

EIS Volume 3 Appendix R

Cultural Heritage Management Plan Framework



Contents

1. Introduction.....	1
1.1. Purpose of this CHMP Framework.....	1
1.2. Project Description	1
1.2.1. Key Project details.....	1
1.2.2. Project location	2
1.3. Scope of Works	2
1.3.1. Key pre-construction activities	2
1.3.2. Key construction activities	2
1.3.3. Key operational activities.....	3
1.4. Aboriginal Cultural Heritage	3
1.4.1. Cultural heritage surveys – pre-construction	3
1.4.2. Cultural heritage surveys and monitoring - construction.....	4
1.4.3. Cultural heritage surveys – operations.....	4
1.5. CHMP Framework.....	4
1.5.1. Pre-construction	4
1.5.2. Construction.....	5
1.5.3. Operations	5

List of Tables

Table 1: Cultural heritage mitigation and management controls.....	3
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List of Figures

Figure 1: Project location and native title interests.....	6
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1. Introduction

This Cultural Heritage Management Plan Framework (CHMP Framework) has been prepared to accompany the Environment Impact Statement (EIS) for the South Australian (SA) portion of Project EnergyConnect (the Project). The CHMP Framework has been prepared to address Aboriginal cultural heritage for the SA portion of the Project only (refer Figure 1).

ElectraNet, the owner and operator of the transmission network in SA, and responsible party for delivering the SA portion of the Project, will oversee the construction of the transmission line. Construction of the transmission line will be undertaken by a Principal Contractor.

1.1. Purpose of this CHMP Framework

The purpose of the CHMP Framework is to:

- demonstrate ElectraNet's commitment to working with relevant Traditional Owner groups
- demonstrate the measures that will be implemented to manage and protect Aboriginal cultural heritage values during pre-construction, construction and operation of the Project, including discovery and reporting procedures
- step out those measures and procedures.

The CHMP Framework provides the structure for the three formal CHMPs that are being developed by appropriately qualified heritage experts (Vivienne Wood Archaeologists and Blackwood Heritage) on behalf of their respective clients, being:

- First Peoples of the River Murray and Mallee (River Murray and Mallee Aboriginal Corporation)
- First Peoples of the River Murray and Mallee (as native title claimants #2)
- Ngadjuri Nation #2.

Each of these formal CHMPs will remain confidential at the request of the parties.

In addition, formal Aboriginal Heritage Agreements have been or are in the process of being negotiated between ElectraNet and the registered body corporates of the Traditional Owner groups, being the River Murray and Mallee Aboriginal Corporation (RMMAC) on behalf of the First Peoples) and Ngadjuri Nation Aboriginal Corporation (NNAC) on behalf of Ngadjuri Nation #2. As with the CHMPs, the Aboriginal Heritage Agreements will remain confidential at the request of the parties.

1.2. Project Description

1.2.1. Key Project details

The Project is a proposed high voltage electricity transmission interconnector to be constructed between Robertstown in SA and Wagga Wagga in New South Wales (NSW), with an added connection from Buronga in NSW to Red Cliffs in north-west Victoria. The Project involves the construction and operation of the South Australian portion (Robertstown to SA / NSW border) of the proposed interconnector (refer Figure 1) which comprises:

- approximately 10 km of 275 kV transmission line supported by steel towers from the existing Robertstown substation to a proposed new substation located towards the western extent of the transmission line at Bunday, near Robertstown
- approximately 195 km of 330 kV transmission line supported by steel towers from the new Bunday substation to the SA / NSW border

- associated telecommunications infrastructure
- associated access tracks
- associated temporary facilities (i.e. temporary construction compounds, site offices, laydown areas and mobile construction camps).

1.2.2. Project location

The Project will traverse approximately 205 km between Robertstown in the Mid North of SA and the SA / NSW border, via the Riverland area. The transmission line corridor refers to a 1 km wide corridor (500 m buffer either side of the proposed alignment) within which the final easement and transmission line infrastructure is expected to be contained. The majority of construction activities associated with the transmission line would be within this corridor.

The final alignment and easement of the transmission line will be confirmed during detailed design. The CHMPs will be finalised following detailed design, micro siting surveys and further engagement with the respective Traditional Owners.

1.3. Scope of Works

Given the variability of terrain along the proposed alignment, the scope of works for construction will remain flexible to account for differing terrain and environmental conditions.

The construction of the transmission line is anticipated to be undertaken using a combination of traditional on-ground methods (i.e. construction of concrete foundations, transportation of structures via trucks) and potentially air-based methods (i.e. utilisation of helicopters for delivery of structures or stringing conductors in more environmentally sensitive areas). Key pre-construction, construction and operational activities are set out in sections 1.3.1, 1.3.2 and 1.3.3 respectively.

ElectraNet acknowledge that despite best efforts to identify and avoid heritage sites through extensive surveys with traditional owners and amendments to route in certain locations, a risk remains that on-ground works could result in damage, disturbance or interference to Aboriginal heritage values such as sites, objects and remains. To ensure all values are protected, mitigation measures will be documented in the CHMPs and implemented by ElectraNet staff, contractors and sub-contractors during all phases of the Project (refer Table 1).

1.3.1. Key pre-construction activities

The key pre-construction activities to be undertaken consist of the following:

- ground-truthing by geotechnical contractors
- geotechnical activities, such as drilling to a maximum depth of 20 metres
- boundary verification by licenced surveyors
- ecological and vegetation assessment surveys
- cultural heritage surveys.

1.3.2. Key construction activities

The key construction activities to be undertaken consist of the following:

- establishment of access tracks
- vegetation clearance and earthworks at tower locations, substation, camps and laydown areas
- establishment of associated temporary facilities (e.g. construction camps, concrete batching plants, laydown areas)

- bore piling and pouring of concrete footings
- installation of towers
- stringing and connection of electrical conductors
- commissioning of transmission lines
- clean up of waste materials and rehabilitation of temporary areas of disturbance.

1.3.3. Key operational activities

The key operational activities to be undertaken consist of the following:

- maintenance of the transmission line, with access via a dedicated track
- safety and security checks, including of fencing and gates.

1.4. Aboriginal Cultural Heritage

During construction of the Project, earthwork activities may inadvertently disturb previously undiscovered sites of cultural significance.

Table 1 outlines mitigation and management controls that will be implemented to avoid and / or minimise impacts to Aboriginal cultural heritage values.

Table 1: Cultural heritage mitigation and management controls

Aspect	Detail
Environmental objectives	Avoid impacts to Aboriginal sites, objects or remains.
Legislation and other guidance	<ul style="list-style-type: none"> • <i>Aboriginal Heritage Act 1988</i> (SA) • Discovery of Aboriginal Sites and Objects (Fact sheet – DPC-AAR 2021) • Project Planning and Aboriginal Heritage (Guide – DPC-AAR 2021)
Potential environmental impacts	<ul style="list-style-type: none"> • Damage, disturbance or interference with areas of Aboriginal cultural heritage significance • Damage, disturbance or interference to identified or unidentified sites, objects or remains.
Mitigation and control measures	<ul style="list-style-type: none"> • Desktop assessment of registered and recorded sites via the Central Archive, including the Register of Aboriginal Sites and Objects, maintained by DPC-AAR. Undertake Aboriginal heritage surveys prior to construction • Utilise previously disturbed areas for tower placement, access tracks and other infrastructure wherever practicable • Micro-site tower locations following detailed design, incorporating further surveys if required • Induct all staff and contractors on cultural heritage prior to any onsite work (construction only) • Develop and implement a Cultural Heritage Management Plan detailing the procedures for the identification, management and protection of Aboriginal cultural heritage sites including monitoring of ground disturbance activities in agreed locations with relevant traditional owner representatives (this document – refer section 1.5).

1.4.1. Cultural heritage surveys – pre-construction

Cultural heritage surveys with the relevant Traditional Owner groups (as set out in Section 1.1) will be undertaken along the entire route prior to the commencement of ground-disturbing pre-construction

activities¹. Sites of Aboriginal cultural heritage significance that may be identified during the surveys will result in the alignment being altered to avoid and limit potential impact to those areas.

Areas of interest for each are shown in Figure 1. The results of each survey will be documented by the relevant a qualified heritage experts (Vivienne Wood Archaeologists and Blackwood Heritage) on behalf of their respective clients.

1.4.2. Cultural heritage surveys and monitoring - construction

Towers will be micro-sited following detailed design, with further surveys and monitoring of ground disturbance activities in certain agreed locations undertaken to ensure sites of Aboriginal heritage value are avoided and protected.

1.4.3. Cultural heritage surveys – operations

It is unlikely further cultural heritage surveys will be required once the transmission line is operational. ElectraNet will manage ongoing compliance with the *Aboriginal Heritage Act 1988* in close consultation with each native title group and in accordance with its operational heritage management system.

1.5. CHMP Framework

ElectraNet is designing the Project to avoid unauthorised damage, disturbance or interference to Aboriginal heritage values and does not intend to make any application for a Section 23 authority under the *Aboriginal Heritage Act 1988*.

Each of the CHMPs will include the following information and requirements in relation to the management and protection of Aboriginal cultural heritage during pre-construction, construction and operation of the Project, taking into consideration the results of cultural heritage surveys:

- requirements and responsibilities for all employees, contractors and subcontractors
- awareness training for all workers to understand cultural heritage considerations associated with the Project
- area-specific site inductions and training
- protocols for discovery of Aboriginal sites, objects or remains and reporting requirements, in accordance with relevant legislation
- requirements to avoid sites of Aboriginal cultural heritage significance as determined from pre-construction surveys and in consultation with relevant Traditional Owner groups
- immediate stop work if any artefacts, hearths or burials (or similar) are exposed during construction and engage a suitably qualified heritage consultant and / or appropriate authority to investigate. No work is to commence until direction has been provided by a suitable authority.
- exclusion areas will be implemented around sites of cultural heritage significance.

1.5.1. Pre-construction

After the completion of Aboriginal heritage surveys, each CHMP will document and categorise areas as:

¹ As noted in Chapter 12 Cultural Heritage, all cultural heritage surveys have been completed and alterations to the alignment made in order to avoid identified cultural heritage values.

- **No go zones:** Aboriginal Heritage sites or areas where access and ground disturbance are not permitted in order to avoid impact
- **Conditional access areas:** areas where construction works can be undertaken with heritage management measures in place (e.g. site flagging, access via existing tracks only, or areas where ground disturbance monitoring is required)
- **Assessed areas:** areas subject to an Aboriginal heritage survey where no Aboriginal heritage sites are identified and there is a low risk of impact from planned works.

The surveys will include an assessment of the potential impact of the Project on Aboriginal culture heritage by each group's preferred archaeologist / anthropologist (i.e. heritage advisors).

Where a survey identifies archaeological, anthropological or historical sites, or sites of significance within the area of planned works, or identifies areas of higher sensitivity or higher risk of impact to Aboriginal heritage, each native title group, in consultation with their heritage advisors, will make recommendations to ElectraNet on measures to mitigate any potential impacts arising from planned works.

Before construction commences, all Aboriginal heritage sites and areas will be flagged with a physical barrier to ensure no unauthorised impact during planned works. Detailed data and mapping of **no-go zones** and **conditional access areas** will be provided to the construction Contractor.

An Aboriginal heritage induction, provided by each of the native title parties, will be delivered to all Project personnel prior to commencement of any on-ground Project activities. At a minimum, this will be online content contributed by each group; however, ElectraNet has also made provision for face-to-face delivery before and during construction.

1.5.2. Construction

During construction, Aboriginal heritage protection and management measures will include:

- ongoing heritage inductions to make all Project personnel aware of Aboriginal heritage sites and appropriate management procedures in place to avoid impact
- monitoring of construction works in higher sensitivity or higher risk locations by respective native title group representatives
- robust 'new find' measures to address site discoveries during construction
- where sites are identified during construction, ElectraNet will aim to relocate works in order to avoid impact
- in the event that works are unable to be relocated, ElectraNet will work closely with the relevant native title group and the contractor to find a suitable solution in accordance with the provisions of heritage management agreements in place with each group and the requirements of the *Aboriginal Heritage Act 1988*
- in areas where monitoring is not required during construction works, ElectraNet intends to resource each native title group to periodically audit compliance with all heritage management conditions and ensure that the measures in place are operating effectively
- at the conclusion of construction, physical barriers will be removed from sites of Aboriginal heritage values.

1.5.3. Operations

ElectraNet will manage ongoing compliance with the *Aboriginal Heritage Act 1988* in close consultation with each native title group and in accordance with its operational heritage management system and the relevant CHMP.

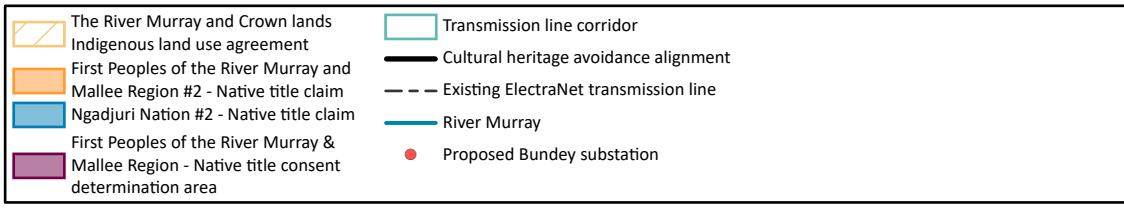
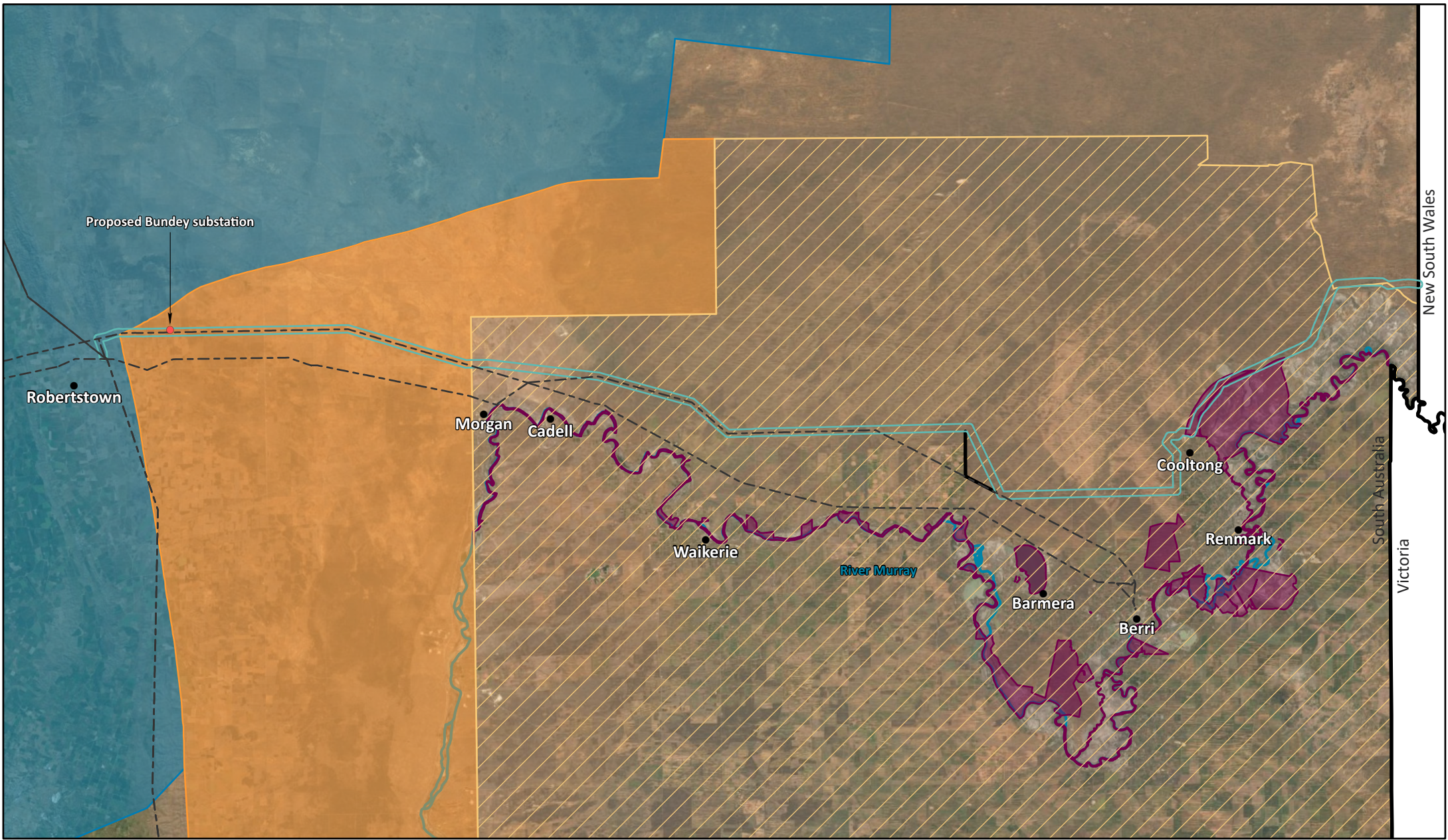
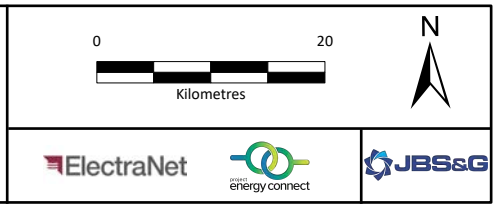


Figure 1
Project location and Native Title interests



Data sourced from: National Native Title Tribunal - <http://www.nntt.gov.au/assistance/Geospatial/Pages/DataDownload.aspx>