

Aboriginal Cultural Heritage Management Plan

Bellambi Heights Battery Energy Storage Project

Prepared for Vena Energy Australia

October 2025

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Bellambi Heights Battery Energy Storage Project

Vena Energy Australia

E220328 RP#18

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Approved by



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23 October 2025

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This document at a glance

ES1.1 Purpose of document

Vena Energy Services (Australia) Pty Ltd (VEA) has approval to develop the Bellambi Heights Battery Energy Storage System, a major grid scale battery and associated infrastructure. The project will be developed within 79 Puggoon Road and 696 Castlereagh Highway (hereafter 'study area'), which was subject to previous archaeological investigations. The project consists of battery containers, cabling, power conversion systems, switching station, site access and other ancillary activities, all encompassed within an approved 'development footprint'. As part of the approval for the project are conditions that require the management of Aboriginal heritage prior to, and during construction activities associated with the development footprint. VEA have opted to combine all Aboriginal heritage requirements into this report to satisfy the various conditions, requirements and processes needed to implement and manage the project.

This document has been developed to address project conditions, including B22 (Protection of Heritage Items), B23 (Chance Finds Protocol) and contributes to C1 (Environmental Management Strategy).

ES1.2 Summary of Aboriginal heritage

The study area within which the development footprint is located, has been subject to previous archaeological investigations and assessment. These identified three discrete Aboriginal sites - two low density artefact scatters (#36-2 0638, #36-2-0507), and one isolated stone artefact (#36-2-0504). These are situated on a hilltop to the west and along a tributary to the east of the development footprint. No other portions of the study area were identified as having potential to contain cultural materials, including the disturbance footprint. No places of cultural or intangible values were documented within the study area.

The proposed development would have no adverse impacts on #36-2-0638, #36-2-0504, and #36-5-0507.

ES1.3 Project specific Aboriginal heritage requirements

- Project specific mitigation measures are required **prior to the construction phase** and include:
 - establish and implement Aboriginal site avoidance requirements as per Section 4.2.1.
- Project specific mitigation measures are required **prior to the construction phase and/or during construction phase** and include:
 - establish and implement a suitable cultural awareness induction process and procedure for all workers as per Section 4.2.2
 - as needed: implement unexpected/chance finds protocols as per Section 4.3.
- Project specific mitigation measures are required **following construction** and include:
 - the reburial of any recovered cultural materials in a suitable location on site with the participation of the registered Aboriginal parties (RAPs) as per Section 4.4
 - ensuring any landscaping and remediation includes consideration of the cultural landscape and suitable endemic plants in discussion with the RAPs as per Section 4.2.2.

ES1.4 General Aboriginal heritage requirements

The ACHMP outlines a number of general requirements to be implemented **prior to and during construction** (Section 4):

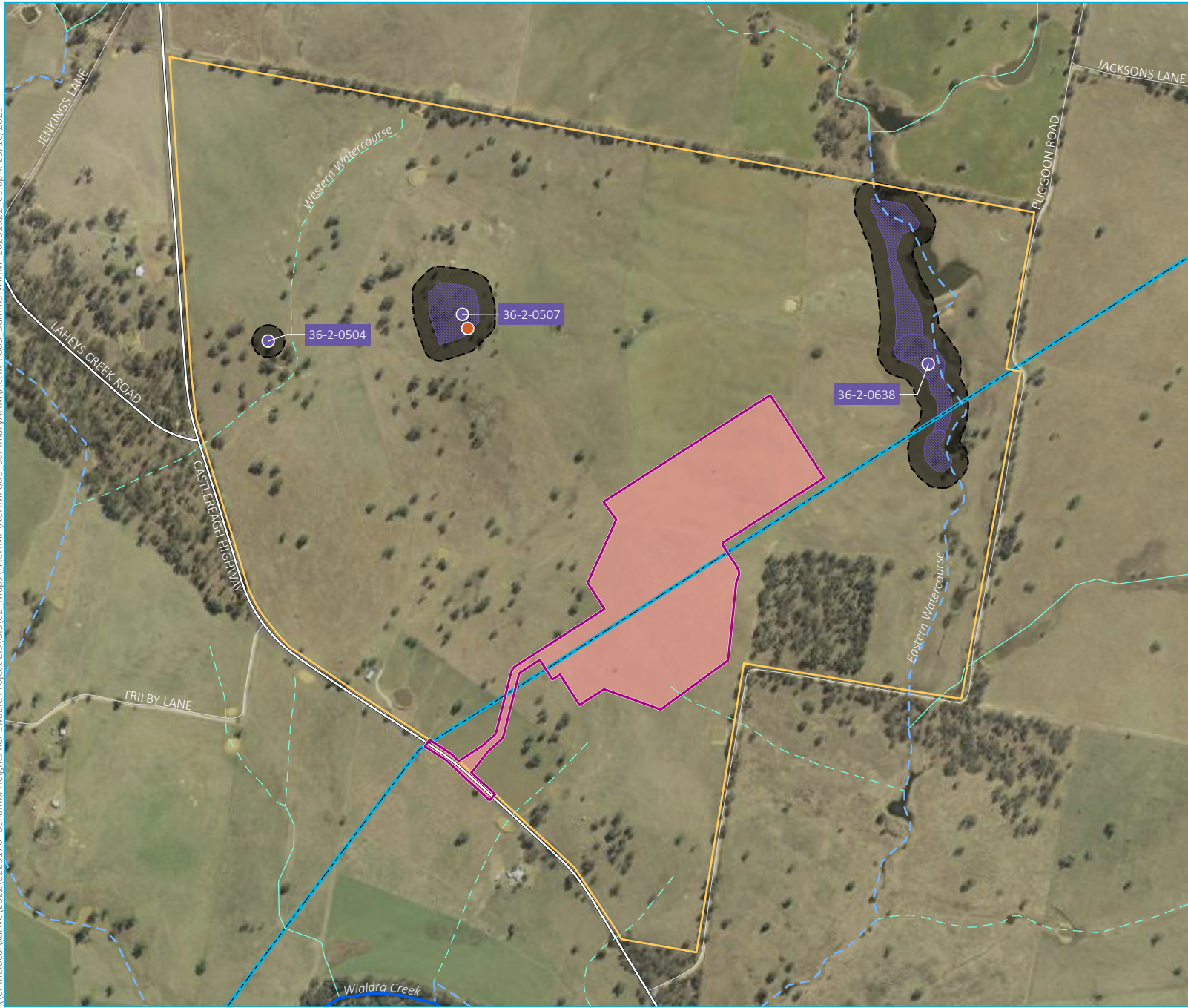
- protocols for undertaking activities in areas outside the development footprint, within and outside of the study area (Section 4.5).

ES1.5 Other useful information

The ACHMP also provides guidance on:

- processes to maintain ongoing consultation with the RAPs and Heritage NSW (Section 2)
- other administrative requirements, including ongoing compliance, regular review and update of the ACHMP to ensure its functionality is maintained through the project (Section 5).

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- KEY**
- Development footprint
 - Study area- area to which the ACHMP applies
 - Buffer for establishing avoidance
 - Low density artefact scatter area
 - Cultural awareness inductions and unexpected finds protocols apply
 - Identified Aboriginal sites
 - Proposed re-burial location
- Strahler stream order
- 1st order
 - 2nd order
 - 3rd order
 - 7th order
- Existing environment
- Major road
 - Minor road
 - 330 kV transmission line

Summary of Aboriginal heritage management requirements

Bellambi Heights Battery Energy Storage System
Aboriginal Cultural Heritage Management Plan
Figure ES1



Source: EMM (2025); DCSSS (2025); OEH (2022); DFSI (2021)

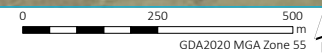


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1 Introduction

1.1 Purpose of document

Vena Energy Services (Australia) Pty Ltd (VEA) proposes to develop the Bellambi Heights Battery Energy Storage System (Bellambi Heights BESS), a major grid scale battery and associated infrastructure. The project will be developed within 79 Puggoon Road and 696 Castlereagh Highway (Lots 101 and 102, DP 1203462), approximately 6.5 kilometres (km) north-west of the township of Gulgong (hereafter 'the study area'). The project includes battery containers, cabling, power conversion systems, switching station, site access from the adjoining road corridor and other ancillary activities (hereafter 'development footprint') (Figure 1.1).

Development consent SSD-33344237 was granted for the project in May 2024 by the NSW Minister for Planning under section 4.38 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act). Development Consent SSD-33344237 was subsequently modified on 20 October 2025. As part of the development application required to obtain the development consent, investigation of Aboriginal cultural heritage for the study area was undertaken by EMM Consulting Pty Limited (EMM).

The investigation consisted of an Aboriginal Cultural Heritage Assessment (ACHA) in consultation with the local Aboriginal community and included a range of on-site investigations to identify tangible and intangible cultural heritage across the study area (EMM 2023). Further details of the report and its findings are presented in Section 3.1. The report recommended that an Aboriginal cultural heritage management plan (ACHMP) be developed following the approval to provide a framework for managing Aboriginal heritage during the pre-construction and construction phases of the project. While the State Significant Development approval (SSDA) did not specifically require an Aboriginal cultural heritage management plan (ACHMP), it includes the need to avoid identified cultural materials, manage unexpected finds, and has requirements for broader environmental management reporting that includes cultural heritage. To capture these requirements, VEA has sought the development of an ACHMP to provide a single document to meet these requirements (Section 1.2).

This document has been developed to address approval conditions, and provides guidance on:

- processes to maintain ongoing consultation with the local Aboriginal community and Heritage NSW (Section 2)
- management procedures for Aboriginal cultural heritage values within the study area during pre-construction, construction and operational phases (Section 4.2)
- chance finds protocols for unexpected/chance finds (including human remains) (Section 4.3)
- protocols for undertaking activities in the study area (outside the development footprint) and/or have not been previously assessed (Section 4.5)
- other administrative requirements, including post-project management of any Aboriginal finds and recovered material, ongoing compliance, regular review and update of the ACHMP to ensure its functionality is maintained through the project (Section 5).

1.2 Legislative context

Aboriginal heritage is managed under the *National Parks and Wildlife Act 1974*. The SSD process 'switches off' a number of requirements under this Act, including the need to obtain Aboriginal heritage impact permits (AHIP) to harm Aboriginal objects. Rather, Aboriginal heritage is managed by the conditions provided in the SSDA (Table 1.1).

A range of other Commonwealth and State legislation also applies to Aboriginal heritage, although none have been identified as pertinent to this project. These were outlined in the ACHA (EMM 2023) and are not considered further.

Table 1.1 Conditions of the SSDA relevant to this document

Requirement	Section addressed
B22. The Applicant must ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items located outside the approved development footprint.	Section 4.2
B23. Prior to the commencement of road upgrades, the Applicant must prepare a Chance Finds Protocol for the development in consultation with Aboriginal Stakeholders, and to the satisfaction of Heritage NSW. Following approval, the Applicant must implement the Chance Finds Protocol.	Section 4.3

Notes: Condition C1 that requires the development of an Environmental Management Strategy that outlines strategic frameworks, statutory approvals, roles and responsibilities and procedures will also be informed by the contents of this report.

1.3 Key stakeholders

This section outlines the project team that will be involved in the project and Aboriginal stakeholder individuals and/or organisations relevant to the project (Table 1.2).

Table 1.2 Key stakeholder contact details

Personnel	Organisation	Role	Telephone contact	E-mail contact
Project team				
Andrew Brownlow *	VEA	Manager (NSW) Development and Stakeholders	0417 210 253	Andrew.Brownlow@venaenergy.com.au
Alan Williams	EMM	Heritage consultant	0438 104 740	awilliams@emmconsulting.com.au
Nicole Davis	Heritage NSW	Heritage regulator	0409 394 343	nicole.davis@environment.nsw.gov.au
Megan Ramsdale	DPHI	Planning regulator	02 9407 2133	megan.ramsdale@planning.nsw.gov.au
Registered Aboriginal parties				
Tony Lonsdale	Mudgee Local Aboriginal Land Council [‡]	Aboriginal representative	0419 479 512	mudgeelalc@bigpond.com
Brad Bliss	Wellington Valley Wiradjuri Aboriginal Corporation [‡]	Aboriginal representative	0427 321 016	wwac@hotmail.com
Melissa Chown	Gallangabang Aboriginal Corporation [‡]	Aboriginal representative	0433 510 072	cobras2@bigpond.com
Debbie Foley	Murong Gialinga Aboriginal & Torres Strait Islander Corporation [‡]	Aboriginal representative	02 6372 0859	muronggialinga@hotmail.com
Virginia Doig	North- Eastern Wiradjuri [‡]	Aboriginal representative	02 6379 6473	wirimbili@newco.page

Personnel	Organisation	Role	Telephone contact	E-mail contact
Kylie Manson	Warabinga-Wiradjuri Native Title Claimants Aboriginal Corporation #7‡	Aboriginal representative	0407 006 097	warrabinga_kylie@outlook.com
Paul Brydon	Wiradjuri Council of Elders	Aboriginal representative	0417 697 293	winchester1948@outlook.com
Lilly Carroll	Didge Ngunawal Clan	Aboriginal representative	0450 954 039	didgengunawalclan@yahoo.com.au
Marilyn Carroll-Johnson	Corroboree Aboriginal Corporation	Aboriginal representative	0415 911 159	corroboreecorp@bigpond.com
Phil Kahn	Kamilaroi Yankuntjatjara Working Group	Aboriginal representative	0451 068 480	philipkhan.acn@live.com.au

Notes: * It is the responsibility of these individuals to ensure the ACHMP is implemented, adopted and maintained through the project.

‡ denotes a locally based individual and/or organisation.

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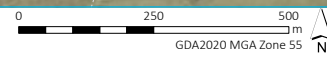


- KEY**
- Development footprint
 - Study area- area to which the ACHMP applies
- Strahler stream order**
- 1st order
 - 2nd order
 - 3rd order
 - 7th order
- Existing environment**
- Major road
 - Minor road
 - Vehicular track
 - 330 kV transmission line
 - Cadastral boundary

Areas to which this ACHMP applies

Bellambi Heights Battery Energy Storage System
Aboriginal Cultural Heritage Management Plan
Figure 1.1

Source: EMM (2025); DCSSS (2025); DFSI (2021)



2 Aboriginal consultation

2.1 At a glance

- This project has an established list of registered Aboriginal parties (RAPs) that require ongoing consultation. A list of the stakeholders and their contacts are presented in Table 1.2.
- The RAPs require consultation during the finalisation of, and any updates to, the ACHMP; as part of any cultural inductions; as part of additional archaeological mitigations; and in the event of any unexpected finds being encountered. On-Country activities will be constrained to locally based Aboriginal individuals and/or organisations (Table 1.2). Timing for notification of each of these activities is provided in Table 2.1.
- Broader involvement and socio-economic opportunities for locally based Aboriginal people in the project are outlined.
- Table 2.2 provides a list of dates that are important to the Aboriginal community, and during which works requiring their participation should be delayed/cancelled to avoid any potential conflict.

2.2 Consultation up to the SSDA

As a requirement of the assessment process, the project's ACHA undertook Aboriginal consultation in accordance with Heritage NSW's *Aboriginal Cultural Heritage Consultation Requirements for Proponents*. This process required the identification and notification of the local Aboriginal community to identify individuals and/or organisations that had an interest in the project, and which identified 10 individuals and/or organisations (Table 1.2).

Identified RAPs, these individuals and/or organisation were provided opportunities to review Aboriginal heritage documentation, including the ACHA, and participating in the on-site activities. As part of the ACHA processes, a range of feedback around post-approval requirements was provided by the RAPs, and this has been integrated into this document.

2.3 Consultation for this ACHMP

A draft copy of this ACHMP was sent to identified RAPs listed in Table 1.2 on 20 November 2024 for a 21-day review period (Table 2.1). All comments received and their contents are presented in Appendix A, with necessary changes in the document undertaken prior to finalisation to address any residual concerns or issues.

2.4 Consultation required following the SSDA

Table 2.1 provides the required Aboriginal consultation to be implemented prior to, and during construction activities. Any Aboriginal consultation undertaken as part of these activities must be documented in Appendix A during the lifetime of the project. Any updated information is to be included in future revisions of the ACHMP. For clarity, the following definitions are adopted consistent with the SSDA:

- Pre-construction – road upgrades or maintenance works to the public road network, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying.
- Construction – construction of the development, including but not limited to, the carrying out of any earthworks on site and the construction of the battery storage and any ancillary infrastructure (but excludes pre-construction).

Table 2.2 provides a list of dates that are culturally sensitive, and when works requiring Aboriginal heritage input and/or participation should be avoided where possible.

Table 2.1 Aboriginal consultation to be undertaken as part of the project

Project stage	Activity	Type and preferred method of communication	Comment period to be provided
Pre-construction [‡]	Development of ACHMP, including Chance Finds Protocol	Distribution of this document to the Aboriginal parties listed in Table 1.2 for three weeks to provide review and comment.	3 weeks
	Finalisation of ACHMP	Provision of final report via e-mail and/or post prior to its implementation to the Aboriginal parties listed in Table 1.2.	1 week
Pre-construction/ construction [‡]	Updates to the ACHMP (as required)	Initial notification via phone/e-mail to the Aboriginal parties listed in Table 1.2 to advise of proposed update. Provision of updated ACHMP for review and inputs via e-mail and/or post. Where significant changes are proposed, a face-to-face meeting will be offered.	3 weeks
	Additional activities within the study area, and/or outside of study area (as required)	Initial notification via phone/e-mail to the Aboriginal parties listed in Table 1.2 to advise of proposed areas outside of development footprint, but within the study area and/or outside the study area. Provision of a detailed description, including appropriate maps, of the new areas and proposed assessment methods and reporting as needed. Where significant changes are proposed, a face-to-face meeting and/or on-site investigations will be offered.	3 weeks
	Archaeological mitigation requirements as outlined in Section 4	Initial notification via phone/e-mail to the locally based Aboriginal parties listed in Table 1.2 to advise of the schedule of the proposed program, followed by further details, timing, personnel required, and relevant engagement and subcontract documentation, etc, via e-mail/post.	3 weeks
Construction [‡]	Cultural awareness inductions	Request for a representative from locally based Aboriginal parties listed in Table 1.2 to conduct inductions should be made at least 7 days prior to the required date via phone and/or e-mail.	Ongoing, with a minimum of one week's notice when required
	Unexpected finds	Contact all locally based Aboriginal parties listed in Table 1.2 via phone and e-mail to advise of any unexpected finds and proposed management. This may include invitation to undertake on-site observations and/or face-to-face meetings where significant cultural materials, such as human remains are discovered. Section 4.3 provides further details.	Within 2 days of find
	Non-conformance (see Section 5.2.3)	Initial notification/discussion to the Aboriginal parties listed in Table 1.2 via phone and e-mail followed by provision of documentation for review as required. This would be followed by on-site observations and/or face-to-face meetings, where determined to be significant [†]	≤1 week
	Other activities as required	Initial notification of/discussion with Aboriginal parties listed in Table 1.2 via phone and e-mail followed by provision of documentation for review as required. Where significant or major changes, suitable face-to-face meetings and/or on-site observation should be provided. [†]	≥2 weeks

Notes: *Additional time may be required during particularly busy periods.

[†] Significant change as defined here would be determined in discussions between VEA and Heritage Consultant.

[‡] Aboriginal participants involved in these activities should be suitably paid or reimbursed for their time and involvement.

Table 2.2 Culturally sensitive dates during which activities requiring Aboriginal heritage inputs/participation should be avoided

Dates	Activity	Description
26 January	Australia/Invasion Day	The public holiday and surrounding days are increasingly seen as a time of trauma for Aboriginal people, and any work activities should be re-scheduled to avoid this date.
27 May – 3 June	National Reconciliation Week, includes Sorry Day	A week during which Australians are encouraged to learn about shared histories, cultures, and achievements, and to explore how one can contribute to achieving reconciliation in Australia. Aboriginal people are often committed to activities during this week and will often be unavailable.
First Sunday – Second Sunday July	NAIDOC week	A week during which Australians are encouraged to celebrate Aboriginal history, cultural and achievements. Aboriginal people are often committed to activities during this week and will often be unavailable.
-	Sorry business	Sorry business is when a member of the Aboriginal community has passed away, and includes the funeral, mourning period and other related associated activities. The timing for these is unknown and can be variable, but when advised that there is Sorry business, the project activity should be postponed. Timing of these delays is unknown and will depend on the Aboriginal community and their views of a suitable mourning period.

2.5 Opportunities for ongoing and improved Aboriginal engagement

VEA is committed to maximising opportunities for Aboriginal engagement and project involvement. A series of on-Country activities are outlined in Section 4. In addition, VEA will implement the following:

- Identification of any opportunities to engage, purchase, procure and/or obtain supplies for the project from local Aboriginal owned businesses.
- Regular review of employment and subcontract opportunities during the construction and ongoing maintenance of the project assets that may be offered to Aboriginal participants.
- Explore opportunities for Aboriginal mentorship and/or internships across the construction and ongoing maintenance of the project assets.

This information would be provided to the locally based Aboriginal individuals and/or organisations, with direction of requirements, skills and process to apply for any roles or opportunities offered.

2.6 Indigenous cultural and intellectual property

The following outlines the definition and management of Indigenous cultural and intellectual property (ICIP) developed as activities resulting from the project and this ACHMP.

ICIP is defined as the cultural rights of identified Aboriginal parties in Table 1.2 to their heritage. Heritage comprises all objects, sites, languages and knowledge, the nature or use of which has been transmitted, or continues to be transmitted from generation to generation, and which is regarded as pertaining to a particular Aboriginal group or its territory. Heritage includes without limitation:

- literary, performing and artistic works (including songs, music, dances, stories, ceremonies, symbols, languages and designs)
- traditional knowledge, which includes cultigens, medicines and the phenotypes of flora and fauna
- all items of movable cultural property

- ancestral remains and human genetic material
- immovable cultural property (including sacred and historically significant sites and burial grounds)
- documentation of Indigenous peoples' heritage in archives, film, photographs, videotape, audiotape and all forms of media.

It is acknowledged that ICIP is likely to be incorporated in some or all of the project-specific activities authorised under this ACHMP. VEA agrees that ownership of any ICIP will remain with the RAPs.

Where ICIP is incorporated in any project-related activities, management, regulatory or other legislative requirements:

- VEA will notify the RAPs of the ICIP and seek guidance on any cultural protocols or restrictions on using and dealing with the ICIP.
- VEA will comply with any such protocols or restrictions provided by the RAPs, where possible having regard to VEA's legislative, regulatory or management requirements.
- VEA incorporating the ICIP will ensure that free, prior informed consent for use of the ICIP in the project is sought and received by the RAPs where possible having regard to VEA's legislative, regulatory or management requirements.
- VEA incorporating the ICIP will ensure that the RAPs are appropriately attributed for use of their ICIP in all relevant project product.
- VEA will not use the ICIP for any purpose other than as part of the project, or as contemplated in this ACHMP.

3 Aboriginal cultural heritage within the project area

3.1 At a glance

- The ACHA undertaken as part of the development application included assessment of the development footprint, as well as the larger study area encompassing the entirety of Lot 1 and Lot 2 DP 1203462.
- The ACHA identified three discrete Aboriginal sites, two low density artefact scatters (#36-2 0638, #36-2-0507), and one isolated stone artefact (#36-2-0504). No other portions of the study area were identified as having potential to contain cultural materials. No places of cultural or intangible values were documented within the study area.
- The project would have no adverse impacts on #36-2-0638, #36-2-0504, and #36-2-0507.

3.2 Summary of Aboriginal heritage investigations

As part of the SSD assessment, an ACHA was undertaken in accordance with Heritage NSW guidelines. This included consultation with the Aboriginal community, desktop review of the regional archaeological record and on-site investigations (field survey and test excavations) to identify and assess the cultural heritage within the study area.

The desktop information from the broader region indicates that cultural materials, where present, would be primarily in the form of stone artefacts. These may be present on the surface or in the upper soil profile (<100 cm below current surface), and are typically found associated with water resources, such as Wialdra, Laheys, Tallawang creeks and Cudgegong River, as well as lesser tributaries. A review of nearby previously documented sites supported this model, with 77 of 103 sites being stone artefactual sites, with lesser occurrences of potential cultural deposits and/or culturally modified trees. Two previous sites were documented within the study area.

Field investigation for the project included pedestrian survey and test excavations. The field survey identified two previously documented sites, #36-2-0504 and #36-2-0507, which consisted of potential cultural deposits associated with a hilltop and small tributary (Figure 3.1). Test excavations were undertaken of three areas distributed across the study area where cultural materials may have been present. These focussed on #36-2-0504 and #36-2-0507, as well as along the tributary in the east of the study area. These all confirmed a low density of stone artefacts, $\leq 2/m^2$, were present up to depths of ~40 cm.

Ultimately, three discrete Aboriginal sites were documented (Section 3.3). None of these discrete sites or places were within the development footprint. No specific intangible/cultural places or values (e.g. Dreaming sites, stories, etc.) were identified as part of the ACHA, although the broader importance of major waterways in the region (e.g. Slapdash Creek) was highlighted.

3.3 Aboriginal sites and/or deposits within the Project's study area

Table 3.1 presents a summary of the Aboriginal objects and sites identified within the study area. A buffer zone around each of the objects and sites is also presented in Table 3.1 and Figure 3.1. These buffer zones are based on the test excavation findings presented in the ACHA, and reflect areas where test pits containing no cultural materials were recovered (and therefore suggest cultural materials do not extend to these locations) and/or are a reasonable distance from the outermost test pit where cultural materials were encountered. Examples of cultural materials are presented in Plate 3.1 to Plate 3.4.

Table 3.1 Aboriginal objects, sites and places documented within the study area. All co-ordinates presented in MGA 2020 Area 55.

AHIMS #	Site name	Site type	Easting	Northing	Archaeological significance	Description	Buffer proposed for management
36-2-0504	BH IF 1	Isolated find	731792	6421773	Low	An isolated stone artefact found following excavation, in TP55. Reflects transitory use of the landscape.	40 m diameter centred on the object.
36-2-0507	BH AS 1	Low density artefact scatter	732359	6421870	Moderate	A low-density artefact scatter (<20) on a hilltop west of the proposed development impacts	40 m beyond the identified site curtilage.
36-2 0638	BH AS 2	Low density artefact scatter	733571	6421692	Low	A low-density artefact scatter (<20) on the terraces and flats running adjacent an ephemeral waterway to the east of the proposed development impact	40 m beyond the identified site curtilage.



Plate 3.1 General landscape around AHIMS #36 2 0507, and one of the proposed test pits, looking north



Plate 3.2 Example of the deep duplex soil profile encountered within AHIMS #36 2 0507



Plate 3.3 The landscape around AHIMS #36 2 0504. Test pits excavated on dry, elevated areas within 200 m of the western watercourse (TP61, view north)



Plate 3.4 Example of the deep duplex soil profile encountered within AHIMS #36 2 0504

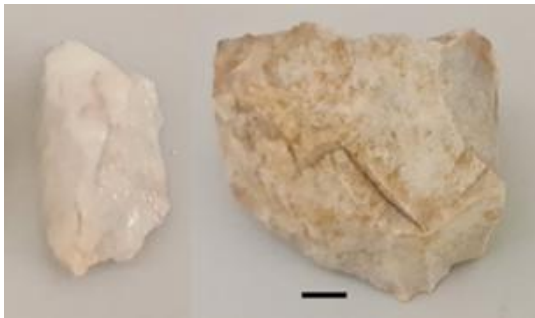


Plate 3.5 Examples of cores recovered from the excavations for the ACHA



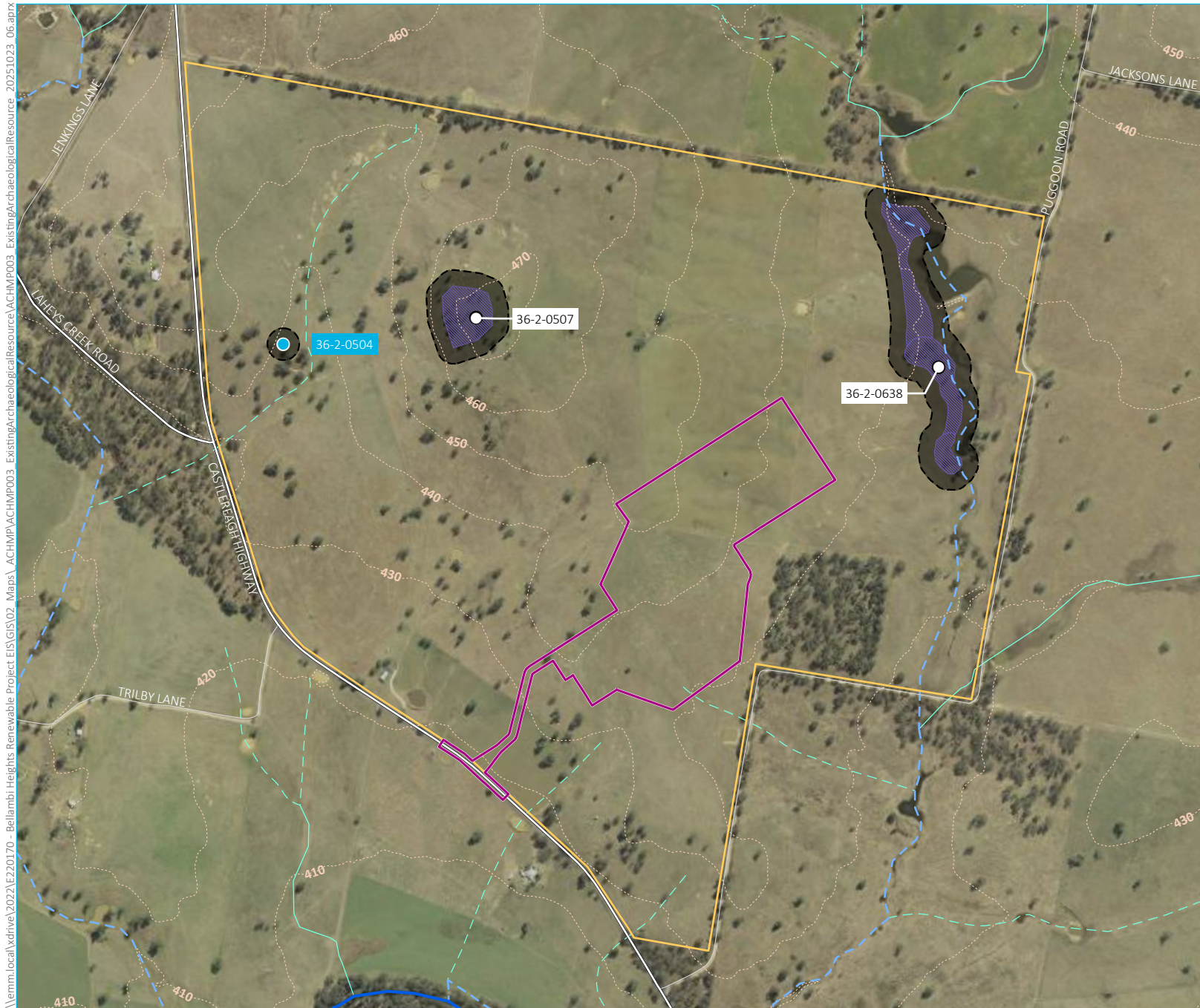
Plate 3.6 Examples of tools recovered from the excavations for the ACHA

3.4 Potential impacts

The project will not adversely impact any cultural materials identified as part of the ACHA (Table 3.2, Figure 3.1).

Table 3.2 Summary of potential impacts to Aboriginal objects, sites and deposits in the study area

AHIMS ID	Site name	Proposed activity causing harm	Degree of harm	Consequence of harm
36-2-0504	BH IF 1	N/A	N/A	N/A
36-2-0507	BH AS 1	N/A	N/A	N/A
36-2 0638	BH AS 2	N/A	N/A	N/A

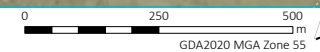


- KEY**
- Development footprint
 - Study area - area to which the ACHMP applies
 - Buffer for establishing avoidance
 - Low density artefact scatter area
 - Isolated Aboriginal object
 - Low density artefact scatter
- Strahler stream order**
- 1st order
 - 2nd order
 - 3rd order
 - 7th order
- Existing environment**
- Major road
 - Minor road
 - Topographic contour (10 m)

Existing archaeological resource within the study area

Bellambi Heights Battery Energy Storage System
Aboriginal Cultural Heritage Management Plan
Figure 3.1

Source: EMM (2025); DCSSS (2024); DFSI (2021); OEH (2022)



4 Mitigation and management

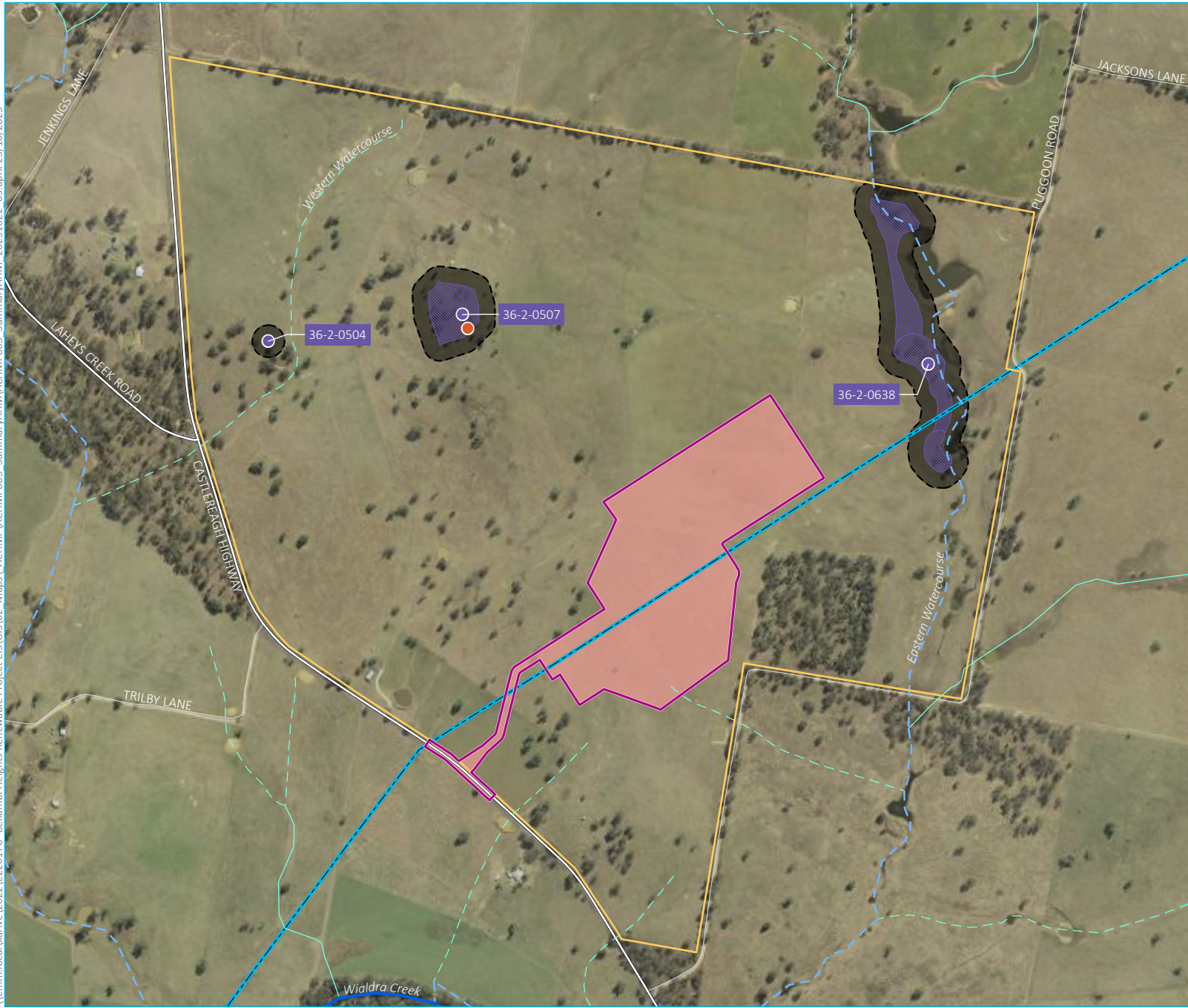
4.1 At a glance

- Project-specific mitigation measures are required **in the pre-construction phase**. These include:
 - establish and implement Aboriginal site avoidance requirements as per Section 4.2.1
 - as needed: implement chance finds protocols as per Section 4.3.
- Project-specific mitigation measures are required **prior to the construction phase and/or during construction phase**. These include:
 - establish and implement a suitable cultural awareness induction process and procedure for all workers as per Section 4.2.2
 - as needed: implement unexpected or chance finds protocols as per Section 4.3.
- Project-specific mitigation measures are required **following construction**. These include:
 - as needed; the reburial of recovered cultural materials in a suitable location on site with the participation of the RAPs as per Section 4.4
 - ensuring any landscaping and remediation includes consideration of the cultural landscape and suitable endemic plants in discussion with the RAPs as per Section 4.2.2.
- Several ongoing general post-approval heritage requirements are required **prior to and during construction**. These are outlined in this section and include processes in the event that activities outside the development footprint within and/or outside the study area are proposed (Section 4.5).

4.2 Project specific requirements

The ACHA and associated documentation concluded that the study area contained three discrete Aboriginal sites, although none are within the development footprint. Figure 4.1 identifies the Aboriginal sites and management requirements within the study area. This section outlines the specific activities and timing of broader cultural heritage requirements outlined in the recommendations of EMM (2023a) and SSDA conditions.

\\emm.local\ydrive\2022\E220170- Bellambi Heights Renewable Project EIS\GIS\02_Maps\ACHMP\ACHMP005_Summary\AHM_20251022_05.aprx 23/10/2025

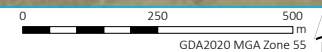


- KEY**
- Development footprint
 - Study area- area to which the ACHMP applies
 - Buffer for establishing avoidance
 - Low density artefact scatter area
 - Cultural awareness inductions and unexpected finds protocols apply
 - Identified Aboriginal sites
 - Proposed re-burial location
- Strahler stream order
- 1st order
 - 2nd order
 - 3rd order
 - 7th order
- Existing environment
- Major road
 - Minor road
 - 330 kV transmission line

Summary of Aboriginal heritage management requirements

Bellambi Heights Battery Energy Storage System
Aboriginal Cultural Heritage Management Plan
Figure 4.1

Source: EMM (2025); DCSSS (2025); OEH (2022); DFSI (2021)



4.2.1 Avoidance and surface protection

As outlined in Section 3.2, cultural materials are present within the study area, but outside of the development footprint (Figure 3.1). It is considered that these sites would be unaffected by the project, but various recommendations sought their avoidance and protection, including SSDA Condition B22.

The following actions should be implemented to reduce inadvertent short and long-term impacts to identified cultural materials:

- During construction:
 - Incorporation of the sites, buffers, and obligations for their protection into cultural inductions for site personnel as per Section 4.2.2.
 - Where available, incorporation of the sites and curtilage into 'no-go' and/or constraint layers within the project development document packages.
 - Where activities are proposed within 40 m of identified Aboriginal sites and/or buffers, establishment of fencing and signage must be implemented prior to, and throughout the construction activities.
 - Where activities are proposed to transgress or use locales within identified Aboriginal sites and/or buffers, establishment of surface protection such as heavy-duty ground protection mats, or equivalent is required.
- Following construction and long-term conservation (i.e. within the study area, where proposed for sale to a third party):
 - establishment of permanent (non-intrusive) signage to indicate cultural deposits at depth and to contact a heritage professional prior to excavation; and/or
 - addition of Aboriginal heritage to any planning certificate issued by Council under section 10.7 of the *Environmental Planning and Assessment Act 1979* to alert any purchaser or consent authority to the Aboriginal heritage values of the site, and place restrictions on future development that may affect these values.

4.2.2 Cultural heritage induction

All employees, contractors, sub-contractors involved in ground-disturbance activities will undergo an Aboriginal cultural heritage induction. For key project team members, this will be conducted by a representative of the locally based RAPs (Table 1.2) prior to any ground-disturbance, and be held on Country. Where multiple locally based RAPs express an interest, opportunity for sharing and/or rotation of the induction opportunities between them would be explored by VEA. Where unfeasible, preference should be given to the Mudgee LALC, Wellington Valley Wiradjuri Aboriginal Corporation and/or Warabinga-Wiradjuri Native Title Claimants Aboriginal Corporation #7. Depending on the required frequency, subsequent inductions may be undertaken by VEA using documentary details sought from, and provided by, the locally based RAPs (Table 1.2). In this situation, periodic involvement of the locally based RAPs (Table 1.2), to ensure the quality and relevance of cultural inductions is maintained, must be undertaken through the project construction phase.

The following points will be conveyed through site induction material:

- Aboriginal sites and places have been identified across the region.

- Aboriginal sites and places are of significance to the Aboriginal community, are important to the wider community and must be treated with respect.
- Aboriginal sites are protected by law and that project approval includes conditions allowing impacts to certain specified Aboriginal sites in accordance with this ACHMP.
- Aboriginal sites have included stone artefact scatters and buried cultural deposits.
- Aboriginal sites can be hard to recognise, but a range of photographs giving examples should be provided to inductees to show the types of material that may be expected.
- There are unexpected finds procedures which involve stopping work if suspected cultural materials or skeletal material/human remains is identified on-site.

In addition, visitors to the study area and general contractors not involved in ground-disturbing activities will be made aware of their obligation to avoid harm to cultural heritage through a cultural heritage component of the general site induction. Records of these inductions will be kept by the lead contractor.

4.2.3 Management of cultural landscape following decommissioning

EMM (2023a) included a recommendation as follows:

The CEMP, or equivalent, should ensure that the cultural landscape is considered throughout the project and as part of the rehabilitation of the project area¹. In discussion with the Aboriginal community, rehabilitation of areas where infrastructure is not remaining after the project should be undertaken to determine suitable ecological communities and other factors in returning the cultural landscape as close to its current state as feasible

The environmental impact statement (EIS) for the project (EMM 2023b) specified that following decommissioning, the development footprint will be rehabilitated to a condition as near as practicable to the condition that existed prior to construction of the project in consultation with the landowner. Rehabilitation will involve the removal of all infrastructure (other than that requested by the landowner to remain). Topsoil will be re-spread over the entire area and then seeded with appropriate grass and legume species. Species for rehabilitation will be cover crops, legumes and pasture species as agreed with the landowner.

To ensure consideration of the cultural landscape, the following process is proposed:

- Consultation should include an online opportunity for RAPs to be advised of the landscaping to undertake discussion on the issue and seek inputs.
- Where feasible, consideration of the inputs from the participating Aboriginal organisations will be included in rehabilitation planning.

¹ Reference to the project area in EMM (2023a) refers to the development footprint.

4.2.4 Timing

Typically, archaeological mitigations are best undertaken during pre-construction and prior to any construction activities that may affect surface and/or shallowly buried cultural materials. However, other activities may extend throughout the project. Specifically, the following timing must be adopted:

- Pre-construction
 - Implement and establish Aboriginal site avoidance requirements as per Section 4.2.1.
- Pre-construction and/or construction
 - Establishment and implementation of cultural awareness inductions as per Section 4.2.2.
 - As needed: implement unexpected/chance finds protocols as per Section 4.3.
- Following construction
 - Management of cultural landscape as per Section 4.2.3.

4.3 Chance finds protocol

The following section outlines cultural heritage processes and procedures that must be implemented during the pre-construction and construction phase of the project in the event that previously unidentified cultural material is identified.

4.3.1 Discovery of Aboriginal artefactual materials

In the event that any previously unidentified cultural material is identified during pre-construction and construction phases of the project, the measures in Table 4.1 will be implemented. Appendix C provides a description of the types of Aboriginal site that may be encountered during the project.

The recording of, and any proposed mitigation measures, will be completed by the project heritage consultant with participation from the RAPs and in discussion with VEA (see Table 1.2 and Section 2.4). Avoidance of newly identified Aboriginal objects is the preferred heritage outcome, if feasible. Mitigation measures will only be employed when it can be reasonably agreed between VEA, project heritage consultant and the participating RAPs that avoidance is not possible.

4.3.2 Discovery of skeletal/human remains

In the event that known or suspected human skeletal remains are encountered during the project, the procedure presented in Table 4.2 must be applied.

Table 4.1 Unexpected/Chance finds protocol – management of unexpected cultural materials (except skeletal/human remains)

Protocols to follow
<ul style="list-style-type: none"> • All works within the location of the Aboriginal object/s must stop. • The person who identified the Aboriginal objects must immediately notify the person in charge of the activity – VEA - Manager (NSW) Development and Stakeholders (Section 1.2). • All construction that could potentially harm the Aboriginal objects or values must cease (including stopping all construction within at least 15 m centred on the find). Only construction that is required to make the area safe is permissible. • The Aboriginal object/s is to be protected with the establishment of a no-go zone. • Contact the project heritage consultant (Section 1.2) and locally based RAPs (see Section 2.4) to lead the subsequent management of the find. • All RAPs are to be notified of the Aboriginal object/s and consulted to determine the significance and management of the find. • Heritage NSW are to be notified and consulted regarding the management of the Aboriginal object/s. Heritage NSW should also be consulted regarding any significant variations to the excavation methodology proposed in Appendix D. • Consideration of avoidance of the cultural materials should be undertaken. Where avoidance can be achieved, implement the following: <ul style="list-style-type: none"> – where the find is within the development footprint, the find will be managed through active protection using suitable fencing (e.g. star pickets, stakes and wire, bollards, concrete blocks, etc.) and appropriate signage (e.g. ‘no access’ and/or ‘heritage site’). These measures should be established by the project heritage consultant with the participation of the locally based RAPs; and/or – where the find is outside the development footprint, no fencing, signage or active land management measures are required for these sites. Suitable recording of the site must be undertaken by the project heritage consultant and representatives of the locally based RAPs (Appendix B). The site/s must be integrated into the cultural inductions (Section 4.2.1) to ensure all personnel are aware of the location and to avoid inadvertent impacts. • Where avoidance cannot be achieved, determine the most appropriate course of action based on below in consultation with the locally based RAPs, heritage consultant (Section 1.2) and as necessary, Heritage NSW: <ul style="list-style-type: none"> – For isolated Aboriginal objects (e.g. stone artefacts, etc) found in disturbed contexts, the site should be recorded as found (see Appendix B), and subsequently collected by the project heritage consultant with participation of the locally based RAPs. – Where significant cultural deposits are identified, additional archaeological excavations should be undertaken prior to any further work in the area. Excavations should include an initial investigative phase to characterise the site, followed by a more extensive salvage excavation where significant cultural material is identified. Excavation methods that can be used as a guide are presented in Appendix D. <p style="margin-left: 20px;">Significant cultural deposits are defined as:</p> <ul style="list-style-type: none"> ▪ presence of artefact densities >20/m² and which may reflect past site specific visitation and/or occupation ▪ presence of cultural materials that may be of Pleistocene (>10,000 years ago) age, which is known regionally, but has not been encountered within the study area or immediate surrounds ▪ presence of deeply (>1 m) stratified cultural materials ▪ presence of rare cultural materials, such as wooden artefacts, which given the soil profiles are not expected, but would be extremely rare if encountered ▪ other rare or unique characteristics as identified by the project heritage consultant in discussion with VEA and the locally based RAPs. • Once the archaeological on-site activities are complete to the satisfaction of the project heritage consultant in consultation with the locally based RAPs, written advice of the actions being completed should be provided to Planning Secretary, Department of Planning, Housing and Infrastructure, Heritage NSW and all RAPs. Works may then proceed. • All archaeological activities should ensure suitable analysis of any cultural materials, chronological, palaeoenvironmental and sedimentological samples collected are suitably analysed and documented in a report that is provided to Heritage NSW (see Appendix D). This should include submission of the identified cultural materials and findings to the Heritage NSW Aboriginal Heritage Information Management System (AHIMS) register.

Table 4.2 Unexpected/Chance finds protocol – management of unexpected skeletal/human remains

Protocols to follow
<ul style="list-style-type: none">• All work must STOP in the vicinity of the remains. The remains must be left in place and protected from further harm or damage. All construction that could potentially harm the human remains must cease. Only construction that is required to make the area safe is permissible.• The person who identified the Aboriginal object/s must immediately notify the person in charge (VEA – Manager (NSW) Development and Stakeholders – see Section 1.3) of the activity.• The human remains are to be protected with the establishment of a no-go zone.• The person in charge shall take photographs with scale (without touching any remains) and provide them to the Project heritage consultant and seek initial advice. If uncertain or probable human identification, proceed with next steps.• The person in charge will notify NSW Police of the discovery as soon as possible. All subsequent steps will be dictated by the NSW Police.<ul style="list-style-type: none">– Police contact: Gulgong Police Station – T: (02) 6371 9450.• Contact the Project heritage consultant (Section 1.2) and RAPs (see Section 2.4) to brief them on the evolving situation.• If the NSW Police advise that the human remains are of ancestral Aboriginal origin, and indicate that they will not investigate, the person in charge will contact the Project heritage consultant (Section 1.2) and locally based RAPs (see Section 2.4) to lead the subsequent management of the find. Heritage NSW (T: 131 555) will also be notified. All RAPs must be notified of the find.• All future management of the human remains is to be determined by the RAPs. As such, discussion between the locally based RAPs, Project heritage consultant, Heritage NSW, VEA and contractor will be organised as soon as possible. Once an agreement on the subsequent management of the find is undertaken, Heritage NSW will be advised of the proposed course of action to be implemented and consulted regarding the management of the Aboriginal object/s.• Discussions will include consideration and resolution of the following:<ul style="list-style-type: none">– If needed: further investigation to understand the extent, distribution and characteristics of the human remains. Where required, the heritage professional in consultation with the locally based RAPs, and participation of a physical anthropologist, will establish the investigation area and define protocols and excavation methods to be adhered to during such investigation.– Avoidance and/or project redesign to ensure the human remains can be left unaffected by the works.– Where avoidance cannot be achieved, the suitable recovery and relocation of the human remains. Where required, the Project heritage consultant in consultation with the locally based RAPs, and participation of a physical anthropologist, will establish the investigation area and define protocols and excavation methods to recover and move the remains.– Whether scientific research is desired by the locally based RAPs to provide further context of the remains (e.g. age of individual, how they died, gender, time of burial, etc).– If relocation is determined, identify a suitable re-burial location, and ensure the necessary discussions and agreements are in place for the re-burial to occur. Where agreed, a temporary storage location may be considered while the final location is resolved.• Once the on-site activities associated with the human remain are complete to the satisfaction of the Project heritage consultant in consultation with the locally based RAPs, construction activities may recommence.• Once the agreed management activities are implemented and completed, ensure suitable analysis (as required) of the remains, and formal reporting is developed to be provided to Heritage NSW and all RAPs (Appendix B). The Planning Secretary, Department of Planning, Housing and Infrastructure, should also be notified of the completion of the activities. This should include submission of the identified cultural materials and findings to the Heritage NSW Aboriginal Heritage Information Management System (AHIMS) register.

4.4 Management of recovered cultural materials and Keeping Place

i Post-mitigation analysis and reporting

All analysis and reporting should be undertaken in accordance with Appendix D.

ii Mid- and long-term curation

All recovered cultural material should:

- be stored at the project heritage consultant's office for archaeological analysis and short-term curation. The assemblage should be stored in a locked cabinet
- once analysis has been completed, the assemblage should be re-buried within the study area in a location determined by the locally based RAPs.

A default location based on discussions during the ACHA is proposed, shown in Figure 4.1, and will be used unless an alternate location is identified in by the locally based RAPs during the initial review of the ACHMP and as part of any ACHMP updates (Section 5).

4.5 Proposed activity outside approved development footprint, within and outside the study area

Aboriginal cultural heritage within the study area has been assessed previously as part of the ACHA (EMM 2023). There are three sites within the study area, as presented in Section 3 and Figure 3.1. There are no sites are within the development footprint.

Changes to the development footprint (as identified in the development consent) will require consideration of Aboriginal cultural heritage as part of any subsequent modification and/or change agreed with the Planning Secretary in accordance with the development consent.

If project-related disturbance outside the development footprint is proposed in the future, VEA will consider relevant approval requirements. Minimal, or no, Aboriginal cultural heritage assessment may be required for proposed changes within the study area, where identified Aboriginal objects/sites (Section 3, Figure 3.1) are not proposed to be harmed or impacted. It is likely that management of cultural heritage can be addressed through the requirements of this ACHMP.

If new areas outside the study area are proposed to be disturbed, further assessment may be required. This may include an initial Aboriginal heritage assessment completed to a level consistent with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010b) guidelines. Further investigation may be required in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales* (DECCW 2010c) and/or other relevant guidelines. If Aboriginal objects are likely to be impacted, further approvals under the *National Parks and Wildlife Act 1974* and/or EP&A Act as required may be required.

Aboriginal heritage impacts will be considered in accordance with relevant assessment requirements as specified by DPHI if any future changes to the development footprint are required.

5 Compliance, review and improvement

5.1 At a glance

- This section provides information to ensure the ACHMP is complied with during the project, and processes and procedures to manage complaints and non-conformances. A complaints register for use is provided in Appendix E.
- Criteria and timing for revisiting and updating the ACHMP is provided in this section. A document control and revision table are provided in Appendix F.

5.2 Compliance and auditing

5.2.1 Changing heritage professional

Where the heritage consultant changes through the project, suitable hand over will be undertaken to minimise loss or mistranslation of the intent of the information, findings and future steps in relation to Aboriginal heritage.

Any handover would include VEA's facilitation of:

- a face-to-face/online meeting between the heritage consultants to discuss the project requirements, key issues, community commitments, and expectations
- ensure data and mapping in useable formats are provided by the incumbent heritage consultant.

Once undertaken, the change of heritage consultant should be advised to the RAPs outlined in Table 1.2.

5.2.2 Measuring performance

Compliance with the ACHMP will be measured by standard environmental auditing procedures undertaken at regular intervals for the project. The audit will include an assessment of compliance with SSDA conditions and will include auditing the following measures:

- protection of all nominated sites
- inductions are taking place and include appropriate material
- reporting and managing any unexpected finds in accordance with this ACHMP.

Any incidents and non-compliance notifications will follow requirements set out in SSDA and as per the broader EMS (Condition C1).

5.2.3 Complaints

Any complaints made by the RAPs and/or related to the ACHMP can be made to the key stakeholders identified in Table 1.2, and will be documented in a 'complaints register' included in Appendix E.

Any complaints will be used in improvements of the ACHMP as outlined in Section 5.3.

5.2.4 Non-conformance

Any non-conformance will be subject to a detailed investigation by VEA and project heritage consultant in consultation with the locally based RAPs. The investigation will include:

- a clear description of the non-conformance, and its actual/potential harm to cultural materials

- all personnel involved in the non-conformity, their organisation and contact details
- any corrective actions undertaken to address the non-conformity
- next steps, including the need for additional heritage activities and/or corrective actions
- contacting DPHI/Heritage NSW to advise them of the non-conformity and outline corrective measures.

Any non-conformance will be used in improvement of the ACHMP as outlined in Section 5.3.

5.3 Review and improvement

5.3.1 Continual improvement

Continual improvement of this ACHMP will be achieved by identifying opportunities for improvement. The continual improvement process will be designed to:

- identify areas of opportunity for improvement of cultural heritage management which leads to improved performance
- determine the root cause or causes of non-conformances and deficiencies
- develop and implement a plan of corrective and preventative action to address non-conformances and deficiencies
- verify the effectiveness of the corrective and preventative actions
- document any changes in procedures resulting from process improvement.

5.3.2 ACHMP review and update

The ACHMP will be revisited and updated in the following circumstances:

- every six months from initial finalisation until the completion of ground disturbance activities
- where modification to the SSDA occurs that may result in harm or impacts to Aboriginal heritage
- where complaints and/or non-conformances have been identified that require changes to ensure suitable management of Aboriginal heritage in future stages of the project
- a reportable incident
- a submission of an Independent Auditor
- at direction from the Planning Secretary
- where other conditions or situations arise that require the updating of this plan.

Any changes to the ACHMP will be included in the document control table provided in Appendix F. Aboriginal consultation for any updates and/or changes will be undertaken in accordance with Section 2.4.

References

EMM Consulting Pty Ltd (EMM), 2023

- 2023a, *Bellambi Heights Battery Energy Storage Project – Aboriginal cultural heritage assessment*. Prepared for Vena Energy Services (Australia) Pty Ltd.
- 2023b, *Bellambi Heights Battery Energy Storage Project, Environmental Impact Statement*. Prepared for Vena Energy Services (Australia) Pty Ltd.

Department of Climate Change and Water (DECCW)

- 2010a, *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.
- 2010b, *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*.
- 2010c, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales*.

Abbreviations

Abbreviation	Full term
ACHA/ACHAR	Aboriginal cultural heritage assessment
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
ACHMP	Aboriginal cultural heritage management plan
EMM	EMM Consulting Pty Limited
DEC/DECCW	A former NSW government body, now Heritage NSW
DPHI	NSW Department of Planning, Housing and Infrastructure
ICIP	Indigenous cultural and intellectual property
LALC	Local Aboriginal Land Council
RAP	Registered Aboriginal Party (for the project)
SSD	State Significant Development
SSDA	State Significant Development approval, also called Project Approval
VEA	Vena Energy Services (Australia) Pty Ltd

Appendix A

Aboriginal consultation

A.1 Consultation log

A log of all consultation undertaken with the RAPs is provided in the next page.

Table A.1 Consultation log

Date	Incoming/ Outgoing	External organisation	Contact made by (internal organisation)	Contact received from (external organisation)	Method	Details of communication
Aboriginal consultation with the registered Aboriginal parties has been extensive and ongoing for this project since July 2022. Further details of these interactions are presented in EMM 2023						
20 November 2024	Outgoing	All registered Aboriginal parties	EMM	-	Email	Provision of draft ACHMP for review.
20 November 2024	Outgoing	Heritage NSW	EMM	-	Email	Provided ACHMP to Heritage mailbox for review and comment.
20 November 2024	Incoming	Heritage NSW	-	Aimee Lee	Email	Informed Megan that as the project is SSD the ACHMP would need to be submitted through the portal for review.
20 November 2024	Incoming	Warrabinga Wiradjuri #7 Native Title Claimants	-	Kylie Manson	Email	Confirmed their agreement with the ACHMP. Expressed their interest in participating in the facilitation of cultural heritage training associated with the project. Thanked EMM for their work on the project and acknowledged EMM's commitment to engaging with stakeholders and ensuring cultural heritage is appropriately acknowledged.
2 March 2025	Outgoing	All registered Aboriginal parties	EMM	-	Email	Final ACHMP issued in late February.
16 May 2025	Outgoing	All registered Aboriginal parties	EMM	-	Email	Sent an update on the project including providing a copy of the finalised ACHMP.
1 July 2025	Outgoing	All registered Aboriginal parties	EMM	-	Email	Provision of notification letter due to a modification to the development footprint.
1 July 2025	Incoming	Wellington Valley Wiradjuri Aboriginal Corporation	-	Bradley Bliss	Email	Brad confirmed he has received notification letter and will review this week.
6 July 2025	Incoming	Wellington Valley Wiradjuri Aboriginal Corporation	-	Bradley Bliss	Email	Confirmed their support for the proposed modification following review of notification letter.
29 July 2025	Incoming	Warrabinga Wiradjuri #7 Native Title Claimants	-	Kylie Manson	Email	Confirmed their support for the proposed modification following review of notification letter.

Date	Incoming/ Outgoing	External organisation	Contact made by (internal organisation)	Contact received from (external organisation)	Method	Details of communication
22 August 2025	Outgoing	All RAPs	EMM		Email	Email to RAPs providing copy of Cultural Heritage Induction for review prior to preliminary online induction undertaken by Amber Morgan (EMM).
22 August 2025	Incoming	Wellington Valley Wiradjuri Aboriginal Corporation	-	Bradley Bliss	Email	Email response indicating that they have no issues or additional comments on the CHI.
25 August 2025	Incoming	Kamilaroi Yankuntjatjara Working Group	-	Phil Khan	Email	Email response stating that they are happy with the CHI and have no further comments to add.
27 August	Incoming	Warrabinga Wiradjuri #7 Native Title Claimants	-	Kylie Manson	Email	Email response stating that they are happy with the CHI.
29 August 2025	Outgoing	-	Amber Morgan	-	Online	Amber Morgan undertook Cultural Heritage Induction with site workers.

A.2 Aboriginal community feedback

The following section includes any feedback received during the finalisation and/or update of this ACHMP.

Kate Cox

From: Megan Sheppard Brennand
Sent: Wednesday, 20 November 2024 12:42 PM
To: Amber Morgan; Alan Williams
Cc: Kate Cox; Andrew Brownlow
Subject: RE: Bellambi Heights ACHMP - Aboriginal cultural heritage management plan review
Attachments: E220170_Bellambi Heights_ACHMP_Draft for consultation.pdf

Dear all,

Thank you all for your ongoing involvement in the Bellambi Heights Battery Energy Storage project, in Beryl NSW. Please find attached the draft Aboriginal cultural heritage management plan for your review. If you would prefer a hard copy of the plan please reply with your most up to date address and we will mail it to you. There is a 21 day review period for this document, if you could please reply with your comments by **10th December 2024** that would be most appreciated.

Any questions please feel free to get in touch.

Thanks,
Megan

Megan Sheppard Brennand

Senior archaeologist

Note: My work days are Monday to Thursday

T 02 9493 9500

M [REDACTED]

www.emmconsulting.com.au

From: Megan Sheppard Brennand
Sent: Wednesday, 3 July 2024 11:43 AM
To: Amber Morgan [REDACTED]
Cc: Kate Cox [REDACTED]
Subject: Bellambi Heights ACHA - final report and development consent

Dear all,

Thank you all for your involvement in the Bellambi Heights Battery Energy Storage project, in Beryl NSW. Please find a link below to a copy of the final Aboriginal cultural heritage assessment report. If you would prefer a hard copy of the report please reply with your most up to date address and we will mail it to you.

[Bellambi Heights Battery Energy Storage Project: Aboriginal cultural heritage assessment \(nsw.gov.au\)](https://www.nsw.gov.au/bellambi-heights-battery-energy-storage-project-aboriginal-cultural-heritage-assessment)

Development consent for the project was received on 2 May 2024. If you wish to contact the Bellambi Heights Project Team you can do so via the details below.

Phone: 1800 841 229

Email: [REDACTED]

Thanks,

Megan

Megan Sheppard Brennand

Senior Archaeologist



T 02 9493 9500
M [REDACTED]
LI [Connect on LinkedIn](#)
emmconsulting.com.au

SYDNEY | Gamaraigal Country, Ground floor, 20 Chandos Street, St Leonards NSW 2065

Note: My work days are Monday to Thursday



[Please consider the environment before printing my email.](#)

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Warrabinga- Wiradjuri #7 Native Title Claimants

-c/o Warrabinga Native Title Claimants Aboriginal Corporation

[REDACTED]
[REDACTED]

27-11-2024

Megan Sheppard Brennand

EMM Consulting

Dear Megan,

Re: Draft Aboriginal Cultural Heritage Management Plan – Bellambi Heights Battery Storage Project, Beryl NSW

On behalf of the Warrabinga Wiradjuri #7 Native Title Claimants, I write to confirm our agreement with the draft Aboriginal Cultural Heritage Management Plan (ACHMP) for the Bellambi Heights Battery Storage Project in Beryl, NSW.

We would also like to take this opportunity to formally express our interest in participating in the facilitation of cultural heritage training associated with the project. We believe this collaboration will contribute significantly to fostering a deeper understanding of and respect for Aboriginal cultural heritage in the region.

Thank you for your thorough work and consultation throughout this process. EMM Consulting's commitment to engaging with stakeholders and ensuring cultural heritage is appropriately acknowledged and managed is greatly appreciated.

If you require any further information or wish to discuss our expression of interest, please do not hesitate to contact me.

Warm regards,

[REDACTED]

Warrabinga Wiradjuri #7 Native Title Claimants Aboriginal Corporation

[REDACTED]

[REDACTED]

Megan Sheppard Brennand

From: Megan Sheppard Brennand
Sent: Friday, 16 May 2025 9:54 AM
To: Amber Morgan
Subject: Bellambi Heights BESS project - Aboriginal cultural heritage management plan
Attachments: E220170_Bellambi Heights_ACHMP_V8_Clean.pdf

Bcc:



Dear All,

This is a brief update on the Bellambi Heights BESS project. As you may recall the Aboriginal cultural heritage management plan (ACHMP) was sent out for review and comment at the end of 2024. We received few comments and the document was then provided to Heritage NSW for their review and comment. The ACHMP has since been finalised with response to Heritage NSW comments in February, please find the document attached for your records. We will update you once we are aware of the next steps.

Thanks,
Megan

Megan Sheppard Brennand

Senior archaeologist – Aboriginal heritage



T 03 9993 1905
M [Redacted]
LI [Connect on LinkedIn](#)
emmconsulting.com.au

MELBOURNE | Wurundjeri Woi Wurrung Country, Suite 9.01, Level 9, 454 Collins Street, Melbourne VIC 3000

Note: My work days are Monday to Thursday



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Outlook

Bellambi Heights BESS project - Proposed Modification 1 - notification

From Rohani Dutch [REDACTED]
Date Tue 7/1/2025 1:21 PM
Cc Stacey Kennedy <skennedy@emmconsulting.com.au>
Bcc [REDACTED]

 1 attachment (2 MB)

20250701-Bellambi Heights BESS Mod1 Consultation_2.pdf;

Good Afternoon,

Thank you for your ongoing involvement in the Bellambi Heights Battery Energy Storage System (Bellambi Heights BESS) project.

Development consent SSD-33344237 was granted to Vena Energy Services (Australia) Pty Ltd (Vena) for the project in May 2024 by the NSW Minister for Planning under section 4.38 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act). Following development consent, an Aboriginal cultural heritage management plan (ACHMP) was also developed in consultation with the local Aboriginal community and in accordance with the ACHA to provide a framework for managing Aboriginal heritage during the pre-construction and construction phases of the project.

Vena intends to modify the development consent to refine the project layout, primarily to accommodate changes to the layout of the switching yard and substation, and connection to the existing overhead 330 kilovolt (kV) transmission line. The elements of the project that are proposed to be modified require changes to the development footprint.

Please see attached a notification letter for your review on the Proposed Modification 1 to the Bellambi Heights BESS project. This letter provides information on the proposed modification, project information and investigations completed to date. If you have any concerns with our proposed approach or the modification, EMM invites you to provide comment or input on the proposed modification via phone ([REDACTED]) or email within two weeks by **15 July 2025**.

Please reach out to Stacey Kennedy (skennedy@emmconsulting.com.au) on [REDACTED]

Kind regards,

Rohani Dutch

Archaeologist – Aboriginal Heritage



T 02 4907 4800
M [REDACTED]
LI [Connect on LinkedIn](#)
emmconsulting.com.au

NEWCASTLE | Awabakal Country, Level 3, 175 Scott Street, Newcastle NSW 2300



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FW: Bellambi Heights BESS project - Proposed Modification 1 - notification

From Stacey Kennedy [REDACTED]

Date Mon 7/7/2025 8:30 AM

To Rohani Dutch [REDACTED]

Hi Rohani,

Please see below. Could you please save in project folder and update consultation log/s as required.

Thank you 😊

Stacey Kennedy

Associate | Team Lead/Technical Lead, Aboriginal heritage

M [REDACTED]

www.emmconsulting.com.au

From: WWVAC Contact Officer <WWVAC@hotmail.com>

Sent: Sunday, July 6, 2025 7:22 PM

To: Stacey Kennedy [REDACTED]

Cc: Alan Williams [REDACTED]

Subject: Re: Bellambi Heights BESS project - Proposed Modification 1 - notification

Dear Stacey,

Wellington Valley Wiradjuri Aboriginal Corporation have in a members meeting discussed this proposed modification, Elders, Members, Field Officers and Wiradjuri Knowledge Holders consulted do not oppose the proposed modification. WWVAC support the avoidance of the identified Aboriginal Sites and reduction in the Environmental impacts.

Regards,

Bradley R. Bliss J.P.

WVWAC CEO and Contact Officer

From: Rohani Dutch [REDACTED]
Sent: Tuesday, 1 July 2025 1:21 PM
Cc: Stacey Kennedy [REDACTED]
Subject: Bellambi Heights BESS project - Proposed Modification 1 - notification

Good Afternoon,

Thank you for your ongoing involvement in the Bellambi Heights Battery Energy Storage System (Bellambi Heights BESS) project.

Development consent SSD-33344237 was granted to Vena Energy Services (Australia) Pty Ltd (Vena) for the project in May 2024 by the NSW Minister for Planning under section 4.38 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act). Following development consent, an Aboriginal cultural heritage management plan (ACHMP) was also developed in consultation with the local Aboriginal community and in accordance with the ACHA to provide a framework for managing Aboriginal heritage during the pre-construction and construction phases of the project.

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Please see attached a notification letter for your review on the Proposed Modification 1 to the Bellambi Heights BESS project. This letter provides information on the proposed modification, project information and investigations completed to date. If you have any concerns with our proposed approach or the modification, EMM invites you to provide comment or input on the proposed modification via phone (0408 597 246) or email within two weeks by **15 July 2025**.

Please reach out to Stacey Kennedy [REDACTED] on [REDACTED]

Kind regards,

Rohani Dutch

Archaeologist – Aboriginal Heritage



T 02 4907 4800

M [REDACTED]

LI [Connect on LinkedIn](#)

emmconsulting.com.au

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Re: Bellambi Heights BESS project - Proposed Modification 1 - notification

From Kylie Manson [REDACTED]

Date Tue 7/29/2025 9:19 AM

To Rohani Dutch [REDACTED]

Hi Rohani

I must apologise as this went to my spam Folder, Warrabinga is agreeable with the Proposed changes.

Thanks

Kylie Manson

Warrabinga WP

From: Rohani Dutch [REDACTED]

Sent: Tuesday, 1 July 2025 1:21 PM

Cc: Stacey Kennedy [REDACTED]

Subject: Bellambi Heights BESS project - Proposed Modification 1 - notification

Good Afternoon,

Thank you for your ongoing involvement in the Bellambi Heights Battery Energy Storage System (Bellambi Heights BESS) project.

Development consent SSD-33344237 was granted to Vena Energy Services (Australia) Pty Ltd (Vena) for the project in May 2024 by the NSW Minister for Planning under section 4.38 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act). Following development consent, an Aboriginal cultural heritage management plan (ACHMP) was also developed in consultation with the local Aboriginal community and in accordance with the ACHA to provide a framework for managing Aboriginal heritage during the pre-construction and construction phases of the project.

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Please see attached a notification letter for your review on the Proposed Modification 1 to the Bellambi Heights BESS project. This letter provides information on the proposed modification, project information and investigations completed to date. If you have any concerns with our proposed approach or the modification, EMM invites you to provide comment or input on the proposed modification via phone [REDACTED] or email within two weeks by **15 July 2025**.

Please reach out to Stacey Kennedy [REDACTED] on [REDACTED]

Kind regards,

Rohani Dutch

Archaeologist – Aboriginal Heritage



T 02 4907 4800
M [REDACTED]
LI [Connect on LinkedIn](#)
emmconsulting.com.au

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Bellambi Heights - preliminary cultural heritage induction



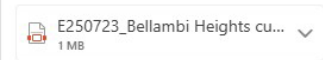
Stacey Kennedy

Cc: Amber Morgan

Bcc: [Redacted]

Reply Reply all Forward [Icons]

Fri 8/22/2025 2:50 PM



Good afternoon,

Preconstruction activities for the Bellambi Heights Battery Energy Storage Project are proposed for early September. In accordance with the Aboriginal Cultural Heritage Management Plan (ACHMP) requirements, Vena Energy Services (Australia) Pty Ltd (VEA) will be undertaking a preliminary online cultural heritage induction on the 29/8/2025 prior to works commencing.

Following earlier communications seeking Aboriginal participants to assist in the cultural induction, the Warrabinga-Wiradjuri Native Title Claimants Aboriginal Corporation expressed an interest. As such, we have now developed an induction package with them for inclusion in VEA's ongoing induction processes. In accordance with the consultation requirements outlined in the ACHMP please see a copy of the preliminary online Cultural Heritage Induction for your review. If you would like to provide any feedback/comments could you please do so by COB Thursday 28/8/2025.

Kind regards,

Stacey Kennedy - B.Arch (Hons)

Associate | Team Lead/Technical Lead – Aboriginal heritage



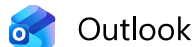
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RE: Bellambi Heights CHI

From Stacey Kennedy [REDACTED]

Date Fri 8/22/2025 1:51 PM

To admin [REDACTED]

1 attachment (1 MB)

E250723_Bellambi Heights cultural heritage awareness training_V3.0.pdf;

Hi Kylie,

In preparation for the Bellambi Heights online cultural heritage induction next week we have prepared a PowerPoint presentation (PPP). Please see attached!

If you would like to provide any feedback/comments could you please do so by COB Thursday 28/8/2025. In accordance with the ACHMP consultation requirements we are also providing a copy for comment to the list of registered Aboriginal parties (RAPs).

Have a great weekend!

Stacey Kennedy

Associate | Team Lead/Technical Lead, Aboriginal heritage

M [REDACTED]

www.emmconsulting.com.au

From: admin [REDACTED]

Sent: Wednesday, August 20, 2025 9:06 AM

To: Stacey Kennedy [REDACTED]

Subject: Re: Bellambi Heights CHI

Hi Stacey

Happy for you guys to facilitate, still having issues getting onto uncle martin to sign off, Sorry

Kind Regards,
Warrabinga NTCAC.
Kylie Manson
[REDACTED]



From: Stacey Kennedy [REDACTED]
Sent: 19 August 2025 11:14 AM
To: admin [REDACTED]
Cc: Megan Sheppard Brennand [REDACTED]
Subject: Bellambi Heights CHI

Hi Kylie,

I hope you have been well! I have been in touch with the Project Manager regarding the CHI for Bellambi. They are now hoping to do pre-construction activities onsite from the 1/09/2025. These activities are preliminary and as such there will not be too many inductees or any onsite facilities at this time.

Due to this, the client was hoping to deliver an online induction over teams for Friday 29/8/2025 to facilitate the preliminary works. The intention is to also follow up with the On-Country Induction/recording in Nov/Dec when they will be ready to start the main construction works and have more workers ready to commence.

We wanted to reach out and see whether you had time and would be interested in delivering or participating in the online induction? Last time I spoke with you I think that you had mentioned that you had nearly completed the slide pack but were still seeking input from the board? If you were available and happy to do the induction would you be able to provide a copy of the slide pack to us this Thursday? The ACHMP requires us to provide copies of inductions to the RAPs for the project for review/comment prior to the induction occurring.

Alternatively, if you are not available (and happy for us to do so) we can prepare the induction slide pack and deliver on this occasion (Friday 29/8/2025). We would provide you and the other RAPs with the induction slide pack for comment/review by this Thursday.

Happy to discuss so please give me a call when it suits!

Kindest regards,

Stacey Kennedy - B.Arch (Hons)

Associate | Team Lead/Technical Lead – Aboriginal heritage



T 03 9993 1905
M [REDACTED]
LI [Connect on LinkedIn](#)
emmconsulting.com.au

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Re: Bellambi Heights CHI

From admin [REDACTED]
Date Wed 8/27/2025 10:57 AM
To Stacey Kennedy <skennedy@emmconsulting.com.au>

Hi Stacey
We are happy 😊

Thanks
Warrabinga NTCAC
Kylie Manson
[REDACTED]



From: Stacey Kennedy [REDACTED]
Sent: Friday, August 22, 2025 1:51:48 PM
To: admin [REDACTED]
Subject: RE: Bellambi Heights CHI

Hi Kylie,

In preparation for the Bellambi Heights online cultural heritage induction next week we have prepared a PowerPoint presentation (PPP). Please see attached!

If you would like to provide any feedback/comments could you please do so by COB Thursday 28/8/2025. In accordance with the ACHMP consultation requirements we are also providing a copy for comment to the list of registered Aboriginal parties (RAPs).

Have a great weekend!

Stacey Kennedy

Associate | Team Lead/Technical Lead, Aboriginal heritage

M [REDACTED]
www.emmconsulting.com.au

From: admin [REDACTED]

Sent: Wednesday, August 20, 2025 9:06 AM

To: Stacey Kennedy [REDACTED]

Subject: Re: Bellambi Heights CHI

Hi Stacey

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Kind Regards,
Warrabinga NTCAC.
Kylie Manson
[REDACTED]



From: Stacey Kennedy [REDACTED]

Sent: 19 August 2025 11:14 AM

To: admin [REDACTED]

Cc: Megan Sheppard Brennand [REDACTED]

Subject: Bellambi Heights CHI

Hi Kylie,

I hope you have been well! I have been in touch with the Project Manager regarding the CHI for Bellambi. They are now hoping to do pre-construction activities onsite from the 1/09/2025. These activities are preliminary and as such there will not be too many inductees or any onsite facilities at this time.

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Happy to discuss so please give me a call when it suits!

Kindest regards,

Stacey Kennedy - B.Arch (Hons)

Associate | Team Lead/Technical Lead – Aboriginal heritage



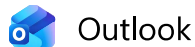
T 03 9993 1905
M [REDACTED]
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Re: Bellambi Heights - preliminary cultural heritage induction

From Phil Khan [REDACTED]

Date Mon 8/25/2025 11:50 AM

To Stacey Kennedy [REDACTED]

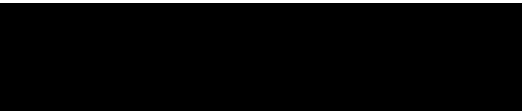
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Outlook-te3qxbv;

Hi Stacey,

We are happy with your Cultural Heritage induction and have no further comments to add.

Kinds Regards
Phil Khan – Director



From: Stacey Kennedy [REDACTED]

Sent: Friday, 22 August 2025 2:50 PM

Cc: Amber Morgan <amorgan@emmconsulting.com.au>

Subject: Bellambi Heights - preliminary cultural heritage induction

Good afternoon,

Preconstruction activities for the Bellambi Heights Battery Energy Storage Project are proposed for early September. In accordance with the Aboriginal Cultural Heritage Management Plan (ACHMP) requirements, Vena Energy Services (Australia) Pty Ltd (VEA) will be undertaking a preliminary online cultural heritage induction on the 29/8/2025 prior to works commencing.

Following earlier communications seeking Aboriginal participants to assist in the cultural induction, the Warrabinga-Wiradjuri Native Title Claimants Aboriginal Corporation expressed an interest. As such, we

have now developed an induction package with them for inclusion in VEA's ongoing induction processes. In accordance with the consultation requirements outlined in the ACHMP please see a copy of the preliminary online Cultural Heritage Induction for your review. If you would like to provide any feedback/comments could you please do so by COB Thursday 28/8/2025.

Kind regards,

Stacey Kennedy - B.Arch (Hons)

Associate | Team Lead/Technical Lead – Aboriginal heritage



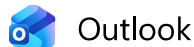
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Re: Bellambi Heights - preliminary cultural heritage induction

From WVVAC Contact Officer [REDACTED]

Date Fri 8/22/2025 3:49 PM

To Stacey Kennedy [REDACTED] Amber Morgan [REDACTED]

Hi Stacey and Amber,

Wellington Valley Wiradjuri Aboriginal Corporation does not have any issues or additional comments.

Regards

Bradley R Bliss J.P.
WVVAC CEO and Contact Officer

Get [Outlook for Android](#)

From: Stacey Kennedy [REDACTED]

Sent: Friday, August 22, 2025 2:50:07 PM

Cc: Amber Morgan [REDACTED]

Subject: Bellambi Heights - preliminary cultural heritage induction

Good afternoon,

Preconstruction activities for the Bellambi Heights Battery Energy Storage Project are proposed for early September. In accordance with the Aboriginal Cultural Heritage Management Plan (ACHMP) requirements, Vena Energy Services (Australia) Pty Ltd (VEA) will be undertaking a preliminary online cultural heritage induction on the 29/8/2025 prior to works commencing.

Following earlier communications seeking Aboriginal participants to assist in the cultural induction, the Warrabinga-Wiradjuri Native Title Claimants Aboriginal Corporation expressed an interest. As such, we have now developed an induction package with them for inclusion in VEA's ongoing induction processes. In accordance with the consultation requirements outlined in the ACHMP please see a copy of the preliminary online Cultural Heritage Induction for your review. If you would like to provide any feedback/comments could you please do so by COB Thursday 28/8/2025.

Kind regards,

Stacey Kennedy - B.Arch (Hons)

Associate | Team Lead/Technical Lead – Aboriginal heritage



T 03 9993 1905
M [REDACTED]
LI [Connect on LinkedIn](#)
emmconsulting.com.au

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A.3 Heritage NSW feedback

The following section includes any feedback received during the finalisation and/or update of this ACHMP.

Our ref: HMS ID 8989

Kate Cox
Associate Director
EMM Consulting
katcox@emmconsulting.com.au
Letter uploaded to the Major Projects Planning Portal

Aboriginal Cultural Heritage Management Plan – State Significant Development

Proposal: Bellambi Heights BESS

Major Project reference: SSD-33344237-PA-2

Received: 2 February 2025

Dear Kate,

Thank you for your referral seeking advice on the chance finds protocol contained in the Aboriginal Cultural Heritage Management Plan (ACHMP) dated 31 January 2025 for the above State Significant Development. Heritage NSW has reviewed the chance finds protocol provided in Section 4.3 of the ACHMP, consultation documentation in Appendix A, and associated methodologies in Appendix D of the ACHMP only. This response does not provide comment on the remainder of the document.

Revisions made to the ACHMP in response to previous correspondence with Heritage NSW are noted. Heritage NSW has reviewed the chance finds protocol and has no further comment at this time.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact James Cole, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Alison Lamond

Alison Lamond
A/ Strategic Manager – Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
5 February 2025

Our ref: HMS ID 8314

Kate Cox
Associate Director
EMM Consulting
katcox@emmconsulting.com.au

Letter uploaded to the Major Projects Planning Portal

Aboriginal Cultural Heritage Management Plan – State Significant Development

Proposal: Bellambi Heights Battery Energy Storage System

Major Project reference: SSD-33344237-PA-2

Received: 13 December 2024

Dear Kate,

Thank you for your referral seeking advice on the chance finds protocol contained in the Aboriginal Cultural Heritage Management Plan (ACHMP) dated 12 December 2024 for the above State Significant Development. Thank you for the continued opportunity to comment on the project.

Heritage NSW has reviewed the chance finds protocol provided in Section 4.3 of the ACHMP, consultation documentation in Appendix A, and associated methodologies in Appendix D of the ACHMP only. This response does not provide comment on the remainder of the document.

Following review of the chance finds protocol, Heritage NSW has identified areas where revisions are required to ensure that the plan meets the requirements of the project approval, as outlined below:

1. The chance finds protocol is unclear on the involvement of Registered Aboriginal Parties (RAPs) in the process. The procedure should be updated to clarify that all RAPs are to be notified where an unexpected find is made and consulted to determine the significance and management of the find.
2. The chance finds protocol should be updated to require that Heritage NSW is notified and consulted regarding the management of any unexpected finds. Heritage NSW should also be consulted regarding any significant variations to the excavation methodology proposed in Appendix D.
3. Update Section 4.3 to include a requirement for any unexpected finds to be registered on the Aboriginal Heritage Information Management System (AHIMS) register.

4. Please provide evidence of consultation undertaken with RAPs in Appendix A.2 of the ACHMP. Following revision of the chance finds protocol to address the above comments, please resubmit to Heritage NSW for comment.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact James Cole, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Alison Lamond

Alison Lamond
A/Strategic Manager – Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
8 January 2024

Appendix B

Legislation and obligations

B.1 Obligation to protect Aboriginal cultural heritage

B.1.1 National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NPW Act) provides protection for Aboriginal objects and places across NSW:

- An Aboriginal object is defined as: *Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction and includes Aboriginal remains.*
- An Aboriginal place is: *any place declared to be an Aboriginal place under section 84.* This is a very specific piece of legislation that provides process and management of Aboriginal sites of cultural, but not necessarily scientific, values. They are commonly, but not always associated with intangible values.
- Any place declared to be an Aboriginal place by the Minister for the Environment, under Section 84 of the Act.

B.1.2 Obligation to avoid harm

All employees, contractors, sub-contractors and visitors to the project have an obligation to avoid harming Aboriginal heritage unless engaged in an Aboriginal heritage management activity described in this plan.

The NPW Act defines “harm” to an object or place as any act or omission that:

- a) destroys, defaces or damages the object or place; or
- b) in relation to an object-moves the object from the land on which it had been situated; or
- c) is specified by the regulations; or
- d) causes or permits the object or place to be harmed in a manner referred to in paragraph (a), (b) or (c), but does not include any act or omission that:
- e) desecrates the object or place; or
- f) is trivial or negligible; or
- g) is excluded from this definition by the regulations.

B.1.3 Obligation to protect and implement management measures

Site personnel, contractors and subcontractors responsible for land management or construction have an obligation to protect Aboriginal heritage within their area or work responsibility. This extends to both cultural materials identified as part of earlier phases of the project, and any additional cultural materials identified during the construction. Protection means active recognition of known Aboriginal heritage and active measure to avoid and/or suitably mitigate Aboriginal heritage.

This may include fencing, erosion control and modification of work plans to avoid impacts to Aboriginal heritage, as well as facilitating a process where work personnel are aware of the nearby heritage.

Site personnel, contractors and subcontractors also have the responsibility to ensure that appropriate management measures have been employed prior to, or in association with, their activities which impact Aboriginal sites.

B.1.4 Statutory reporting requirements

Notifications to Heritage NSW are required in relation to discovery, impact and care of Aboriginal objects under the NPW Act. This will be the responsibility of the VEA Manager (NSW) Development and Stakeholders (Section 1.2).

B.1.5 Discovery of Aboriginal objects

Under section 89A of the NPW Act, it is a requirement that Heritage NSW is notified of the existence of Aboriginal objects as soon as practicable after they are first identified. This is done through the completion of the Heritage NSW Aboriginal Site Card which is submitted to the Registrar of AHIMS for inclusion on the Aboriginal site database. Information regarding AHIMS and site recording forms can be downloaded from Heritage NSW's website:

<http://www.environment.nsw.gov.au/licences/DECCAHIMSSiteRecordingForm.htm>.

B.1.6 Care agreements

Under section 85A of the NPW Act, Aboriginal objects remain the property, and under the protection of, the Crown until formal transfer to a person or persons of a class prescribed by the regulations occurs. A Care Agreement is not currently proposed under this plan; however, may be pursued in the future if Aboriginal objects are identified to a level of significance that the RAPs wish to retain such objects.

Care Agreement application forms can be downloaded at:

<https://www.environment.nsw.gov.au/topics/aboriginal-cultural-heritage/protect-and-manage/care-agreements>.

B.1.7 Reporting impact to Aboriginal sites

An Aboriginal Site Impact Recording Form must be completed following impacts to AHIMS sites that are:

- as a result of any activities carried out under the ACHMP in which cultural materials are encountered and/or mitigated
- completed forms must be submitted to the AHIMS Registrar at ahims@environment.nsw.gov.au.

Aboriginal Site Impact Recording Forms can be downloaded at:

<https://www.environment.nsw.gov.au/resources/cultureheritage/aboriginal-site-impact-recording-form-120558.pdf>

Appendix C

Aboriginal site definitions

C.1 Site definitions

A description of terms used to describe different site features known to occur in the vicinity of the study area is provided in Table C.1 and use definitions provided by Heritage NSW.

Table C.1 Site definitions and recording

Site feature	Definition and recording methods
Aboriginal ceremony and Dreaming	Previously referred to as mythological sites these are spiritual/story places where no physical evidence of previous use of the place may occur, e.g. natural unmodified landscape features, ceremonial or spiritual areas, men's/women's sites, dreaming (creation) tracks, marriage places, etc.
Artefact site (open stone artefact site)	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people.
Burials	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be marked, e.g. in caves, marked by stone cairns, in sand areas, along creek banks, etc.
Fish trap	A modified area on watercourses where fish were trapped for short-term storage and gathering.
Grinding grooves	Grinding grooves are defined as an area of outcropping bedrock containing evidence of one or more grinding grooves where ground-stone hatchets or other grinding practices (i.e. seed grinding) were implemented.
Habitation structure	Structures constructed by Aboriginal people for short- or long-term shelter. More temporary structures are commonly preserved away from the NSW coastline, may include historic camps of contemporary significance. Smaller structures may make use of natural materials such as branches, logs and bark sheets or manufactured materials such as corrugated iron to form shelters. Archaeological remains of a former structure such as chimney/fireplace, raised earth building platform, excavated pits, rubble mounds, etc.
Modified tree (carved or scarred)	Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc., or alternately intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers.
Potential archaeological deposit (PAD)	An area where Aboriginal objects may occur below the ground surface. The term 'potential archaeological deposit' was first applied in Sydney regional archaeology in the 1980s and referred to rockshelters that were large enough and contained enough accumulated deposit to allow archaeologists to predict that subsurface cultural material was likely to be present. Since then, the term has come to include open sites where the same prediction can be made. Unless previously identified, it is considered unlikely that a PAD would be classified through an unexpected finds process.
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering or consumption. Usually found in deposits previously referred to as shell middens. Must be found in association with other objects like stone tools, fish bones, charcoal, fireplaces/hearths, and burials. Will vary greatly in size and composition.
Stone quarry	Usually, a source of good quality stone which is quarried and used for the production of stone tools. Stone quarries represent where Aboriginal people gathered raw stone materials for stone tools and/or manufactured stone tools from the adjacent source material. Quarry sites are found at rock outcrops where the material was of suitable quality to have been used to manufacture stone tools. Stone quarries were defined by the presence of outcropping stone material with nearby evidence of the same material type used in the stone tool manufacture process. This was most commonly indicated by large stone cores or stone flakes distributed amongst the same naturally outcropping material.

Appendix D

Archaeological excavation methods

D.1 Excavation methods

The following section outlines an excavation methodology to be implemented for archaeological excavations of unexpected finds procedures where needed (Section 4.3; Table 4.1 and Table 4.2). In the case of unexpected/chance finds that are considered significant (Table 4.2), this approach will be used a default, with alternate methods considered by the project heritage consultant in consultation with VEA, the locally based RAPs on a case-by-case basis.

The specific methods below propose a two-stage approach, reflecting initially an investigative phase followed by subsequent conservation ex situ or archaeological salvage where certain thresholds are met.

D.1.1 Research aims and objectives

Overall, the aims of the salvage excavation are to consider the following:

- To answer and/or resolve the research questions outlined in Section D.1.2 in relation to the formative and stratigraphic nature of the deposits, and what they can tell us about Aboriginal populations in the past.
- To use fine resolution excavation and environmental analyses to further characterise the archaeological deposits relating to the past Aboriginal occupation. This includes a greater understanding of resource exploitation; technological attributes; identification of any change through time in spatial and chronological phases of activity; and site formation processes.
- To obtain an appropriate assemblage of Aboriginal objects, for detailed documentation and long-term curation, within the spatial limits of the project (i.e. preservation in record).
- To allow greater cultural association between the site and the registered Aboriginal parties (i.e. 'cultural salvage') through involvement in the excavation, and options for the interpretation of the results as part of the overall project.
- To ensure that the project can proceed with minimised risk of unknown or unexpected significant Aboriginal objects/features being harmed during activities.
- To integrate with the recommendations of the ACHA to provide a holistic and comprehensive understanding of the archaeological landscape and cultural materials within it.
- To inform any future interpretation for the project.

D.1.2 Research questions

The following provide a series of research questions that should be further considered and/or answered as part of any archaeological investigative and salvage excavation program.

i General research questions for any unexpected finds

- What is the spatial and stratigraphic patterns of cultural materials within the investigation area? Can inter and/or intra-site past Aboriginal activities be determined through excavation in these areas?
- What is the age, composition, technological attributes, and significance of cultural materials within the areas of the proposed activity?

- What are the environmental characteristics associated with the distribution of Aboriginal cultural heritage within the area? Can the formative processes of the stratigraphic profile provide information on the nature and/or survivability of the archaeological resources? Are there other key factors in the distribution and extent of the material culture within the area?
- What are the cultural, social and public values associated with the cultural materials in the area? Does the excavations support or require modification of the significance and values previously assigned to Aboriginal sites, places and/or locales within the study area?
- How should the cultural materials be conserved and managed in future?

D.1.3 Investigative phase

The following methods will be adopted to investigate the cultural materials.

- Excavation
 - A grid of 1 m² test pits would be established at 5 to 10 m spacing (to be determined by the project heritage consultant in discussion with Aboriginal participants) across the identified sites curtilage + 20 m buffer using a hand-held Leica RTK CS10/GS08 survey grade Differential GPS device (or equivalent).
 - All test pits would be dug manually using shovels, mattocks, trowels and other hand tools as required. Excavation would be undertaken as 1 m² units. Each square would be given an alpha-numeric label for identification purposes.
 - All excavation would be undertaken in 10 cm spits to culturally sterile depths or 1.5 m below current surface (the deepest depth that can be reached without shoring systems and/or benching).
 - All sediment would be placed in buckets, labelled according to its assigned test pit number and spit, and recorded and documented. All sediment would then be wet-sieved through a 5 mm wire aperture mesh, and any historic and/or Aboriginal cultural material recovered, labelled and bagged for subsequent analysis and curation.
- Field documentation
 - All test pits would be documented using photographic records, written descriptions and scaled drawings.
 - Soil profiles would be recorded in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010), including scaled drawings, photographs, and written descriptions.
 - Soil samples may be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information. Optically Stimulated Luminescence (OSL) samples would be taken in areas where Aboriginal objects are found, and generally try to bracket the deposit (to provide a maximum and minimum age). Material for radiocarbon analysis may also be undertaken opportunistically if archaeological features containing charcoal or other dateable material are evident.
 - Reduced levels of the top and bottom of the test pit would be documented using a dumpy level against a known elevation. Other levels may be taken as required.

- Excavation procedures and protocols may be modified at the discretion of the project heritage consultant, in consultation with the locally based RAPs and VEA as the conditions in the field and nature of the excavations develop. This includes the movement/discontinuance of test pits to avoid existing obstacles, buried services and disturbances.

At the completion of the Phase 1 test pits, consideration of the Phase 2 thresholds (Section D.1.4) will be considered as to whether further excavations are required.

D.1.4 Thresholds for further excavation

The initiation of Phase 2 – salvage excavation – would *only* be undertaken in areas where the thresholds outlined below are met. The location of salvage excavations would be determined at the completion of the Phase 1 and at those locations where the greatest potential for answering the research questions (Section D1.1) is identified.

The thresholds for expansion would include:

- Stone artefact densities greater than 20/m² and therefore indicative of past occupation based on our broader understanding of the study area (EMM 2023). Values of several hundreds and even thousands are known regionally, and as such higher values would be considered more favourable for expansion where encountered.
- Where evidence of multiple phases of past activity is identified through changing raw material types and/or distinct technological attributes at different depths within the soil profile.
- Where dense concentrations of cultural materials are discovered that may be considered of Pleistocene age based on their context and/or typological composition.
- Where rare or unique stone artefacts and/or other archaeological material is recovered.
- Where unique and/or rare stratified archaeological features (e.g. hearths, cooking pits, etc.) are identified.
- Where identified cultural deposits have the ability to inform the research questions in Section D1.2.
- Other conditions that are considered by the project heritage consultant to inform the research questions.

D.1.5 Salvage excavations

Where thresholds are met (Section D1.4), additional archaeological excavations would be undertaken in these identified locations. These works are proposed to consist of contiguous open area salvage excavation using higher resolution recovery techniques. It is considered that each open area salvage excavation would be a maximum of 25 m² (5 m x 5 m). Whether salvage excavations exceed a single location centred on the unexpected find would be determined based on the findings of the investigative program and to answer the research questions and/or recover significant cultural materials. The number, size, extent and location of open area excavations, and whether they continue beyond the 25 m² provided here would be developed based on thresholds, significance of the findings, and in discussion with the project heritage consultant, VEA and locally based Aboriginal participants.

The following methods would be adopted for all salvage excavations:

- Excavation:
 - Establishment of open area excavation area/s using a using a hand-held Leica RTK CS10/GS08 survey grade Differential GPS device (or equivalent).

- All test pits would be dug manually using shovels, mattocks, trowels and other hand tools as required. Excavation would be undertaken as 1 m². Each square would be given an alpha-numeric label for identification purposes.
 - All excavation would be undertaken in 5 cm spits to the depth of culturally sterile deposits as identified by previous phases of excavation. Depths of excavation would be adjusted as necessary based on the findings of the investigative phase.
 - All sediment would be placed in buckets, labelled according to its assigned test pit number and spit, and recorded and documented. All sediment would then be wet-sieved through a 5 mm wire aperture mesh, and any historic and/or Aboriginal cultural material recovered, labelled and bagged for subsequent analysis and curation.
- Field documentation:
 - All excavations would be documented using photographic records, written descriptions and scaled drawings.
 - Soil profiles would be recorded in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010), including scaled drawings, photographs, and written descriptions.
 - Soil samples would be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information. Optically Stimulated Luminescence (OSL) samples would be taken in areas where Aboriginal objects are found, and generally try to bracket the deposit (to provide a maximum and minimum age). Material for radiocarbon analysis may also be undertaken opportunistically if archaeological features containing charcoal or other dateable material are evident.
 - Reduced levels of the top and bottom of the test pit, and at the top of each fourth spit would be documented using a dumpy level against a known elevation. Other levels may be taken as required.
 - Excavation procedures and protocols may be modified at the discretion of the Excavation Director, in consultation with the locally based RAPs and VEA as the conditions in the field and nature of the excavations develop. This includes the movement/discontinuance of test pits to avoid existing obstacles, buried services and disturbances.

D.1.6 Post excavation analysis and reporting

The post-excavation analysis (incorporating data from the excavations) would be designed to address the research objectives and aims, along with other relevant questions that may arise based on the results of the excavation. These would include, but not be necessarily limited to:

- Stone artefact analysis, including descriptive and functional recording of the assemblage, as well as interpretation of past activities, post-depositional change and comparison with other nearby data. Conjoining may also be attempted where sufficient cultural materials have been recovered. Geochemical analysis of stone artefacts for provenance and other material source research questions using X-Ray Fluorescence, Inductively Coupled Plasma Mass Spectrometry and/or Thermal Ionisation Mass Spectrometry may also be undertaken. These samples would be processed either at Australia's Nuclear Science and Technology Organisation (ANSTO), University of Wollongong and/or University of New South Wales.

- Other human indicators, including the consideration of sediment DNA and/or faecal biomarkers. While of limited commercially available, Consiglio Nazionale delle Ricerche (National Research Council of Italy) Institute of Polar Sciences (CNR-ISP), Venice, Italy and the Australian Centre for Ancient DNA, University of Adelaide would be contacted to explore the interest and feasibility to undertake these types of analyses. These are both cutting edge techniques that can further inform the presence of past human activity, but their application in cultural heritage management has not been explored to date in Australia.
- Geochronology, including the processing and analysis of samples to inform the absolute age of the soil profile and/or cultural assemblage recovered. This would include Optically Stimulated Luminescence ages, as well as radiocarbon samples were recovered. While large number of these samples are likely to be collected, given the prohibitive cost of processing, it is probable that a small number of ages would be obtained in a small number of master-sequences to inform the broader archaeological program. The samples would be processed by either University of Gloucestershire and/or University of Wollongong.
- Geochemistry and soil analysis that would be used to further inform and interpret the formation history of the soil profile from which cultural materials are recovered. This would include the use of Itrax X-ray Fluorescence (XRF) core scanning methods at Australia's Nuclear Science and Technology Organisation (ANTSO), as well as particle size analysis to explore changes in the alluvial and colluvial history of the river corridor.
- Palaeo-environmental analysis, including palynology, phytolith analysis and/or charcoal analysis to explore the past vegetation and fire regimes that may have influenced and/or modified by past human activity. These would utilise the same samples collected for geochemistry and/or sampling and sent to a range of university specialists in these fields to process and interpret the results.
- Reporting that would provide information on the field investigations, compilation and synthesis of the post-excavation analyses, and interpretation of the results to inform the past activity and use of the region.

Appendix E

Complaints register

Appendix F

Document control

Australia

SYDNEY

Level 10 201 Pacific Highway
St Leonards NSW 2065
T 02 9493 9500

NEWCASTLE

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