

31 May 2023

Adam Gray
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Synergy Wind Pty Ltd
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**ADVERTISED
PLAN**

By email: adam.gray@exceed-energy.com.au

Dear Adam,

Gelliondale Wind Farm– Historical heritage letter of advice

Our reference: 38940

This letter of advice outlines the statutory requirements under the *Heritage Act 2017* and the *Planning and Environment Act 1987* as they relate to the historic cultural heritage values of Gelliondale Wind Farm (study area) in relation to the proposed development of a wind energy facility within the Activity Area.

A review of relevant historic cultural heritage information has identified that there is no requirement for statutory approvals under the *Heritage Act 2017* and the *Planning and Environment Act 1987*.

Should you have any queries, please do not hesitate to contact me on 0408 410 912.

Yours sincerely



Hannah Cope-Williams
Heritage Consultant

Description of the Activity

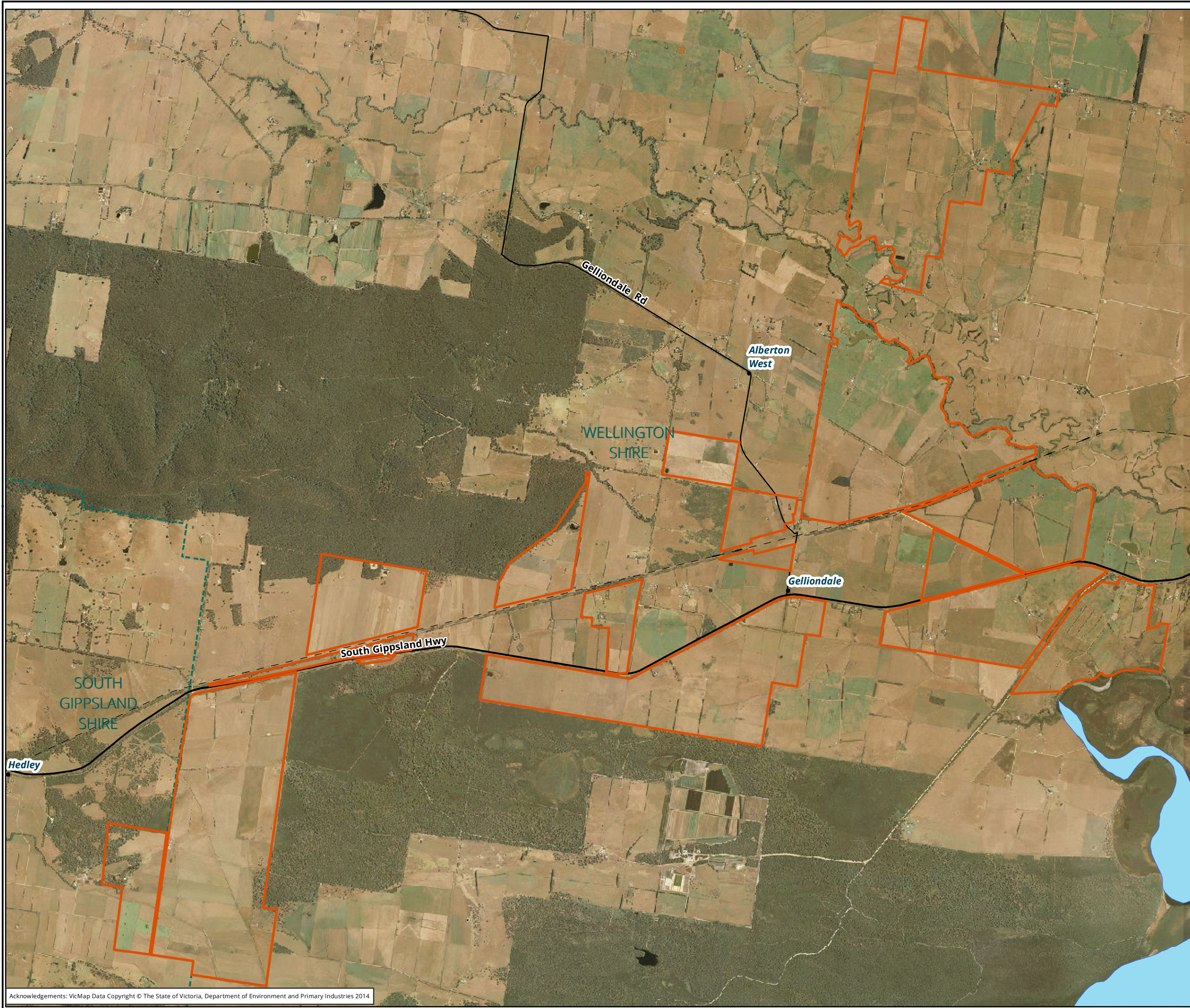
Synergy Wind Pty Ltd intends to develop a wind energy facility extending over an area approximately 12.9 km east-west by 6.7 km, comprising 13 widely spaced turbines within the study area. The construction of affiliated infrastructure will occupy a much smaller overall development footprint, and will include access tracks, underground cable routes, substation and battery storage, site amenities, and laydown and construction compound areas.

Description of the study area

The study area is located in the townships of Alberton West, Hedley and Gelliondale in the coastal region of Southern Gippsland, approximately 230 km to the east of Melbourne (Figure 1). This area occupies reclaimed coastal swamplands of low relief, with undulating rises to the north and high-level terraces and fans to the south. Jack River, Albert River, Tarra River, Muddy Creek, Stoney Creek, Nine Mile Creek, and their tributaries lie within or in proximity to the study area.

The study area consists of four separate blocks of farmland, lying to north and south of the South Gippsland Highway, measuring approximately 1,467 hectares (this includes land up to the boundaries of adjacent property parcels where various infrastructure for the activity will be located).

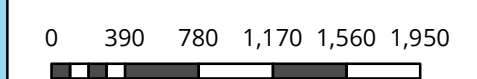
The study area largely consists of open grazing paddocks across floodplains that rise to hills to the north-west and spread to coastal dunes to the south. Most of the native vegetation has been removed except for occasional tree strands or isolated old gums remaining in the paddocks that serve as shade trees for the livestock.



Legend

Study Area

Figure 1: Extent of the Study Area

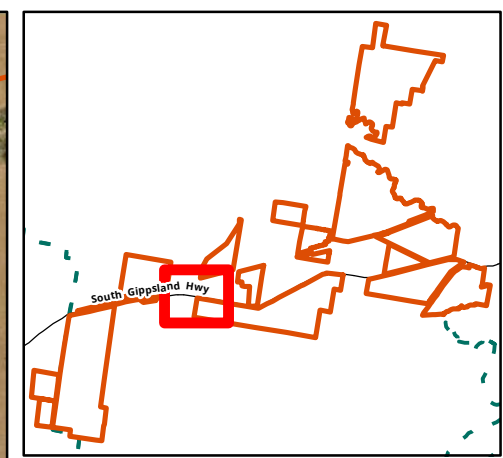


Metres
 Scale: 1:40,000 @ A3
 Coordinate System: GDA 1994 MGA Zone 55

biosis

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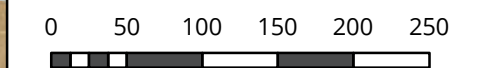
Ballarat, Brisbane, Canberra, Melbourne,
 Newcastle, Sydney, Wangaratta & Wollongong



Legend

- Study Area
- Heritage Register

Figure 2: Extent of H1058 Gelliondale Briquette Plant



Metres
 Scale: 1:5,000 @ A3
 Coordinate System: GDA 1994 MGA Zone 55

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Background Review

Historic heritage

A search of the following historic heritage registers was undertaken by Michaela Dinas, Biosis Pty Ltd on 21 March 2023.

- Victorian Heritage Register (VHR).
- Victorian Heritage Inventory (VHI).
- Wellington Shire Heritage Overlay (HO).
- National Heritage List (NHL).
- Commonwealth Heritage List (CHL).
- Register of the National Estate (RNE).
- National Trust Register (NTR).

As a result of these searches, it was identified that there is one registered historic heritage site listed within the study area:

- Gelliondale Briquette Plant (VHR: H1058, VHI: H8220-0008, HO: HO81).

The Gelliondale Briquette Plant is located along Coal Pit Road and the South Gippsland Highway, Gelliondale, and is registered on the Victorian Heritage Register, Victorian Heritage Inventory, and a Heritage Overlay. The Plant began manufacturing briquettes in 1934 under the ownership of James T Knox and was decommissioned fully in 1950. The site currently consists of a dam, mullock heap, trolley line, boiler mountings, coal bunker and associated infrastructure.

The site's significance is attributed to the Plant's demonstration of technical accomplishment in the history of briquette production. It also represents an early private enterprise into a brown-coal mining enterprise. Additionally, the site is a rare surviving example of a briquette plant, as out of the three original Victorian briquette factories, the Gelliondale Briquette Plant is the last represented by physical remains. Furthermore, it is the only remaining site that represents a non-government operated briquetted plant.

The site has social significance in association with the actions of James T. Knox and the Gelliondale Brown Coal and Oil company in their retaining of individual and private enterprise rights against government opposition (VHD 1994) as there was a lack of power in the private section in the utilisation of natural resources. This was exacerbated by the passing of the 1950 Gelliondale Land (Mineral Lease) Act, which granted authority of the resumptions of land and mineral leases to the Crown (VHD 1994). The site's original owner, James T. Knox, is also recognised as an important figure in Victorian heritage known for the promotion of concrete use within the Australian construction industry (VHD 1994).

The Gelliondale Briquette Plant lies approximately 10 metres west of the application footprint (the area assessed in relation to wind farm infrastructure), and is 110 metres west of a proposed turbine (GWT04) and crane pad (there is no construction activity proposed to take place between GWT04 access track and the Briquette Plant, and the alignment of the track and underground cabling in this area has been designed to avoid any interaction with this historic heritage site). Under the current plans the heritage site will not be directly impacted by the proposed activity.

Land use history

The Study area is located within Alberton West, Hedley and Gelliondale which are located within the broader region of the Yarram (also known as Yarram Yarram township). Yarram Yarram was originally identified in 1841 by Aeneas Ronaldson MacDonnell in 1841 as a potential settlement for Scottish migrants. However, the experiment folded, and he subsequently moved to New Zealand. In 1853, the township was first sold for farming lots. The town retained the name Yarram Yarram until 1924; the name is believed to be derived from a local Aboriginal word meaning plenty of water (Morgan 1997). A post office was established at Yarram Yarram in 1861 and houses and shops were constructed in increasing numbers through the 1870s and 80s. The town of Yarram was gazetted in 1893. Agriculture, in particular dairying, and extractive industries have been an important part of Gippsland's development. Trees were cleared in large swathes to provide wood for the building boom in Melbourne during the 1880s (Biosis 2001). Construction of the railway in Yarram began in 1897 and resulted in many businesses relocating to Yarram by 1921 when the railway was connected.

During the initial phases of European settlement in the south Gippsland area, native tree and scrub removal was undertaken on a wide scale to make room for pasture for livestock. This was also to enable travel routes between the coastline in the south, Melbourne in the west and the ranges, river lands and inland settlements to the north.

Before the study area was subdivided into freehold farm lots, it was part of the Tarra Creek, Cascade and Alberton squatting runs, also known as Trenton Valley (Spreadborough & Anderson 1983). These runs were established by Charles Lucus (Cascade in 1848), Edmund Bodman (Tarra Creek in 1847) and Henry Bodman (Trenton Valley in 1848) and were managed as cattle and sheep runs. As such, podding and pugging (cattle damage) has occurred across the study area. The land was gradually used for dairy industry, for which South Gippsland is now famous, and subjected to further land clearance, more stringent fencing, and dam construction. Dairy farming and dryland grazing pasture remains the predominant uses of land within the study area.

Prior to the construction of the Gelliondale Briquette Plant (H8220-0008), an open cut for mining commenced in the area in 1924 (Vines 2008). Records indicate the Gelliondale Open Cut was operated intermittently sometime between 1941 and 1955. In 1929, the construction of the Gelliondale Brown coal and Oil Briquette Plant began, with operations commencing in 1930 under the ownership of James T Knox and the first manufacture of briquettes in 1934 (VHD 1994). The company ceased the production of briquettes in 1944, with all production at the company finishing in 1950 (VHD 1994).

Site inspection

A site inspection of the study area was conducted on Thursday 30 March 2023 by Hannah Cope-Williams and Martin Lawler. The site inspection confirmed the Gelliondale Briquette Plant (VHR: H1058, VHI: H8220-0008, HO: HO81) does not spatially overlap the boundary of the impact area.

Predictive statement for study area

The study area contains the registered historic site Gelliondale Briquette Plant (VHR: H1058, VHI: H8220-0008, HO: HO81), which includes a dam, mullock heap, trolley line, boiler mountings, coal bunker and associated infrastructure.

Based on the site inspection and the historical background information, there is low potential for the proposed turbine (GWT04) and crane pad to impact the Gelliondale Briquette Plant, as it does not spatially overlap the boundary of this impact area.

Statutory requirements

Historic heritage

Are historic permits or consents required?

Under Section 93 of the *Heritage Act 2017* the Executive Director may issue a permit authorising works in relation to a Victorian Heritage Register site and under Section 124 issue a consent authorising works in relation to a Victorian Heritage Inventory site (or an archaeological site which is not recorded in the Victorian Heritage Inventory). While under Wellington City Council Heritage Overlay, a permit under the *Planning and Environment Act 1987* is required for impacts to heritage places specified on their schedule to the overlay.

Conclusions for historic permits and consents

Resulting from a review of the registry, inventory and overlay a historic site was identified within the study area. However, under the Wellington Shire requirements for Heritage Overlay works, as well as the requirements listed by Heritage Victoria for registered sites, permits are only required for works that will take place on or will impact a site. Therefore, as the proposed works will be taking place approximately 100 metres east of the heritage site and there is no spatial overlap between the site and the proposed wind farm application footprint, there is no requirement for statutory approvals for the following site in Table 1.

Table 1 Historic heritage statutory approvals

Name	Heritage List	Designation	Legislative requirements
Gelliondale Briquette Plant	HO VHR VHI	HO81 HI058 H8220-0008	<p>Whilst the site is within the study area; the proposed works will not impact the Gelliondale Briquette Plant. If the site will not be harmed there are no further requirements.</p> <p>If there are any changes to the proposed works that will result in harm to the site, then a planning permit will be required under the <i>Planning and Environment Act 1987</i>, and a Heritage Impact Statement (HIS) must be prepared for the proposed works, as it will accompany the permit application to Heritage Victoria. Any Permit issued is likely to carry conditions, so it is recommended that the Permit is sought well in advance of commencement of works.</p>

Is a historic survey advised?

All historical archaeological sites in Victoria older than 75 years are protected under the *Heritage Act 2017*, regardless of if they are recorded or not. If a site is uncovered during the activity, under Section 127 of the *Heritage Act 2017* it is an offence to knowingly disturb, damage or excavate a site without obtaining the relevant approval. Therefore, regardless of the requirements for permits or consents, an assessment of the study area must be made to determine the likelihood that historic sites may be present.

It was confirmed during the site inspection undertaken for this assessment that there is historical cultural material from the Gelliondale Briquette Plant present in the study area. However, the material is confined to the current site extent, which does not spatially overlap the proposed works footprint and therefore, will not be impacted.

Based on the background review, which included research of the region, a search of all the relevant registers and mapping of historic sites in proximity to the study area, it is considered unlikely there are unrecorded historic sites within the study area. Therefore, a historic survey is not advised.

Conclusions

Heritage Act 2017

Requirements

Whilst the Gelliondale Briquette Plant (VHR: H1058, VHI: H8220-0008, HO: HO81) is located within the study area, it will not be impacted by the proposed activity. Therefore, historic permits and/or consents are not required under the *Heritage Act 2017*.

Recommendations

The findings of this letter concluded that the potential for unrecorded historic heritage to be present within the study area is unlikely. Therefore, a historic heritage assessment is not recommended.

Planning and Environment Act 1987

Requirements

There are no requirements to obtain permits for the proposed works under the *Planning and Environment Act 1987* in respect to sites [protected under a Heritage Overlay.

Recommendations

The findings of this letter concluded that a Heritage Advisor must be engaged as soon as possible should there be any changes to the activity plan that will potentially impact the Gelliondale Briquette Plant.

References

Biosis 2001. Basslink Cultural Heritage Assessment, Phase 4; Old Rosedale Road Interconnector Alignment Preliminary Assessment, South Gippsland, Victoria, Prepared for NSR Environmental Consultants Pty Ltd and Basslink Pty Ltd.

Morgan P 1997. The Settling of Gippsland: A Regional History, Gippsland Municipalities Association, Leongatha, Victoria.

Spreadborough R & Anderson H 1983. Victorian Squatters, Red Rooster Press, Ascot Vale, VIC.

VHD 1994. 'Gelliondale Briquette plant', <https://vhd.heritagecouncil.vic.gov.au/places/1738>.

Vines J 2008. Coal Mining Heritage Study in Victoria, Heritage Council Victoria, Melbourne.