

EIS Volume 1 Chapter 12

Cultural Heritage



Contents

12. Cultural Heritage	12-1
12.1. Key Findings	12-1
12.2. Setting the Context	12-1
12.2.1. EIS Guidelines.....	12-2
12.2.2. Requirements in legislation, guidelines and other standards	12-3
12.2.3. Views of stakeholders	12-3
12.2.4. Assessment method.....	12-4
12.3. Description of Existing Environment	12-7
12.3.1. Aboriginal cultural heritage	12-7
12.3.2. Non-Aboriginal cultural heritage	12-8
12.4. Impact Assessment	12-12
12.4.1. Project design.....	12-12
12.4.2. Land disturbance during construction	12-15
12.4.3. Operations	12-15
12.4.4. Summary of key mitigation measures	12-15
12.5. Conclusion.....	12-16

List of Tables

Table 12-1: EIS Guidelines addressed in Cultural Heritage chapter	12-2
Table 12-2: Aspects of assessment requirements addressed in other chapters	12-2
Table 12-3: State Heritage Place in the HSA	12-10
Table 12-4: Key mitigation measures – cultural heritage	12-15

List of Figures

Figure 12-1: State Heritage Places in the area of the Project	12-11
Figure 12-2: Cultural heritage avoidance alignment – Hawks Nest Station	12-14

List of Plates

Plate 12-1: ‘Suicide Bridge’, Old Coach Road	12-10
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12. Cultural Heritage

This chapter describes how the construction and operation of the Project may affect Aboriginal and non-Aboriginal cultural heritage values within the transmission line corridor.

Native title in the area of the Project is discussed in Chapter 9 Land Use and Tenure.

12.1. Key Findings

Aboriginal cultural heritage

- Cultural heritage surveys along the entire route have identified sites of Aboriginal cultural heritage significance and the alignment has consequently been altered to avoid and limit potential impact.
- Towers will be micro-sited following detailed design and survey to further avoid and protect sites.
- Cultural Heritage Management Plan(s) will be developed and implemented to address protection for identified Aboriginal sites of significance and procedures for discovery and reporting. A draft framework for the Cultural Heritage Management Plan is included as Appendix R.
- Aboriginal Heritage Agreements between ElectraNet and the Traditional Owner groups will be entered into to ensure cultural heritage values are protected and their views are taken into consideration.

Non-Aboriginal cultural heritage

- Impacts to non-Aboriginal cultural heritage sites due to Project construction and operation are not expected.
- There are no Commonwealth Heritage, National Heritage or Local Heritage places in the transmission line corridor.
- There is only one State Heritage listed place near the transmission line corridor which will be avoided by the alignment and construction activities.
- A Project Construction Environmental Management Plan (CEMP) will detail requirements, procedures and responsibilities for all staff and contractors around known and discovered non-Aboriginal heritage sites.

12.2. Setting the Context

This section provides information needed to explain the context within which impact and risk assessment occurs. It describes:

- the relevant EIS Guidelines
- relevant requirements in legislation and other standards
- views of stakeholders and the environmental and social outcomes they would like the Project to meet
- the assessment methodology used to identify baseline environmental values and to undertake the impact and risk assessment.

12.2.1. EIS Guidelines

The EIS Guidelines require the assessment of the potential impacts of Project construction on Aboriginal or non-Aboriginal cultural heritage as set out in Table 12-1.

Table 12-1: EIS Guidelines addressed in Cultural Heritage chapter

EIS Guidelines and Assessment Requirements	Assessment level
Effect on Conservation Values <i>Assessment Requirement 3:</i> The proposed development traverses a corridor which contains significant and extensive tracts of remnant habitat (including one of the largest stands of old-growth Mallee vegetation in Australia) and has high conservation values. It is also within close proximity of the floodplain habitat of the River Murray.	
<ul style="list-style-type: none"> 3.2: Identify the potential effects and measures to avoid and or mitigate the proposal on the local, regional, state or national conservation status of sites, objects and areas of significance to Aboriginal people during both construction and maintenance. 	Critical
Effect on Cultural Heritage Values <i>Assessment Requirement 6:</i> The proposed development has the potential to impact on sites / locations of Indigenous or Non-indigenous heritage through disturbance during construction.	
<ul style="list-style-type: none"> 6.1: Identify any effects on Aboriginal sites of archaeological or anthropological significance (including but not limited to those listed in the Register of the National Estate and the SA Register of Aboriginal Sites and Objects). Indicate any consultation with local Aboriginal organisations that have an in interest in the area. 	Critical
<ul style="list-style-type: none"> 6.2: Identify any effects on post European settlement sites of archaeological or anthropological significance (especially but not limited to those listed in the Register of the National Estate, State Heritage Register or Interim List for the State Register and lists of places of local heritage value). 	Critical
<ul style="list-style-type: none"> 6.3: Outline measures adopted to avoid or minimise impacts on Aboriginal and European sites of archaeological or anthropological significance. 	Critical
Effect on Communities <i>Assessment Requirement 9:</i> The proposed development has the potential to affect the local community during construction and through the establishment of a large linear structure.	
<ul style="list-style-type: none"> 9.2: With reference to assessment requirement 6 above, outline potential impacts on any other use of the land by Aboriginal people, or on cultural values held by Aboriginal people that relate to the areas affected by the project. 	Medium
Specialist reports and details A Cultural Heritage Management Plan prepared by an appropriately qualified heritage expert that includes an assessment of the potential impact of the proposal on Aboriginal cultural heritage. The CHMP must outline measures to be taken before during and after the proposed development in order to manage and protect Aboriginal cultural heritage. The CHMP should include a cultural heritage survey identifying areas of Aboriginal significance. This survey should identify any archaeological, anthropological or historical sites, or sites of significance according to Aboriginal tradition.	

Aspects of assessment requirements identified in Table 12-1 which are not addressed in this chapter are listed in Table 12-2 together with the applicable chapter.

Table 12-2: Aspects of assessment requirements addressed in other chapters

Assessment requirement	Chapter
6.3 Consideration of cultural heritage when selecting temporary facilities including construction camps	Chapter 9 Land Use and Tenure

12.2.2. Requirements in legislation, guidelines and other standards

State legislation

The *Aboriginal Heritage Act 1988* provides for the protection and preservation of Aboriginal sites, objects and remains of significance and outlines the obligations of parties to disclose newly discovered sites, object and remains. No Aboriginal site, object or remains may be damaged, disturbed or interfered with unless prior approval has been obtained from the Minister for Aboriginal Affairs and Reconciliation.

The *Heritage Places Act 1993* provides for the identification, recording and conservation of places and objects of non-Aboriginal heritage significance through listing in the South Australian Heritage Register. Records of State and local heritage places that were previously maintained by local councils and noted in the relevant Development Plans are now mapped in the State-wide Planning and design Code and State Atlas. They continue to be listed in the South Australian Heritage Register.

Guidelines

The *Discovery of Aboriginal Sites and Objects* fact sheet provides guidance on what to do should an Aboriginal site, object or remain be found. Information on potential Aboriginal sites (e.g. areas within close proximity to creeks, rivers, watercourses etc) and reporting guidelines are provided (e.g. stop work procedures), together with managing any areas of discovery (DPC-AAR 2021).

The *Project Planning and Aboriginal Heritage* guide assists proponents with identifying and protecting Aboriginal heritage. It provides information on how to find recorded information, who to liaise with and what actions can be taken to ensure Aboriginal heritage sites, objects or remains are not damaged, disturbed or interfered with (DPC-AAR 2021).

12.2.3. Views of stakeholders

Aboriginal cultural heritage

ElectraNet has extensively liaised with the Traditional Owners of land in the region of the Project, which comprise the First Peoples of the River Murray and Mallee (First Peoples), First Peoples of the River Murray and Mallee native title claim #2 and Ngadjuri Nation #2 (Ngadjuri), together with their respective legal representatives from SA Native Title Services (SANTS).

Liaison has occurred via meetings with each of the Traditional Owner groups, presenting an overview of the Project, route selection process and providing an opportunity to ask questions and obtain feedback, together with on-site cultural heritage surveys.

The First Peoples advised early on in the process that the eastern most section of the alignment within South Australia is particularly sensitive from a heritage perspective, with many areas of known sites recorded and a high likelihood of other significant, but as yet undiscovered, areas.

In addition to the protection of Aboriginal sites and objects of significance, the Traditional Owners have raised the following matters when meeting with ElectraNet representatives:

- compensation for impacts or potential impacts to native title land
- employment opportunities for Indigenous people
- the importance of not crossing the River Murray.

These matters have been addressed in Aboriginal Heritage Agreements negotiated between ElectraNet and each of the registered body corporates for the First Peoples, the River Murray and Mallee Aboriginal Corporation (RMMAC) and Ngadjuri Nation Aboriginal Corporation (NNAC) respectively.

The proposed alignment will not traverse the River Murray.

Further information on engagement is provided in Chapter 6 Stakeholder Engagement.

Non-Aboriginal heritage

Community and stakeholder consultation undertaken for the Project provided an opportunity for people to raise issues related to non-Aboriginal heritage and sites of local significance to the community.

A consistent view expressed by stakeholders was that the proposed alignment should not traverse south of the River Murray for a variety of reasons, including the potential for impacts to cultural heritage sites. The proposed alignment will generally be more than 5 km north of the main channel of the River Murray.

12.2.4. Assessment method

The route selection methodology used by ElectraNet to identify constraints and opportunities based on environment, social (including cultural heritage), land use and engineering aspects is discussed in Chapter 4 Route Selection.

The desktop Aboriginal heritage study area (AHSa) comprises a 10 km corridor (i.e. 5 km buffer either side of the proposed alignment).

The non-Aboriginal cultural heritage study area (HSA) for the purposes of this assessment is the transmission line corridor (i.e. 500 m buffer either side of the proposed alignment).

Information on recorded sites of Aboriginal cultural heritage significance was identified during a desktop assessment of AHSa. Sites identified by Traditional Owners during on-site cultural heritage surveys are also noted, although locations are confidential at the request of the Traditional Owners and are not provided in this EIS.

Aboriginal cultural heritage – desktop review

To identify relevant Traditional Owners and any Aboriginal heritage sites, objects or remains which may be located in the AHSa, a desktop review of various available sources was undertaken and took into account the EIS Guidelines, legislative requirements and stakeholder views, and included an assessment of publicly available information from the following sources:

- the Central Archive, including the Register of Aboriginal Sites and Objects, maintained by DPC-AAR. This search covered the initial 10 km Project investigation corridor which was identified in the early stages of the route selection process (refer Chapter 4 Route Selection).
- Aboriginal History, Volume 40, 2016 covering the Overland Stock Route (Burke et al. 2016)
- review of the extensive works undertaken as part of the SNI project by Sinclair Knight Merz (SKM) in 2002.

Results of the search of the Central Archive

The Central Archive incorporates the Register of Aboriginal Sites and Objects maintained by Department of the Premier and Cabinet-Aboriginal Affairs and Reconciliation (DPC-AAR). A search of the archive provided numerous recorded and registered sites located within 20 km of the proposed alignment. The search results were fed into the route selection process and enabled the initial 10 km Project investigation area to be narrowed down to a 1 km transmission line corridor which avoided each of those registered and recorded sites (refer Chapter 4 Route Selection).

On-site cultural heritage surveys with the relevant Traditional Owners were then organised to ensure the construction and operation of the Project within the 1 km corridor would not impact on any previously undiscovered sites, objects or remains along the proposed alignment. The results of the on-site heritage surveys are discussed in Section 12.3.1.

Existing Cultural Heritage information – First Peoples

The First Peoples' preferred archaeologist / anthropologists, Dr Vivienne Wood and Craig Westell of Vivienne Wood Heritage Consultant Pty Ltd, have a long and respectful relationship with the First Peoples and were contracted by the First Peoples to undertake an on-site survey in respect of the land within with their native title consent determination area.

In preparation for the survey, Dr Wood and Mr Westell undertook a comprehensive desktop review of all available archival and documentary materials and, together with the results of previous heritage surveys, provided ElectraNet with a confidential risk assessment of the native title consent determination area. The assessment related to four distinct zones which were ranked from High to Low. Both the River Murray Valley and the River Murray Valley Margin Zones were ranked as High, the Murray High Plain Zone ranked as Low, and the Alluvial fans Zone were ranked Low to Moderate.

Existing Cultural Heritage information – First Peoples #2

Dr Wood and Mr Westell were also contracted by the First Peoples claim #2 to undertake an on-site survey in respect of the land within with their native title claim area.

In preparation for the survey, Dr Wood and Mr Westell undertook a comprehensive desktop review of all available archival and documentary materials and, together with the results of previous heritage surveys, provided ElectraNet with a confidential risk assessment of the native title claim area.

Existing Cultural Heritage information – Ngadjuri Nation #2

Ngadjuri Nation has its own website with a wealth of information about Ngadjuri country, culture and heritage. Ngadjuri country extends from Angaston and Gawler in the south to Panaramittee and Yunta in the north, and includes the Mid North, Clare Valley, Barossa Valley, Burra, Peterborough, Orroroo, Jamestown and parts of the Southern Flinders Ranges (Ngadjuri 2016). Many of the towns within the Ngadjuri area of interest have Ngadjuri names which hint at their Ngadjuri heritage. These include Kapunda, Eudunda, Booleroo and Yarcowie (Ngadjuri 2016).

Ngadjuri Dreaming and Creation stories have been passed down from generation to generation for thousands of years, connecting Ngadjuri people to their ancestors. These stories teach the Ngadjuri about history, lore and traditions, and teach and maintain culture and enrich Ngadjuri understanding of history (Ngadjuri 2016).

Aboriginal cultural heritage – on-site surveys***First Peoples – Native Title Consent Determination Area***

Land use and tenure within the area of the native title consent determination area comprises:

- pastoral lease for conservation (e.g. remnant native vegetation) or primary production purposes (e.g. sheep grazing)
- Crown Record held by the Minister for Environment and Water for the Chowilla Regional Reserve in respect of tourism and conservation
- freehold land held by various parties for grazing and cropping purposes.

In preparation for on-site surveys, Dr Wood / Mr Westell reviewed information relating to previous recorded sites within 200 m of the proposed alignment which was sourced from DPC-AAR, historic and archival resources and previous heritage surveys they had undertaken in the region. During this process it was noted that the first 40 km, commencing from the eastern-most part of the consent determination area and heading west, is particularly sensitive in terms of Aboriginal heritage. This is due to the proximity of the northern margin of the River Murray floodplain in the areas of Chowilla Game Reserve and Calperum Station.

Two surveys were undertaken in October 2019 and November 2020 with the intent of traversing the proposed alignment within a 100 m wide 'preferred corridor' over the entire stretch of country within

the First Peoples native title consent determination area (refer Figure 9-5 in Chapter 9 Land Use and Tenure).

October 2019 survey

The survey team comprised Dr Wood / Mr Westell, six First Peoples' members and two representatives from ElectraNet.

The survey included the entire first 40 km of the consent determination area and was undertaken over the course of five days. Systematic pedestrian survey was able to be conducted throughout due to the easily accessible and relatively flat terrain.

Several areas of interest to the First Peoples were identified during the survey. These areas have been recorded for the purpose of route design and to ensure avoidance by ElectraNet and its contractors during construction and maintenance. To ensure protection of these areas, a slight change was made to shift the alignment north within the Chowilla Game Reserve which was also agreed to by representatives of the Department for Environment and Water (DEW), on behalf of the Environment Minister.

A survey report has been completed by Dr Wood / Mr Westell and provided to the First Peoples and ElectraNet. Survey results are summarised in Section 12.3.1, noting that the formal survey report is confidential at the request of the First Peoples.

November 2020 survey

This survey commenced on 11 November 2020 and started from the point where the October 2019 survey ended. Completion was scheduled for two weeks after commencement, with the entire stretch of the consent determination area to have been covered by that time.

Good progress was made during this pedestrian survey, with approximately 50 km traversed within the first five days. Unfortunately, the survey was halted on Wednesday, 18 November 2020 due to the COVID-19 lockdown announced by the SA government. The parties were able to re-start the survey on 30 November 2020 and completed the entire stretch of land within the native title consent determination area by 6 December 2020.

A survey report has been completed with the outcomes of the November 2020 survey and provided to the First Peoples and ElectraNet. Survey results are summarised in Section 12.3.1, noting that the formal survey report is confidential at the request of the First Peoples.

February 2021 consultation

On 2 and 3 February 2021, ElectraNet joined RMMAC representatives and heritage advisers in a follow-up field visit to consult further on the heritage values of the transmission line corridor and arrangements to avoid impact to sites of significance. These discussions further inform the Cultural Heritage Survey Report, which is under development, pending further consultation between ElectraNet and RMMAC representatives.

First Peoples – Native Title Claim #2

An Aboriginal Heritage Survey was completed with First Peoples #2 representatives between 27 January 2021 and 4 February 2021 over the area within the First Peoples #2 claim (as shown in Figure 9-5 Chapter 9 Land Use and Tenure). Several areas of interest to the First Peoples were identified during the survey. These areas have been recorded for the purpose of route design and to ensure avoidance by ElectraNet and its contractors during construction and maintenance.

A Cultural Heritage Survey Report is under development, pending further consultation between ElectraNet and First Peoples #2 representatives.

The land use and tenure within this claim area is freehold land held by various parties for grazing and cropping purposes. An existing ElectraNet 132 kV transmission line traverses the area and the proposed alignment runs parallel to Powerline Road.

Ngadjuri Nation #2

ElectraNet have met with members of Ngadjuri Nation #2 and their legal representatives from SANTS to discuss the proposed Project. A cultural heritage survey in respect of the 7 km stretch of native title claim within the area of the Project was undertaken on 16 December 2020 and the results are discussed further in Section 12.3.1. A report detailing outcomes is being prepared for Ngadjuri Nation and ElectraNet but remains confidential at the request of the Ngadjuri.

As with the First Peoples, an Aboriginal Heritage Agreement has been entered into to ensure heritage values are protected and the views of Ngadjuri Nation are taken into consideration.

All land within the 7 km stretch is held under freehold title and utilised for grazing and cropping purposes, with the exception of the land comprising the existing Robertstown substation which is the commencement point of the proposed alignment.

Non-Aboriginal cultural heritage

A desktop assessment of non-Aboriginal cultural heritage was conducted, utilising a 1 km wide corridor based on the proposed alignment of the Project (the HSA).

The following steps were taken to conduct the assessment of non-Aboriginal heritage:

- a search of the following South Australian databases:
 - South Australian Heritage Places Database
<http://maps.sa.gov.au/heritagesearch/HeritageSearchLocation.aspx>
 - Local Heritage Places as listed in a Schedule of Local Heritage Places within local Council Development Plans and the Planning and Design Code
- a search of the following national databases:
 - Commonwealth Heritage Places – searched via the Australian Heritage Database
<https://www.environment.gov.au/heritage/places/commonwealth-heritage-list>
 - National Heritage Places –searched via the EPBC Act Protected Matters Search Tool
<https://www.environment.gov.au/heritage/places/national-heritage-list>
- a review of heritage surveys conducted in areas overlapping or adjacent to the HSA, including the River Murray and Lower North (Department for Environment, Heritage and Aboriginal Affairs (DEHAA) 1998)
- a review of the extensive works undertaken as part of the SNI project by Sinclair Knight Merz (SKM) in 2002. Information obtained and summarised by SKM has been used during development of this chapter.

12.3. Description of Existing Environment

This section examines the existing environment and the cultural heritage values, both Aboriginal and non-Aboriginal, that require protection.

12.3.1. Aboriginal cultural heritage

As noted in Section 12.2.4, a desktop review and on-ground Aboriginal cultural heritage surveys have been conducted to determine the Aboriginal cultural heritage values across the AHSA. The results of the reviews and surveys have informed appropriate mitigation measures to ensure those values are protected during construction and maintenance activities.

The search of the Central Archive, which includes the Register of Aboriginal Sites and Objects administered by the DPC-AAR, revealed that there are both registered and recorded Aboriginal heritage sites within 20 km of the area of the Project, together with restricted areas in the general vicinity. The majority of the sites are located along the River Murray and reflect the ties to the land and water by the First Peoples over many thousands of years (together with Ngarrindjeri Nation with ties to the River Murray from the Murray Mouth and Coorong, as far north as Mannum) (DEW 2020).

Outcomes of on-site cultural heritage surveys

During the various surveys undertaken by Traditional Owner groups for the Project, sites of significance were located along the original proposed alignment. ElectraNet has agreed in some cases to move the alignment in order to avoid those sites and otherwise to implement a buffer to protect sites. An additional level of protection has also been agreed and is documented in the Aboriginal Heritage Agreement between the various parties.

The Aboriginal Heritage Agreements detail all requirements and obligations of both Traditional Owners and ElectraNet during the construction and maintenance phases of the Project. ElectraNet has also committed to including a cultural heritage component into its standard inductions to ensure personnel and contractors undertaking field work during the design and early works are aware of the region's heritage values and the importance of following mitigation measures including:

- all vehicles must stay on existing vehicle tracks
- there must be no interference with any cultural heritage sites, objects or remains
- any discoveries must immediately be reported to ElectraNet and the First Peoples, with appropriate lines of communication to be identified.

Additional mitigation measures are proposed to ensure that no sites, objects or remains of significance that are not currently recorded, registered or discovered, will be impacted by the Project (refer Section 12.4).

12.3.2. Non-Aboriginal cultural heritage

Non-Aboriginal cultural heritage consists of places or objects with special cultural value inherited from the past, which are intended for conservation and passing on to future generations.

The area of the Project has a long history of non-Aboriginal cultural heritage. In the western region of the HSA, recorded heritage places reflect the long history of copper mining which contributed to South Australia's early prosperity. In the eastern region, identified heritage places are largely centred around early European use of the River Murray as a medium for trade, agriculture and commerce, with the majority of heritage sites located within the boundaries of townships.

Regional historical overview

Western region of the HSA

The Mid North region was one of the first areas in South Australia settled by Europeans after colonisation, due to its suitability for farming. However, the character of the area changed with the discovery of copper near Burra Creek in 1845. By 1848 the Burra Mine was established. Burra began as a single company mining township that over time, was a set of townships owned privately, by government and by the mining company (Auhl 1986).

As the area become increasingly populated by mine workers and adjacent supporting industries, John Roberts, a Koorunga storekeeper, carted supplies to the nearby Emu Downs district. Roberts eventually established a store and house in the area from which to operate. When postal services started there, the town was gazetted as Roberts Town (DEP 1983).

After the closure of the mine, the population of the area gradually decreased, and horticulture and agriculture became more established. While these industries continue to support the region in modern times, there has also been a recent shift toward renewable energy infrastructure.

The township of Burra is recognised as a State Heritage Area because of the town's significant links with mining in the history and development of South Australia and the area is of economic and cultural heritage significance to Australian mining history (Heritage SA 2018).

Eastern region of the HSA

The first European settlement on the River Murray in South Australia was established in 1841 and by 1853 the era of steam navigation of the River Murray had begun. The river ports grew and the first irrigation settlement in Australia was established at Renmark by the Chaffey brothers. Once the possibility of creating fertile land alongside the river through irrigation was realised, more European settlers began to take up land. A network of towns soon arose throughout the region to supply the support services required by farmers (State Library SA 2010a and 2010b).

After the First and Second World Wars, the South Australian government settled returned soldiers and their families in irrigation colonies along the River Murray which resulted in the expansion of the existing areas Cobdogla, Waikerie, Renmark and Berri, as well as new settlements in Cadell and Chaffey among others. The strong community bonds of soldiers resulted in large-scale collaborative irrigation works, which eventually formed the basis of the highly productive orchard and vineyard businesses that support the region today (State Library SA 2010a and 2010b).

Listed heritage places

Commonwealth Heritage Places

Commonwealth Heritage Places are heritage places on Commonwealth lands or waters, or under Australian Government control. A review of the Commonwealth Heritage List identified 'Murray Mallee-Calperum Station and Taylorville Station' as a Commonwealth Heritage Place within the HSA. The leases for these properties were previously held by the Commonwealth (Director National Parks (DNP)) and were transferred in perpetuity to Australian Landscape Trust (ALT) in 2013–14.

As part of Department of Agriculture Water and Environment's (DAWE) consideration of the EPBC referral prepared for the Project, the status of Calperum and Taylorville Stations as Commonwealth land was addressed. The Heritage Branch and General Counsel Branch of DAWE confirmed that, as the stations are no longer owned or leased by the DNP they are no longer Commonwealth Heritage Places despite not having been removed from the Commonwealth Heritage List. The properties were therefore not further considered by DAWE under the Commonwealth Heritage Matters of National Environmental Significance for a controlled action. Accordingly, Calperum and Taylorville Stations have not been included in this heritage assessment as Commonwealth Heritage Places.

National Heritage Places

National Heritage Places are natural, historic or Indigenous places with outstanding national heritage value to the Australian nation, outside of Commonwealth land. No National Heritage Places have been identified in the HSA. The closest identified site is the Australian Cornish Mining Site in Burra, located approximately 33 km north-west from the HSA.

State Heritage Places

State Heritage Places are places that embody important aspects of the State's history and / or are of significant cultural value. A review of the State Heritage Register identified 'Suicide Bridge' as a State Heritage Place in the HSA (refer Plate 12-1). The site is located 1.5 km south of the proposed alignment in the Chowilla Game Reserve approximately 35 km north-east of Renmark. The location of Suicide Bridge is shown in Figure 12-1 and a summary of the statement of significance is provided in Table 12-3 (Dallwitz and Marsden 1984).

A number of other State Heritage Places associated with historical pastoral, irrigation and river-based commerce activities along the River Murray were identified around Waikerie, Cadell and Morgan but are not considered further in this assessment as they are located more than 5 km outside the HAS. At the western end of the alignment, State Heritage Places such as the Lime Kiln Ruins at Bower and the Princess Royal Homestead and Station near Burra were identified but are also not considered further in this assessment due to their distance from the HSA (more than 20 km).

Table 12-3: State Heritage Place in the HSA

Listed Address	LGA	Listed Name	Statement of significance
Old Coach Road to Wentworth near Border Cliffs via Renmark	Unincorporated SA	Suicide Bridge (previously Lunatic Bridge) Timber Trestle and former NSW-SA Telegraph Line Posts, Chowilla Game Reserve Part of Bookmark Biosphere Reserve Buffer Zone.	The old coach route to Wentworth in NSW cut through the isolated country to the north of the Murray Valley and was in use until the early twentieth century. 'Suicide Bridge' is one of the few surviving structures associated with that coaching era. Its curious names probably relate to the terrifying night-time coach crossings during storms or floods. This item is a highly significant vernacular structure. It is made of native pine with split eucalyptus decking. Nearby, to the east, are the remains of old telegraph posts which were once part of the overland telegraph between South Australia and New South Wales. To the west is an example of early timber roadside fencing.

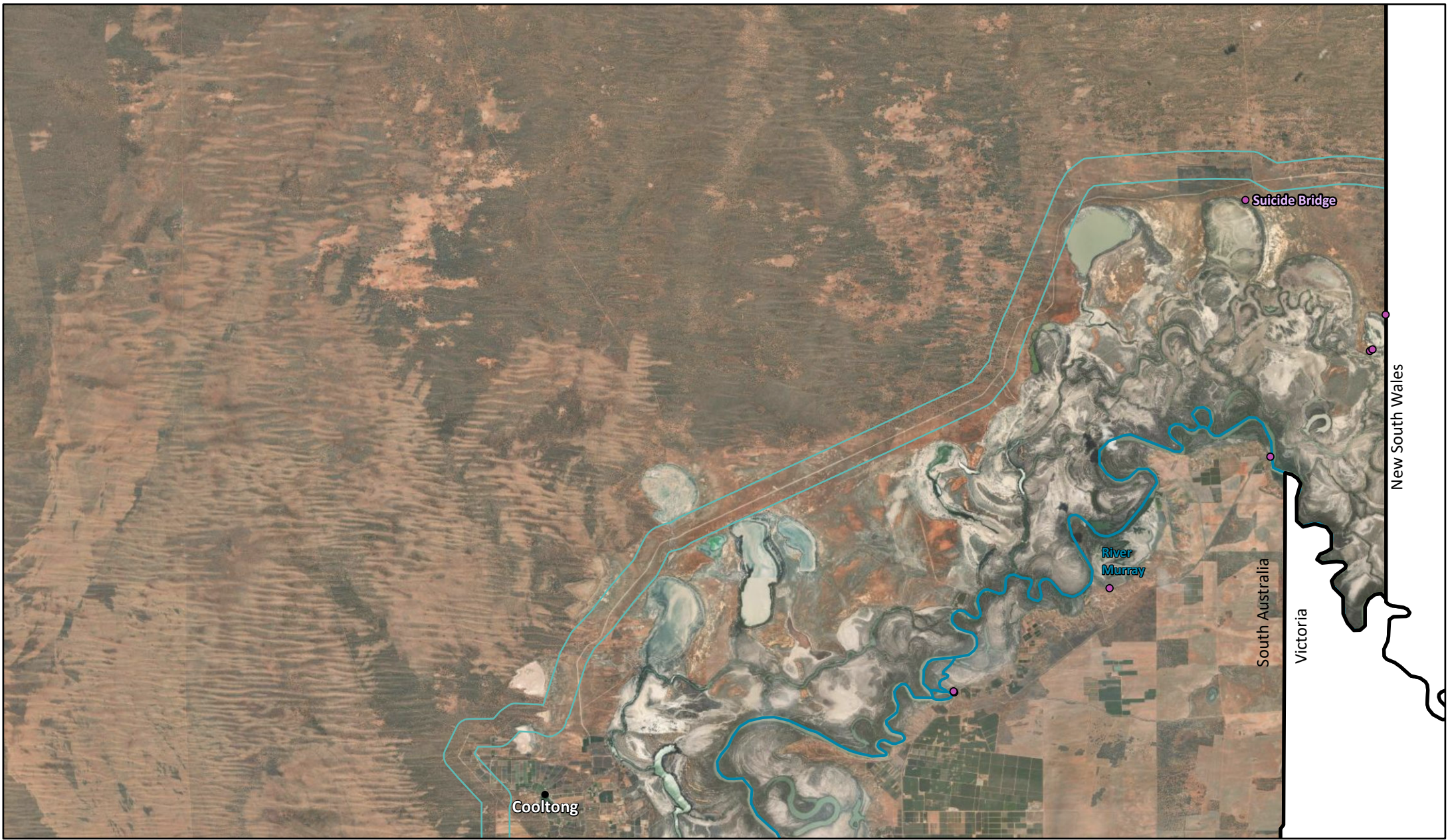
Local Heritage Places

Local Heritage Places are structures or buildings that demonstrate important local historical attributes or contribute to the historical themes of a local area. No Local Heritage Places have been identified in the HSA.



Plate 12-1: 'Suicide Bridge', Old Coach Road

(Source: Exploroz www.exploroz.com)









	Transmission line corridor
	River Murray
	State heritage places

Figure 12-1
State Heritage Places in the
area of the Project

 0 5 Kilometres	 N	
		

12.4. Impact Assessment

The following aspects of the Project have been identified as sources of impacts to cultural heritage:

- location of Project infrastructure
- land disturbance from Project activities during construction, including excavations for structure foundations and erection of towers and conductors.

The potential impact events resulting from these aspects of the Project are discussed below.

12.4.1. Project design

Placing of towers and other easement infrastructure

Cultural heritage desktop assessment and field surveys have identified sites of significance and the alignment has been moved accordingly. Towers will be micro-sited and access designed to protect those sites.

Aboriginal cultural heritage

Inappropriate location of towers, staging and laydown areas, stringing corridors and access tracks has the potential to damage, disturb or interfere with sites, objects or remains of Aboriginal heritage significance.

Placement of infrastructure, location of activities and careful planning provides the greatest opportunity to reduce impacts to Aboriginal cultural heritage. ElectraNet engaged early with the relevant Traditional Owners of land within the AHSA and cultural heritage surveys were undertaken with the First Peoples in October 2019 and November 2020. These surveys covered all land along the proposed alignment from the SA / NSW border in the east, to the border with the First Peoples #2 native title claim and the Ngadjuri Nation #2 native title claim approximately 7 km from Robertstown.

The eastern end of the alignment is of particular importance to the First Peoples and the October 2019, November 2020 and February 2021 surveys identified several locations of cultural significance. This has resulted in changes to the proposed alignment traversing Hawks Nest Station in order to completely avoid sites of significance. The cultural heritage avoidance alignment on Hawks Nest Station now traverses the previously disturbed western and southern property boundaries and utilises existing access tracks and the existing ElectraNet 132 kV transmission line (refer Figure 12-2). This alignment has been fully surveyed and agreed to by the Traditional Owners and the pastoral lessee.

No additional sites were identified along the proposed alignment by either the First Peoples or Ngadjuri Nation #2 during these surveys.

In addition to avoidance by the alignment, a Cultural Heritage Management Plan (CHMP) will be prepared to ensure protection of identified sites. A draft framework for the CHMP is provided at Appendix R. The CHMP will be finalised following detailed design, micro siting surveys and further engagement with the respective Traditional Owners. An appropriate buffer sufficient to protect each site of significance will be implemented. Physical barriers may be erected around each identified site during construction activities (in consultation with the Traditional Owners). No encroachment within the buffer will be authorised without further consultation with the relevant Traditional Owners.

The Cultural Heritage Management Plan Framework (Appendix R) provides information on ElectraNet's commitment to working with Traditional Owners to protect cultural heritage values during all phases of the Project, including strategies that will be utilised to avoid sites and manage heritage generally.

A Project CEMP will detail requirements and responsibilities for all staff and contractors, including site inductions and training, prior to the commencement of construction work including protocols for site

discovery and reporting. Cultural heritage awareness will be included in standard inductions to ensure personnel and contractors undertaking field work during the design and early works are aware of the region's heritage values and the importance of following management measures set out in the CHMP including remaining on existing tracks.

Non-Aboriginal cultural heritage

The Project is situated at sufficient distance from the closest State Heritage Place for any impacts for Project construction or operation extremely unlikely.

There is only one State Heritage Place identified in the vicinity of the transmission line corridor which will be avoided by construction activities. Suicide Bridge and the accompanying infrastructure lies 1.5 km south of the proposed alignment and on the southern side of the Wentworth-Renmark Road. There are no construction activities proposed in the vicinity of the heritage site.

All employees, contractors and sub-contractors will be made aware of the location of the State Heritage Place, and training and induction will be undertaken for all personnel to educate them on the importance of remaining within designated / approved areas. The requirements to avoid the site will be set out in the Project CEMP.

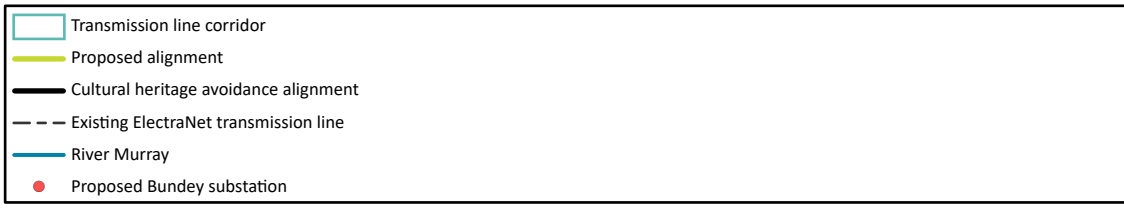
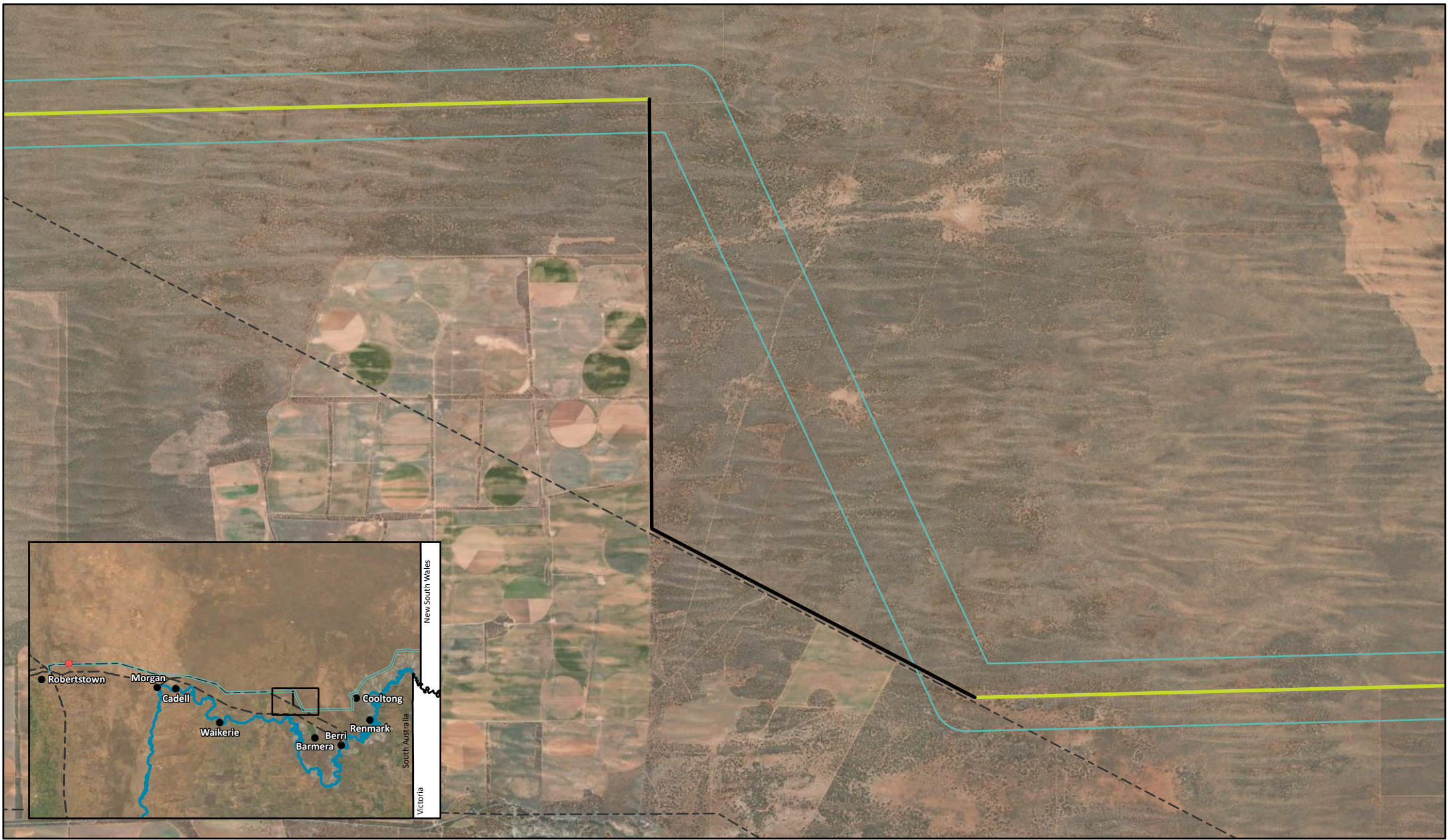







Figure 12-2
Cultural heritage avoidance alignment

 <p>0 2 Kilometres</p>	 <p>N</p>	
		

12.4.2. Land disturbance during construction

Discovery of potential Aboriginal cultural heritage sites, objects or remains

Discovery of Aboriginal sites, objects or remains will be managed in accordance with the *Aboriginal Heritage Act 1988* and in consultation with the relevant Traditional Owners.

Aboriginal cultural heritage

Although the alignment has been surveyed with Traditional Owners, there is potential for previously unknown sites, objects or remains to be uncovered during construction ground disturbance and excavations.

This potential will be mitigated to some extent by utilising previously disturbed areas for tower placement, access tracks and other infrastructure wherever practicable. If any sites, objects or remains are discovered during construction activities, work will cease immediately in the vicinity and care taken not to cause further disturbance. The CHMP for the Project will set out procedures for discovery and reporting and will include a requirement that any discoveries must immediately be reported to ElectraNet and the relevant Traditional Owners. Notification of any discovery will also be made in accordance with the *Aboriginal Heritage Act 1988*.

If the alignment cannot be moved to avoid those sites, objects or remains, ElectraNet will discuss all options with the relevant Traditional Owners. ElectraNet's first and preferred option is to relocate Project infrastructure to avoid impact to heritage sites. Only after extensive consultation with the relevant Traditional Owner groups, and only where infrastructure relocation remains unfeasible, will ElectraNet consider making an application to the Minister for Aboriginal Affairs pursuant to Section 23 of the *Aboriginal Heritage Act* to seeking approval to damage, disturb and interfere with those sites, objects or remains.

Compliance with the *Aboriginal Heritage Act* and the CHMP will ensure impacts to Aboriginal sites, objects or remains discovered during constructed are minimised.

Non-Aboriginal cultural heritage

If potential sites or objects are discovered, procedures in the CEMP for the identification, management and protection of heritage sites will be implemented. If sites or objects cannot be avoided, the requirements of the *Heritage Places Act 1993* provide safeguards to protect heritage values. This would include obtaining a permit from the Heritage Council prior to any excavation, disturbance or removal of a potential place / object of archaeological significance.

The Project CEMP will detail requirements for all staff and contractors of their responsibilities and procedures around known and discovered non-Aboriginal heritage sites.

12.4.3. Operations

Once constructed, impacts to Aboriginal cultural heritage are considered to be extremely unlikely if operation of the transmission line is in accordance with Aboriginal Heritage Agreements reached with the Traditional Owners.

Impacts to non-Aboriginal cultural heritage from operation of the Project are not expected.

12.4.4. Summary of key mitigation measures

Table 12-4: Key mitigation measures – cultural heritage

Mitigation measure	Construction	Operation
Cultural Heritage Management Plans which may include no-go zones, conditional access areas ground disturbance monitoring	✓	✓
Cultural Heritage site inductions	✓	

Mitigation measure	Construction	Operation
Site Discovery Procedure	✓	✓
Property Access requirements and GIS mapping	✓	✓

12.5. Conclusion

ElectraNet have placed a high priority on the protection of cultural heritage and particularly Aboriginal cultural heritage. Early and ongoing engagement has been undertaken with the relevant Traditional Owners of land traversed by the Project and the alignment has been modified to avoid sites of significance in response to survey results.

Aboriginal Heritage Agreements between ElectraNet and the First Peoples River Murray and Mallee and Ngadjuri Nation #2 will be entered into to ensure cultural heritage values are protected and the views of the Traditional Owners are taken into consideration.

A project CHMP and CEMP will be implemented prior to the commencement of any work and detail requirements and responsibilities for all staff and contractors, including site inductions and the importance of remaining within designated and approved areas, training and protocols for site discovery and reporting.

Due to the consultation undertaken, adjustments to the Project alignment and the management measures which will be implemented, impacts to Aboriginal and Non-Aboriginal cultural heritage from Project construction or operation are not expected.