



A/O James Landy
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DATE

25 March 2026

SUBJECT

Goorambat East BESS: Heritage Assessment Letter

REFERENCE

0798824

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Dear Minister for Planning,

Environmental Resources Management Australia Pty Ltd has been engaged by International Power (Australia) Pty Ltd (The Proponent), a subsidiary of ENGIE S.A. to provide planning and environment advice on the proposed Goorambat East BESS (the Project), located approximately 175 km north of Melbourne. This heritage assessment letter supports the planning application for the Project and references the assessments previously undertaken for the approved Goorambat East Solar Farm (P0102/19), with which this Project is co-located with and surrounded.

This heritage assessment letter has been prepared to provide a preliminary assessment of potential impacts to existing heritage values that may occur because of the Project. The key findings summary of this assessment are:

- There are no areas of Aboriginal cultural heritage sensitivity (CHS) present within the Project Area, with the nearest area of CHS associated with Broken Creek (2.4 km to the west);
- A review of topography, geology, geomorphology and general archaeological sensitivities indicate there is a low potential for unknown Aboriginal heritage to occur in the Project Area;
- A search of the Victorian Aboriginal Heritage Register found that no registered Aboriginal places are located within the Project Area;
- There are no registered World, Commonwealth, National, State or local historic heritage places located within the Project Area. The nearest registered historic places or heritage overlays are located over 10 km away from the Project Area; and
- Based on the current indicative development footprint, a mandatory CHMP is not triggered. While the Project constitutes a high impact activity under the *Aboriginal Heritage Act 2006* and as defined under the *Aboriginal Heritage Regulations 2018*, it is not located in an area of CHS.

To mitigate harm and lower risk to any potential unknown Aboriginal heritage in the Project Area, however low the risk, a voluntary CHMP may be carried out. In the absence of a CHMP, an Unexpected Finds Protocol should be prepared and followed during construction.

Jenny Luk
Partner, ERM

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1. INTRODUCTION

Environmental Resources Management Australia Pty Ltd (ERM) has been engaged by International Power (Australia) Pty Ltd (The Proponent), a subsidiary of ENGIE S.A., to provide planning and environment advice on the proposed Goorambat East BESS (the Project), a Battery Energy Storage System (BESS) at Goorambat, Victoria. This heritage assessment letter (Assessment) has been prepared to provide a preliminary assessment of potential impacts to existing heritage values that may occur because of the Project.

This assessment was prepared by ERM Principal Heritage Consultant, Mark Dowdell, and Senior Consultant, Noah Brett.

1.1 AIMS AND SCOPE

This assessment aims to identify potential Project risks and constraints relating to identified historic and cultural heritage values. The scope of this assessment comprises the following:

- identify Aboriginal cultural heritage and historic heritage, including potential historical archaeology values, of the Project Area;
- assess the potential impacts on the identified and potential historical and Aboriginal cultural heritage values;
- provide risk mitigation options to assist ENGIE in developing the Project design to avoid or minimise potential impacts and mitigate significant risks to heritage values; and
- identify the statutory requirements and provide advice on future heritage requirements.

1.2 METHODOLOGY

This assessment examines Aboriginal cultural heritage and historic heritage values within the Project Area. It has been prepared using the following methodology:

- Review of relevant statutory (Commonwealth, State and Local government) and non-statutory heritage database and mapping systems to identify the existing registered Aboriginal and historic heritage values within the Project Area, including information sourced utilising readily available (public) data through key Commonwealth, state and local database and register searches:
 - Australian Heritage Database (Commonwealth Heritage List (CHL), National Heritage List (NHL), & World Heritage List (WHL) (Accessed 28 October 2025);
 - Victorian Heritage Database - Victorian Heritage Register (VHR) and Victorian Heritage Inventory (VHI) (Accessed 28 October 2025);
 - Aboriginal Cultural Heritage Register and Information System (ACHRIS) (Accessed 28 October 2025, Access Number 15975); and
 - VicPlan information service and online map viewer (Local Planning Schemes Heritage Overlays) (Accessed 28 October 2025).
- Mapping areas of known cultural heritage, based on the results of the searches outlined above;
- Identification of areas of archaeological potential (if present);

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- Identification of potential heritage constraints based on anticipated project activities; and
- Preparation of preliminary mitigation measures and recommendations for management of heritage values within the Project Area.

This letter has been prepared with consideration of current leading heritage practice guidance including:

- Burra Charter: The Australian ICOMOS Charter for the Conservation of Places of Cultural Significance 2013. A copy of the Burra Charter and Practice Notes can be accessed online at <http://icomos.org/australia>;
- Dhawura Ngilan: A vision for Aboriginal and Torres Strait Islander Heritage in Australia;
- Free, Prior and Informed Consent guidelines (FPIC). The FPIC guidelines can be accessed from: First Nations Engagement the principles of Free, Prior and Informed Consent;
- Ask First: A Guide to Respecting Indigenous Heritage Places and Values.' The Ask First guidelines can be accessed from: <http://www.environment.gov.au/about-us/publications/archive#heritage>; and
- Australian Natural Heritage Charter.

A glossary of acronyms and abbreviations is supplied in Attachment A.

1.3 LIMITATIONS

ERM acknowledges that this report has the following limitations within which the findings need to be interpreted carefully:

- No consultation with First Nations Peoples/Registered Aboriginal Parties has been undertaken by ERM to inform this report;
- No detailed desktop analysis of regional archaeological reports that overlap the activity area;
- No site visit or survey was carried out as part of this assessment; and
- No detailed archaeological site prediction modelling.

2. THE PROJECT

2.1 PROJECT DESCRIPTION

The Project is a proposed battery energy storage facility of up to 200 MW and up to approximately 1200 MWh (6 hours), co-located with the approved and constructed 250 MW Goorambat East Solar Farm (GESF), located in Goorambat, approximately 12 km north of Benalla, Victoria. The Project would connect to the grid via the constructed Goorambat East Terminal Station (GETS). The BESS construction itself consists of the main BESS facility, laydown areas and associated support infrastructure such as cables, access tracks and a substation.

2.1.1 PROPOSED INFRASTRUCTURE AND WORKS

Key proposed infrastructure and components include:

- Modular lithium-iron-phosphate (LFP) battery enclosures within fenced compounds;

- Power conversion systems (inverters/PCS) and MV step-up transformers;
- 33 kV internal collector network to a BESS 33 kV switch room and control building;
- Fire safety systems (hydrants, water supply tanks and fire-breaks) designed in consultation with the CFA and to relevant Australian/International standards;
- Security fencing, CCTV, low-spill lighting compliant with AS 4282;
- Internal access tracks, laydown areas, temporary construction compounds and stormwater/drainage controls;
- Operational and maintenance facility, car parking, and business identification signage; and
- Landscape mitigation measures (native vegetation plantings, visual screening).

Construction will be staged and will commence after the completion of GESF construction activities to avoid any overlap of construction activities. It will predominantly use existing GESF laydown areas and internal tracks, with temporary compounds and site offices placed within the Project Area. Typical construction activities include minor earthworks, drainage, installation of foundations/pads, delivery and craning of battery containers, cable trenching, and commissioning. The BESS will operate 24/7 under supervisory control, with periodic maintenance visits; typical traffic is expected to be minimal following the construction phase of the Project.

3. UNDERSTANDING THE AREA

3.1 PROJECT AREA

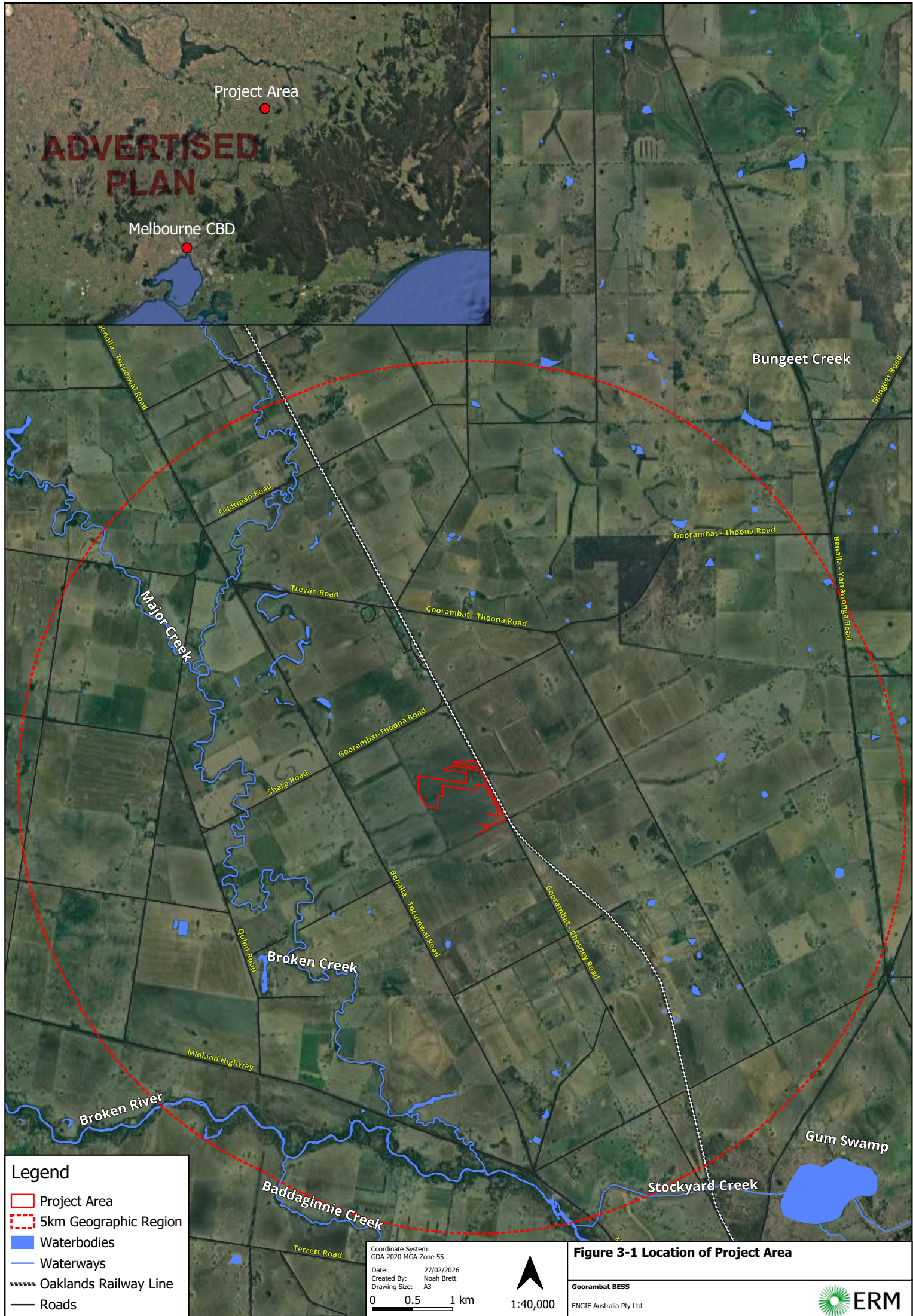
The Project Area (Figure 3-1) is approximately 24 ha in size, and is located within the broader GESF landholding, approximately 1.3 km south of Goorambat. The Project avoids waterways and areas of higher environmental sensitivity identified through previous GESF assessments. Land required for the Project is owned/controlled by the Proponent as part of the GESF land acquisition.

The Project Area is predominantly cleared agricultural land with some existing site access and electrical infrastructure.

3.2 GEOGRAPHIC REGION

The Project Area is in the central north region of Victoria. For the purposes of this assessment the Project Area is reviewed, as well as a 5 km buffer around the Project Area to provide a Geographic Region when considering potential heritage values for the Project Area (henceforth known as the Study Area).

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Project Area

Melbourne CBD

Bungeet Creek

Major Creek

Broken Creek

Broken River

Baddaginnie Creek

Gum Swamp

Stockyard Creek

Legend

Project Area

5km Geographic Region

Waterbodies

Waterways

Oaklands Railway Line

Roads

Coordinate System:
GDA 2020 MGA Zone 55

Date: 27/02/2026

Created By: Noah Brett

Drawing Size: A3

0 0.5 1 km

1:40,000

Figure 3-1 Location of Project Area

Goorambat BESS

ENGIE Australia Pty Ltd

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3.3 ENVIRONMENTAL CONTEXT

3.3.1 GEOLOGY AND GEOMORPHOLOGY

The Project Area has been historically cleared for agricultural use, as well as construction of the GESF and GETS that are currently undergoing commissioning works. This also reflects the wider uses in the Study Area.

A search of Agriculture Victoria's Victorian Resources Online (VRO) database revealed the Project Area is located within two geological units, the Shepparton Formation (Nws) and incised colluvium (Nc1).

The VRO describes Nws soils as consisting mostly of:

Clay, sand, silt, & poorly sorted lenticular gravel. Dissected flood plain alluvium: terraces 1-10 metres above present river channels; well-developed soil 2-3 m thick.

The VRO describes Nc1 soils as consisting mostly of:

Silt, sand, & gravel; generally, poorly sorted and poorly rounded except within channels cut into colluvial material; dissected to variable degrees.

An additional search of the VRO database revealed the Project Area is located within the Northern Riverine Plain (RP) tier one (4) geomorphic unit (GMU) and the Alluvial fans and aprons tier two (4.3) GMU.

The geology and geomorphology located within the Project Area comprise of predominantly flat or undulating plain intersected by a shallow drainage line. Soils within the Project Area are likely to comprise of a mixed silty, sandy A Horizon deposits overlying a clay B-horizon. Depth of B-Horizon deposit are likely to fluctuate due to the intermittent flooding of the drainage line as well intensive ploughing within the flatter plain landform.

3.3.2 FLORA AND FAUNA

The ecology and native vegetation of the Project Area have been cleared and extensively modified for agricultural use. Low trees and shrubs are evident in aerals around drainage line with no mature large species of eucalyptus tree present that may indicate remnant flora (pre-European settlement in the Project Area).

A search of the Department of Energy Environment and Climate Action's (DEECA) NatureKit database revealed the Project Area is located within the Victorian Riverina Bioregion, and the Ecological Vegetation Class (EVC) Plains Woodland (EVC 803).

3.4 HISTORICAL CONTEXT

Warning

The following historical information may be distressing, as it relates to the significant mental and physical impacts experienced by Yorta Yorta people during colonisation. It emphasises that the material is drawn from 19th- and 20th-century ethnohistorical and linguistic sources, which may not reflect contemporary Yorta Yorta perspectives.

It also highlights the challenges of accurately describing Aboriginal groups from this period due to inconsistencies in early colonial accounts, misunderstandings of Aboriginal societies, and the profound disruptions caused by colonisation, including land loss, disease, social upheaval and forced relocation, which further complicate historical interpretation.

3.4.1 ETHNOGRAPHIC HISTORY

The Yorta Yorta peoples are the Traditional Owners of a large region along the lower Goulburn and Murray rivers. Yorta Yorta cultural heritage is deeply tied to the landscape, reflected through archaeological sites, oral histories and long-standing custodianship. Local oral traditions describe creation stories such as the “eternal Dreaming” and recall major geological events like the Cadell Fault-related “Great Flood,” demonstrating cultural continuity spanning tens of thousands of years. Pre-colonial Yorta Yorta society was organised into socio-dialectical groups with defined territories, guided by elders who held cultural and spiritual authority. Social, ceremonial and economic life was interconnected, with seasonal gatherings, moiety-based kinship rules and deeply embedded spiritual practices.

The Yorta Yorta maintained a highly sophisticated and sustainable relationship with Country. The local riverine environment supported a diverse subsistence economy drawing on fish, waterbirds, yabbies, kangaroos, emus and edible plants. Land management practices such as fire-stick farming enhanced biodiversity and productivity, and resource use reflected deep ecological knowledge—canoe-making from river red-gum, fibre nets for fishing, and oven mounds for cooking. Seasonal movement across ecological zones followed both subsistence needs and cultural calendars, while totemic obligations helped regulate ecological balance. Certain individuals held specialised roles in resource management, and shared sites like the Mt William stone quarry demonstrate complex systems of ownership and exchange. Collectively, these practices illustrate a sophisticated environmental stewardship that continues to shape Yorta Yorta custodianship today.

3.4.2 COLONIAL & LAND USE HISTORY

The Project Area is based 1.5 km south of the southernmost extent of the modern township of Goorambat. Goorambat is a rural township situated about 17 km north of the larger township of Benalla, along the route to Yarrawonga, in largely flat, lightly treed country approximately 2km east from Broken Creek (Victorian Places 2025). The locality’s name derives from the Goorambat pastoral run, believed to be a Yorta Yorta word meaning “nonsense” or “hunting ground” (Victorian Places 2025). Agriculture has been the economic cornerstone of Goorambat since its inception. Initially supporting dairying and pasturelands, the region would slowly transition primarily to wheat and sheep farming by the mid-20th century (Victorian Places 2025).

Colonial occupation began in the early 1840s with overlanders and pastoralists establishing unofficial runs across north central Victoria (NEART 2025). As shown by Figure 3-2, selectors/surveyors arrived in 1860, establishing farms along Broken Creek and pasturelands in the Geographic Region. The 1860 parish plan shows that the Project Area did not have an official landowner yet and was split between “fair pastureland” for sale to the north and “good agricultural land” suitable for cropping for sale to the south.



FIGURE 3-2 PARISH PLAN 1860 (PROV 2025)

Along the banks of the Broken Creek construction of the old township of Goorambat and essential community infrastructure would soon follow the 1960 survey (NEART 2025). For example, a Methodist church was built in the old township of Goorambat in 1865 and was shortly followed up by the construction of a primary school in 1866 (Victorian Places 2025). By 1882 we can see in Figure 3-3 that the Geographic Region around the Project Area is officially owned by a Thomas Kennedy and is likely being used for agricultural purposes.

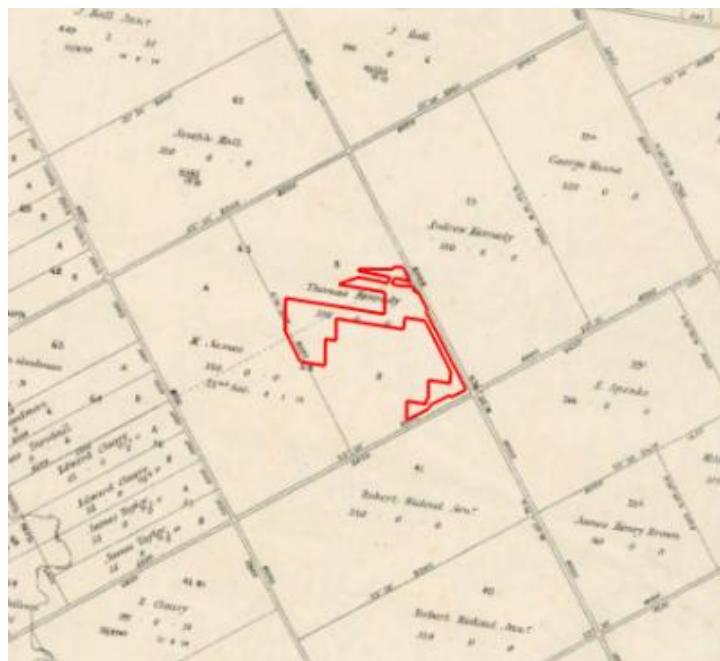


FIGURE 3-3 PARISH PLAN 1882 (PROV 2025)

The arrival of the Benalla–Yarrawonga railway branch in 1883 marked a pivotal moment in the township’s development. Rather than serving the early settlement at Broken Creek, the line bypassed it, prompting the emergence of the new modern Goorambat settlement around the railway station (Victorian Places 2025). After the construction of the Goorambat Railway Station businesses such as a wood yard, post office, a flour mill, and a hotel followed in quick succession (NEART 2025). In 1884 Casey's Weir was built on Broken River near the junction with Stockyard Creek and was the first successful irrigation weir in northern Victoria (NEART 2025). It helped divert water from Broken River into Broken Creek for agricultural and livestock purposes to serve the Goorambat area and remains functional to this day (NEART 2025).

Cultural and social institutions would also rapidly take shape around the new modern Goorambat Township. A mechanics institute was built in 1888 by James and William Hall who owned the land directly north of the Project Area (Figure 3-2, NEART 2025). The mechanic’s institute was the centre of the Goorambat community as it hosted events such as concerts, balls, roller-skating, but also served as a school and a public library. By 1930 it included a “picture theatre” box to screen films (NEART 2025). Furthermore, we can see in Figure 3-4 that by 1930 the Project Area is still owned by a Thomas Kennedy and sits directly next to the new Benalla-Yarrawonga railway, with the new Goorambat Train Station further to the north.

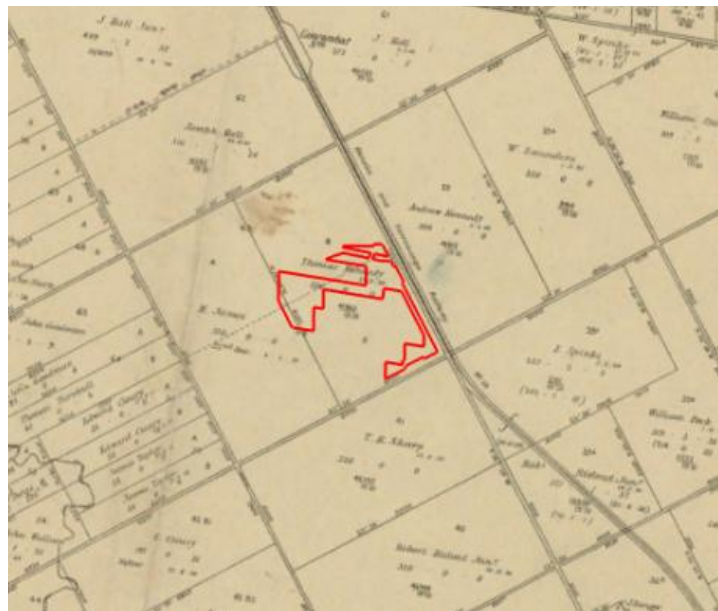


FIGURE 3-4 PARISH PLAN 1930 (PROV 2025)

In 1954, Goorambat was the centre of the commonwealth world during the royal train’s stopover, with Queen Elizabeth II and the Duke of Edinburgh staying overnight on the 4th of March (NEART 2025). The town was decorated with flags, greenery, and a welcoming arch by the Country Women’s Association, a decorative plaque can be found at the mechanics institute celebrating the visit (NEART 2025).

In the Figure 3-5 historical aerial photograph shows that by 1963 the township of Goorambat has expanded, and the Project Area is used for cropped agriculture. Both the Figure 3-6 1980 historic aerial photograph and Figure 3-7 2025 satellite image showcase the further expansion of the township of Goorambat, with the Project Area still being used for cropped agriculture.



FIGURE 3-5 HISTORIC AERIAL PHOTOGRAPH 1963 (GEOSCIENCE AUSTRALIA 2025)



FIGURE 3-6 HISTORICAL AERIAL PHOTOGRAPH 1980 (GEOSCIENCE AUSTRALIA 2025)

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FIGURE 3-7 PRESENT DAY (GOOGLE EARTH 2025)

3.5 PREVIOUS STUDIES

A search was carried out of the VAHR via ACHRIS (access code 15975) for Aboriginal cultural heritage studies on 28 October 2025, and the results are presented below.

In total 11 Aboriginal cultural heritage studies were found to have been carried out within the Project Area (Figure 3-8). Nine of these studies are broad regional level desktop studies conducted between the years 1984 and 2002. These nine studies were found not to carry any archaeological information relevant to the Project Area and thus are not detailed below. Two studies were chosen for further analysis: the nearest CHMP located approximately 2.2 km north in the centre of the township of Goorambat and a Cultural Heritage Assessment (CHA) undertaken for the GESF that encompasses the entire Project Area.

Australian Cultural Heritage Management, 2016. Cultural Heritage Management Plan 14345: North East Water Drinking Water Supply Pipeline, Goorambat.

In 2016 Australian Cultural Heritage Management Pty Ltd (ALA) prepared a CHMP for North East Water Pty Ltd for the proposed construction of a 11.3 km subsurface drinking water supply pipeline. The Activity Area consisted purely of 1.5 m sections of the road reserves of Woods, Devenish and Trewin roads, with the proposed pipeline beginning at the township of Devenish and terminating at the township of Goorambat. The Desktop Assessment identified moderate potential for Aboriginal cultural heritage due to proximity to water sources such as Broken Creek. However, the Standard assessment (survey) did not identify any Aboriginal cultural heritage. The lack of Aboriginal cultural heritage was attributed to the Activity Area consisting of a significantly disturbed road reserve and thus in consultation with Yorta Yorta Nation Aboriginal Corporation a Complex Assessment (archaeological testing) was deemed unnecessary.

Andrew Long & Associates Pty Ltd, 2019. Goorambat EAST Solar Farm – Eastern Front: Cultural Heritage Assessment.

In 2019, Andrew Long & Associates Pty Ltd carried out a cultural heritage assessment (CHA) for Neoen Pty Ltd for the proposed construction of the GESF. The Study Area of the GESF CHA encompasses the entirety of the Project Area for the Goorambat BESS. The CHA assessed whether a mandatory CHMP was required for the high impact activity and concluded there was no legislative requirement for a mandatory CHMP as the Project Area is not within an area of CHS.

The CHA addresses Regulation 25 and 40 of the *Aboriginal Heritage Regulations 2018*. Regulation 25 defines registered cultural heritage places as areas of CHS and regulation 40 defines dunes and source-bordering dunes as areas of CHS, unless significantly disturbed. The CHA identified no areas of CHS relating to registered cultural heritage places overlapping with the Project Area.

The CHA detailed that their Study Area lies within three geomorphological units: plains with leveed channels (GMU 4.2.1), outlying ridges and hills (GMU 1.4.6), and alluvial fans and aprons (GMU 4.3). The CHA identified that while GMU 4.2.1 may include source-bordering dunes, no such dunes (labelled as "Qdi" on the Surface Geology of Victoria map) were present within the Study Area and thus no area of CHS was present within the Study Area.

Andrew Long & Associates Pty Ltd determined that a mandatory CHMP was not triggered by the proposed GESF works. The study indicated there was some potential, however low, for Aboriginal cultural to occur near watercourses and water bodies in the Study Area (not listed as CHS). To mitigate harm during the works to unknown Aboriginal heritage a voluntary CHMP was recommended. Based on a review of ACHRIS, the Sponsor for the project did not proceed with a voluntary CHMP.

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4. ASSESSMENT AGAINST RELEVANT LEGISLATION

This section outlines an assessment of the Project against the relevant legislative requirements for historic and Aboriginal cultural heritage.

TABLE 4-1 ASSESSMENT AGAINST RELEVANT LEGISLATION

Legislation	Description	Assessment Summary
<i>Aboriginal Heritage Act 2006</i>	The <i>Aboriginal Heritage Act 2006</i> was enacted to provide protection of Aboriginal (First Nations) cultural heritage sites in Victoria. The Act prohibits the wilful destruction or disturbance of any Aboriginal cultural heritage site, place or object, whether on private or public land. The Act also allows for different First Nation organisations, groups, and bodies to connect and better enforce and preserve policies regarding Aboriginal Heritage. It does this through the establishment of the Victorian Aboriginal Heritage Council, Registered Aboriginal Parties (RAPs), the Victorian Aboriginal Heritage Register (VAHR), Cultural Heritage Management Plans (CHMPs) and cultural heritage permit processes. The Act is administered by First Peoples – State Relations.	A search was carried out of the Victorian Aboriginal Heritage Register (VAHR) via ACHRIS (2025) using access code 15975 for Aboriginal cultural heritage Places and areas of cultural heritage sensitivity (CHS) on 28 October 2025 There are no registered Aboriginal places in the Project Area. The nearest Aboriginal places comprise of two scarred tree registrations: Midland Hwy Benalla ST2 (VAHR 8025-0325) and Hchesney 1 (VAHR 8025-0005). Both place registrations are located approximately 4.6 km south of the Project Area along road reserves. Furthermore, no areas of CHS are located within the Project Area, with the nearest CHS (Broken Creek) located approximately 2.4 km west. A review of studies available on ACHRIS or the public domain located in the Project Area showed very few archaeological assessments have previously been conducted, with only two studies deemed to directly address the Project Area.
<i>Aboriginal Heritage Regulations 2018</i>	The <i>Aboriginal Heritage Regulations 2018</i> give effect to the Act and prescribe standards, set out the circumstances in which a CHMP is required, should be prepared and set out the various fees and charges. The Regulations should be read in conjunction with the Act. The Regulations are administered by First Peoples – State Relations. CHMP triggers: • A Cultural Heritage Management Plan (CHMP) is required for an Activity (i.e. the use or development of land) if the Activity is both: • A high impact Activity; and • Falls in whole or in part within an area of cultural heritage sensitivity.	A mandatory CHMP is only required if the works should constitute both a high impact activity <i>and</i> be located in an area of cultural heritage sensitivity. Based on the current known design specifications and location of the Project Area, the proposed works likely trigger a high impact activity under the following regulations: Regulation 46 (1) (b) <i>land used to generate electricity, including a wind energy facility.</i> Regulation 46 (1) (b) <i>a utility installation, other than a telecommunications facility, if—</i> (C) <i>the works are a linear project with a length exceeding 100 metres (other than the construction of an overhead power</i>

	The terms 'high impact activity' and 'cultural heritage sensitivity' are defined in the <i>Aboriginal Heritage Regulations 2018</i>.	<i>line or a pipeline with a pipe diameter not exceeding 150 millimetres); or</i> <i>(D) the works affect an area exceeding 25 square metres</i> A review of the location and ACHRIS indicates that the Project Area is <i>not</i> located within an area of cultural heritage sensitivity and as such does not fulfil this requirement. As such, based on the <i>Aboriginal Heritage Regulations 2018</i> triggers there is no mandatory requirement for a CHMP to be prepared.
<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act)</i>	Part 3, Division 1 of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC) requires that actions that have, will have or are likely to have a significant impact on Matters of National Environmental Significance (MNES) require approval from the Australian Government Minister for the Environment. The MNES that relate to heritage matters are World Heritage Properties, and National Heritage Places. Section 341ZC of the EPBC Act addresses National and Commonwealth Heritage Places. This section requires the minimisation of adverse impacts to the heritage values of a National or Commonwealth Heritage Place. This could be direct impacts from physical disturbance or could also include secondary impacts in the event of activities that would impact on the visual aspect, cultural importance, landscaping and curtilage of an adjacent listed property. Section 341ZC only applies to places legally gazetted as having Commonwealth/National heritage values by the Minister for the Environment.	The Australian Heritage Database was reviewed to identify World, National and Commonwealth Heritage Places. There are no World Heritage Properties within the Project Area. The nearest World Heritage is the Royal Exhibition Building and Carlton Gardens (ID105143) site approximately 176 km southwest from the Project Area. There are no National Heritage places within the Project Area. The nearest National Heritage place is Glenrowan Heritage Precinct (ID105729) approximately 26 km east from the Project Area. There are no Commonwealth Heritage Sites within the Project Area. The nearest Commonwealth Heritage Site is the Euroa Post Office (ID106201) approximately 48 km southwest of the Project Area. The Project does not trigger any requirements under the EPBC Act.
<i>Heritage Act 2017</i> and <i>Heritage Regulations 2017</i>	<i>The Heritage Act 2017</i> provides protection and conservation for all Victorian historic heritage sites and items that are at least 75 years old, including underwater heritage. The Act sets out procedures to identify items of state heritage significance, and of historical archaeological value. It also establishes the processes for obtaining approvals for changes to those places, enforcing compliance, and other administrative procedures.	THE VICTORIAN HERITAGE REGISTER The VHR list is used to provide legal protection for objects and places which are significant to the history of the state of Victoria. There are no VHR listed sites located within the Project Area. The closest VHR place is the Broad Gauge Rail Bridge Over Broken River (H1061), which is approximately 13.4 km south of the Project Area in Benalla. THE VICTORIAN HERITAGE INVENTORY

	It also creates offences and other enforcement measures to protect and conserve heritage. If an item has statutory heritage protection at a state level in Victoria, it will be recorded in the Victorian Heritage Register (VHR) or the Victorian Heritage Inventory (VHI). All historical archaeological sites in Victoria are protected by the provisions of the Act. The <i>Heritage Act 2017</i> (Vic) is administered by Heritage Victoria (Department of Transport and Planning).	The VHI list is used to provide legal protection for known historical (non-Indigenous) archaeological sites in the state of Victoria. There are no VHI listed sites located within the Project Area. The closest VHI place is Benalla Railway Station and Yard (H8024-0016), which is approximately 13 km south of the Project Area in Benalla. The Project does not trigger any requirements under the Heritage Act. An unexpected finds protocol should be developed for the Project to ensure unregistered heritage is not disturbed.
<i>Native Title Act 1993</i>	Australian legislation that recognises and protects traditional ownership of land and waters by Aboriginal and Torres Strait Islander peoples. Enacted in response to the 1992 <i>Mabo</i> decision, it provides a legal framework for determining native title claims, negotiating "future acts" (developments on native title land), and managing compensation. The Act is overseen by the <u>National Native Title Tribunal (NNTT)</u>.	There are no Native Title claims (determined or registered) over the Project Area at the conclusion of this report.
<i>Planning & Environment Act 1987</i>	Areas of local heritage significance can be protected by a heritage overlay, which is part of a local planning scheme of the local government area (Council). The guidelines for heritage overlays are set out in Clause 43.01 of each planning scheme. Councils are responsible for issuing planning permits for changes or prospective impacts, both direct and indirect, to local heritage places.	The relevant planning scheme to the Project Area is the Benalla planning scheme in the Benalla Rural City Local Government Authority (LGA) area. There are no Heritage Overlays within the Project Area. The closest HO place is the Farmers Arms Hotel (HO59), which is approximately 13 km south of the Project Area in Benalla.

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5. CONCLUSIONS

This assessment found that no registered Aboriginal places or historic heritage sites are present within the Project Area. The lack of registered places may be due to a lack of studies (see Table 4-1) and the general low sensitivity for heritage to occur in the Project Area. Site patterning in the region shows a strong correlation of Aboriginal cultural heritage in the vicinity of permanent fresh watercourses, with the likelihood of sites decreasing as the distance from water increases.

Historic Heritage

There are no registered World, Commonwealth, National, State or local historic heritage places located within the Project Area. The nearest registered places or heritage overlays are over 10 kilometres in distance, a result that likely reflects the remoteness of the Project Area from a larger township. A review of parish records and historic aerials shows the Project Area to have been consistently used for agricultural land for well over 100 years.

Based on the location and prior ground disturbance the likelihood of intact historic heritage to be present is considered very low. No further historic heritage investigation is considered to be required.

Aboriginal Heritage

ERM has reviewed the other available evidence (databases, public record, topography, geomorphology, prior reports etc.) and the two mandatory triggers for a CHMP (CHS layer and High Impact Activity) for this Project Area. It has concluded that under the *Aboriginal Heritage Regulations 2018*, a mandatory CHMP is not triggered by the works as no CHS layer is present in the Project Area.

Consideration has been given to the potential for unknown Aboriginal cultural heritage to occur in the Project Area that may be harmed by the works. The desktop review looked at prior land use, ACHRIS search, prior reports, topography, water sources (drainage line), geology and geomorphology to determine archaeological potential for the Project Area. This review found that the Project Area is comprised of agricultural land that had been historically cleared and farmed for at least 75 years with no permanent water source nearby. An ephemeral drainage line intersects the Project Area and is very shallow in the landscape and would have offered very little water during wet periods for Aboriginal peoples. As such, this assessment has concluded that there is low archaeological potential and by extension there is a low risk to unknown Aboriginal heritage for the proposed works in Project Area.

However low the risk, it must be noted that it is an offence to harm heritage known or unknown as per Regulation 27 and 28 of the *Aboriginal Heritage Act 2006*, and any unknown Aboriginal heritage is protected under the *Aboriginal Heritage Act 2006*.

If Aboriginal cultural heritage materials were encountered in the absence of an approved CHMP, construction delays could occur due to mandatory stop-work requirements and the need to prepare and approve a CHMP. If the Proponent elects to complete a voluntary CHMP, the CHMP should be prepared in consultation with the legislated evaluator Yorta Yorta Nation Aboriginal Corporation (YYNAC) who are the Registered Aboriginal Party (RAP) for the region.

In absence of a voluntary CHMP being prepared, it is recommended that an Unexpected Finds Protocol be developed to be included in construction planning documents and kept onsite during the ground works to ensure procedures are in place for any unexpected finds that may occur, however unlikely they may be.

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6. REFERENCES

- Aboriginal Cultural Heritage Register Information Service (ACHRIS). Accessed online 30 October 2025.
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ATTACHMENT A ACRONYMS AND ABBREVIATIONS

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ACRONYMS AND ABBREVIATIONS

Acronym	Description
ACHRIS	Aboriginal Cultural Heritage Register and Information System
BESS	Battery Energy Storage System
CHA	cultural heritage assessment
CHL	Commonwealth Heritage List
CHMP	Cultural Heritage Management Plan
CHS	cultural heritage sensitivity
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Cth)
DEECA	Department of Energy Environment and Climate Action
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
ERM	Environmental Resources Management Australia Pty Ltd
EVC	Ecological Vegetation Class
FPIC	Free Prior and Informed Consent
GESF	Goorambat East Solar Farm
GETS	Goorambat East Terminal Station
GMU	geomorphic unit
HO	Heritage Overlay
LGA	Local Government Authority
MNES	Matters of National Environmental Significance
NHL	National Heritage List
P&E Act	<i>Planning and Environment Act 1987</i>
PHA	Preliminary Heritage Assessment
RNE	Register of the National Estate (repealed)
VAHR	Victorian Aboriginal Heritage Register
VHI	Victorian Heritage Inventory
VHR	Victorian Heritage Register
VRO	Victorian Resources Online
WHL	World Heritage List

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