

Richard Barker
Senior Development Manager
Wind Prospect Pty Ltd
Suite 10, 9-35 Gertrude Street
Fitzroy
Victoria 3065

03 August 2018

Our reference: 9276

Dear Richard

Re: Summary of Cultural Heritage Matters at the proposed Willatook Windfarm, Victoria

Ecology and Heritage partners were engaged to carry out a series of cultural heritage investigations for the proposed Willatook Windfarm. The activity area is located west of Willatook, southwest of Hawkesdale, east of Orford and Broadwater and east and south of Dunmore in southwest Victoria (Moyne Shire Council). The activity area is approximately 6750 hectares in size, including the new additional areas, which are approximately 418 hectares. The activity area is roughly bounded by Kangertong Road to the north, Tarrone Lane to the south, Muddy Dam Road to the west and the Moyne River to the east.

The Willatook Wind Farm will contain up to 83 wind turbines together with ancillary infrastructure including hardstand areas at each turbine location, access tracks, underground cabling, overhead powerlines, facilities building, an electrical substation and wind monitoring masts.

The investigations have taken place from 2009 through to 2018 at different periods. Historical heritage and Aboriginal heritage were investigated.

Historical Heritage

The background research indicated that there have been no historical sites previously recorded that are within the activity area.

The initial field survey was undertaken in 2009 and 2010 by Archaeologists/Cultural Heritage Advisors Oona Nicolson and Jen Burch.

No historical places suitable for listing on the Victorian Heritage Inventory or other lists (e.g. Heritage Overlay, Heritage Register or any National Lists) or areas of historical archaeological sensitivity were identified during the survey. Some sections of dry stone wall were noted in places; however they are in such poor condition that they would not meet the significance criteria to be listed on the Victorian Heritage Inventory.

In regard to historical heritage, there are no historical places that warrant listing on the Victorian Heritage Inventory or other lists (e.g. Heritage Overlay, Heritage Register or any National Lists). There are no areas of

historical archaeological sensitivity. Therefore no further investigations in relation to historical heritage are required.

Aboriginal Heritage

An Aboriginal Cultural Heritage Management Plan (CHMP) commenced preparation in 2009 under the *Aboriginal Heritage Act 2006*. The CHMP will be evaluated by Aboriginal Victoria (AV) as there was no Registered Aboriginal Party (RAP) for the activity area at the time the CHMP commenced. There are currently no Native Title claims extending over the activity area. Parts of the activity area are designated as Crown Land, therefore Native Title has not been extinguished.

Investigations commenced in 2009 and a field survey, followed by targeted archaeological testing of areas considered to have archaeological potential for Aboriginal heritage places was undertaken in consultation with the relevant Traditional Owner groups. The key Traditional Owner groups consulted with are as follows:

- Framlingham Aboriginal Trust
- Gunditj Mirring Traditional Owners Aboriginal Corporation

The site prediction model developed for the area identified that mound sites were the most likely site type to occur within the activity area. These were likely to be found in the stony rise areas. Mound sites were however not located within the activity area at all. Mound sites can take some time to accrue as they represent consistent use of an area over time. Climatic conditions present in the area during the complex assessment program were far from hospitable. The landscape is deceptively rugged and harsh, it is highly exposed to the elements as it is relatively treeless, and was consistently wind blasted each afternoon. Presuming that climatic conditions in the region have not changed a great deal, this area did not appear to represent an environment that a group of people would choose to linger in for any length of time. Field representatives from the Framlingham Aboriginal Trust and the Gunditj Mirring Traditional Owners Aboriginal Corporation agreed with this assessment.

Stone artefact scatters and isolated artefacts were considered a very likely site type to be found within the activity area, these were expected on high ground close to watercourses. The standard assessment further reiterated the finding that the rocky rises close to swamps, creeks and rivers was sensitive for artefact scatters. This prediction was found to be correct, as all the sites located within the activity area were either isolated artefacts or artefact scatters, all of which were located in proximity to watercourses. This prediction however can now be further clarified, but drawing attention to mid-level shelves on rocky rises as being particularly sensitive in this area. Mid-level shelves provided some protection from the harsh winds, but still offered high flat ground to comfortably view the landscape, and allowed easy access to water.

Aboriginal burials and scarred trees were also considered a possible site type that may have been found in the area. None of these site types were located within the activity area. Very little remnant vegetation remains in the activity area; all native trees of appropriate age were inspected but none had cultural scarring. No Aboriginal burials were identified in the areas, both Framlingham Aboriginal Trust and the Gunditj Mirring Traditional Owners representatives said the activity area did not represent the 'right ground' for burials.

The program was both thorough and comprehensive, it systematically inspected or tested the entire area identified as having potential during the standard assessment.

In total, seven Aboriginal heritage places were identified within the activity area. They are:

- Glen Stirling (7321-0031 [VAHR])
- Willatook AS 1 (7321-0473 [VAHR]);
- Willatook AS 2 (7321-0474 [VAHR]);
- Willatook IA 1 (7321-0475 [VAHR]);
- Willatook IA 2 (7321-0476 [VAHR]);
- Willatook IA 3 (7321-0477 [VAHR]); and
- Willatook LDAD (7321-#### [VAHR]).

Of the seven Aboriginal heritage places, Glen Stirling (7321-0031 [VAHR]), a mound site that was recorded decades previously was unable to be relocated despite extensive efforts. Despite this, the location of the original site is still being treated as an Aboriginal heritage place. It was recommended to avoid the location in any case, which Wind Prospect agreed to do.

The other six site types listed above consist of three sub surface Isolated Artefacts (IA), a Low Density Artefact Distribution (LDAD) and two low density sub surface Artefact Scatters (AS). Each of the sites identified in the area was located on elevated ground in proximity to waterways. Most sites were located on relatively horizontal extended mid level shelves on the rocky rises, rather than at the top of the rocky rise. These mid level shelves allowed for excellent views of the surrounding countryside, were protected from the afternoon winds, and allowed ready access to nearby sources of water by being located close to creeks or rivers in the area. Locating these five sites supports the prediction model, and allowed for a further refinement of the model by identifying the mid level shelves on the rises as having potential for Aboriginal heritage. It was these areas that were the main focus of the complex investigation.

The assessment undertaken as part of this CHMP determined that the proposed activity would have caused harm to the six new sites and one previously recorded site located within the activity area. Wind Prospect have environmental policies aimed at the preservation of sites and have actively sought opportunities to avoid harm to the cultural heritage identified within the activity area. As a result, Wind Prospect has endorsed management recommendations that have engendered the philosophy for the protection of cultural heritage within the area and will completely avoid harm to all of the Aboriginal sites located within the activity area.

Wind Prospect has altered the design layout, adjusting the location of turbines, tracks, cabling and associated infrastructure in order to avoid all of the Aboriginal places identified within the activity area.

In addition to this, protective measures including the erection of temporary fencing/flagging tape will be used around each of the sites prior to, and throughout the construction process. To further reinforce the protection

of sites within the area, all construction crews will undergo a cultural heritage induction to ensure they are aware of the boundaries of each site so that they can be correctly avoided as required.

In conclusion, there are no historical heritage issues and the Aboriginal heritage assessment has been comprehensive and all identified Aboriginal heritage places can be avoided by redesign of the layout.

If you have any questions please do not hesitate to contact me on 0428 725 089 via email at onicolson@ehpartners.com.au or call 03 9377 0100.

Yours sincerely,



Oona Nicolson
Director / Principal Heritage Advisor
Ecology and Heritage Partners Pty Ltd