Dudek and Emma Moore

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Acknowledgement of Country

We respect and acknowledge the Gunaikurnai Land and Waters Aboriginal Corporation, their lands and waterways, their rich cultural heritage and their deep connection to Country, and we acknowledge their Elders past and present. We are committed to truth-telling and to engaging with Gunaikurnai Land and Waters Aboriginal Corporation to support the protection of their culture and heritage. We strongly advocate social and cultural justice and support the Uluru Statement from the Heart.

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Aboriginal and Torres Strait Islander readers are advised that this report may contain images or names of First Nations people who have passed away.

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Cultural Heritage Management Plan number: 20325

Desktop Assessment

Draft report

Size of the activity area: Medium

Sponsor: Eku Energy Australia Pty Ltd (ABN: 99 662 797 382)

Heritage advisors: Leah Tepper and Briannon Dudek

Author/s: Briannon Dudek and Emma Moore

GML Heritage Victoria Pty Ltd

ABN 31 620 754 761

6 December 2024

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Report register

The following report register documents the development of this report, in accordance with GML’s Quality Management System.

Job No.	Issue No.	Notes/description	Issue date
3614	1	Draft Desktop Assessment Report	6 December 2024

Quality assurance

The report has been reviewed and approved for issue in accordance with the GML quality assurance policy and procedures.

It aligns with best-practice heritage conservation and management, *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance, 2013* and heritage and environmental legislation and guidelines relevant to the subject place.

Indigenous cultural and intellectual property

We acknowledge and respect the inherent rights and interests of the Gunaikurnai in Indigenous Cultural and Intellectual Property. We recognise that Aboriginal and Torres Strait Islander people have the right to be acknowledged and attributed for their contribution to knowledge but also respect their rights to confidentiality. We recognise our ongoing obligations to respect, protect and uphold the continuation of Gunaikurnai rights in the materials contributed as part of this project.

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Photo of Eel Hole Creek. (Source: captured by Briannon Dudek)

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Abbreviations

ACHRIS	Aboriginal Cultural Heritage Register and Information System
BP	Before Present
BYDA	Before You Dig Australia
CHMP	Cultural Heritage Management Plan
DPC	Department of Premier and Cabinet
EVC	Ecological Vegetation Class
FP—SR	First Peoples—State Relations
GDA94	Geodetic Datum Australia 1994
GKLaWAC	GunaiKurnai Land and Waters Aboriginal Corporation
GMU	Geomorphological Unit
HA	Heritage Advisor
LDAD	Low Density Artefact Distribution
MTP	Mechanical Test Pit
NOI	Notice of Intention
PGC	Primary Grid Coordinate
RAP	Registered Aboriginal Party
SA	Surface Artefact
SGD	Significant Ground Disturbance
STP	Shovel Test Pit
SU	Survey Unit
TO	Traditional Owner
TP	Test Pit
VAHC	Victorian Aboriginal Heritage Council
VAHR	Victorian Aboriginal Heritage Register
VRO	Victorian Resources Online



1 Desktop assessment

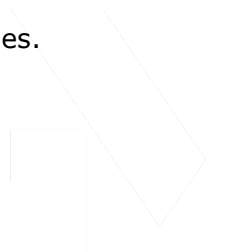
The following section contains the results of the desktop assessment. The desktop assessment was prepared in accordance with Regulation 61 and Clause 8(1), Schedule 2 of the Aboriginal Heritage Regulations 2018.

1.1 The geographic region

The geographic region for the activity area represents the range of relevant and accessible landforms, waterways and resources and encompasses major waterways and a variety of Aboriginal place types.

The geographic region for this CHMP is defined by the Princes Freeway in the north, Waterhole Creek to the east, and bordering GMU 7.3.3 and the western extent of Billy Creek to Monash Way, before running along the western banks of the Morwell River in a northerly direction. The geographic region includes salient features such as the Morwell Open Cut Mine, the site of the former Hazelwood Power Station, the Hazelwood Cooling Pondage, and other large energy infrastructure, and numerous waterways including Bennetts Creek and Eel Hole Creek. The geographic region is generally low lying and encompasses parts of Hazelwood, Hazelwood North, Hazelwood South, Jeeralang Junction and the township of Churchill, nestled at the base of the Strzelecki Ranges.

The geographic region is shown in Map 6.1.



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Legend

- Activity Area

Geographic Region

Road

Trail

Watercourse

Waterbody
- Aboriginal Places

Artefact Scatter

Earth Feature

LDAD

Quarry

Scarred Tree
- Geomorphological units

3.1.1

3.1.2

3.1.3

3.2.3

7.2.1

7.2.2

7.3.1

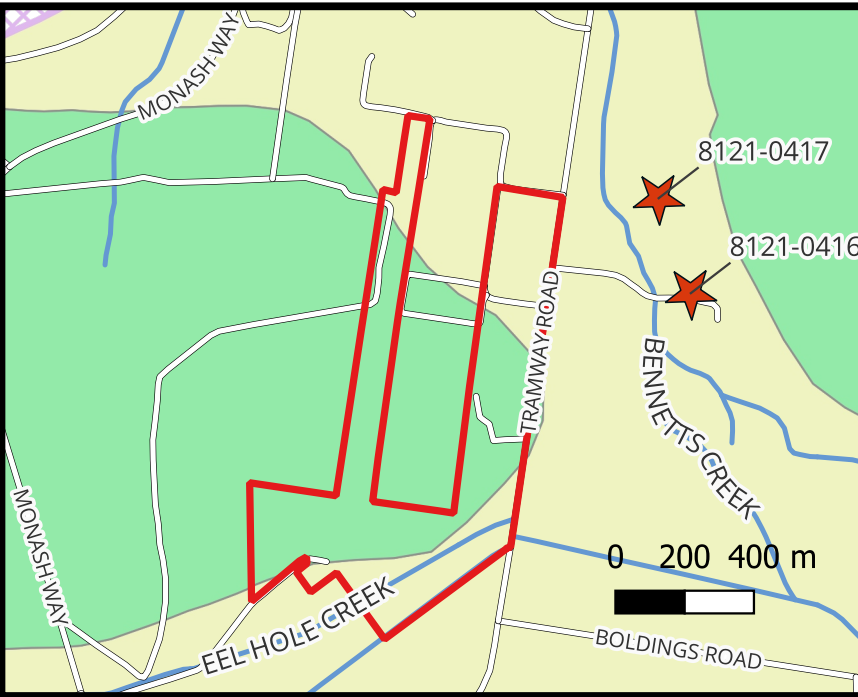
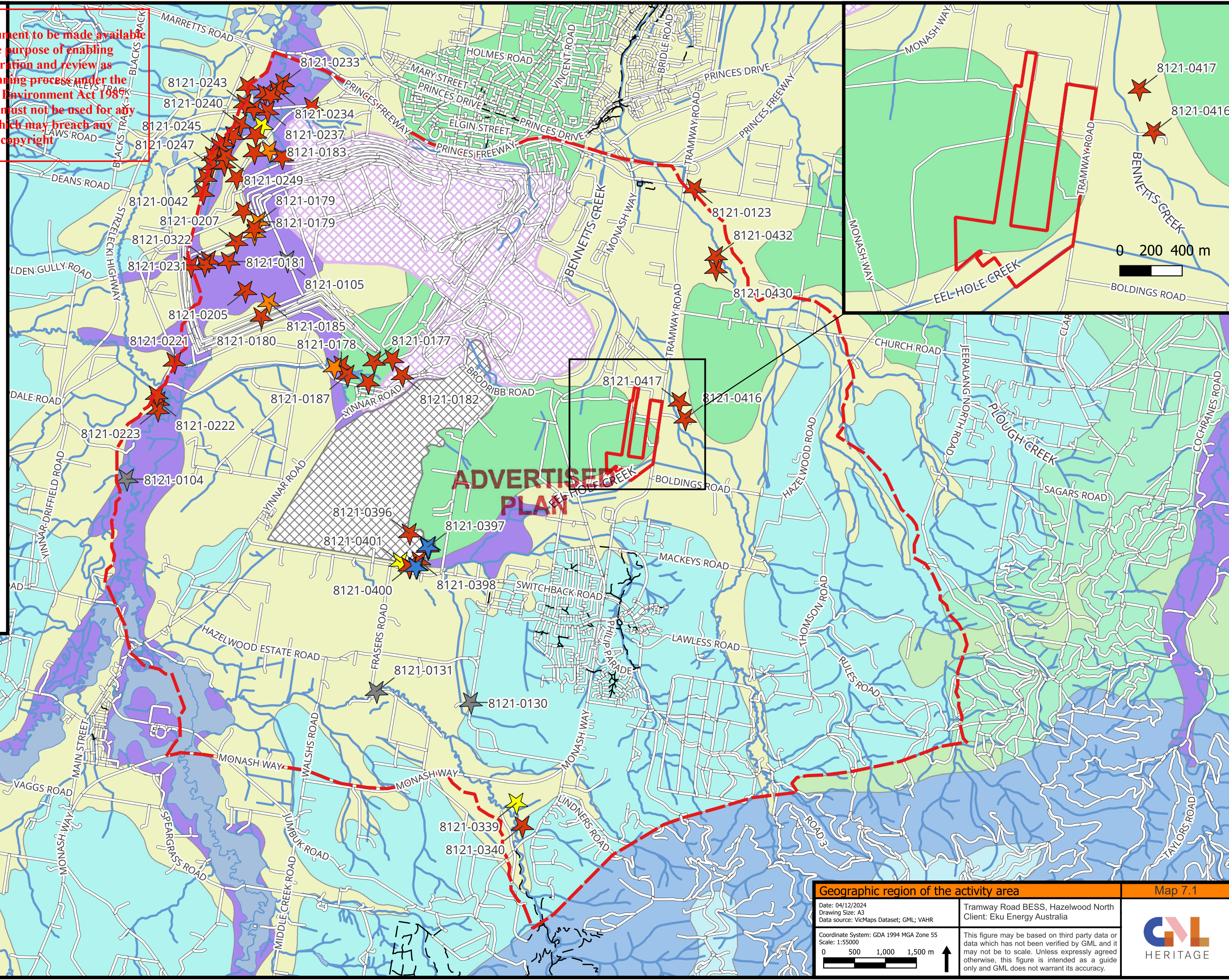
7.3.3

7.3.5

Mine

Artificial waterbody

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Geographic region of the activity area		Map 7.1
Date: 04/12/2024 Drawing Size: A3 Data source: VicMaps Dataset; GML; VAHR		Tramway Road BESS, Hazelwood North Client: Eku Energy Australia
Coordinate System: GDA 1994 MGA Zone 55 Scale: 1:55000 0 500 1,000 1,500 m		This figure may be based on third party data or data which has not been verified by GML and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and GML does not warrant its accuracy.

1.2 Landforms, geomorphology, and geology of the activity area

1.2.1 Geomorphology

The activity area spans across two geomorphological units (GMU) being GMU 7.3.1 and GMU 7.2.2.

The western half of the activity area is characterised by GMU 7.3.1 (*Plains without dunes (Darnum, Loy Yang, Giffard, Leongatha South, Munro plains)*). This GMU landscape is characterised by very low relief plains with occasional incised streams, comprised of alluvial and fluvial sediment formed during the Neogene and Early Quaternary periods from 20.03 million to 2.58 million years ago (Agriculture Victoria, 2020).

The eastern half of the activity area and GMU 7.2.2 *Prior stream plains (Agnes, Yarram, Yinnar, Tinamba, Clydebank)*, which is characterised by low-relief alluvial plains and terraces formed by the Morwell River and its tributaries (Agriculture Victoria, 2020). These terraces are representative of the prior, elevated floodplains of these streams, and were formed prior to the Last Glacial Maximum (LGM) approximately 26,000–18,000 years ago (Agriculture Victoria, 2020).

1.2.2 Geology and Landform

The eastern half of the activity area is defined as a plain above flood level (<9m) (National Committee on Soil and Terrain, 2009), with sediments comprising alluvium (Qa1) associated with Eel Hole Creek (Resources Victoria, 2024). The soils in this section of the activity area consist of silt, sand and gravels formed through channelled stream flow from Eel Hole Creek (fluvial processes). Eel Hole Creek dissects the south-eastern half of the activity area and is an ephemeral waterway and tributary of Morwell Creek.

The western half of the activity area is characterised as being a low-hill relief landform (30-90m) (National Committee on Soil and Terrain, 2009), and is characterised by the Haunted Hills Formation (Nlh) which consists of sand, silt, gravel of various shades of brown, yellow, red and white, with strongly oxidised ironstone common near the surface (Resources Victoria, 2024). This unit formed during the Pliocene to Pleistocene (5.33 million to 11,700 thousand years ago) through over-bank stream flow (Resources Victoria, 2024).

Silcrete naturally occurs in some areas of the Haunted Hills Formation gravels which have undergone silicification resulting in a silcrete with a matrix of sand or larger gravel sized quartz fragments (Wesson & Beck, 1981, p. 46). It is unlikely for naturally occurring stone sources suitable for the manufacture of flaked stone tools to be present within the

activity area. However silcrete has been quarried previously from of large boulders and nodules where Eel Hole Creek feeds into the Hazelwood Cooling Pondage, approximately 3100m southwest of the activity area (see VAHR 8121-0397, 0432 and 8121-0399 in Section 7.5.1 below).

Due silcrete being readily available and its excellent knapping properties, silcrete is the most common stone tool raw material utilised in the geographic region.

1.3 Pre-colonial flora and fauna

The activity area is part of the Gippsland Plain bioregion. The following description of the pre-colonisation vegetation is based on ecological vegetation classes (EVCs), which are commonly used to classify vegetation in southern Australia. Information has been drawn from various sources, including Oates and Taranto (2001), EVC/Bioregion benchmarks for vegetation quality assessment and the pre-colonisation (pre-1750) EVC and 2005 EVC mapping available in NatureKit (Department of Energy, Environment, and Climate Action, 2024).

The activity area has been almost entirely cleared of native vegetation since colonisation. It falls within two distinct pre-1750s EVCs, with EVC 53 in the western half and EVC 55 in the eastern half of the activity area.

The activity area would have been rich in resources prior to the land being cleared. A sparse overstorey of eucalypts such as River Red Gum (*Eucalyptus camaldulensis*) and Gippsland Red Gum (*E. tereticornis*) with scattered smaller trees such as Messmate Stringybark (*Eucalyptus obliqua*), Black Sheoak (*Allocasuarina littoralis*), Woolly Tea-tree (*Leptospermum lanigerum*), Black Wattle (*Acacia mearnsii*) and Blackwood (*Acacia melanoxylon*), and an understorey dominated by Kangaroo Grass (*Themeda triandra*) and Swamp Paperbark (*Melaleuca ericifolia*), sometimes with emergent eucalypts such as Messmate Stringybark (*Eucalyptus obliqua*), and a sparse understorey of shrubs such as Prickly Tea-tree (*Leptospermum continentale*) and Prickly Currant-bush (*Coprosma quadrifida*), herbs, rushes, grasses, reeds and ferns. This woodland would have supported large populations of Eastern Grey Kangaroos (*Macropus giganteus*) and was probably burned seasonally to maintain the grassy understorey (Victorian Government Department of Sustainability and Environment, 2007, p. 51).

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1.4 Search of the Victorian Aboriginal Heritage Register

A search of the Victorian Aboriginal Heritage Register was conducted on 11 September 2024 by Briannon Dudek, GML Heritage Victoria. The search of Aboriginal places within the geographic region was used to form a representative sample of places that may be present within the activity area.

1.5 Aboriginal places in the geographic region

To understand what types of Aboriginal cultural heritage material may be present within the activity area, a search of the VAHR for previously identified Aboriginal places was conducted within the geographic region.

This search identified 70 Aboriginal places have been previously recorded in the geographic region (Table 6.1). No Aboriginal places have been recorded or registered within the current activity area.

The most predominant Aboriginal place type present in the geographic region are artefact scatters (77.1%), followed by earth features (8.6%), scarred trees (5.7%), low-density artefact distributions (LDADs) (4.3%) and quarries (4.3%). LDADs are the occurrence of stone artefacts at densities of up to 10 counted artefacts in an area of approximately 10 x 10 m including within a single test pit of $\leq 1 \text{ m}^2$.

Object collections represent places that have been removed from the context in which they were originally recorded. More specifically, they represent the location of stored artefacts (i.e., heritage consultancies, museums, private collections) or places where artefacts have been repatriated; therefore, object collections are not necessarily representative of the archaeological character of the region. For the sake of this archaeological assessment, we have disregarded object collections in our discussion.

Table 6.1 Aboriginal place type and frequency in the geographic region

Aboriginal Place Type	Amount	Percentage
Artefact scatter	54	77.1%
Earth feature	6	8.6%
Scarred trees	4	5.7%
LDADs	3	4.3%
Quarry	3	4.3%

1.5.1 Aboriginal places within 4km of the activity area

A refined search was conducted within a 4km radius of the current activity area within geographic region. This radius was selected to encompass places found in association with Eel Hole Creek and to cover similar landforms to those present within the current activity area. The refined search was conducted to better provide information regarding the nature and extent of Aboriginal cultural heritage relevant to the activity area.

This refined search identified a total of 16 previously registered Aboriginal places within a 4km radius of the activity area which are summarised in Table 6.2.

Table 6.2 Aboriginal places within 4km of the AA

VAHR No.	Place Name	Place Type	Approx. distance to the AA
8121-0416	Tramway Road Artefacts 1	Artefact Scatter	750m NE
VAHR 8121-0416 (Tramway Road Artefacts 1) is a subsurface artefact scatter comprising 78 silcrete artefacts on an alluvial terrace. This cultural heritage material was identified within a single 1 x 1 m test pit. The place extent occupies a low rise along and parallel to the high riverbank of Bennetts Creek over an area of 30 x 30m. Aboriginal cultural heritage was identified at depths of 100-400mm. Past disturbance has probably removed some of the upper portion of the sediment or artefactual deposits and extensive ploughed cultivation has previously dispersed many of the stone artefacts.			
8121-0417	Tramway Road Artefacts 2	Artefact Scatter	910m NE
VAHR 8121-0417 (Tramway Road Artefacts 2) is a subsurface artefact scatter comprising 15 silcrete artefacts recorded on an alluvial terrace landform. This cultural heritage material was identified within a single 1 x 1 m test pit and the place extent occupies a low rise along and parallel to the high riverbank of Bennetts Creek over an area of 30 x 30m based on the results of extent testing. Aboriginal cultural heritage was identified at depths of 100-300mm. Past disturbance has probably removed some of the upper portion of the sediment or artefactual deposits and extensive ploughed cultivation has previously dispersed many of the stone artefacts.			
8121-0397	Eel Hole Creek 2	Quarry and Artefact Scatter	3135m SW
VAHR 8121-0397 (Eel Hole Creek 2) comprises a group of fine grained silcrete boulders which have been quarried, and the surrounding area shows an associated flake production area. The silcrete boulders and nodules appear to occur naturally in the area and range up to 40cm in diameter. Surrounding the quarry is an artefact scatter consisting of approximately 300 or more surface stone artefacts which have been exposed due to the reduced water level of the Hazelwood Pondage and have been dispersed through pondage wave wash. The place is located on southeastern shore of Hazelwood Pondage near former channel of Eel Hole Creek and the extent of this place measures approximately 60 m x 60 m. The raw material types consisted primarily of silcrete followed by quartz and quartzite in lesser quantities.			
8121-0430	343 Tramway Rd AS1	Artefact Scatter	3185m NE
VAHR 8121-0430-2 (Tramway Rd AS1) is a subsurface artefact scatter located on a low-lying terrace within a grassed paddock close to Waterhole Creek. This place comprises a total of 87			

VAHR No.	Place Name	Place Type	Approx. distance to the AA
stone artefacts made from silcrete (n=76) and quartz (n=11). Full details of this place and subsurface soil conditions are not currently available as CHMP 19673 has not been completed.			
8121-0398	Eel Hole Creek 3	Artefact Scatter	3350m SW
VAHR 8121-0398 (Eel Hole Creek 3) is a surface artefact scatter which contains a very large scatter of diverse raw material, stone flakes and formal tool types, including horse hoof cores, flaked hand axes, grinding slabs, hammerstones and a possible hearth. A total of 101 artefacts were recorded but there are an estimated 10,000 artefacts within this site extent. Artefact densities were noted to increase in proximity to the banks of Eel Hole Creek.			
8121-0396	Eel Hole Creek 1	Artefact Scatter	3365m SW
VAHR 8121-0396 (Eel Hole Creek 1) is a surface artefact scatter located on a slight rise adjacent to the Hazelwood Pondage. Wave action from the pondage appears to have eroded surface sediments from the area and resulting in the exposure of artefactual material. Approximately 300 artefacts were noted across the place extent and includes cores, waste flakes, and angular fragments. Stone material types were consistent with the fine-grained pale silcrete found at the Eel Hole Creek 2 (VAHR 8121-0397), as well as red quartzite, quartz and other raw materials.			
8121-0432	343 Tramway Rd AS2	Artefact Scatter	3390m NE
VAHR 8121-0432 (343 Tramway Rd AS2) is a subsurface artefact scatter comprising 16 artefacts recorded in subsurface contexts during assessment for CHMP 19673. Silcrete was the most common raw material identified (n=9) followed by quartz (n=7). The place is located on the bank of Waterhole Creek, in the northeast corner of a large open paddock. The landform, a raised section of the west bank of Waterhole Creek, has partially informed the extent. This place covers an irregular polygon covering an area of 3130 m ² . It was recorded that it is likely that the place extends further to the north and east but subsurface testing indicates that it does not extend to the southwest.			
8121-0399	Eel Hole Creek 4	Quarry and Artefact Scatter	3450m SW
VAHR 8121-0399 (Eel Hole Creek 4) is a large surface artefact scatter with a predicted number of over 300 stone artefacts. Only 60 artefacts were recorded at the time of registration which include 29 quartz, 27 silcrete and four quartzite artefacts. This place contains some small ochre-like stones amongst the stone artefacts. An area of exposed clays containing brightly coloured elements in red, white, orange, and red were identified over an area of 5 x 10m. The place is located on the south side of Eel Hole Creek and the ground is fairly flat, rising to the south, but drops off steeply near the current water edge and likely represents the top of the creek bank prior to the creation of the pondage.			
8121-0400	Eel Hole Creek 5	Earth Feature and Artefact Scatter	3465m SW
VAHR 8121-0400 (Eel Hole Creek 5) is a large surface artefact scatter along the south bank of Eel Hole Creek which is separated from Eel Hole Creek 4 (VAHR 8121-0399) by a gully. The extent of the site is over 20m to 40m and it is estimated that there are about 300 stone artefacts within this Aboriginal place. The surface earth feature comprises a number of burnt clay balls or nodules believed to have been used in hearths or cooking pits. Various stone artefacts were also located in association with these potential cooking pits/hearth.			

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VAHR No.	Place Name	Place Type	Approx. distance to the AA
8121-0182	MORWELL MONOCLINE	Artefact Scatter	3525m NW
VAHR-0182 (MORWELL MONOCLINE) is a surface artefact scatter of an undisclosed number of stone artefactual material over an area of 500 x 150m adjacent to Brodribb Road located on a hill/ridge (monocline) overlooking the Hazelwood Cooling Pond. The stone material comprises quartz and silcrete in the form of worked flakes, cores, microliths and other unspecified chipped stone artefacts. Due to the age of site card, no other information is available.			
8121-0401	Eel Hole Creek 6	LDAD	3651m SW
VAHR 8121-0401 (Eel Hole Creek 6) is an isolated surface silcrete waste flake artefact identified 200m west of Eel Hole Creek 5 (VAHR 8121-0400). This location is some distance from the natural creek channel, and so may also reflect the reduced density of artefacts further away from the water source.			
8121-0176	PERIMETER RD ISA 1	Artefact Scatter	3765m NW
VAHR 8121-0401 (PERIMETER RD ISA 1) is a surface artefact scatter consisting of a yellow/red banded quartzite retouched flake and a red fine-grained silcrete retouched nose scraper. This place is located in a ploughed section of paddock on the top of a hill located 500m northwest of the Hazelwood Cooling Pond.			

Summary

Reflecting the results of the wider geographic region, the majority of the Aboriginal place types within the 4km search radius are artefact scatters (n=11), quarries (n=3), an earth feature (n=1) and an LDAD (n=1). The predominant raw material identified in assemblages is silcrete, followed by quartz and quartzite in lesser amounts. Artefact types within this area are very diverse.

The majority of these Aboriginal places have been recorded in close proximity with Eel Hole Creek and Bennetts Creek (a tributary of the Morwell River), particularly in areas of elevated terrain or alluvial terraces adjacent to these waterways. In particular, a channel of Eel Creek where it meets the southeastern extent of the Hazelwood Cooling Pond (approximately 3.1-3.6km northwest from the activity area) appears to be a highly significant and culturally sensitive area. The Aboriginal places registered in this area collectively contain upwards of 10,000-15,000 surface artefacts, as well as large silcrete boulders and nodules as part of a quarry, a potential ochre quarry, and potential hearths/cooking pits with clay heat retainers, which indicate the area was heavily utilised. Subsurface testing within 4km of the activity area and along Tramway Road has identified Aboriginal cultural heritage at depths between 100-400mm within silty or clayey silt deposits particularly in low rise areas overlooking Bennetts Creek.

1.6 Previous work in the geographic region

The VAHR is the repository for Aboriginal cultural heritage (archaeological) reports.

A search of the VAHR identified a total of twenty archaeological reports in the geographic region, which include seven desktop or paper or due diligence or other, six surveys, four complex assessment CHMPs, two test excavations and one standard assessment CHMP.

The following discussion provides a summary of reports relevant to the activity area within the context of its broader landscape. Reports were determined as being relevant due to proximity to the activity area, and whether they were within the same, or similar culturally sensitive landforms (i.e., within 200m of a waterway).

1.6.1 Previous regional investigations

Wesson and Beck (1981) undertook a survey and prepared a subsequent report (#11) for the proposed Driffield Project which involved the development of two brown coal power stations, a new open cut mine, and a major diversion of the Morwell River. Their study area is situated 1100m to the west at the closest point to the current activity area. The survey aimed to assess the impact of the proposed works on Aboriginal places and historical archaeological sites stemming directly and indirectly from the construction and operation of the proposed Driffield Project. The survey resulted in the recording and registration of 109 isolated artefacts, 22 artefact scatters, four scarred trees and two stone sources (silcrete boulders) over an area of 107m². Ground surface visibility was poor and only 1% of the survey area was investigated. Therefore, the number of Aboriginal places within this area was likely much higher than was recorded. Silcrete, particularly fine-grained silcrete, was the most common stone tool raw material utilised in the study area, with silcrete naturally occurring in some areas of the Haunted Hills Formation gravels which have undergone silicification resulting in a silcrete with a matrix of sand or larger gravel sized quartz fragments (Wesson & Beck, 1981, p. 46). A distribution model found that the majority of Aboriginal places were located on the top of a rise/ridge (36%) followed closely by the sides of a hill (35%), the side of a creek and an undulating landform (10% each respectively), and by flat plains and river terraces (5% each respectively) (Wesson & Beck, 1981, p. 47).

Djekic (1998) published an update (#1285) to the 1981 Archaeological Study of the Latrobe Valley Coalfields as well as the results of the 1989 study which falls partially within the current activity area. No survey information relating to the current activity area is mentioned within the report. The survey identified a total of 50 Aboriginal places which mostly consist of artefact scatters and isolated finds, and scarred trees in lesser amounts across three of the coalfield's development zones, with only two places (VAHR 8121-0008 and VAHR 8121-0039) falling into areas proposed for development. Poor ground surface visibility (0.4%) hindered the results of the survey. The analysis of the stone artefactual material found that silcrete was the most common raw material type (92.4%) and the low number of cores may suggest that the initial stages of stone artefact manufacture likely occurred closer to the source of raw materials (Djekic, 1998).

1.6.2 Previous CHMPs within the geographic region

McFadyen and Cross (2022) prepared a voluntary complex CHMP (18583) for the proposed construction of the Wooreen BESS and associated infrastructure at 30 Bonds Lane, Hazelwood North adjacent to the existing Jeeralang Power Station and 1100m north of the current activity area. The activity area was located on a low-lying alluvial plain prone to inundation, which was determined to have low archaeological potential. The standard assessment involved both a systematic and opportunistic survey across the entire activity area which identified evidence of prior land modification, and drainage works including dams, and utility installations. Dense grass coverage resulted in poor ground surface visibility and no Aboriginal cultural heritage was identified during the survey. The CHMP did not proceed to a complex assessment as it was determined that Aboriginal cultural heritage was not likely to be present in the area due to the disturbed nature of the activity area and it not falling within an area of cultural heritage sensitivity (McFadyen & Cross, 2022).

Cupper, Reith & Challis-O'shea (2021) prepared a mandatory complex CHMP (17291) for the proposed development of the Morwell Solar Farm, 436 and 545 Tramway Road, Hazelwood North, situated approximately 800-2500m north of the current activity area. Landforms within the activity area included a flat to gently rising alluvial terrace associated with Bennetts Creek. Their desktop assessment concluded that waterways and associated wetlands would have been resource rich and favourable for past occupation, particularly on alluvial terraces and rises. No Aboriginal cultural heritage was identified during the standard assessment. The complex assessment comprised two 1x1m test pits and 37, 0.5x0.5m shovel test pits to depths of 600mm into cultural sterile clay deposits. A total of two Aboriginal places were recorded during the complex assessment, VAHR 8121-0416 and VAHR 8121-0417. These places extend approximately 30m along low rises along and parallel to the high riverbank of Bennetts Creek. The artefacts were dispersed between 100-400mm in very dark brown clayey silt and were not believed to be in situ due to past land disturbances as evidenced by mixed soil profiles. VAHR 8121-0416 comprises 78 silcrete stone artefacts within a 1x1m test pit. VAHR 8121-0417 comprises 15 silcrete stone artefacts identified within a 1x1m test pit. The authors concluded that no Aboriginal cultural heritage was encountered beyond 100m from the waterway, and the proposed solar farm was redesigned to avoid harm to the Aboriginal places identified (Cupper, et al., 2021).

Carr and Cross (2021) prepared a mandatory complex CHMP (17460) for the proposed construction of the Morwell BESS to the west and south of the Morwell Terminal Station on Monash Way, approximately 2700m north of the current activity area. The desktop assessment found that the alluvial plains hold a low potential for Aboriginal cultural heritage material, whereas the elevated landforms such as terraces have an increased potential for Aboriginal cultural heritage to be present. The standard assessment involved

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both a systematic and opportunistic survey across the entire activity area which identified evidence of prior land modification, and installation of drainage lines, dams, and utility installations. One terrace feature was identified as having increased archaeological sensitivity and a complex assessment was required. The complex assessment involved the excavation of one 1x1m test pit and nine 0.5x0.5m shovel test pits in the area of sensitivity associated with Bennetts Creek. The soil profiles generally consisted of a dark grey brown compact silty clay to 100mm, followed by a grey brown silty clay with infrequent charcoal fragments to a depth of 250mm, onto a grey brown compacted silty clay base with yellow orange mottling increasing with depth to 300mm on average, with the maximum depth varying between 120-450mm across the site. No Aboriginal cultural heritage was identified during the course of this CHMP and the authors concluded that their activity area had a low potential for subsurface cultural deposits to be present (Carr & Cross, 2021).

Barker (2014) prepared a mandatory complex CHMP (12931) for the proposed “Twin Six” Distribution Main Replacement, Monash Way, Hazelwood Estate Road and Junction Road, Churchill, located approximately 3700m south of the current activity area. The desktop assessment found that the area had been subjected to prior ground disturbances associated with the construction of the existing water main which was confirmed during the standard assessment. During the standard assessment, sandy rises in the southwest and northeast corners of the activity area were noted as being of high potential for Aboriginal cultural heritage material as these points would have provided dry, elevated views of the region and were near Billy Creek, and were therefore favourable for establishing a campsite. The complex assessment involved the excavation of one 1x1m test pit and 84, 0.3x0.3m shovel test pits to depths of 400mm. The stratigraphy varied but generally consisted of mixed greyish brown/grey silty loam to 100mm, followed by a light greyish brown silty clayey silt to 370mm, onto a compacted brown clay to 400mm. Two previously unrecorded Aboriginal places were recorded and registered. VAHR 8121-0340 is a subsurface artefact scatter comprising 14 in situ silcrete artefacts at depths of 200-350mm approximately 30m west of Billy Creek. VAHR 8121-0339 is a subsurface LDAD consisting of a single silcrete flake identified in the upper 100mm which appeared to be mixed and within the plough zone, approximately 200m east of Billy Creek. Both recorded places were located on the upper slope and crests of the hills. The stone artefact assemblage consisted of silcrete and the stone working activities were likely associated with the primary manufacture of stone tools (Barker, 2014).

Summary

Previous archaeological investigations have determined that floodplains generally have a low potential for Aboriginal cultural heritage material, and areas of elevation such as rises and alluvial terraces overlooking waterways were noted to hold higher potential to retain Aboriginal cultural heritage material. Most of the Aboriginal places within the

region have been identified within 100m of a water source, with cultural heritage material generally identified between depths of 300-600mm within clayey silts. Historic land use activities in the region, such as vegetation clearance, ploughing, the creation of dams, and the installation of subsurface utilities and drainage lines have likely disturbed the original deposition of cultural material within the current activity area, but not removed them entirely.

1.7 Gunaikurnai Country: Historical and ethno-historical accounts in the geographic region

Since time immemorial Gunaikurnai have relied on an intimate connection and deep understanding of the natural cycles of the land and climate. The Gunaikurnai are the Traditional Owners of much of the area known as Gippsland and their territory includes the coastal and inland areas and extending to the southern slopes of the Great Dividing Range in the Victorian Alps (Figure 6.1). Gunaikurnai Country is made up of five major clan groups which include the Brabralung, Brataualung, Brayakalung, Krauatungalung, and Tatungalung (Howitt, 1904, pp. 76-77).

Ancestral creation stories of the Gunaikurnai describe the arrival of their people into Gippsland. One of these stories speak of the pelican Borun, who was travelling alone for a long time and carrying his canoe from the mountains down to Tarra Warackel (Port Albert) on the coast (Victorian Aboriginal Corporation for Languages, 2014). In the distance he heard a tap, tap, tap. He continued to follow the sound over the mountains, through the forests and along the rivers, all the while creating songlines as he went. Eventually, he came to the water and found a female musk duck named Tuk. The two water birds Borun and Tuk were married and had five clans of children, who represent the five clans of the Gunaikurnai (Victorian Aboriginal Corporation for Languages, 2014).

Recent archaeological investigations on Gunaikurnai Country at Cloggs Cave in the foothills of the Victorian Alps have found evidence of over 500 generations of cultural transmission of an ethnographically documented ritual practice (David, et al., 2024). These Casuarina wood sticks, called 'murrawan' were smeared with animal or human fat and used by medicine men or women, called 'bungil murrawun' (David, et al., 2024, p. 1487). These murrawan date to 11,000-12,000 years Before Present (BP) and are Australia's oldest recorded wooden artefacts. Other features within Cloggs Cave date as far back as 23,000 years BP, thus highlighting the endurance and continuation of cultural practices and oral history of the Gunaikurnai (David, et al., 2024, pp. 1487, 1482).

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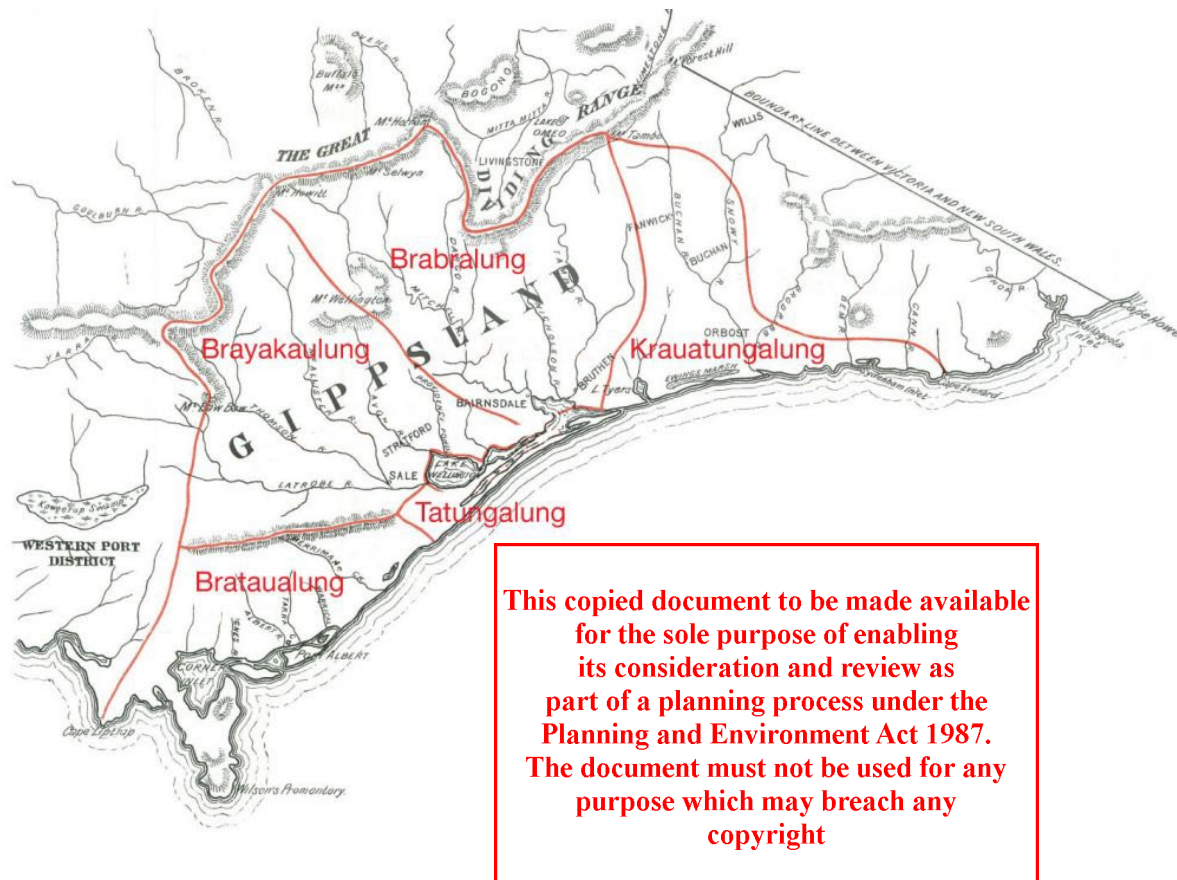


Figure 6.1 The Five Clans of the Gunaikurnai, as approximated by A.W. Howitt in the 1880s (Source: (GLaWAC, 2024))

1.7.1 Social organisation

The activity area is associated with the Brayakaulung clan, meaning 'men of the west' (Clark, 1996, p. 9). The Brayakaulung clan area is centred around Sale and encompasses the west of the Mitchell River, Lake Wellington and Providence Ponds, including the Avon and Latrobe Rivers (Deadly Story, 2024). This also extended north-east to Mount Baw Baw and north to Mount Howitt in the Victorian Alps. To the south of the activity area was the Brataualung, 'men belonging to the place of fire', throughout South Gippsland (Clark, 1996, p. 9). However, these clans were most likely not constrained by definitive boundaries and there was some movement of these clans into and out of neighbouring territories (Context, 2019, p. 15). Howitt noted that a significant area between the Latrobe and Yarra rivers, extending from the rivers' sources to the coast and part of the Brayataulung territory, was referred to by the Kurnai as Wea-wuk or the 'Bad Country,' though he did not explain the origin of this name (Howitt, 1904, p. 403).

The totems of the Gunaikurnai were Yerang for men and Djeetgang for women, both of which are small birds (Deadly Story, 2024). Each person would have a personal thundung (totem) and were forbidden from eating that animal. A thundung could be

passed down matrilineally or if a mother saw an animal during birth, that animal would be the child's thundung (Deadly Story, 2024).

A favourite pastime of many of the Victorian Aboriginal people, including Gunaikurnai, was a ball game which involved keeping a ball from the other team for as long as possible. According to Howitt (1904, p. 700), the Gunaikurnai played clan against clan and were divided by totemic groups, and the ball was constructed using the scrotum of a large elderly kangaroo which was stuffed tightly with grass and called Turta juraua (Howitt, 1904, p. 700). It is believed that this ball game was the inspiration behind the formation of Australian rules football.

1.7.2 Life on Country

The Gunaikurnai clans traversed their land seasonally, moving lightly and periodically returning to familiar campsites (Presland, 2017, p. 49). Their journeys depended on the availability of various foods and resources, as well as their cultural responsibilities. They built shelters using bark sheets, boughs, and stringybark rope, setting up camps along rivers and swamps where food and water were abundant (Presland, 2017, p. 49). Some Gunaikurnai made annual treks to the mountains in summer to feast on the nutritious and easy-to-catch Bogong Moth (*Agrotis infusa*) (Stephenson, et al., 2020).

The Latrobe River and other waterways were vital to the Gunaikurnai, offering a variety of reliable food sources throughout most of the year and facilitating trade and transport. The rivers, creeks, lagoons, and swamps, like Morwell River and Eel Hole Creek, were rich in fish, eels, freshwater mussels, and other shellfish, as well as frogs, tortoises, waterbirds, and lizards (Context, 2019, p. 16). The Gunaikurnai used sophisticated fishing techniques which included the use of fishing hooks made from bone, which is not known to have been used by any other Aboriginal people elsewhere in Victoria (Massola, 1956).

Robert Borough Smyth (1878, p. 391) describes:

"The women [of Gippsland] are expert anglers. They will sometimes secure as much as 60 lbs. weight of fish with the modern hook. But what was the measure of their success when they used the bone, wooden or shell hook is not known to me"

The waterways nourished rushes and marsh vegetation such as Bulrush (*Cumbungi*) which could be steamed and eaten and the remaining fibre could be used to make nets (Nash, n.d.). These waterways would have encouraged the growth of numerous plant foods important to Gunaikurnai people. Plants were also used for medicinal and non-culinary purposes, such as making baskets, nets, and ornaments.

The plains and woodlands supported diverse wildlife, including birds, kangaroos, wallabies, wombats, possums, and emus. Swamps and wetlands attracted various waterfowl, such as ducks and black swans, providing meat and eggs. The skins from the

possums could be used to create a possum skin cloak, and to make the skin more pliable, markings were made using mussel shells (Figure 6.2). Each person had individual markings which were unique to them and these were called *waribruk* (Howitt, 1904, pp. 741-742).



Figure 6.2 1858, Group of Aboriginal tribesmen, probably from Gippsland, image captured by Antione Fauchery. (Source: Early Photographs of Aborigines in the Picture Collection, no. 43, Autumn 1989).

1.7.3 Colonisation

In 1841, explorers and pastoralists Paul Strzelecki and Angus McMillian explored the region which would later become known as Gippsland (Glowrey, 2023). The establishment of squatting runs and pastoral runs within the region contributed to the rapid decline in the population and quality of life for the Gunaikurnai as a result of the introduction of foreign diseases and the clearing of their lands which resulted in the decreased availability of bush foods (Context, 2019, p. 21).

As a result, tension and conflicts arose between the Gunaikurnai and settlers in the region. Angus McMillian and his party were responsible for the slaying of many Gunaikurnai people and conflict between the squatters and settlers in the region (Glowrey, 2023). One such event, known as the 'first attack' involved between 200-300

Gunaikurnai attacking McMillian's station near Stratford in 1840 (Gardner, 1983, p. 13). Numerous raids followed, including the largest known massacre in Australian history at Warrigal Creek in 1843, resulting in the death of 90 to 150 Aboriginal people on the banks of Warrigal Creek in retaliation for the murder of Ronald MacAlister (Gardner, 1983, p. 13).

The original population of the Gunaikurnai was estimated to be 1000-1500 prior to European colonisation (Howitt & Fison, 1991, p. 181). Gardner suggests that this is an underestimation, and the population was likely closer to 2,500-3,000. Howitt observed that the population of the Gunaikurnai in 1860 was about 300, and by 1877, this had decreased to 140 (Gardner, 2016, p. 1). In 1857, the population of the Brayakaulung was 50 people (Pepper & de Araugo, 1985, p. 98).

In 1860, the Central Board for the Protection of Aborigines was established to replace the previous Protectorate system which had not set aside a reservation for Gippsland (Broome, 2005, pp. 130-131). Following its inception, numerous Aboriginal missions and reserves were established across the state with the aim of providing education, resources, and protection to Aboriginal people. However, these institutions were often underfunded and forced the remaining Aboriginal population to give up their traditional customs, language, and way of life in favour for European ones (Context, 2019, p. 21).

In 1861, the Lake Tyers Mission Station was established by Reverend John Bulmer, to house and protect some of the Gunaikurnai survivors of the conflict (Figure 6.3). Unlike some of the other Aboriginal reserves and missions in Victoria, Bulmer encouraged the Aboriginal residents to continue cultural practises and traditional ways of hunting to ensure they had enough food (Deadly Story, 2024). Bulmer attempted to establish an exclusive area for residents to fish from, but this request was defined by the government. He was the manager of the mission until his resignation in 1907, before it was taken over by the government who placed harsh restrictions on the residents. Some of the Aboriginal people in Gippsland chose to remain on Country and lived in bush camps and found seasonal work like shearing, harvesting, and bark stripping (Context, 2019, p. 41).

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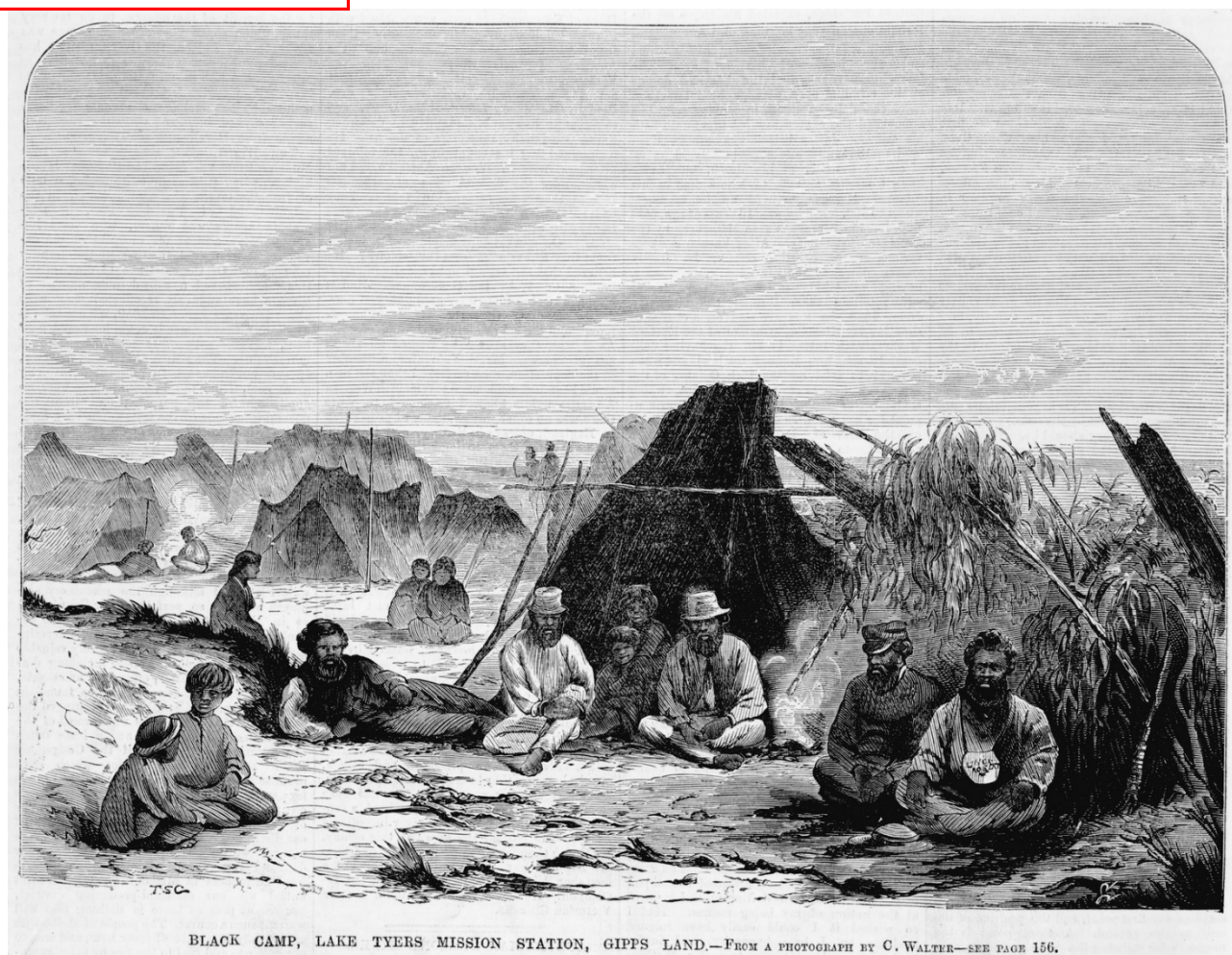


Figure 6.3 Aboriginal Camp at Lake Tyers Mission Station, Gippsland, engraved by Samuel Culvert, 1869. (Source: State Library of Victoria)

In 1863, the Ramahyuck Mission was established near Sale by Reverend Friedrich August Hagenauer, who had previously helped found the Ebenezer Mission. The mission was subsequently closed in 1908 due to low numbers and the remaining residents were sent to Lake Tyers Aboriginal Reserve (Deadly Story, 2024). Ramahyuck was a Moravian mission which taught the Gunaikurnai domestic work and farming, and instructed them in Christian doctrine and discouraged them from continuing with their traditional cultural practices (Context, 2019, p. 71).

Lake Tyers became the depository for half of Victoria's dispossessed people and residents from three other Victorian missions, Ramahyuck, Condah and Coranderrk, who had been drawn from outside of Gippsland as well, were moved to Lake Tyers, which was taken on by the government in 1908 (Deadly Story, 2024).

By the early 1960s Victoria's government decided to try to close the settlement, and attempt to assimilate the population into the wider community and in 1965 the mission

was declared a permanent reserve following protests and petitions. Under the *Aboriginal Lands Act 1970*, Lake Tyers was granted formal ownership to the Gunaikurnai and other Aboriginal residents in 1971 (Pepper & de Araugo, 1985, p. 262). The land is now known as *Bung Yarnda* and many people still call this place home.

Despite colonisation and dispossession, Aboriginal communities of the Latrobe Valley have retained strong cultural connections and have rebuilt strong communities and connections to Country. Today, the Gunaikurnai people are represented by GLaWAC.

1.8 Land use history of the activity area

1.8.1 Historical development of the surrounding area

European settlement in the area began with the establishment of the Hazelwood pastoral run in 1844 until 1870 when the runs were opened for selection (Victorian Places, 2015). During this period, the activity area was likely specifically used for grazing land for cattle and sheep. In the 1870s the demand for coal was growing and prizes were announced for anyone who discovered a coal seam (Context, 2019, p. 46). In 1883, the Hazelwood Coal Mining Co. was founded along with numerous other mining companies during this time (Context, 2019, p. 46).

In the early 1920s, the Hazelwood Estate was subdivided as part of the soldier settlement scheme which resulted in the formation of the Hazelwood Estate which expanded again following the Second World War (Context, 2019, p. 27). During the Second World War and post-war years, the Latrobe Valley was an industrial hub for the increasing demand in food production, textiles, electricity, gas, and coal. During the mid-twentieth century, the State Electricity Commission (SEC) planned and developed multiple open-cut coal mines and power stations in the Latrobe Valley (Figure 6.4). The Hazelwood Power Station was first planned in 1959 with construction commencing in 1964 before completion in 1971 (Context, 2019, p. 57). The construction of Hazelwood power station and associated infrastructure involved compulsorily acquiring farmland, altering waterways including Eel Hole Creek and the Morwell River, and the damming of the Hazelwood Pondage (Victorian Places, 2015) (Figure 6.5). In particular, the activity area surrounds the Hazelwood Terminal Station, the construction of which would have resulted in varying levels of ground disturbance in the areas adjacent to the structure.

A planning scheme for a new town to accommodate the new workforce was approved in 1964. The town was initially named Hazelwood, until it was changed in 1965 to Churchill to honour Sir Winston Churchill (Victorian Places, 2015). The township of Churchill is located 2.5km south of the current activity area. This ambitiously planned town was set to accommodate over 40,000 residents and was designed to service the workers and their families. The site was specifically chosen due to its location at the foot of the

Strzelecki Ranges and overlooking the pondage and compared to other towns in the region the air was relatively clean (Victorian Places, 2015).

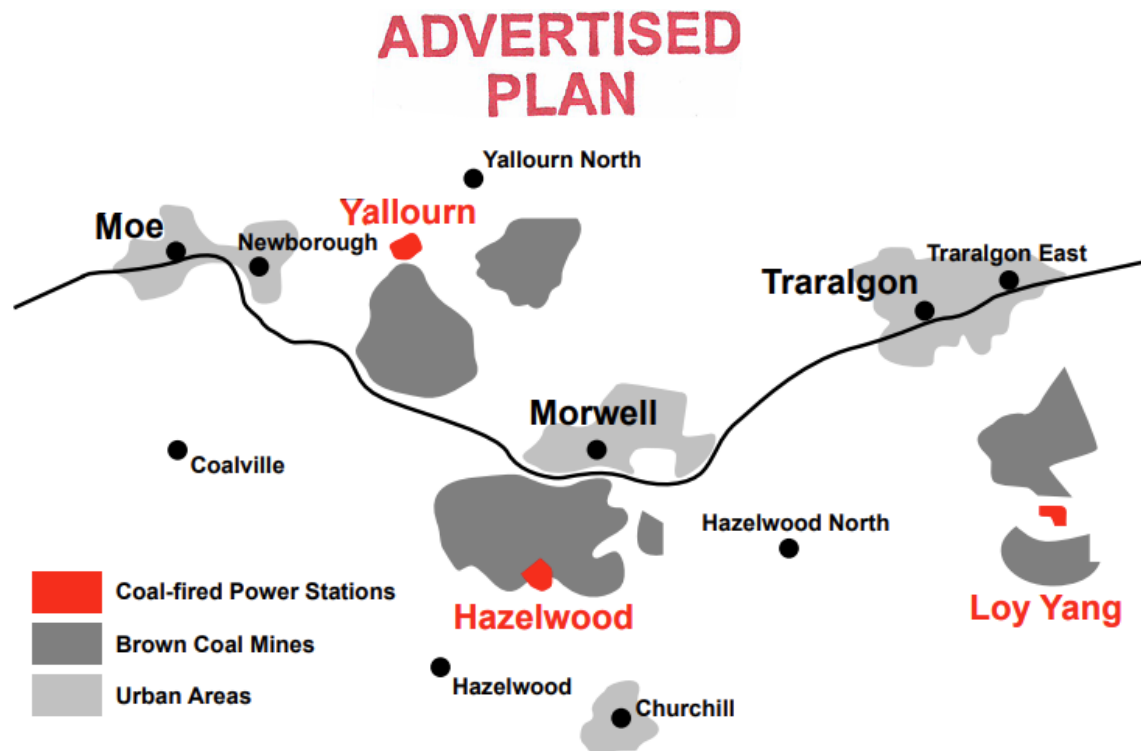


Figure 6.4 Brown coal mines and power stations of the Latrobe Valley (Context, 2019, p. 59).

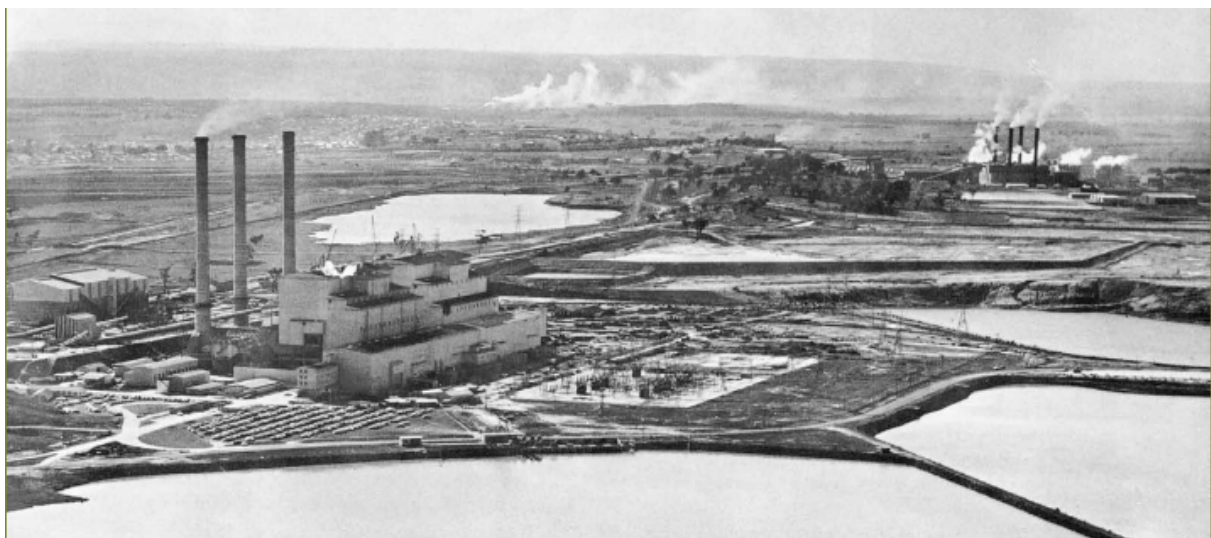


Figure 6.5 Hazelwood power station and pondage in 1965 (Source: Churchill and District Community Association)

Hazelwood and the associated mine were sold for \$2.35bn in 1996, when the Kennett government privatised energy production in the state (Power Technology, 2009). At the height of production, Hazelwood power station provided up to 25% of Victoria's electricity. However, Hazelwood was also responsible for 5% of carbon dioxide emissions in Australia (Power Technology, 2009). There has been significant criticism of the environmental impacts of the power station (located approx. 3.4km northwest) and associated Morwell Open Cut mine (located approx. 5.5km northwest), particularly following the Hazelwood Coal Mine Fire in 2014 which burned for 45 days and put the lives and health of residents in the Latrobe Valley at risk (Hazelwood Mine Fire Inquiry, 2014). In 2016, Engie announced the closure of the Hazelwood power station by March 2017. The demolition and decommissioning of the site are in process, as well as the Hazelwood Rehabilitation Project. This rehabilitation project has proposed filling in the open cut mine with water to create an artificial lake and stabilise the large mine void (ENGIE, 2023). The project also proposes the reestablishment of Eel Hole Creek which currently flows through the cooling pondage, located 3.5km west of the current activity area (ENGIE, 2023).

Today most of the farmland in the Hazelwood North area between Morwell and Churchill is owned or set to be developed by private industrial companies, with numerous renewable projects including solar farms and battery energy storage systems being developed in the area over the past decade.

1.8.2 Historical land use of the activity area

The activity area was part of the Hazelwood run which encompassed an area of 17,300 acres. The run was first held by Albert Eugene Broadribb and William Bennett from 1844-1847. John Macmillan was the last owner of the Hazelwood run until it was forfeited and subsequently subdivided in 1881 (Spreadborough & Anderson, 1983, p. 14). In a parish plan from 1883, the landholders of the activity area include William John Marshall, William Northway, Thomas D. Williams, and William John Marshall (Figure 6.6).

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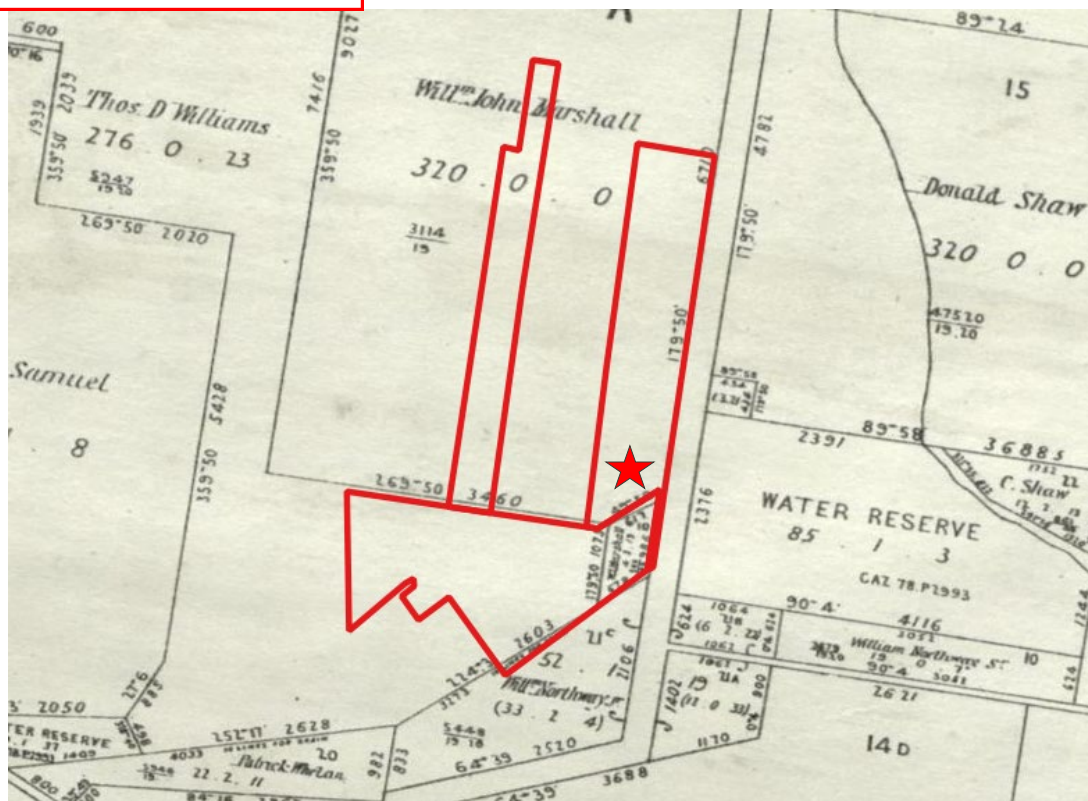


Figure 6.6 Parish Plan, Hazelwood, County of Buln Buln, photo-lithographed at the Department of Crown Lands and Survey, Melbourne, by J. Noone, 24. 10. 1883. Approximate extent of the activity area outlined in red and VHI H8121-0060 indicated by the red star. (Source: State Library of Victoria with GML overlay).

A portion of the activity area falls within a Victorian Heritage Inventory (VHI) site as part of 600 Tramway Rd (see Figure 6.6). This site is listed as H8121-0060 and was registered in 2023 for its local and archaeological significance associated with William John Marshall (Victorian Heritage Database, 2024). He purchased the land in 1876 which was primarily used as grazing land for cattle and sheep and the operation of a creamery (Victorian Heritage Database, 2024).

Both the 1883 and 1951 (Figure 6.6 and Figure 6.7) parish plans indicate that Bennetts Creek still follows its natural alignment, but Eel Hole Creek does not appear to naturally run through the activity area. The parish plans indicate that a drain or drainage line was artificially created across the southern half of the activity area as suggested by the description of "10 links for drain". This may indicate that the area is prone to inundation and required drainage.

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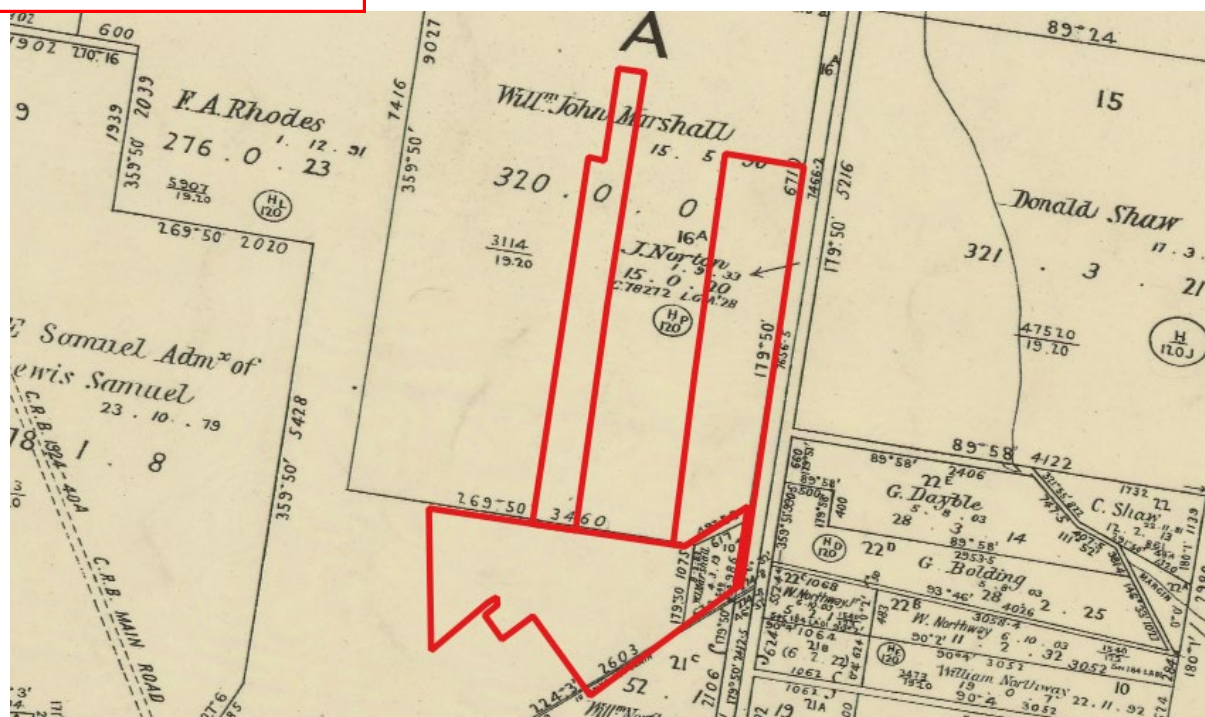
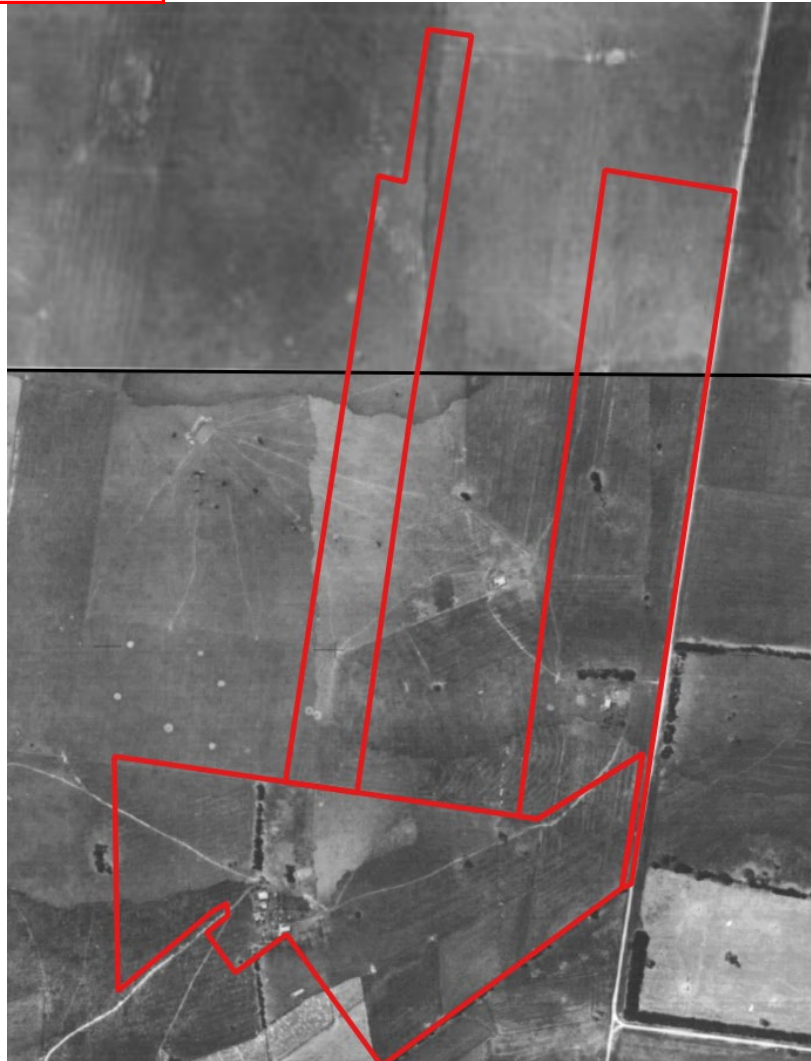


Figure 6.7 Parish Plan, Hazelwood, County of Buln Buln, photo-lithographed at the Department of Lands and Survey, Melbourne, by J.J. Gourley, November 1951. Approximate extent of the activity area in red. (Source: State Library of Victoria with GML overlay).

An aerial image captured in 1945 suggests that the activity area remained as undeveloped pastoral land well into the twentieth century (Figure 6.8). Some small artificial dams and two residential properties and associated outbuildings are present at 600 Tramway Road in the east of the activity area, and another property in the southwest of the activity area. A faint drainage line indicating Eel Hole Creek can be seen in the south-eastern corner of the property.

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In 1977, the Hazelwood Terminal Station was in the early stages of construction which resulted in varying levels of disturbance within the activity area associated with the construction of transmission lines, access roads and buildings servicing the terminal station (Figure 6.9).

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Figure 6.9 1977 aerial image with the approximate activity area outlined in red. (Source: Landata with GML overlay).

Between 1977 and 1990, an additional building was constructed in the property in the southwestern corner of the activity area and a row of trees were removed (Figure 6.10). By 1990, additional buildings and facilities were erected east of the terminal station and in the eastern extent of the activity area. Tree planting and landscaping appears to have occurred in the northern and eastern areas of the activity area by this time (Figure 6.10).

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Figure 6.10 1990 Aerial image of the activity area, approximate location of the activity area outlined in red. (Source: Landata with GML overlay).

In 2012, additional buildings were constructed as part of the terminal station on the eastern side of the activity area and evidence of soil disturbance is present in the northern extent (Figure 6.11). At least one of the structures associated with the southernmost property has been demolished or removed by this time.

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Figure 6.11 2012 Aerial image of the activity area with the approximate outline of the activity area in red (Source: Nearmap with GML overlay).

In 2017, the Hazelwood Power Station closed, and subsequent decommissioning occurred over the following years. Previously most of the power generated at the Hazelwood Power Station passed through the Hazelwood Terminal Station site and was diverted to the north or the south along the 500,000-volt transmission lines to Melbourne (Visit Gippsland, n.d.). There were no major changes to the activity area itself between 2012 and 2024 (Figure 6.12).

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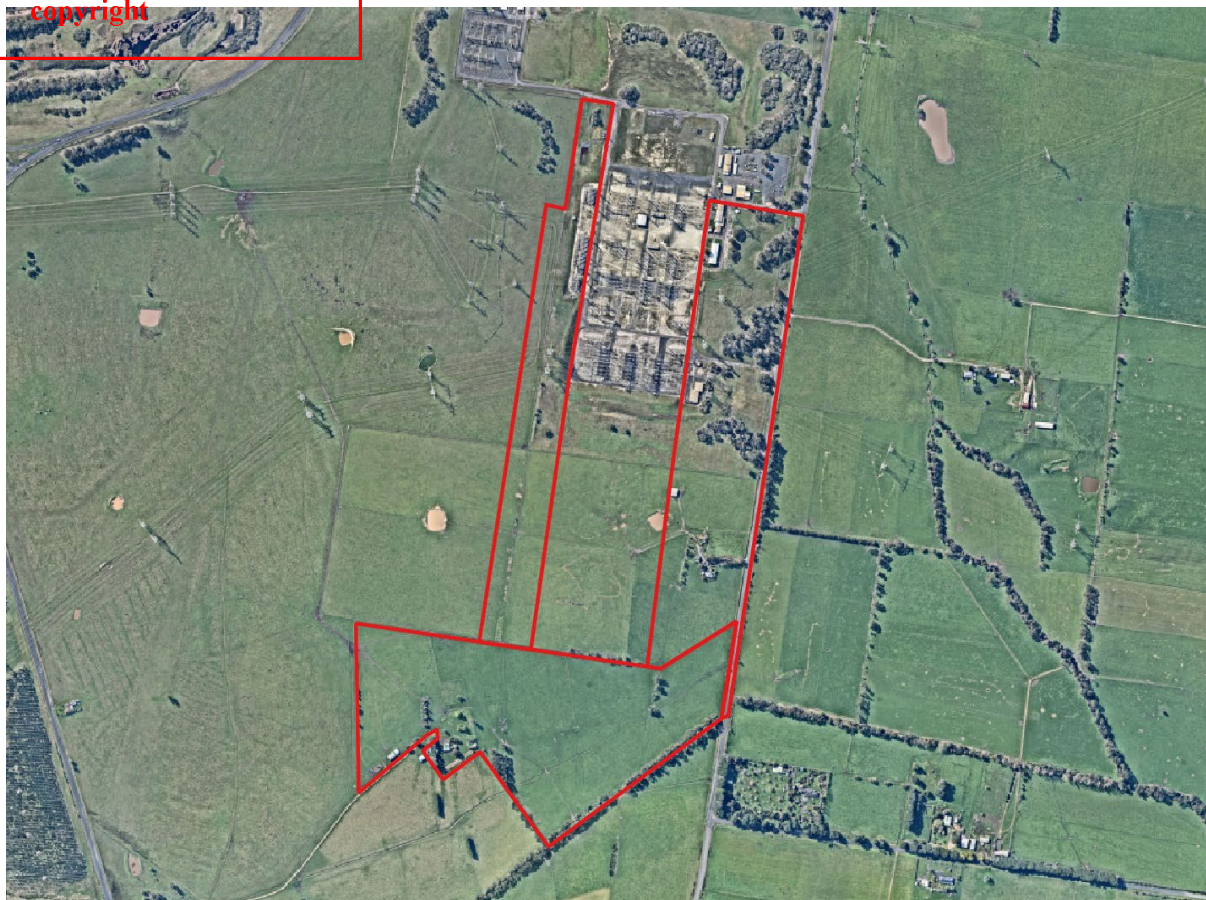


Figure 6.12 2024 Aerial image with the activity area approximately outlined in red (Source: Nearmap with GML overlay).

1.8.3 BYDA results

A Before You Dig Australia (BYDA) search was conducted by Briannon Dudek on 16 September 2024. Numerous assets are present across the current activity area and are outlined below in Table 6.3.

A critical subsurface water main and associated water valves run the length of the entire activity area starting in the north-western corner and running south to southeast. The Hazelwood Terminal Station is technically outside of the activity area but has resulted in the installation of numerous transmission lines, and underground communications services, particularly in the northern half of the activity area. Buried telecommunication cables run alongside Tramway Road and within the eastern half of the southern BESS site and are likely associated with the residential property.

The installation of these assets would have involved trenching using mechanical means to depths of 2–3 m, likely truncating or removing Aboriginal cultural heritage material in these areas of impact.

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Table 6.3 BYDA Results

Asset Holder	Areas Affected
AusNet Electricity Services Pty Ltd	All of the Hazelwood Terminal Station is an AusNet asset and multiple above ground transmission lines dissect from every direction around the perimeter. Subsurface communication cables are present in the northeast and northwest of the Hazelwood Terminal Station (Figure 6.13). No subsurface assets are present in the activity area south of the Hazelwood Terminal station (Figure 6.14).
AusNet Transmission Group Pty Ltd	The entire activity area includes areas where terminal stations, transmission lines, and underground communication cables occur, particularly within the northern half of the activity area and roadsides.
Gippsland Water	A critical water main and associated water valves run the entire length of the activity area (Figure 6.15).
Telstra VicTas	A buried telecommunication cable is present within southern half of the BESS area connecting the property, running from the south to the northwest, and another two cables running south to northeast (Figure 6.16).
VERNet Pty Ltd	An unspecified type of subsurface telecommunication asset is present alongside Tramway Road.

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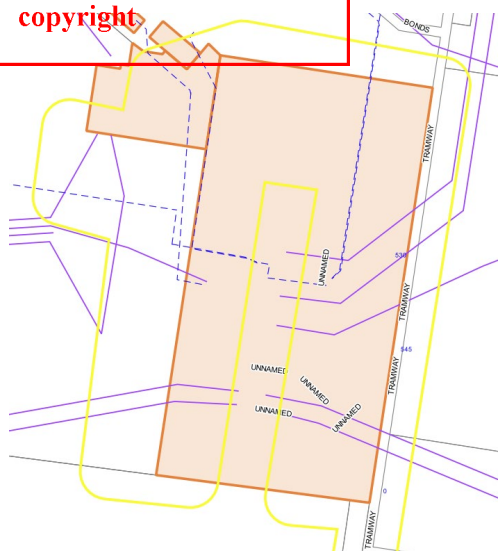


Figure 6.13 Northern study area – AusNet assets. Purple: above ground transmission lines, blue: subsurface communication cable

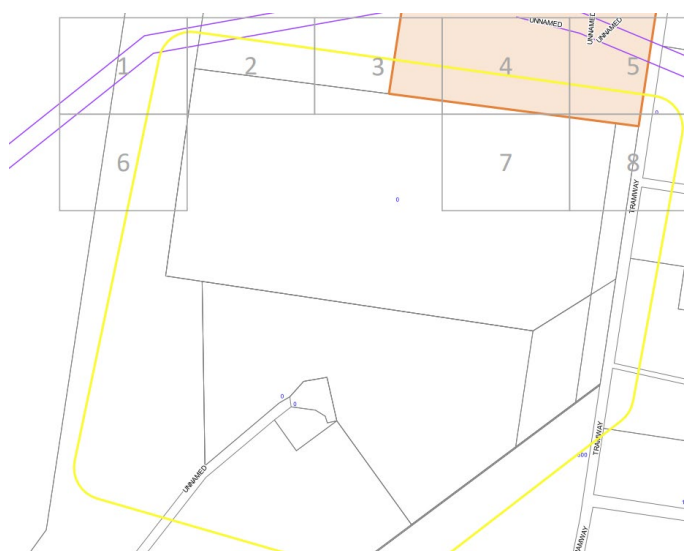


Figure 6.14 Southern study area – AusNet no assets



Figure 6.15 Gippsland Water assets

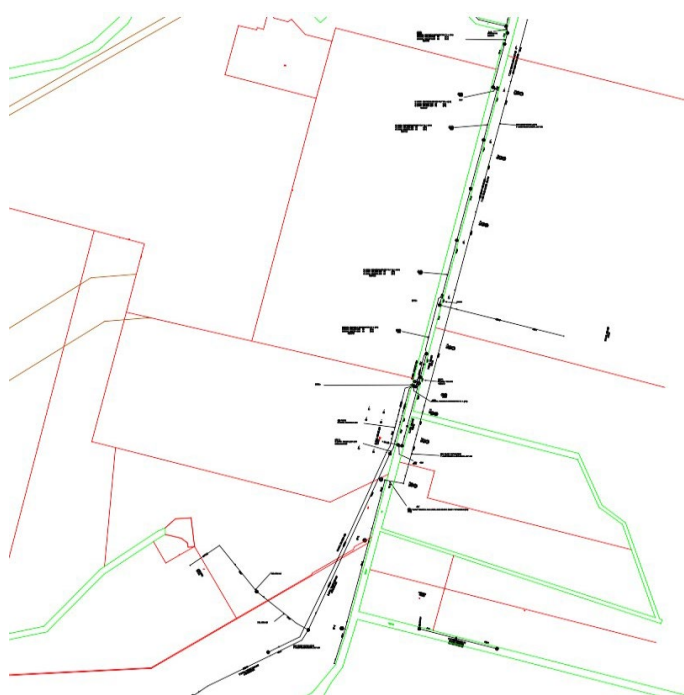


Figure 6.16 Telstra VicTas assets

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1.9 Conclusions from desktop assessment

The activity area is characterised by a plain landform in the eastern half of the activity area, which gradually rises into a low hill to the western half of the activity area. An artificial drainage line of Eel Hole Creek dissects the south-eastern half of the activity area and acts as an ephemeral waterway and tributary of Morwell Creek. Eel Hole Creek would have been traditionally of great importance to the Brayakaulung clan of the Gunaikurnai and elevated rises adjacent to waterways would have been ideal camp locations as they are dryer than the surrounding landscape, offer good vantage points and are rich in resources; they are therefore archaeologically and culturally sensitive.

There are a total of 70 Aboriginal places identified within the geographic region: which include artefact scatters (77.1%), earth features (8.6%), scarred trees (5.7%), LDADs (4.3%) and quarries (4.3%). The majority of these Aboriginal places have been associated in close proximity with Eel Creek and Bennetts Creek, particularly in areas of elevated terrain or alluvial terraces adjacent to these waterways.

The subsurface testing within the radius and along Tramway Road has identified Aboriginal cultural heritage at depths between 100-400mm within silty or clayey silt deposits particularly in low rise areas overlooking Bennetts Creek. This indicates that there is potential for stone tools to be present in similar landforms in proximity to Eel Hole Creek in the south of the activity area.

Much of the activity area has not been significantly disturbed through historical land use. However, activities in such as vegetation clearance, ploughing, the creation of dams, and the installation of subsurface utilities and drainage lines have likely disturbed the original deposition of lithic material within the current activity area, but not removed them entirely. Due to tree clearing, it is unlikely that scarred trees will be present within the activity area. In the northern half of the activity area, the construction of the Hazelwood Terminal Station, whilst not in the activity area, may have disturbed the original soil deposits through the installation of utilities, introduction of fill, or other ground disturbing works. A critical water main and associated water valves run the entire length of the activity area, and an unspecified type of subsurface telecommunication asset is present alongside Tramway Road and connects to the property in the south. The installation of these utilities would have involved trenching of depths extending beyond 1m and likely resulted in the displacement, or removal of any cultural heritage material in those locations. However, in the areas not impacted by subsurface utility installations there is moderate potential for artefact distributions to be present.

The results of the desktop assessment have indicated that it is reasonably possible for unidentified Aboriginal cultural heritage material in the form of artefact scatters to be within the activity area. Therefore, as per r.62(1), it was deemed necessary to undertake a standard assessment.

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