



Goulburn River Solar Farm – Heritage Management Plan

FINAL

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Prepared by Ozark Environment and Heritage for Umwelt (Australia) Pty Limited on behalf of Lightsource bp Renewable Energy Investments Limited

Acknowledgement

Lightsource Development Services Australia Pty Ltd acknowledge the Wonnarua people of the area in which this plan applies and pay respect to their beliefs, cultural heritage, and continuing connection with the land. We also acknowledge and pay respect to the post-contact experiences of Aboriginal people with attachment to the area and to the Elders, past and present, as the next generation of role models and vessels for memories, traditions, culture and hopes of local Aboriginal people.

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GLOSSARY AND ABBREVIATIONS

Aboriginal heritage	Those aspects of Aboriginal culture that are inherited from the past and continue into the present may be referred to as Aboriginal heritage. For the purpose of this HMP the term is used to collectively refer to Aboriginal sites and archaeologically sensitive areas.
Aboriginal object	A physical manifestation of past Aboriginal activity. The legal term is defined in the NPW Act Section 5 as: <i>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</i> . Typical examples include stone artefacts, grinding grooves, Aboriginal rock shelters which by definition include physical evidence of occupation, midden shell, hearths, stone arrangements and other landscape features which derive from past Aboriginal activity.
Aboriginal site	The location where a person in the present day can observe one or more Aboriginal objects. The boundaries of a site are limited to the extent of the observed evidence. A 'site' does not include the inferred extent of unobserved Aboriginal objects (such as archaeological deposit). Different archaeologists can have varying definitions of a 'site' and may use the term to reflect the assumed extent of past Aboriginal activity beyond visible Aboriginal objects. Such use of the term risks defining all of Australia as a single 'site'.
Aboriginal Stone Artefact	A stone object with morphological features derived from past Aboriginal activity such as intentional fracture, abrasion or impact. Artefacts are distinguished by morphology and context. Typically, flaked stone artefacts are distinguished from naturally broken stone by recognition of clear marginal fracture initiation (typically hertzian/conchoidal or wedging initiation) on highly siliceous stone types which can often be exotic to the area. Care must be taken to distinguish modern broken stone in machine impacted contexts and therefore context must be carefully considered as well as morphology.
ACHAR	Aboriginal Cultural Heritage Assessment Report.
HMP	Incorporates the Aboriginal Cultural Heritage Management Plan. Describes this document which is a requirement of State Significant Developments (SSDs). A HMP both manages impacts to Aboriginal cultural heritage within approved disturbance areas (AHIPs are not required), as well as management of Aboriginal cultural heritage sites and values outside of approved impact areas but within land able to be managed by Lightsource bp (AHIPs required).
AHIMS	Aboriginal Heritage Information Management System. A computer software system employed by Heritage NSW to manage many aspects of Aboriginal site recording and permitting. AHIMS includes an Aboriginal sites database which can be accessed via an internet portal.
AHIP	Aboriginal Heritage Impact Permit. Issued to permit harm to Aboriginal objects under section 90 the NPW Act.

Archaeological Potential	The potential for a place to contain archaeological remains. This potential is assessed based on contextual information and can relate to Aboriginal and Historical archaeology.
ASIRF	Aboriginal Site Impact Recording Form. A standardised form for recording authorised impacts to Aboriginal sites. Only with a completed ASIRF can a site be listed as ‘destroyed’ on the AHIMS.
BESS	Battery Energy Storage System
Code of Practice	<i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW.</i>
Community interest tree	Trees referred to as ‘community interest trees’ are not consistent with Aboriginal scarring morphology but have been identified by Aboriginal community representatives as of cultural significance.
DPHI	Department of Planning, Housing and Infrastructure (formerly known as the Department of Planning and Environment (DPE)). DPHI is the NSW government department responsible for Project approval and the administration of this HMP.
EIS	Environmental Impact Statement. This is the document that includes all environmental factors, including heritage, which is used by the government to determine the merits of a particular Project.
EMS	Environmental Management System.
EPC	Engineering, Procurement & Construction.
Lightsource bp	Lightsource Development Services Australia Pty Ltd.
Heritage Act	<i>Heritage Act 1977.</i> Primary legislation providing protection for items or places of heritage significance. This includes protection for historical places, structures, relics, moveable heritage items and landscapes of significance. The Heritage Act also affords protection to Aboriginal places of State heritage significance included on the NSW State Heritage Register or subject to an interim Heritage Order.
Heritage Item	A place, building, work, relic, moveable object, precinct or landscape assessed as having heritage significance and listed on a statutory heritage register.
Heritage NSW	Government department tasked with managing regulation and compliance associated with the NPW Act and Heritage Act.
Historical Archaeology	Remains associated with the use or occupation of a site or place since the British arrival in Australia in 1788.
HSE	Health, Safety and Environment.
Isolated find	A single artefact not directly associated with any other artefacts. The origin of an isolated find may be the spot of the loss or the discard of an artefact, however, most commonly they are artefacts that have been dislodged from their original context by erosion or another impact and redeposited elsewhere. As such, isolated finds rarely have a high archaeological value.
kV	kilovolt

LALC	Local Aboriginal Land Council.
LGA	Local Government Area.
MWh	Megawatt hour.
MWp	Megawatt peak.
NPW Act	<i>National Parks and Wildlife Act 1974</i> . Primary piece of legislation protecting Aboriginal cultural heritage in NSW.
O&M	Operation and Maintenance.
PV	Photovoltaic.
RAPs	Registered Aboriginal Parties.
REZ	Renewable Energy Zone.
Salvage	In the case of harm to an archaeological site, an appropriate mitigation strategy is to salvage the site to protect individual artefacts from harm but, more importantly, to record as much information about the site before it is harmed, and the information lost.
SSD	State Significant Development.

1 INTRODUCTION

Lightsource Development Services Australia Pty Ltd, a wholly owned subsidiary of Lightsource bp Renewable Energy Investments Limited (Lightsource bp) received Development Consent for the Goulburn River Solar Farm (SSD 33964533) in August 2024. The Development Consent was granted by a delegate of the Minister for Planning and Public Spaces under section 4.38 of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act).

The Project is located approximately 28 kilometres (km) southwest of Merriwa in New South Wales (NSW). It is wholly within the Upper Hunter Local Government Area (LGA).

The Project Area comprises two freehold properties that span across multiple lots, covering an area of approximately 2,000 hectares (ha). The Development Footprint for the solar farm occupies 792.19 ha and road upgrades will cover approximately 8.1 km.

The Project involves the construction, operation and decommissioning of approximately 550-megawatt peak (MWp) of solar photovoltaic (PV) generation as well as a Battery Energy Storage System (BESS) with a maximum 1,030 MWp/2,060-megawatt hour (MWh) capacity.

The Project will include a substation and connection to an existing 500 kilovolt (kV) transmission line which passes through the Project Area. The Project will include road repairs and upgrades to Ringwood Road, Wollara Road, and the Golden Highway intersection. The Project also includes a temporary workforce accommodation camp, temporary construction facilities, operation and maintenance buildings, internal access roads, civil works, electrical infrastructure to connect the Project to the existing transmission line and a 30 metre (m) telecommunications tower.

Lightsource bp is a global leader in the development and management of solar energy projects. Its purpose is to deliver affordable and sustainable solar power for businesses and communities around the world. Lightsource bp is active in 19 countries, across six continents, however, are continuing to rapidly expand globally. Lightsource bp provides a full service to its customers, from initial site selection, financing and permitting through to construction, long-term operation, and decommissioning.

1.1 PURPOSE OF THIS HERITAGE MANAGEMENT PLAN

This Heritage Management Plan (HMP) addresses the requirements of the Development Consent with a focus on heritage values. The HMP has been informed by the following assessment reports:

- Goulburn River Solar Farm Aboriginal Cultural Heritage Assessment Report (ACHAR) (OzArk 2023).
- Environmental Impact Statement (EIS) for Goulburn River Solar Farm (Umwelt 2023a).

- Goulburn River Solar Farm Historical Heritage Impact Assessment (Umwelt 2023b).
- Goulburn River Solar Farm Amendment Report (Umwelt 2023c).
- Goulburn River Solar Farm Temporary Workers Accommodation Facility Amendment Report (Umwelt 2024).

This HMP has been prepared to comply with the relevant conditions within the Development Consent, as well as to meet other applicable statutory requirements and obligations during the construction, operation and decommissioning of the Project.

The Development Consent includes administrative and environmental conditions, as well as environmental management and reporting requirements, that necessitate the preparation of several post-approval management plans and strategies. This HMP has been prepared to meet the requirements of Condition B26 of the Development Consent.

Table 1.1 shows where the relevant conditions of consent have been addressed in this document.

Table 1.1: Relevant HMP Development Consent conditions.

Condition	Relevant Section
<p>Condition B24</p> <p>The Applicant must ensure the development does not cause any direct or indirect impacts on the heritage items located outside of the Development Footprint.</p>	<p>Section 6 and Section 6.4.5</p>
<p>Condition B25</p> <p>The Applicant must maintain a 20m exclusion zone around the area of 'high potential' for historical archaeological artefacts associated with the original slab hut as identified by the red shading on Figure 11 in Appendix 6.</p>	<p>Section 6.2.3.4</p>
<p>Condition B26</p> <p>Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must</p>	<p>-</p>
<p>a) be prepared in consultation with local Aboriginal stakeholders, and reviewed by Heritage NSW</p>	<p>Section 5</p>
<p>b) include a description of the measures that would be implemented for:</p> <p>i) protecting the heritage items identified in Table 1 of Appendix 6, and items located outside the approved development footprint;</p>	<p>Section 6.2.3.1, Section 6.2.3.10 and Section 6.4.5</p>
<p>ii) fencing / demarcation (as appropriate) of the identified heritage items prior to carrying out any development that could directly or indirectly impact the identified heritage items</p>	<p>Section 6.2.3 and Section 6.3</p>
<p>iii) establishing the exclusion zone around the original slab hut as required under condition B25</p>	<p>Section 6.2.3.3</p>

Condition	Relevant Section
iv) recording and salvage collection of the heritage items located within the approved development footprint, as identified in Table 2 of Appendix 6	Section 6.2.3.5 and Section 6.2.3.7
v) further recording and investigation of the grinding groove site 'Killoe Creek GG1' (AHIMS site #37-1-1033)	Section 6.2.3.2
vi) a contingency plan and reporting procedure if: <ul style="list-style-type: none"> • heritage items outside the approved development footprint are damaged; • previously unidentified heritage items are found; or • skeletal material is discovered 	Section 6.3.2, Section 6.4.1, Section 6.4.2 and Section 10
(vii) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions	Section 7.2
(viii) ongoing consultation with Aboriginal stakeholders during the implementation of the plan	Section 5 and Appendix 2
c) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.	Section 7

Preparation of this HMP has been undertaken in consultation with Heritage NSW and Aboriginal stakeholders. Stakeholder correspondence, and where this feedback has been addressed in this HMP, is documented in **Appendix 1** and **Appendix 2**.

Several commitments were made within the ACHAR (as amended) prepared by OzArk (2023) for the Project. These are summarised in **Table 1.2**.

Table 1.2: Statement of commitments.

Statement of Commitments	Section/s addressed
Following development consent of the Project, the proponent will develop an HMP which is to be agreed to by the Registered Aboriginal Parties (RAPs) and the Department of Planning, Housing and Infrastructure (with input from Heritage NSW). The HMP will include an unanticipated finds protocol, unanticipated skeletal remains protocol, protocols related to heritage inductions for work crews, and long-term management of any Aboriginal sites being impacted.	This HMP
37-1-1027 (Redlynch Creek IF1), 37-1-1032 (Ringwood Gully IF6), 37-1-1033 (Killoe Creek GG1), and 37-1-1037 (Rocky Creek Gully OS4) will not be harmed by the Project as they are not located within the Development Footprint.	Section 6.2.3.1

Statement of Commitments	Section/s addressed
Seven Aboriginal sites, 37-1-1028 (Rocky Creek Slope IF2), 37-1-1029 (Wollara Road IF3), 37-1-1030 (Monaghans Creek IF4), 37-1-1031 (Rocky Creek Gully IF5), 37-1-1034 (Redlynch Creek OS2), 37-1-1035 (Redlynch Creek OS1), and 37-1-1036 (Redlynch Creek OS3) will be salvaged by a surface collection of visible artefacts. The recommended methodology for the salvage will be set out in the HMP and will include the measures outlined in Section 9.2.1 of the ACHAR.	Section 6.2.3.5
The entire extent of 37-1-1035 (Redlynch Creek OS1) will be salvaged as the portion of the site outside the Development Footprint will continue to be harmed by ongoing erosion.	Section 6.2.3.5
The three trees of community interest (CST1, and CST4–CST5) that are liable to be impacted will be included in a site visit and photographic recording with RAPs at the time of the surface artefact collection set out in Section 9.2.1 of the ACHAR. The results of the photographic recording and any comments from the RAPs about the trees will be included in the salvage report that will be produced following all salvage activities.	Section 6.2.3.6
Further recording and investigation of the grinding groove site (Killoe Creek GG1) prior to construction activities will be conducted. The methodology of this investigation will be set out in the HMP and will include detailed mapping and photography of the site by a suitably qualified archaeologist.	Section 6.2.3.2
The location of HS01 will be included on all site construction plans and induction materials to ensure that the location is protected. The boundary of the Development Footprint around HS01 will be permanently flagged and signed to ensure that the place is not impacted.	Section 6.2.3.4
All land-disturbing activities must be confined to within the Development Footprint. Should the parameters of the proposed work extend beyond this, then further archaeological assessment will be required.	Section 2.3

1.2 APPLICATION OF THE HERITAGE MANAGEMENT PLAN

This HMP applies to all employees, contractors and visitors during the construction, operation and decommissioning of the Project, as described in the Development Consent. It will be used by all Project employees, contractors, sub-contractors, and visitors as the first point of reference for Aboriginal cultural heritage and historical heritage related issues.

The Environmental Management System (EMS) identifies key personnel and the environmental management responsibilities for the Project. Management measures developed for this HMP that will be implemented for construction and operation of the Project are listed below, each of which are discussed in detail in **Section 6** of this HMP.

1.3 AIMS AND OBJECTIVES OF THE HERITAGE MANAGEMENT PLAN

The HMP provides management measures for Aboriginal and historical heritage values that will be implemented to avoid, minimise, and mitigate impacts to heritage values associated with the Project during construction, operational and decommissioning phases.

The objectives of this HMP are to set out controls and protocols for the management of Aboriginal cultural heritage sites and historical heritage items and archaeology, and to prevent unapproved harm to any identified and/or unidentified Aboriginal cultural heritage sites, historical heritage items, historical archaeological remains and values.

This HMP has been prepared by Ben Churcher, OzArk Principal Archaeologist.

2 OVERVIEW OF THE PROJECT

2.1 PROJECT SETTING

The Project is comprised of predominantly managed agricultural land, approximately 28 km southwest of the township of Merriwa (**Figure 2-1**) and is surrounded by the Goulburn River National Park.

The Project Area is approximately 15 km from the Central West Orana Renewable Energy Zone (REZ) however it is not related to the REZ, nor is it dependent on the REZ. The REZ location was selected because of the benefits of relatively low transmission build costs due to its proximity to the existing transmission network structures. This development benefits from utilising the existing 500 kV transmission line crossing the south-east portion of the site, allowing connection to the national electricity grid and eliminating the need for the development to construct a transmission line to connect to the grid.

The Project Area is zoned RU1 Primary Production and is generally flat, with some minor undulation in the landscape which has been disturbed by historical agricultural activity.

2.2 DEVELOPMENT AREA

The Project Area is considered as the total area of the development, including the development boundary.

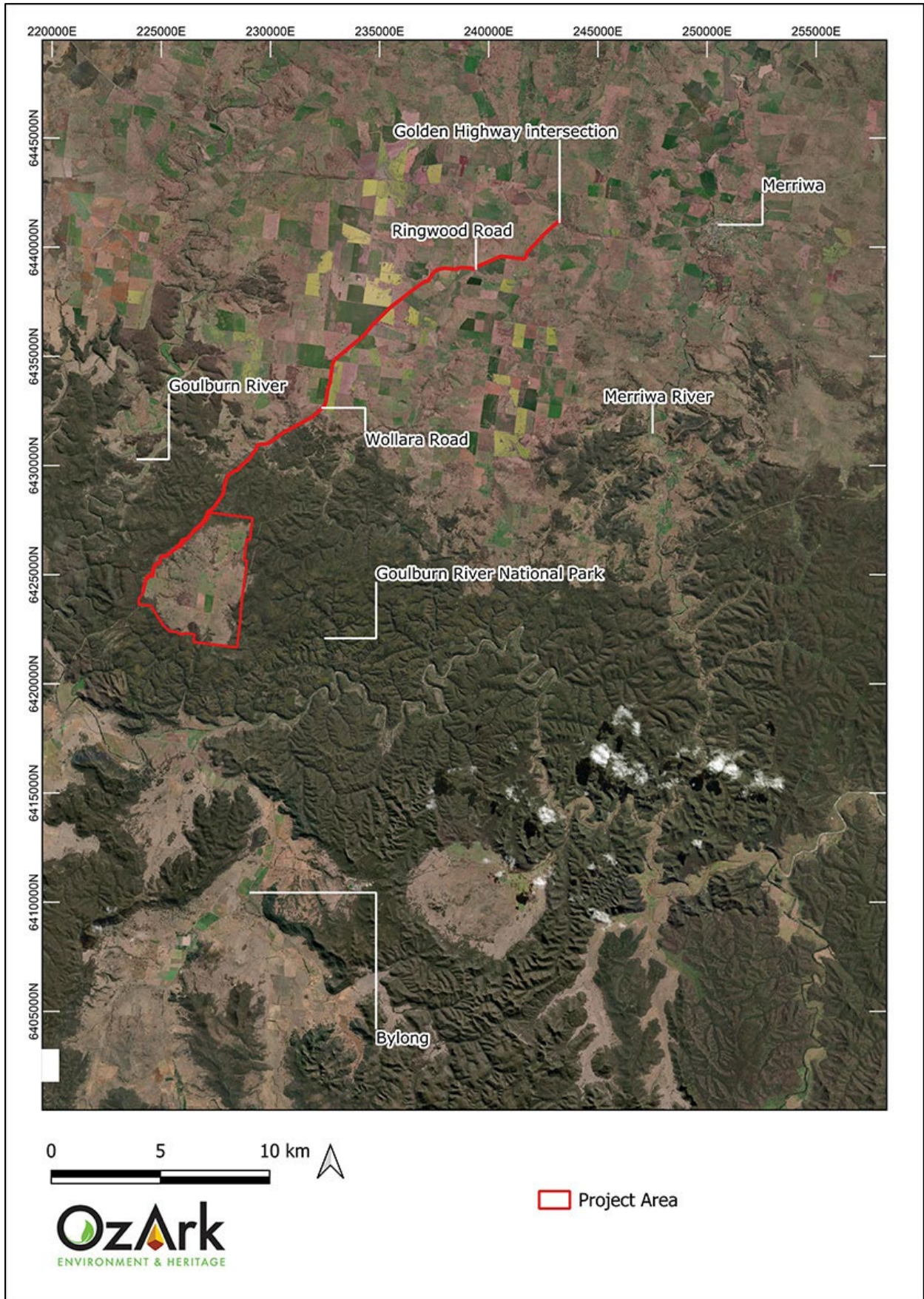
It comprises approximately 792.19 ha of freehold land and Crown land contained within the development boundary.

The Project Area is comprised of five key components, including:

- Solar farm footprint
- Public roads and culverts
- Substation
- BESS
- Temporary Workers Accommodation Facility.

The Project Area is shown on **Figure 2-2**.

Figure 2-1: Regional Locality.



2.3 PROJECT AREA AND DEVELOPMENT FOOTPRINT

The Project Area of the solar farm covers approximately 2,000 ha with a Development Footprint of approximately 792.19 ha, as shown on **Figure 2-2**.

The remainder of the Project Area will be protected and managed as a Biodiversity Stewardship Site (BSS). Access to the Development Footprint will be off Wollara Road via the existing driveway towards the southern end of the property's western boundary. Two secondary access points, also off Wollara Road, will be available towards the north of the property's western boundary for emergency use. Emergency services and National Parks and Wildlife Service (NPWS) access will be maintained through the Project Area, to be used for emergencies only or on request.

The layout of the solar arrays associated infrastructure and temporary workers accommodation facility would be entirely contained within the Development Footprint. The Project also includes road repairs which are located outside of the Project Area (across approximately 8.1 km of existing road). These encompass parts of Ringwood Road (including culverts at two waterway crossings), Wollara Road, the intersection of Barnett Street and Golden Highway, and the intersection of Golden Highway and Ringwood Road. Works on the two culverts and the intersection are required to support Project construction traffic, whilst other road improvements are in response to feedback and represent part of a community benefit offered by the Project. All road upgrades will improve safety outcomes for both the Project and the broader community.

The works on Wollara Road, Ringwood Road and Barnett Street are contained to the road reserve and landowner's consent from Upper Hunter Shire Council has been obtained. The upgrades to the intersection of the Golden Highway and Ringwood Road require works which will be largely contained within the road reserve but will encroach into the cadastral boundary of Lot 1 DP34496 (outside of the existing fence-line). The formalisation of the bus stop on Ringwood Road at the intersection with Golden Highway will be contained within Lot 7303 DP1146691.

The Project Area and Development Footprint is shown on **Figure 2-2**.

2.4 COMPONENTS AND FEATURES

The Project includes the construction, operation, maintenance, and decommissioning of a PV solar farm with a capacity of approximately 550 Megawatt peak MW_p, which will supply electricity to the national electricity grid.

The key components of the Project include:

- Approximately one million bifacial solar PV modules.
- A centralised BESS with an approximate 450 MW_p and 900 MWh capacity with the option of a decentralised BESS with an approximate 580 MW_p and 1,160 MWh capacity.
- On-site 500 kV switchyard and substation, with underground electrical conduits and cabling.
- On-site power line connection via underground electrical conduits and cabling.
- Telecommunication tower.
- An additional transmission tower within the existing easement of the 500 kV transmission line adjacent to the BESS/substation.
- Road upgrades required on Ringwood Road, Wollara Road and the intersection of Ringwood Road and the Golden Highway.
- Perimeter security fencing, CCTV and security lighting.
- Office amenities, parking and storage facilities.
- Laydown areas suitable for storing plant and equipment, solar panels, cable drums and areas to support waste management activities.
- A temporary helipad for emergency response purposes during construction.
- On-site Temporary Workers Accommodation Facility within the Development Footprint.

The Project is expected to operate for 40 years or more. After the initial 40-year operating period, the solar farm would either be decommissioned, removing all above ground infrastructure, and returning the site to its existing land capability, or repurposed with new PV equipment subject to technical feasibility and planning consents.

2.5 PROJECT PHASE ACTIVITIES

2.5.1 Early Works – Pre-construction

The early works phase of the Project includes preparatory works which must occur prior to the commencement of main construction activities.

To comply with the conditions of the Development Consent, these early works are limited to:

- Road upgrades required under Condition B7 of the Development Consent
- Building/road dilapidation surveys
- Installation of fencing
- Artefact survey and/or salvage
- Overhead line safety marking
- Geotechnical drilling
- Surveying.

Early works are currently scheduled to start in Q4 2024, and the construction period for these early works will be approximately three months. As per Condition B17 of the Development Consent, construction hours will generally be limited to Monday to Friday 7:00 am to 6:00 pm and Saturday 8:00 am to 1:00 pm, with no works on Sundays or Public Holidays. Some works outside these hours may occur as permitted by Condition B18 of the Development Consent. Any variations to these hours will be in accordance with Condition B19.

A key activity within the early works will be the road upgrades required on Ringwood Road, Wollara Road, the intersection of Barnett Street and the Golden Highway, and the intersection of Ringwood Road and the Golden Highway. These works will consist of realignment, widening and sealing of sections of road and upgrades to culverts at existing road crossings of Bow River and Killoe Creek.

With early works focusing on the road upgrades to the Golden Highway and Barnett Street intersections, as required under Condition B7 of the Development Consent; some residual approved early work construction activities may occur during the main works period described below.

2.5.2 Main Works – Construction Activities

Main works are currently scheduled to start in Q1 2025, and the main works construction period will last up to approximately 25 months, including a peak period of approximately eight months. The main works construction hours will be consistent with the hours specified in **Section 2.5.1** above. Some works outside these hours may, consistent with early works, occur as permitted by Condition B18. The Project will have a construction workforce of approximately 350 workers during the peak period.

Construction activities will include:

- Site establishment and enabling works including fencing, ground preparation, construction of the internal access tracks, preliminary civil works and drainage works.

- Construction of the temporary workforce accommodation camp.
- Installation of steel posts and framing system to support the solar panels.
- Installation of PV panels.
- Installation of permanent fencing and security.
- Preparation of foundations for the permanent buildings, BESS and on-site substation.
- Installation of underground cabling (trenching and installation of power conversion stations).
- Construction of site operations and maintenance facility.
- Establishment of the BESS.
- Construction of the onsite substation and associated grid connection infrastructure.
- Removal of temporary construction facilities.
- Rehabilitation of disturbed areas.

During the peak period, the Project is expected to generate up to 130 two-way construction traffic movements, including 55 heavy vehicle movements, 15 shuttle bus movements (associated with worker transport) and 60 light vehicle movements.

2.5.3 Operation and Maintenance

The expected operational life of the Project is approximately 40 years, however, infrastructure upgrades throughout the Project lifecycle may extend its operational life. The key activities that would be undertaken during operation include:

- Visual inspections, maintenance, and cleaning of solar panels and the substation.
- Vegetation management including:
 - Potential for grazing of sheep
 - Mechanical vegetation maintenance
 - Maintaining groundcover vegetation
 - Maintenance of landscaping, including the vegetation buffer.
- Site security and operational response.
- Replacement of equipment and infrastructure.
- Pest plant and animal control.
- Livestock operations (i.e., if sheep are grazed onsite).

During the operational phase of the Project, it is anticipated that a workforce of up to ten full time equivalent personnel would be required, and traffic movements would be restricted to light vehicles for routine operations and maintenance.

2.5.4 Decommissioning

At the end of the Project's operational life, unless the Planning Secretary agrees otherwise, the solar farm infrastructure will be decommissioned and removed. This will include removal of solar panels and foundation posts, the substation, and associated connections and underground cabling, the operations and maintenance facility, carpark, and fencing.

Disturbed areas will be rehabilitated to ensure the Development Footprint is safe, stable, and non-polluting. The Development Footprint will be rehabilitated in accordance with the rehabilitation objectives as defined in Condition B41 of the Development Consent.

3 STATUTORY CONTEXT

3.1 OVERVIEW OF RELEVANT LEGISLATION

Legislation relevant to the implementation of this HMP and heritage management in general includes:

- *National Parks and Wildlife Act 1974*
- *Environmental Planning and Assessment Act 1979*
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Commonwealth)
- *National Parks and Wildlife Regulations 2019*.

4 EXISTING ENVIRONMENT

4.1 CULTURAL HERITAGE ITEMS

The Aboriginal cultural heritage assessment (OzArk 2023) identified 12 Aboriginal sites within the Project Area that consist of one grinding groove site, five artefact scatters, and six isolated finds (Table 4.1). Seven trees of community interest were also noted¹ (Table 4.2).

Figure 4-1 shows the location of recorded Aboriginal sites within the Project Area and the location of the community interest trees.

In addition, the Slab Hut ruins (HS01), retains cultural value. The site includes tangible remains related to shared Aboriginal and European histories of the Merriwa area during the contact period (Table 4.3 and Figure 4-1).

Detailed descriptions and images of each site and/or feature are provided in OzArk 2023.

Table 4.1: Aboriginal Heritage Sites Recorded in the Project Area.

AHIMS ID	Site name	Site type	Coordinates Easting / Northing	Site description	Within Development Footprint?
37-1-0053	Poggy;Mt Misery;	Artefact Scatter	227877 6423152	An open camp site recorded by Margrit Koettig during an assessment for a proposed electricity easement. Located at the headwaters of an ephemeral waterway.	No
37-1-1033	Killoe Creek GG1	Grinding Grooves	237357 6438576	The site is on the southern creek bank of Killoe Creek, 55 m east of the creek crossing on Ringwood Road. The site consists of at least 20 very weathered grooves on a flat sandstone slab next to the creek.	No

¹ Trees referred to as 'community interest trees' are not consistent with Aboriginal scarring morphology but have been identified by Aboriginal community representatives as of cultural significance.

AHIMS ID	Site name	Site type	Coordinates Easting / Northing	Site description	Within Development Footprint?
37-1-1035	Redlynch Creek OS1	Artefact Scatter	228219 6426563	A low-density artefact scatter located 40 m south of Redlynch Creek. The scatter covers an area of 90 m x 32 m across an erosion scour. The site includes at least 20 artefacts including 10 flaked pieces, five flakes, four cores, and one axe blank, mainly composed of chert and volcanic materials, with one example of a quartz artefact.	Yes
37-1-1034	Redlynch Creek OS2	Artefact Scatter	228274 6426411	A low-density artefact scatter consisting of three artefacts situated 22 m east of Redlynch Creek along a lower slope. Redlynch Creek OS2 includes two flakes and one core all composed of a chert material. The scatter covers an area of 75 m x 40 m.	Yes
37-1-1036	Redlynch Creek OS3	Artefact Scatter	228272 6426217	A low-density artefact scatter consisting of seven artefacts situated 90 m east of Redlynch Creek along a mid-slope. Redlynch Creek OS3 includes six flakes and one flaked piece all composed of a chert material. The scatter covers an area of 58 m x 30 m.	Yes
37-1-1037	Rocky Creek Gully OS4	Artefact Scatter	224888 6424844	A low-density artefact scatter consisting of five artefacts situated on the southern bank of a tributary gully of Rocky Creek. Rocky Creek North Gully OS4 includes a two chert cores, one chert flake, a flaked piece, and a quartz flaked piece. The scatter covers an area of 40 m x 20 m.	No
37-1-1027	Redlynch Creek IF1	Isolated Find	228173 6425902	Redlynch Creek IF1 is a silcrete flake located within a small erosion scour 60 m east of Redlynch Creek.	No

AHIMS ID	Site name	Site type	Coordinates		Site description	Within Development Footprint?
			Easting /	Northing		
37-1-1028	Rocky Creek Slope IF2	Isolated Find	226913 6426210		Rocky Creek Slope IF2 is a quartzite flaked piece. The site is situated within a boggy, slightly sloping landform.	Yes
37-1-1029	Wollara Road IF3	Isolated Find	226394 6426654		Wollara Road IF3 is a chert core located on the shoulder of a track approximately 950 m northeast of Rocky Creek.	Yes
37-1-1030	Monaghans Creek IF4	Isolated Find	227432 6424546		Monaghans Creek IF4 is a quartzite scraper located 100 m north of an unnamed drainage line.	Yes
37-1-1031	Rocky Creek Gully IF5	Isolated Find	224916 6426210		Rocky Creek Gully IF5 is a quartz flake located 50 m north of an unnamed drainage line.	Yes
37-1-1032	Ringwood Gully IF6	Isolated Find	228045 6422023		Ringwood Gully IF6 is a proximal chert fragment located within rock outcrops in a lower slope landform.	No

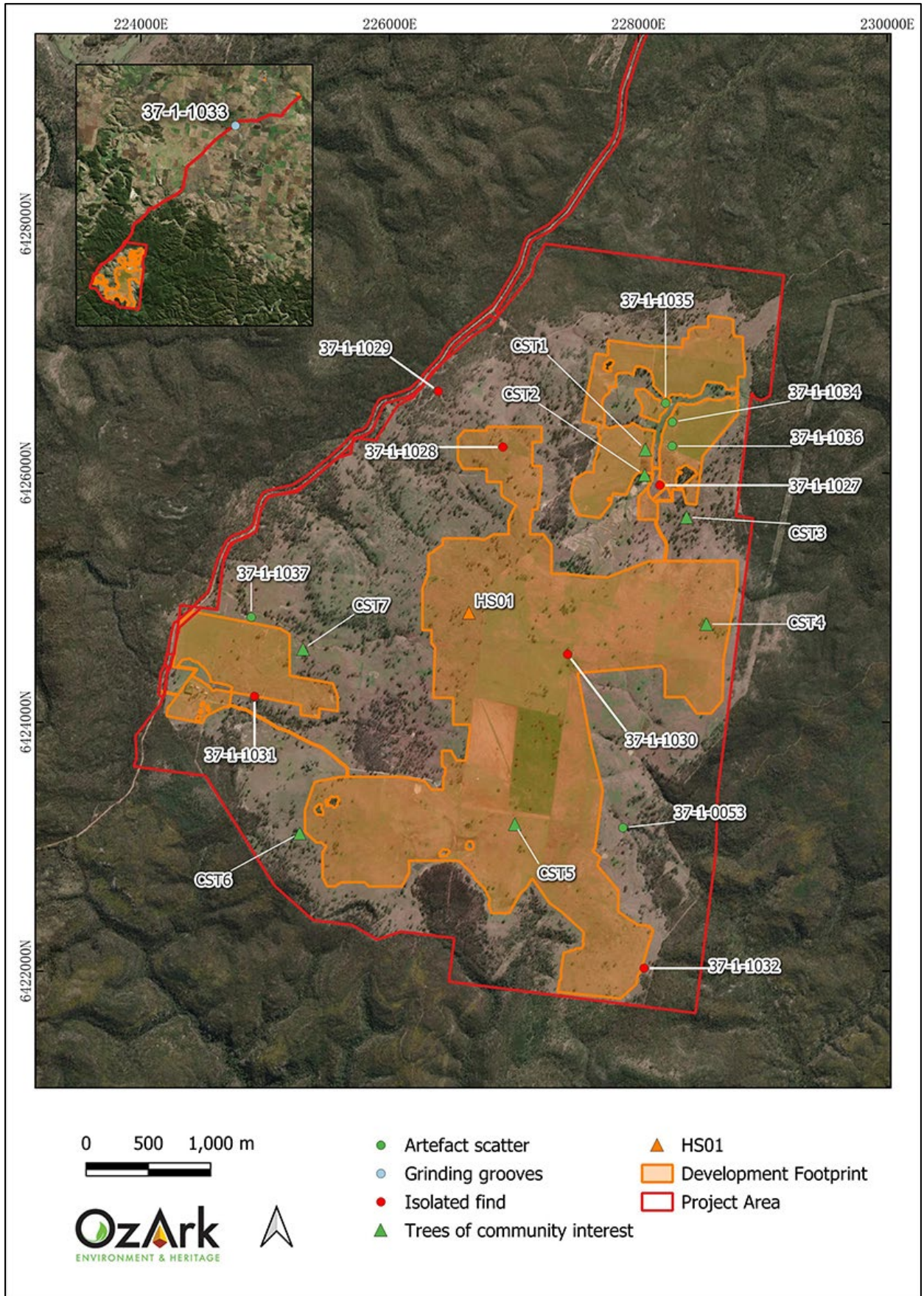
Table 4.2: Community Interest Trees Noted During the Survey.

Item name	Coordinates (GDA Zone 56) East	Coordinates (GDA Zone 56) North	Within Development Footprint?
CST1	228056	6426189	Yes
CST2	228050	6425986	No
CST3	228388	6425647	No
CST4	228547	6424788	Yes
CST5	227007	6423181	Yes
CST6	225278	6423107	No
CST7	225304	6424587	No

Table 4.3: Location of HS01 (Slab Hut).

Item name	Coordinates (GDA Zone 56) East	Coordinates (GDA Zone 56) North	Within Development Footprint?
HS01	226638	6424879	No

Figure 4-1: Cultural Heritage Items in Relation to the Project Area.



4.1.1 Socio-cultural Values

Socio-cultural values relate to the importance of a site or features to the relevant cultural group: in this case the Aboriginal community and the local community.

Aspects of social value include the assessment of sites, objects, and landscapes that are traditionally significant or that have contemporary importance to the Aboriginal community. This importance involves both traditional links with specific areas, as well as an overall concern by Aboriginal people for their sites generally and the continued protection of these. This type of value may not be in accord with interpretations made by the archaeologist. For example, a site may have low archaeological value but high social value, or vice versa.

4.1.2 Aboriginal Cultural Values

All recorded Aboriginal sites within the Project Area hold cultural value to the local Aboriginal community due to the artefacts representing a direct connection to ancestors and as objects illustrating the broader cultural landscape.

Wonnarua man, Victor Perry (2001), notes that: *'the Wonnarua people consider that all sites within their traditional homeland (to be) of high importance and ...in need of proper care and protection'*. Further, Perry 2001 notes: *'the Wonnarua wish to protect their history and culture wherever possible, and maintain a connection with the land by providing recommendations in regards to Wonnarua Koori Heritage. The land and its stories were passed down from father to son over 200 generations before the arrival of Cook from England.'*

For these reasons, the Aboriginal objects recorded during the survey have high cultural value and the conservation of these objects is a central aspect of Aboriginal tribal lore.

4.2 HISTORICAL HERITAGE

Umwelt prepared a Historical Heritage Assessment for the Project in 2023 as part of the EIS (Umwelt 2023b). The purpose was to identify any historical heritage items or sites within the Project Area, and if present, to provide an assessment of the associated heritage significance. The historical heritage assessment was undertaken in accordance with the *Heritage Act 1977* and included statutory heritage register searches, background research, field survey, and analysis of results to understand the heritage values of the Project Area as well as identify any areas of historical archaeological potential.

No statutory heritage items are located within the Project Area. Review of the historical development of the Project Area and analysis of the data collected through desktop review and field survey did not indicate any unrecorded items of historical heritage significance within the Project Area.

Historical research undertaken as part of the historical heritage assessment identified an area of historical archaeological potential within the Project Area. Identified on **Figure 6-5**, this area of archaeological potential is located roughly at the centre of the Project Area and is associated with the early pastoral land use of the area and specifically the O'Brien family, who have owned and operated the pastoral property in the area since at least the 1800s. In particular, there is potential to encounter archaeological remains in association with a pre-1880s Slab Hut located near the centre of the Project Area (HS01). The area of archaeological potential includes the visible remains of the Slab Hut, including standing timber posts. The grading of archaeological potential applied to this area is high.

This area of historical archaeological potential associated with HS01 is also a place of strong cultural values for the Aboriginal community that provides tangible remains related to shared Aboriginal and European histories of the Merriwa area during the contact period.

An area of archaeological potential was also identified in association with a c. 1900 house site. The area of potential is only located partially within the Development Area. The grading of archaeological potential applied to this area is low–moderate.

5 CONSULTATION

5.1 CONSULTATION WITH GOVERNMENT STAKEHOLDERS

This plan was submitted for review by the Department of Planning, Housing and Infrastructure (DPHI) via the Major Projects Planning Portal on 5 February 2025. Correspondence with DPHI is presented in **Appendix 1 Table 1**.

This HMP has been prepared in consultation with Heritage NSW as per Schedule 2 Condition B26 of the Development Consent. A copy of the draft HMP was provided to Heritage NSW via the Major Projects Planning Portal for their review and comment. Correspondence with Heritage NSW received on 9 January 2025 is presented in **Appendix 1 Figure 1** and **Appendix 1 Table 2**.

5.2 ABORIGINAL COMMUNITY CONSULTATION

In accordance with Condition B26(a) of the Development Consent, this HMP has been prepared in consultation with the Registered Aboriginal Parties (RAPs).

A log regarding consultation undertaken is provided in **Appendix 2**.

5.2.1 Aboriginal Parties Consulted

The RAPs for the Project were identified by undertaking the guidelines established in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (ACHCRs) (DECCW 2010a) whereby an advertisement was placed in the local press on 26 May 2022 and relevant agencies were contacted on 27 October 2021 to determine if they were aware of groups or individuals who may have cultural knowledge of the region surrounding the Project.

The RAPs for the Project are:

- A1 Indigenous group
- Didge Ngunawal Clan
- Gomeroi Native Title Applicant
- Hunter Traditional Owner
- Hunters & Collectors
- Junburra Aboriginal Consultancy Services
- Merrigarn
- Murra Bidgee Mullangari Aboriginal Corporation
- Rose Nean
- Stakeholder 1

- Ungooroo Aboriginal Corporation
- Walhallow Local Aboriginal Land Council (LALC)
- Wanaruah LALC
- Widescope Indigenous Group.

An individual/group who did not wish to be identified is referred to as ‘Stakeholder 1’.

5.2.2 RAP Consultation on this HMP

A draft of this HMP was sent to all RAPs on 19 November 2024 with a closing date for comment on 17 December 2024 (**Appendix 2 Figure 1**). At the conclusion of the comment period, one RAP replied that they were satisfied with the contents of the HMP (**Appendix 2 Figure 2**).

A log regarding the consultation undertaken is provided in **Appendix 2 Table 1**.

5.2.3 Ongoing Consultation Protocols

RAPs will be involved in the conservation and management of Aboriginal cultural heritage within the Project Area by ensuring they are involved in ongoing consultation, site access (subject to safety and security measures), and consultation on the Aboriginal cultural heritage awareness training materials for inductions.

Lightsource bp with the assistance of an engaged archaeologist (when needed), will continue to consult with the RAPs identified in **Section 5.2.1** in compliance with Condition B26(a) of the Development Consent. Consultation with the RAPs will include, but not be limited to:

- This version of the draft HMP will be reviewed by the RAPs and any applicable comments will be incorporated into the final version.
- Notification of new discoveries of Aboriginal objects (**Section 6.4.3**).
- Notification of new discoveries of Aboriginal ancestral remains (**Section 6.4.2**).
- Review of the HMP (**Section 9.2**).
- Any archaeological salvage program (**Section 6.2.3.5**).
- Significant changes to the Project that may have implications for Aboriginal heritage management.
- Significant land management actions are required in Aboriginal site protection areas not envisaged by this HMP.
- Cultural awareness training and induction materials will be developed in consultation with the RAPs through review and comment by the RAPs on the proposed packages (**Section 7.2**).

Six-monthly email updates from Lightsource bp to the RAPs will be made during the construction of the Project. This will allow for regular and inclusive engagement so that ideas, aspirations, and concerns can be raised at regular intervals.

Once the Project is operational, RAPs will be provided with contact details of the Lightsource bp Development Principal in case they wish to make enquires and/or raise any concerns with regards to the Project.

The consultation log in **Appendix 2 Table 1** will be updated and maintained by Lightsource bp recording details of the six-monthly email updates to RAPs and any other additional consultation that may occur throughout the life of the project.

5.2.4 Dispute/issue Resolution

Issues raised by RAPs in conversations whether by telephone or in person in the course of ongoing consultation will be documented in writing by Lightsource bp or the archaeologist involved in the correspondence and responded within 10 working days.

5.2.5 Access to Aboriginal Objects

Lightsource bp will provide access for RAPs to Aboriginal sites within the Project Area, subject to reasonable safety and security measures. These measures may include the location of hazardous areas and the availability of site personnel to enable safe access to relevant areas.

Any request to visit the site is to be made to Lightsource bp at least two weeks before the proposed visit to allow for adequate response time.

6 MITIGATION AND MANAGEMENT

6.1 OVERVIEW

Appendix 4 Table 1 provides all management procedures related to the management of cultural heritage values associated with the Project.

6.2 ABORIGINAL CULTURAL HERITAGE MANAGEMENT MEASURES

This section provides detailed management strategies to be applied to the development in accordance with the Development Consent (SSD 33964533).

These management strategies are developed with reference to the results of the Aboriginal cultural heritage survey of the Project Area, the cultural and archaeological significance of the sites identified, and the assessment of potential impacts discussed in the ACHAR (OzArk 2023). A consolidated set of Aboriginal cultural heritage mitigation strategies for the development (including commitments for each development phase, responsibilities, timing, and records) is provided in **Appendix 4 Table 1**. The implementation of these strategies, during construction (early and main works) is the responsibility of the Construction Contractor Site Manager and the Health, Safety and Environment (HSE) Coordinator. The Operation and Maintenance (O&M) Contractor will be responsible for the implementation of these procedures during the operation of the Project. Further detail of the measures to be implemented is included in the following sections.

6.2.1 Obligation to Protect Aboriginal Cultural Heritage

6.2.1.1 *Obligation to Avoid Harm*

All employees, contractors, sub-contractors, and visitors to the Project have an obligation to avoid harming Aboriginal heritage.

The definition of harm used in this HMP stems from the definition in Section 5 of the *National Parks and Wildlife Act 1974* (NPW Act). The examples used below are for illustrative purposes and are not exhaustive.

Harm to an Aboriginal object or Aboriginal site includes:

- Moving or collecting stone artefacts (although picking up artefacts and inspecting them is acceptable if they are immediately returned to their original location).
- Disturbing the earth where stone artefacts are located, e.g., by earthworks for drains, roads, etc.
- Breaking stone artefacts, e.g. by running over them in a vehicle.
- Cutting down, disturbing, or otherwise marking scarred trees.

Trivial or negligible impacts on Aboriginal objects are not regarded as harm. However, 'trivial' is defined, for example, as breaking an artefact during gardening. Any harm or impact to Aboriginal objects that occurs due to construction associated with the Project is unlikely to be regarded as 'trivial'.

6.2.1.2 *Obligation to Protect*

All personnel, contractors, and subcontractors having responsibility for land management, construction, or operation inside the Project Area have an obligation to protect Aboriginal heritage within their area of work responsibility.

Protection means having accurate information on the location of known Aboriginal heritage objects on all applicable plans and undertaking active measures to avoid harm to Aboriginal heritage. This may include fencing, mitigation of erosion effects, and/or modification of work plans to safeguard Aboriginal heritage such as changing design plans to avoid harm to known Aboriginal objects.

It should be noted information relating to the location and extent of Aboriginal heritage items will reflect the recorded extent of the site shown in the Aboriginal Heritage Information Management System (AHIMS) site card map for that site, the single centralised location of a site is not acceptable unless that site is an isolated find.

The location of Aboriginal objects will be made clear to any future users or owners of an area. Moreover, implementation of an unanticipated finds protocol will be in place for all Project activities (**Section 6.4.1**).

6.2.1.3 *Obligation to Implement Management Measures*

All employees, contractors, and sub-contractors of the Project have a responsibility to ensure that the appropriate Aboriginal heritage management measures have been implemented prior to construction activities commencing.

6.2.1.4 *Obligation to Minimise Harm to the Environment*

In meeting the specific environmental performance criteria established under this Development Consent, Lightsource bp will implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the Project.

The Construction Contractor Site Manager is responsible for managing any development-related risks during construction and the O&M Contractor is responsible for managing any development-related risks during the operation of the Project. If an incident/non-compliance occurs, the Construction Contractor/O&M Site Manager will notify Lightsource bp, who will contact the relevant regulator and/or RAPs (refer to **Section 10**).

6.2.2 Performance Measures

Development-related risks will be managed to ensure that there are no exceedances of the criteria and/or performance measures as follows:

- a) That this HMP is used and adhered to in relation to the protection and management of Aboriginal heritage.
- b) That all reasonable care is taken to ensure the conservation of all known Aboriginal cultural heritage within and outside of the Project Area.
- c) That all new discoveries of Aboriginal cultural heritage are appropriately managed.
- d) That all applicable plans show the location of known Aboriginal cultural heritage objects so that harm to the objects is prevented.
- e) That consultation is ongoing with the RAPs.
- f) That all workers and contractors engaged in works are aware of the legislative requirement to conserve known Aboriginal cultural heritage objects.
- g) That consultation is undertaken with the RAPs both in terms of assessing the significance of any new discoveries of Aboriginal objects and concerning any incident or update to this HMP.
- h) That no incidents or non-compliances occur (see **Section 10** for incident and non-compliance procedures).

If any of these performance measures fail, Lightsource bp will immediately:

- a) Take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur.
- b) Consider all reasonable and feasible options for remediation (where relevant) and submit a report to DPHI describing those options and any preferred remediation measures or another course of action.
- c) Implement remediation measures as directed by the Planning Secretary, to the satisfaction of the Planning Secretary.

6.2.3 Measures to protect known Aboriginal objects

Potential measures to protect and manage Aboriginal objects within the Project Area are described below.

In accordance with the Development Consent, the Project has received approval to impact seven sites in their entirety. Five sites recorded during the survey (refer to **Section 6.2.3.1**), including 37-1-1033 (Killoe Creek GG1) will be conserved in the landscape. One previously recorded site

in the Project Area, 37-1-0053 (Poggy;Mt Misery;) will also not be harmed. Measures required to protect and manage Aboriginal objects are described below.

These measures must be maintained once the Project moves from construction to operation and the Construction Contractor Site Manager and the O&M Contractor must ensure appropriate environmental supervision to this end.

6.2.3.1 *Aboriginal Sites that will Not be Harmed*

The following five Aboriginal sites will not be harmed by the Project (**Table 6.1**):

- 37-1-0053 (Poggy;Mt Misery;)
- 37-1-1027 (Redlynch Creek IF1)
- 37-1-1032 (Ringwood Gully IF6)
- 37-1-1033 (Killoe Creek GG1)
- 37-1-1037 (Rocky Creek Gully OS4).

Four of the seven community interest trees will not be harmed (**Table 6.2**).

All sites/features that are to be avoided by Project activities will be included on all applicable construction plans and the location made known to all work crews working in the vicinity of the site to ensure the site/feature is not inadvertently harmed.

All sites/features that will not be harmed are shown on **Figure 6-1 and Figure 6-2**.

Table 6.1: Aboriginal Sites that will Not be Harmed.

AHIMS ID	Site name	Site type	Coordinates		Site description	Site extent
			Easting /	Northing		
37-1-0053	Poggy;Mt Misery;	Artefact Scatter	227877 6423152		The site is located 200 m east of the boundary of the Development Footprint and will not be harmed by the project.	Approximately 60 m x 40 m Figure 6-2.
37-1-1033	Killoe Creek GG1	Grinding Grooves	237357 6438576		The site is on the southern creek bank of Killoe Creek, 55 m east of the creek crossing on Ringwood Road. The site consists of at least 20 very weathered grooves on a flat sandstone slab next to the creek.	Approximately 30 m x 12 m Figure 6-2.

AHIMS ID	Site name	Site type	Coordinates		Site description	Site extent
			Easting /	Northing		
37-1-1037	Rocky Creek Gully OS4	Artefact Scatter	224888 6424844		A low-density artefact scatter consisting of five artefacts situated on the southern bank of a tributary gully of Rocky Creek. Rocky Creek North Gully OS4 includes a two chert cores, one chert flake, a flaked piece, and a quartz flaked piece. The scatter covers an area of 40 m x 20 m.	Approximately 40 m x 20 m Figure 6-2.
37-1-1027	Redlynch Creek IF1	Isolated Find	228173 6425902		Redlynch Creek IF1 is a silcrete flake located within a small erosion scour 60 m east of Redlynch Creek.	Isolated find: 5 m x 5 m
37-1-1032	Ringwood Gully IF6	Isolated Find	228045 6422023		Ringwood Gully IF6 is a proximal chert fragment located within rock outcrops in a lower slope landform.	Isolated find: 5 m x 5 m

Table 6.2: Community Interest Trees that will Not be Harmed.

Item name	Coordinates (GDA Zone 56) East	Coordinates (GDA Zone 56) North
CST2	228050	6425986
CST3	228388	6425647
CST6	225278	6423107
CST7	225304	6424587

6.2.3.2 Additional investigation at 37-1-1033 (Killoe Creek GG1)

The grinding groove site, 37-1-1033 (Killoe Creek GG1), will not be harmed by the Project.

Further recording and investigation of 37-1-1033 (Killoe Creek GG1) will take place within 12 months of construction commencing. The methodology of this investigation will include detailed mapping and photography of the site by a suitably qualified archaeologist.

This will include but not be limited to:

- Detailed scale mapping of all visible grooves and their immediate context.
- Inventory of all visible grooves including the dimensions and form of all grooves.
- Detailed photography of the site, as well as individual grooves.

The results of the additional investigation will be presented in a report, and the report will be sent to the AHIMS register to be linked with site 37-1-1033 (Killoe Creek GG1).

Should works need to take place at the Killoe Creek crossing on Ringwood Road, the site should be included on all applicable construction plans and the location made known to all work crews working in the vicinity of the site to ensure the site is not inadvertently harmed.

6.2.3.3 Additional investigation at 37-1-0053 (Poggy;Mt Misery;)

The artefact scatter site, 37-1-0053 (Poggy;Mt Misery;), will not be harmed by the Project.

Further recording and investigation of 37-1-0053 (Poggy;Mt Misery;) will take place within 12 months of construction commencing. The methodology of this investigation will include detailed mapping and photography of the site by a suitably qualified archaeologist.

This will include but not be limited to:

- Detailed mapping of all visible artefacts at the site
- Update of site condition
- Detailed photography of the site.

The results of the additional investigation will be presented in a report and the report will be sent to the AHIMS register to be linked with site 37-1-0053 (Poggy;Mt Misery;).

6.2.3.4 Management of HS01

The ACHAR (OzArk 2023) for the Project identified that the slab hut ruins (HS01) (refer to **Section 4.1**) has strong historical values and strong cultural values both for the current descendants who own the land, and for the Aboriginal community due to the site's role in illustrating Aboriginal relations and issues at the turn of the nineteenth century.

The 20 m buffer boundary of the Development Footprint around HS01 will be the responsibility of the Construction Contractor Site Manager to install a permanent fence (post and cable) and signed to ensure that the place is not harmed and that Aboriginal cultural values are managed in accordance with the management recommendations set out in the ACHAR (OzArk 2023), prior to commencement of construction.

Ongoing monitoring will occur during monthly environmental inspections.

Section 6.3 of this HMP outlines the management measures to protect the historical heritage values associated with HS01.

6.2.3.5 Management of 37-1-1027

Redlynch Creek IF1 is a silcrete flake located within a small erosion scour 60 m east of Redlynch Creek, located outside of the development footprint. As this is in close proximity to the development footprint, permanent fencing (post/cable) and sign to be installed prior to commencement of construction.

Figure 6-1: Location of Sites and Other Features that will Not be Harmed by the Project.

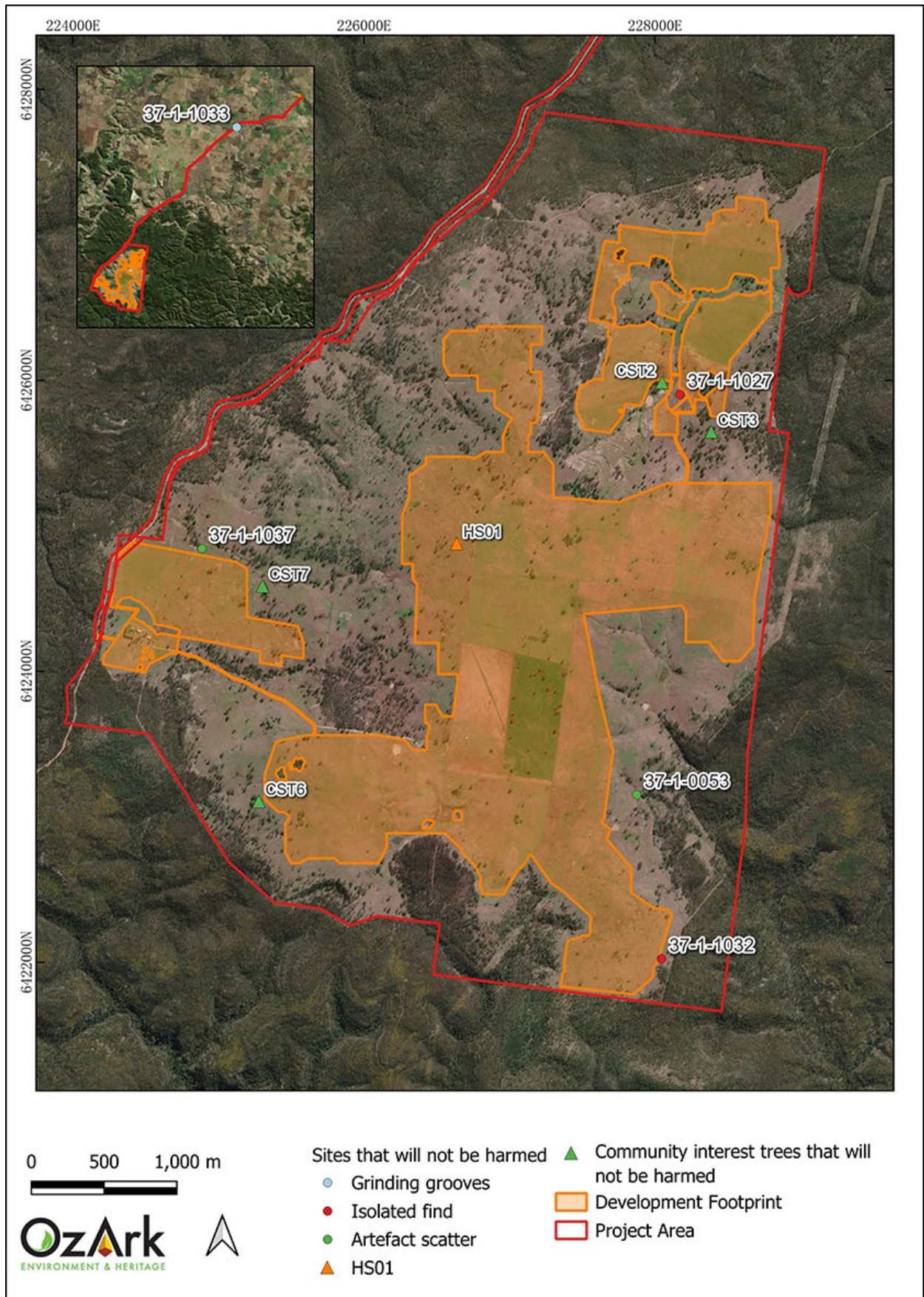


Figure 6-2: Extent of Sites near the Project Area that will Not be Harmed by the Project.

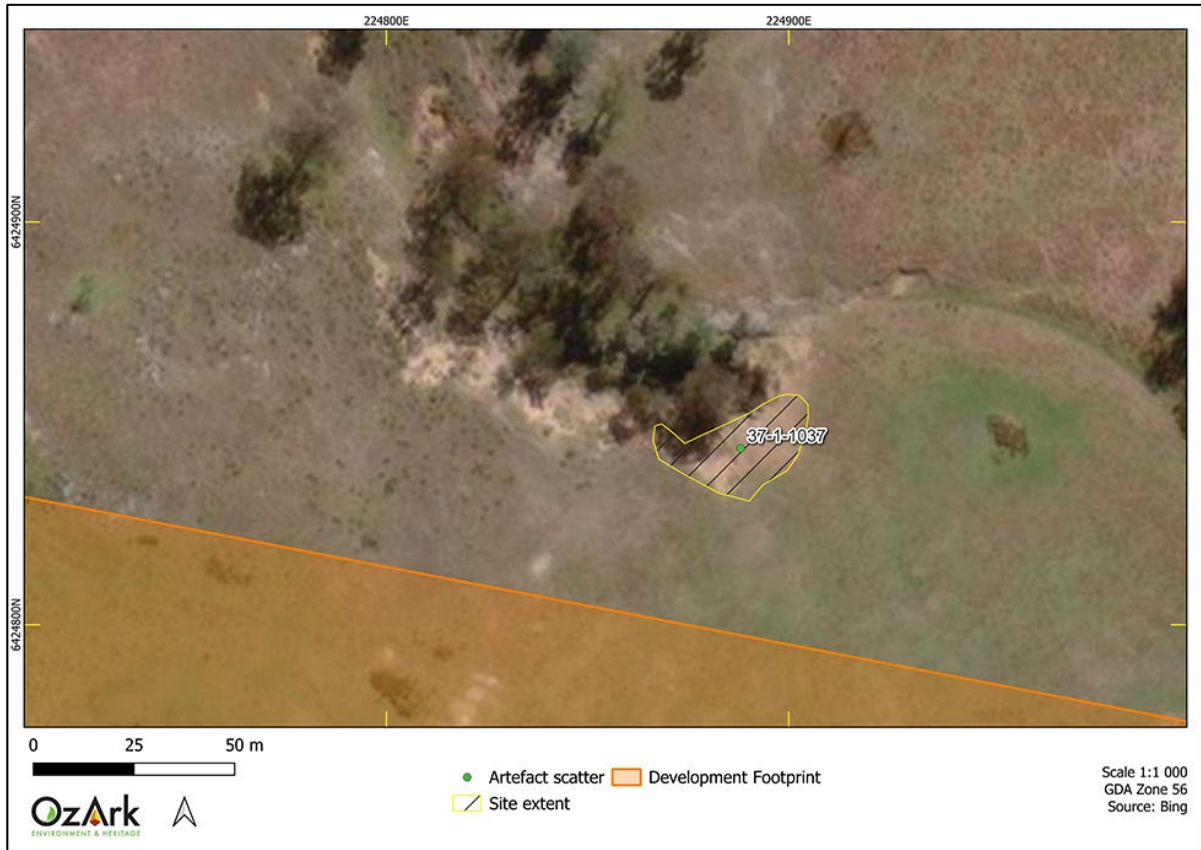
37-1-0053 (Poggy;Mt Misery;).



37-1-1033 (Killoe Creek GG1).



37-1-1037 (Rocky Creek Gully OS4).



6.2.3.6 Aboriginal Sites Approved for Salvage

Seven Aboriginal sites are approved to be salvaged. These sites are listed in **Table 6.3** and shown on **Figure 6-3** and **Figure 6-4**.

The surface collection methodology for these sites is detailed in **Section 6.2.3.7**.

Table 6.3: Aboriginal Sites Approved for Salvage.

AHIMS ID	Site name	Site type	Coordinates Easting / Northing	Site description	Site extent
37-1-1035	Redlynch Creek OS1	Artefact Scatter	228219 6426563	A low-density artefact scatter located 40 m south of Redlynch Creek across an erosion scour. The site includes at least 20 artefacts including 10 flaked pieces, five flakes, four cores, and one axe blank, mainly composed of chert and volcanic materials, with one example of a quartz artefact.	Approximately 90 m x 32 m Figure 6-3.

AHIMS ID	Site name	Site type	Coordinates Easting / Northing	Site description	Site extent
37-1-1034	Redlynch Creek OS2	Artefact Scatter	228274 6426411	A low-density artefact scatter consisting of three artefacts situated 22 m east of Redlynch Creek along a lower slope. Redlynch Creek OS2 includes two flakes and one core all composed of a chert material.	Approximately 75 m x 40 m Figure 6-3.
37-1-1036	Redlynch Creek OS3	Artefact Scatter	228272 6426217	A low-density artefact scatter consisting of seven artefacts situated 90 m east of Redlynch Creek along a mid-slope. Redlynch Creek OS3 includes six flakes and one flaked piece all composed of a chert material.	Approximately 58 m x 30 m Figure 6-3.
37-1-1028	Rocky Creek Slope IF2	Isolated Find	226913 6426210	Rocky Creek Slope IF2 is a quartzite flaked piece. The site is situated within a boggy, slightly sloping landform.	Isolated find: 5 m x 5 m
37-1-1029	Wollara Road IF3	Isolated Find	226394 6426654	Wollara Road IF3 is a chert core located on the shoulder of a track approximately 950 m northeast of Rocky Creek.	Isolated find: 5 m x 5 m
37-1-1030	Monaghans Creek IF4	Isolated Find	227432 6424546	Monaghans Creek IF4 is a quartzite scraper located 100 m north of an unnamed drainage line.	Isolated find: 5 m x 5 m
37-1-1031	Rocky Creek Gully IF5	Isolated Find	224916 6426210	Rocky Creek Gully IF5 is a quartz flake located 50 m north of an unnamed drainage line.	Isolated find: 5 m x 5 m

Figure 6-3: Extent of Artefact Scatters Approved for Salvage.



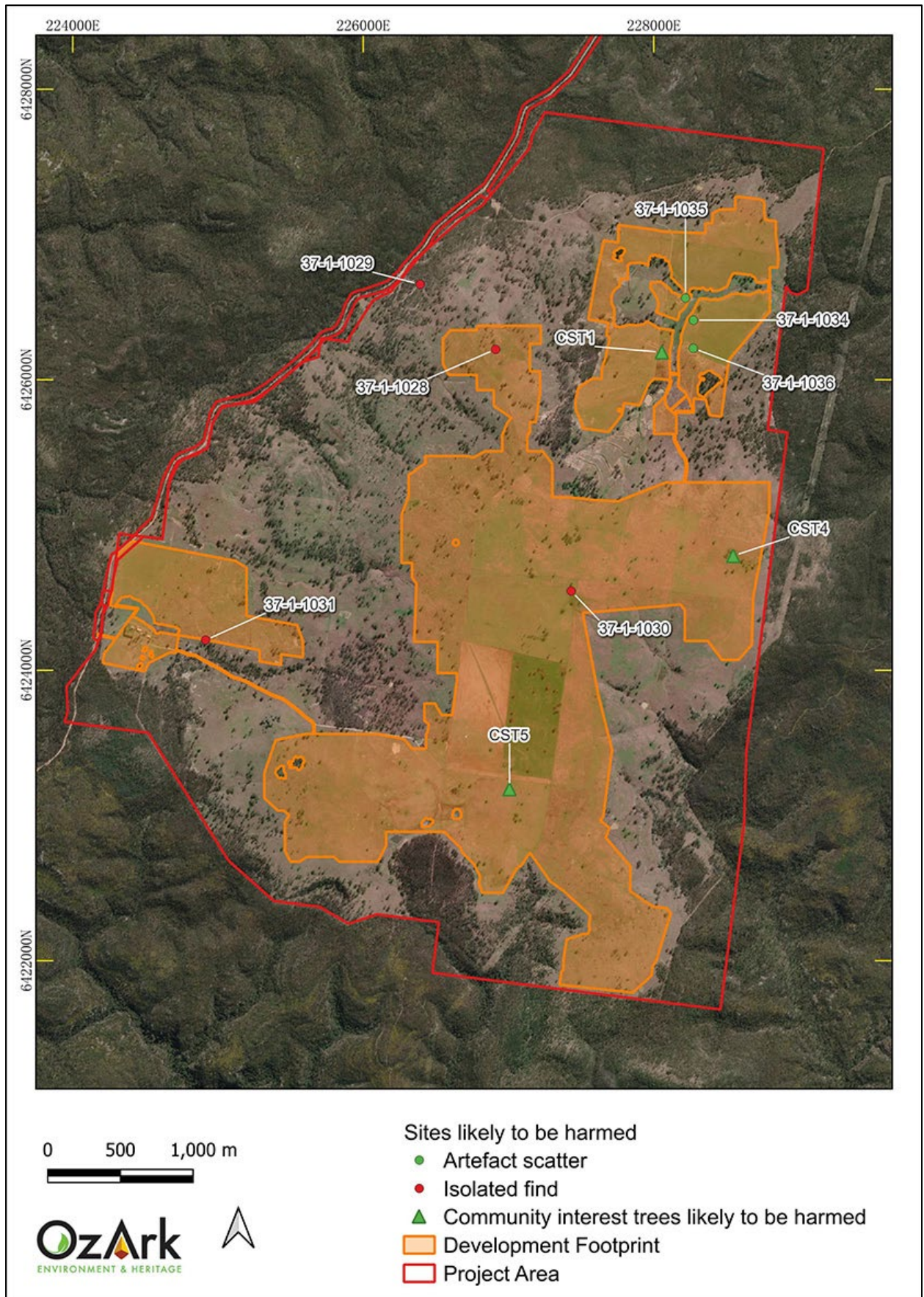
6.2.3.7 *Community Interest Trees that will be Harmed*

In addition, three community interest trees will be harmed by the Project (**Table 6.4** and **Figure 6-4**).

Table 6.4: Community Interest Trees that will be Harmed.

Item name	Coordinates (GDA Zone 56) East	Coordinates (GDA Zone 56) North
CST1	228056	6426189
CST4	228547	6424788
CST5	227007	6423181

Figure 6-4: Location of Aboriginal sites and Other Features to be Salvaged.



6.2.3.8 *Surface Collection Methodology for Aboriginal Sites*

Seven Aboriginal sites, 37-1-1028 (Rocky Creek Slope IF2), 37-1-1029 (Wollara Road IF3), 37-1-1030 (Monaghans Creek IF4), 37-1-1031 (Rocky Creek Gully IF5), 37-1-1034 (Redlynch Creek OS2), 37-1-1035 (Redlynch Creek OS1), and 37-1-1036 (Redlynch Creek OS3), will be salvaged by a surface collection of visible artefacts.

The entire extent of 37-1-1035 (Redlynch Creek OS1) will be salvaged as the portion of the site outside the Development Footprint will continue to be harmed by ongoing erosion.

The methodology for the salvage is as follows:

- All visible artefacts at a site will be flagged in the field.
- The site will be photographed after flagging (orange) and before recording.
- All artefacts will have the following artefact information recorded:
 - Location
 - Artefact class
 - Artefact type
 - Size
 - Reduction level
 - Raw material
 - Notes.
- A selection of indicative and / or unusual artefacts from each site will be photographed.
- Once all recording is complete, the artefacts will be collected according to site with artefacts from each site being kept separate.
- An Aboriginal Site Impact Recording Form (ASIRF) will be submitted to AHIMS recording the results of the salvage of the sites.
- The recording of the artefacts recovered will largely be completed in the field and this data would be incorporated into a report.

6.2.3.9 *Long-term Management of Aboriginal Objects*

Following consultation with RAPs for the Project during the Aboriginal cultural heritage survey, the preferred option for the long-term management of the collected Aboriginal objects was reburial within the Project Area but outside of the Development Footprint.

This will take place in accordance with Requirement 26 “Stone artefact deposition and storage” in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (the Code of Practice; DECCW 2010b) or in a manner agreed to with the RAPs.

Alternatively, a RAP group may nominate themselves to apply for a Care Agreement to retain the artefacts. Any Care Agreement will require the approval of Heritage NSW.

If the relocation of the salvaged objects is not able to take place immediately following the salvage, OzArk will store any artefacts retrieved in a locked cupboard at the OzArk office: 145 Wingewarra Street, Dubbo, NSW, until the relocation can take place.

6.2.3.10 *Management of Community Interest Trees*

The three trees of community interest (CST1, and CST4–CST5) that are liable to be harmed must be included in a site visit and photographic recording with RAPs at the time of the surface artefact collection set out in **Section 6.2.3.7**. The results of the photographic recording and any comments from the RAPs about the trees will be included in the salvage report that will be produced following all salvage activities.

6.2.3.11 *Protection of Known Sites Outside the Development Footprint*

The Aboriginal cultural heritage sites outside of the Development Footprint but inside the Project Area identified in **Table 6.1** will be protected by:

- All ground disturbance being restricted to the approved Development Footprint.
- All sites outside of the Development Footprint being identified on applicable plans.
- Restricting vehicle traffic to established roads and tracks.
- Informing all contractors working in the vicinity of the sites being informed of their location and legislative protection.

6.2.4 **Land Management**

6.2.4.1 *Vehicle access*

Wherever possible, vehicle access will be restricted to existing or designated tracks within the Project Area during the construction and operation of the Project to avoid potential harm to Aboriginal sites. Vehicle access within exclusion zones must be restricted as much as is possible.

6.2.4.2 *Erosion control*

Any erosion and sediment control measures will be undertaken in a manner that avoids harm to known Aboriginal objects unless an assessment is undertaken.

If works are required within 10 m of a known Aboriginal cultural heritage site, a suitably qualified archaeologist will inspect the site to advise on whether the proposed works are likely to harm Aboriginal objects. If harm is possible, a further archaeological assessment to inform the Planning Secretary's permission to complete the works will be required.

If erosion control take place near a known Aboriginal site, the following principles will be followed:

- Potential interactions between the remediation works and the cultural heritage sites will be managed. The potential for harm to Aboriginal cultural heritage objects will be assessed by a suitably qualified archaeologist.
- Natural regeneration of vegetation in an area will be encouraged to return it to as near as possible its original form.
- Soft engineering solutions such as the placing of hay bales or coir logs on the surface will be preferably implemented to minimise disturbance to the site.

If significant site flooding occurs, additional auditing / Aboriginal site monitoring will be required to confirm whether any harm to Aboriginal sites outside of the Development Footprint can be observed.

It is the responsibility of the Construction Contractor Site Manager to ensure appropriate monitoring of known Aboriginal sites throughout construction. During the operation of the Project, the O&M Contractor will be responsible to ensure appropriate monitoring. This will be undertaken through environmental auditing by the Construction Contractor/O&M Site Manager, who will monitor Aboriginal site condition and ensure appropriate implementation of this HMP. Results of these inspections may be presented in checklist format and will be included in the compliance reporting outlined in **Section 9.3**.

6.3 HISTORICAL HERITAGE MANAGEMENT

These management strategies are developed with reference to the results of the historical heritage survey of the Project Area, the cultural and archaeological significance of the sites identified, and the assessment of potential impacts discussed in the historical heritage assessment (Umwelt 2023b). A consolidated set of historical historic cultural heritage mitigation strategies for the development (including commitments for each development phase, responsibilities, timing, and records) is provided in **Appendix 4 Table 1**. The implementation of these strategies, during construction (early and main works) is the responsibility of the Construction Contractor Site Manager. The Operation and Maintenance Contractor will be responsible for the implementation of these procedures during the operation of the Project. Further detail of the measures to be implemented is included in the following sections.

The Project Area was assessed to contain an area of historical archaeological potential within the vicinity of Aboriginal cultural heritage site HS01. This area is associated with the partially standing remains of a pre-1880's Slab Hut.

The following management measures are recommended to be implemented through the design and construction phase of the Project to minimise and/or manage impacts to historical heritage within the Project Area.

6.3.1 Historical Heritage Management Measures

6.3.1.1 Performance Measures

Development-related risks will be managed to ensure that there are no exceedances of the criteria and/or performance measures as follows:

- a) That this HMP is used and adhered to in relation to the protection and management of historical cultural heritage.
- b) That all reasonable care is taken to ensure the conservation of all known historical cultural heritage within and outside of the Project Area.
- c) That all new discoveries of historical cultural heritage are appropriately managed.
- d) That all applicable plans show the location of known historical cultural heritage places so that harm to the places is prevented.
- e) That all workers and contractors engaged in works are aware of the legislative requirement to conserve known historical cultural heritage places.
- f) That no incidents or non-compliances occur (see **Section 10** for incident and non-compliance procedures).

6.3.1.2 Historical Archaeology Management

The following measures are to be implemented to minimise impacts on historical archaeological remains within the Project Area.

- Impacts to the areas of identified historical archaeological potential will be avoided wherever possible. An exclusion zone of at least 20 m will be maintained around the identified areas of historical archaeological potential at HS01.
- All personnel and contractors associated with the Project are to be made aware of the archaeological sensitivity of the site and the extent of the 20 m exclusion zone around the historical ruin at HS01.
- Should design modifications result in impacts within the areas of historical archaeological potential at HS01, further investigation would be required prior to the commencement of construction activities.

- This would include the preparation of an archaeological research design (ARD) and test excavation methodology to confirm the extent of historical archaeological remains present, and the likely significance level of any historical archaeological remains on the site.
- The ARD and Test Excavation methodology should be prepared in consultation with Heritage NSW.
- This HMP should be updated with the results of any archaeological investigations.

If any of these performance measures fail, Lightsource bp will immediately:

- a) Take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur.
- b) Consider all reasonable and feasible options for remediation (where relevant) and submit a report to DPHI describing those options and any preferred remediation measures or another course of action.
- c) Implement remediation measures as directed by the Planning Secretary, to the satisfaction of the Planning Secretary.

6.3.2 Identification of Previously Unknown Historical Heritage Sites

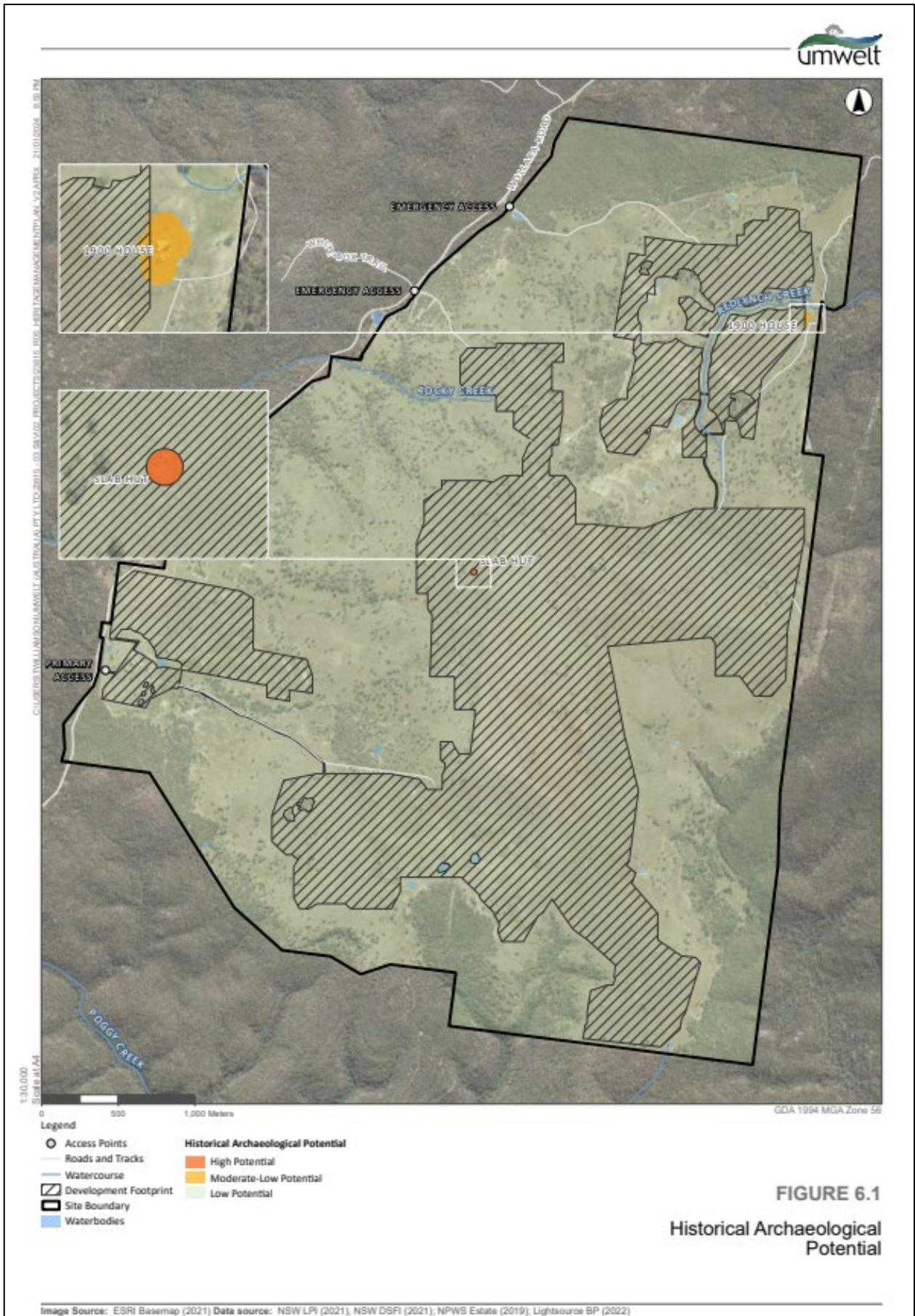
An unexpected finds protocol (**Section 6.3.2.1**) will be followed at all stages of development to ensure that any unexpected historical heritage or archaeological finds, features or subsurface deposits are correctly managed and assessed should they be identified.

6.3.2.1 Procedure

- The person who discovers or suspects they have discovered a potential historical heritage item during the proposed works will immediately notify the person in charge of the activity.
- Works in the immediate vicinity of the item(s) will cease and the area will be cordoned off with temporary fencing.
- An exclusion zone of 20 m radius is to be established with the temporary fencing around the suspected heritage item(s). In the case of multiple items, the 20 m area applies from the outermost cluster of items. The heritage item or archaeological remains must not be moved or disturbed until preliminary assessment has been undertaken by a heritage consultant.

- The Construction/Operation Contractor Site Manager will then inform Lightsource bp, who will contact a suitably qualified heritage consultant to evaluate the potential historical heritage item. Information about the location and condition of the site should also be provided. An inspection of the item(s) by the cultural heritage consultant may be required to confirm the significance of the item(s).
- Where item(s) are identified as having local or higher heritage significance, the Construction/Operation Contractor Site Manager will inform Lightsource bp, who will contact Heritage NSW to provide information about the newly identified site/material and determine an appropriate management strategy. Should it be determined that the material identified does not hold any significance, works may proceed and there are no further requirements.

Figure 6-5: Impacts to historical heritage.



6.4 DETAILED PROCEDURES

6.4.1 Unanticipated heritage finds procedures

The following sections outline the management strategies to be adhered to if any new Aboriginal objects or Aboriginal ancestral remains are identified within the Project Area.

Under the NPW Act (Part 6), an Aboriginal object is defined as: any deposit, object, or material evidence (not being a handicraft for sale) relating to Aboriginal habitation of the area that comprises NSW, being habitation both prior to and concurrent with the occupation of that area by persons of European extraction and includes Aboriginal remains.

It is noted that all new sites or Aboriginal ancestral remains will be recorded in accordance with Heritage NSW requirements, including submission of a site card to Heritage NSW in accordance with Section 89A of the NPW Act.

6.4.2 Identification of Potential Human Skeletal Remains

This procedure details the actions to be taken when suspected human skeletal remains are discovered during construction or operation activities. This information will be included in site inductions as per the training requirements discussed in **Section 7.2** of this HMP.

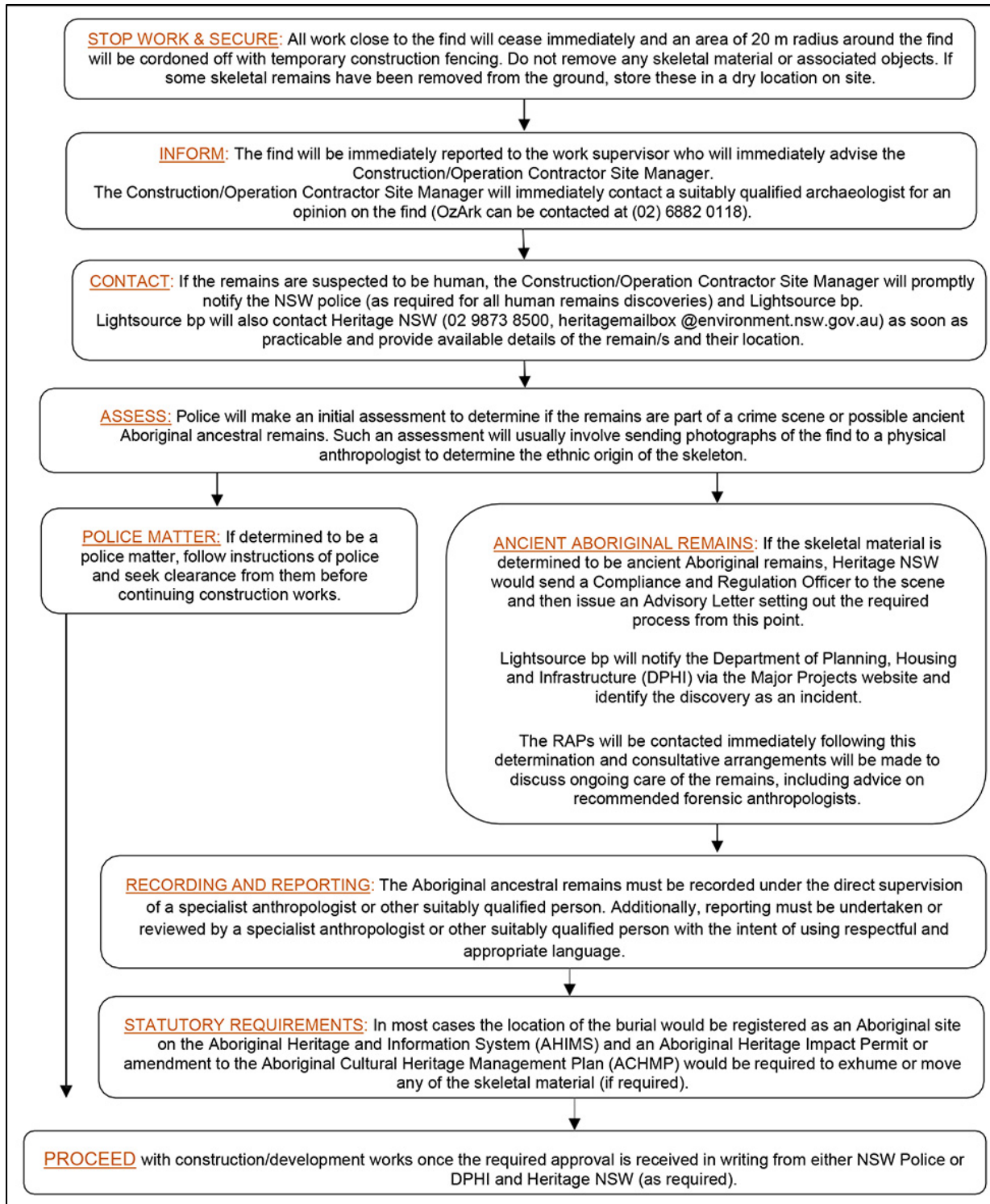
This procedure is applicable to all activities conducted by any personnel during the construction and operation of the Project that have the potential to uncover suspected human skeletal remains. All human skeletal remains (both Aboriginal and non-Aboriginal) are subject to statutory protection and controls.

6.4.2.1 Procedure

- When suspected human skeletal remains are exposed or uncovered, all work is to cease immediately in the near vicinity of the find location
- The discovery of human ancestral remains must be treated as an incident (see **Section 10**)
- An exclusion zone with a radius of 20 m is to be cordoned off by temporary fencing around the outer extent of the exposed suspected human skeletal remains site
- The Construction/Operation Contractor Site Manager is to notify Lightsource bp and the New South Wales Police immediately
- If the New South Wales Police determine that the remains are modern and human, the area will become a crime scene under the jurisdiction of the NSW Police. They may request that a suitably qualified forensic anthropologist or archaeologist be engaged to assist
- If the remains are identified as ancient Aboriginal remains, Heritage NSW and the RAPs are to be formally notified in writing and the procedure set out in **Figure 6-6** followed.

- It the remains are identified as historical, non-Aboriginal human remains, the site is to be secured, and Heritage NSW contacted
- It the remains are identified as non-human, work can recommence immediately.

Figure 6-6: Discovery of Aboriginal Ancestral Remains Flowchart.



6.4.3 Discovery of Unrecorded Aboriginal Object(s)

In the event of discovery of unrecorded Aboriginal object(s), all work close to the discovery will cease and an area of 20 m around the Aboriginal object(s) will be fenced with temporary construction fencing. An archaeologist and one representative from the RAPs will be contacted to determine the significance of the Aboriginal object(s) present. The discovery of unrecorded Aboriginal objects is not regarded as an incident (see **Section 10**).

If any unexpected finds are confirmed Aboriginal heritage finds, the protocols documented in **Section 6.4.1** and **Section 10.3** must be followed, including all agency notifications.

6.4.3.1 *Aboriginal Scarred Trees*

Should a previously unknown Aboriginal scarred tree be identified, all works in the vicinity of the site will cease, an area of 10 m around the scarred tree will be fenced with temporary construction fencing, and Lightsource bp will be informed of the presence of the potential site. The opportunity will then be provided to a qualified archaeologist to inspect the newly identified tree and evaluate whether the scarring is a result of Aboriginal cultural activities. If the scar has a cultural origin or there is doubt about the origin of the scar, a representative of the RAPs, and a qualified arborist (if required) will be consulted to assess the Aboriginal cultural and archaeological significance of the tree.

If the tree is confirmed as an Aboriginal scarred tree and is not required to be harmed because of approved Project activities, a fence should be erected with a 10 m buffer around the site as a protection measure. The location and dimensions of the fence should be determined with reference to the size and condition of the tree.

If the site is confirmed as an Aboriginal scarred tree and is subject to harm because of approved Project activities, it will be subject to temporary protection measures as described above until such time as an appropriate management strategy has been developed for the site. Lightsource bp will consult with the RAPs and a suitably qualified archaeologist to develop an appropriate management strategy for the site. If suitable, the methodology for scarred tree salvage outlined in **Section 6.4.4** may be used.

6.4.4 Newly Discovered Sites within the Development Footprint

Any newly discovered Aboriginal sites identified within the approved Development Footprint (excluding human remains, see **Section 6.4.2**) will be temporarily fenced² as quickly as possible. Signage on the fencing is to state that the area is subject to environmental protection, that no ground disturbance is allowed, and will include relevant contact details for the Construction Contractor/O&M Site Manager.

The minor impact to the ground surface during installation of fence posts is permissible on condition that no soil is to be removed off site. The following procedure will be implemented for any newly identified sites:

- a) The site will be assessed by a qualified archaeologist and a representative from the RAPs. As well as recording the site, the site's significance will also be determined through this consultation.
- b) The site will be temporarily fenced.
- c) The site location will be registered with AHIMS and a site card submitted (**Section 10.3**).
- d) Notify Heritage NSW of the find.
- e) The site location will be entered on to Project plans including operational plans and maps.
- f) Depending on the Aboriginal cultural heritage values at the site and the degree of immediate threat to the site, the site will be salvaged according to the methodology in this HMP (**Section 6.2.3.7**).
- g) A brief report of the salvage will be produced to record the findings.
- h) On the completion of salvage at such sites, an ASIRF will be completed and submitted to the AHIMS (see **Section 10.3**). Copies of the forms will be archived by Lightsource bp. The form will be lodged within a reasonable time of fieldwork completion and within four months, at the latest
- i) All artefacts salvaged will be subject to relocation as per the long-term management of objects set out in the HMP (**Section 6.2.3.8**).

6.4.5 New Sites Outside the Development Footprint

Any new Aboriginal site identified outside the approved Development Footprint but within the Project Area will be managed in accordance with the following procedure:

- a) The site will be assessed by a qualified archaeologist and one representative of the RAPs. As well as recording the site, the site's significance will also be determined through this consultation.

² A temporary fence will consist of 3–4 star pickets with caution tape strung between the star pickets.

- b) The site will be considered for fencing depending on its proximity to the impact footprint.
- c) The site location will be registered with AHIMS and a site card submitted.
- d) The site location will be entered on to Project plans, including operational maps.
- e) If the site contains Aboriginal objects of interest such as many artefacts or rare features such as a hearth that is in an area of active and destructive erosion and is at risk of being destroyed, Heritage NSW must be contacted for advice. Any actions will only be undertaken with the full consultation and participation of the RAPs and Heritage NSW. All instructions from Heritage NSW will be followed, and unless under emergency provisions as set out in the NPW Act, an Aboriginal Heritage Impact Permit (AHIP) will be required.

7 MONITORING AND REPORTING

7.1 HERITAGE RECORDS

Copies of all heritage records will be kept by Lightsource bp. These will include:

- a) This HMP
- b) The consultation log shown in **Appendix 2 Table 1** and any required updates.
- c) A copy of the Development Consent for SSD-33964533
- d) Maps showing heritage site locations
- e) Archaeological reports that have been produced for the Project
- f) All applicable site cards and ASIRFs.

7.2 CULTURAL HERITAGE AWARENESS TRAINING

It is recognised that training and awareness is an important aspect of the EMS.

All employees, contractors, sub-contractors and visitors to the Project will be made aware of the obligation to avoid harm to Aboriginal and historical heritage through a cultural heritage component of a general site induction prior to them commencing work on the Project. The induction will include notifying workers of any cultural heritage places and sites in proximity to their work areas.

The cultural heritage induction will include the following points expressed in plain language:

- a) The Project is located within Wonnarua Country.
- b) Aboriginal sites occur across the Project Area.
- c) There are identified places of historical heritage significance in the Project Area.
- d) Aboriginal sites are of great significance to the Aboriginal community, are important to the wider community and must be treated with respect.
- e) Many Aboriginal artefacts and historical archaeological items are obscured within the topsoil and are not readily visible. The apparent absence of a site does not mean it is no longer in existence.
- f) Aboriginal sites and significant historical places are protected by law. If any Aboriginal sites or significant historical places not permitted to be harmed by the HMP are harmed by the Project, relevant fines for non-compliance may be issued.
- g) Protocols for unanticipated finds or skeletal remains will be followed.

An Aboriginal artefact identification sheet is provided in **Appendix 3** to assist employees, contractors, sub-contractors, and visitors to the Project in case they encounter a potential artefact.

The Construction Contractor Site Manager and O&M Site Manager will be responsible for maintaining induction records during construction and operations, respectively, and for ensuring that workers complete the necessary Cultural Heritage Awareness training.

As outlined in Section 9, following any updates to this plan, the Cultural Heritage Awareness training will be reviewed and revised as necessary.

7.3 MONITORING PROGRAM

Monitoring of known Aboriginal sites is the responsibility of the Construction Contractor Manager and O&M Site Manager. This will be undertaken through annual environmental inspections by the Construction Contractor Manager and O&M Site Manager or by assigned qualified personnel, who will monitor Aboriginal site condition and ensure appropriate implementation of this HMP.

Results of these inspections may be presented in checklist format and will be included in compliance reporting. Inspection reporting will assess the effectiveness of the measures outlined in **Section 6** of this plan on the protection of known Aboriginal sites and HS01.

8 ROLES AND RESPONSIBILITIES

Roles and responsibilities for Lightsource bp personnel and contractors are outlined in **Table 8.1**.

Table 8.1: Accountabilities.

Role	Accountabilities for this document
Lightsource bp Development Principal (Construction and Operation)	<ul style="list-style-type: none"> Oversee the implementation of this HMP and other management plans which interface with the HMP Have working knowledge of the HMP Review the HMP Lead consultation with Heritage NSW, DPPI and RAPs Report all HMP non-compliance and incidents to DPPI Distribute copies of this HMP as required Maintain records of Aboriginal consultation and past HMPs including updating the website where relevant Arrange for review of the HMP as set out in Section 9.2 Implementing mitigation measures as detailed in Appendix 4 Table 1.
Construction Contractor Site Manager (Construction)	<ul style="list-style-type: none"> Provide adequate resources for the implementation of this HMP Report all HMP non-compliance and incidents to Lightsource bp, who would then report to DPPI through the Major Projects website Comply with all requirements of this HMP

	<ul style="list-style-type: none"> • Implementing mitigation measures as detailed in Appendix 4 Table 1.
HSE Coordinator (Construction)	<ul style="list-style-type: none"> • Implement the HMP • Ensure inclusion of Aboriginal heritage worker inductions through delivery or input to induction documents • Management of consultants/archaeologists (as required) • Respond to Aboriginal cultural heritage related complaints • Ensure audit and relevant statutory reporting is undertaken • Report on continuous improvement opportunities\ • Implementing mitigation measures as detailed in Appendix 4 Table 1.
O&M Site Manager (Operation)	<ul style="list-style-type: none"> • Provide adequate resources for the implementation of this HMP • Report all HMP non-compliance and incidents to Lightsource bp, who would then report to DPHI through the Major Projects website • Comply with all requirements in this HMP • Implementing mitigation measures as detailed in Appendix 4 Table 1.
All Employees and Contractors	<ul style="list-style-type: none"> • Follow any instructions provided by Lightsource bp, the Construction/Operation Contractor Site Manager or an appropriately qualified and experienced archaeologist • Work in accordance with the requirements of this HMP • Implementing mitigation measures as detailed in Appendix 4 Table 1.

9 REVIEW AND IMPROVEMENT

9.1 IMPROVEMENT OF PERFORMANCE

The conservation of known Aboriginal sites and following the correct procedure for new discoveries is at the core of this HMP. In **Section 6.2.2** several performance measures are outlined to measure how this HMP is implemented. The performance measures will be reviewed on a regular basis and updated in accordance with Conditions C3 to C6 of the Development Consent.

Lightsource bp will respond to any audit process, community complaints, and stakeholder (internal and external) suggestions. Depending on the nature of the suggestions, this HMP may require revision that would be undertaken in consultation with the Aboriginal community and to the satisfaction of the Planning Secretary.

At all times Lightsource bp will seek to improve the performance of this HMP to ensure that Aboriginal cultural heritage is conserved and appropriately managed.

The adaptive management procedure is outlined in **Table 9.1**.

Table 9.1: Adaptive Management Table.

Element	Description	Action
1	Objectives	See performance measures Section 6.2.2 .
2	Process model	The major threat to non-compliance with the HMP is causing harm to a known Aboriginal or historical cultural heritage sites/places or the incorrect management of new discoveries.
3	Plan	All workers will be aware of the legislative requirements to protect Aboriginal and historical cultural heritage sites/places and to be aware of the correct procedure for the discovery of new heritage objects or places. All known Aboriginal and historical cultural heritage sites will be marked on all appropriate plans to ensure that their location is known and that there will be no inadvertent harm to the sites. If any of the performance measures fail, it may be necessary to revise this Plan in consultation with the Aboriginal community and to the satisfaction of the Planning Secretary.
4	Implement feedback	This HMP will be reviewed at least annually to ensure that it remains 'fit for purpose'. This review will monitor the management effectiveness of the HMP. The HMP may also require review and possible revision following community complaints, community suggestions, or from internal or external audits.

9.2 REVISION OF STRATEGIES, PLANS AND PROGRAMS

This plan will not be staged or updated without stakeholder consultation unless agreed to by the Planning Secretary.

Ongoing monitoring and review of the performance and implementation of this HMP will be undertaken in accordance with Condition C2 of the Development Consent.

Consistent with Condition C2 of the Development Consent, Lightsource bp will:

- Update the HMP to satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site.
- Review and revise (if necessary) the HMP to the satisfaction of the Planning Secretary within one month of:
 - a) The submission of an incident report under Condition C11 or Scheduled (see **Section 10.1**)
 - b) The submission of an audit report, under Condition C15 of Schedule 2 or
 - c) Any modifications to the conditions of the Development Consent.
 - d) Any changes to the management of Aboriginal cultural heritage.

Lightsource bp will review, and if necessary, revise, the strategies, plans, and programs required under this approval to the satisfaction of the Planning Secretary. Where this review leads to revisions in any such document, the revised document will be submitted to the Planning Secretary for approval.

9.3 INDEPENDENT ENVIRONMENTAL AUDIT

As per Conditions C15–C18 of the Development Consent, an independent audit must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements* (2020).

Lightsource bp will commission and pay the full independent environmental audit of the development. The audit will:

- a) Review and respond to each Independent Audit Report prepared under Condition C15 of the Development Consent, or where notice is given by the Planning Secretary.
- b) Submit the response to the Planning Secretary; and
- c) Make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary. unless otherwise agreed by the Planning Secretary.

Within two months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Planning Secretary, a copy of the audit report will be submitted to the Planning Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations of the Independent Environmental Audit will be implemented to the satisfaction of the Planning Secretary.

10 INCIDENT REPORTING

This section describes the incident reporting procedures for the Project, having regard to the requirements of the Development Consent.

10.1 NOTIFICATION PROCEDURES UNDER DEVELOPMENT CONSENT

The Planning Secretary will be notified in writing via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident.

In accordance with the Development Consent an incident is defined as “A set of circumstances that causes or threatens to cause material harm to the environment”.

Furthermore a written notification addressing the requirements set out below will be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of the incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under Condition C11 of the Development Consent or, having given such notification, subsequently forms the view that an incident has not occurred.

Written notification of an incident must:

- a. identify the development and application number (Goulburn River Solar Farm, SSD-33964533)
- b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident)
- c. identify how the incident was detected
- d. identify when the applicant became aware of the incident
- e. identify any actual or potential non-compliance with conditions of consent
- f. describe what immediate steps were taken in relation to the incident
- g. identify further action(s) that will be taken in relation to the incident
- h. identify a project contact for further communication regarding the incident.

Within 30 days of the date on which the incident occurred, or as otherwise agreed by the Planning Secretary, Lightsource bp will provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all the requirements below, and such further reports as may be requested.

The Incident Report must include:

- a. a summary of the incident
- b. outcomes of an incident investigation, including identification of the cause of the incident
- c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence
- d. details of any communication with other stakeholders regarding the incident.

10.1.1 Non-Compliance Notification

Non-compliance notification requirements are set out in Conditions C12 to C14 of the Development Consent. Under the Development Consent, a non-compliance is defined as an ‘occurrence, set of circumstances or development that is a breach of this consent but is not an incident.’

Lightsource bp will notify DPHI in writing via the Major Projects website within seven days after becoming aware of any non-compliance. Any non-compliance notification will identify the Project and the application number (Goulburn River Solar Farm, SSD 33964533), set out the condition of consent that the Project is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known). The notification will also identify what actions have been taken, or will be undertaken, to address the non-compliance.

Consistent with Condition C14 of Development Consent, a non-compliance which has been notified as an incident does not need to also be notified as a non-compliance

10.2 DISCOVERY OF ABORIGINAL OBJECTS

Under Section 89A of the NPW Act, it is a requirement that the AHIMS Registrar is notified of the existence of Aboriginal objects as soon as practicable after they are first identified. This is usually done through the completion of an Aboriginal site card which is submitted to the Registrar of the AHIMS for inclusion on the Aboriginal sites database. Information regarding AHIMS and site recording forms can be downloaded from the Heritage NSW website³.

10.3 REPORTING AUTHORISED HARM TO ABORIGINAL SITES

Although not strictly required by the NPW Act, Heritage NSW expects that information on authorised harm to Aboriginal sites be reported to them by submitting an ASIRF which can be downloaded from the Heritage NSW website⁴.

⁴ <https://www.environment.nsw.gov.au/resources/cultureheritage/aboriginal-site-impact-recording-form-120558.pdf>
⁴ <https://www.environment.nsw.gov.au/resources/cultureheritage/aboriginal-site-impact-recording-form-120558.pdf>

10.4 PUBLICLY AVAILABLE INFORMATION AND EXTERNAL REPORTING

Lightsource bp will ensure the following Project information is publicly available on its website ([Goulburn River solar | Lightsource bp Australia](#)) as per Condition C19 of the Development Consent:

- a) Make the following information publicly available on its website as relevant to the stage of the development:
 - i. The EIS;
 - ii. The final layout plans for the development;
 - iii. Current statutory approvals for the development;
 - iv. Approved strategies, plans or programs required under the conditions of this consent (other than the Fire Safety Study and Fire Management and Emergency Plan);
 - v. The proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;
 - vi. How complaints about the development can be made;
 - vii. A complaint's register;
 - viii. Any compliance reports;
 - ix. Any independent environmental audit, and the Lightsource bp's response to the recommendations in any audit; and
 - x. Any other matter required by the Secretary.
- b) Lightsource bp will ensure that this information is kept up to date.

11 REFERENCES

DECCW 2010a, *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*, Department of Environment, Climate Change and Water, Sydney.

DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment, Climate Change and Water, Sydney.

OzArk 2023, *Aboriginal Cultural Heritage Assessment Report. Goulburn River Solar Farm*.

Perry, V 2001, (Upper Hunter Wonnarua Council). *Aboriginal Cultural Heritage Assessment for "POGGY" via Merriwa. Lot 58 Sandstone, Quarry*.

Umwelt Australia Pty Ltd 2023a, *Goulburn River Solar Farm Environmental Impact Statement*.

Umwelt Australia Pty Ltd 2023b, *Goulburn River Solar Farm Historical Heritage Assessment*.

Umwelt Australia Pty Ltd 2023c, *Goulburn River Solar Farm Amendment Report*.

Umwelt Australia Pty Ltd 2024, *Temporary Workers Accommodation Facility Amendment Report*.

12 CHANGE INFORMATION

A summary of the document history is provided in **Table 12.1**.

Table 12.1 Change Information.


Version	Date	Author	Description
Consultation Draft	November 2024	OzArk Environment & Heritage	HMP revised to account for RAP and Heritage NSW Feedback. Version issued to RAPs on 19 November 2024 and Heritage NSW on 26 November 2024.
Draft	February 2025	OzArk Environment & Heritage	Version issued to DPPI on the 5 February 2025.
Final	March 2025	OzArk Environment & Heritage	Version issued to DPPI on 28 March 2025.

APPENDIX 1: GOVERNMENT STAKEHOLDER CONSULTATION RECORDS

Appendix 1 Table 1: Government stakeholder consultation on this HMP.

Date	Organisation	Comment	Method
19 November 2024	RAP	Consultation Draft HMP submitted for RAP review	Email
26 November 2024	Heritage NSW	Consultation Draft HMP submitted for Heritage NSW review.	Via Major Projects Planning Portal
5 February 2025	DPHI	Draft HMP submitted for DPHI review	Via Major Projects Planning Portal
28 March 2025	DPHI	Final HMP submitted to DPHI	Via Major Projects Planning Portal

Appendix 1 Figure 1: Correspondence with Heritage NSW on this HMP.

Department of Climate Change, Energy, the Environment and Water	
	Our ref: HMS ID 8076
Beth Kramer Principal Environmental Planner Lightsource bp beth.kramer@lightsourcebp.com	
Letter uploaded to the Major Projects Planning Portal	
<hr/> Heritage Management Plan – State Significant Development	
Proposal: Goulburn River Solar Farm	
Major Project reference: SSD-33964533	
Received: 26 November 2024	
Dear Beth,	
Thank you for your referral seeking advice on the draft Heritage Management Plan (HMP) dated November 2024 for the above State Significant Development. Thank you for the continued opportunity to comment on the project.	
It is understood that the draft HMP encompasses the Goulburn River Solar Farm Project, covered by the Development Consent for SSD-33964533 and has been developed to meet the requirements of Condition B26. Heritage NSW has reviewed the draft HMP and supports the mitigation and management measures outlined in the document; however the following updates are required:	
<ol style="list-style-type: none">1. As noted in our previous comments on the project (DOC23/512441 and DOC24/471227-2) the Aboriginal Cultural Heritage Information Management System (AHIMS) indicates that Aboriginal site AHIMS #37-1-0053 is located within the Project Area and remains valid. Please update the HMP to include reassessment and detailed mapping of this site.2. Please update existing figures (e.g. Figure 6-1 and Figure 6-2) or provide additional maps to clearly illustrate the boundaries of recorded Aboriginal sites relevant to the HMP area.3. Please update Section 5.2.3 (Ongoing consultation protocol) to include details of how ongoing consultation will be recorded (i.e., the consultation log in Appendix 2 of the HMP will be updated and maintained by Lightsource bp recording details of the six-monthly email updates to Registered Aboriginal Parties (RAPs) and any other additional consultation that may occur throughout the life of the project). Note that, Section 7.1 may also require updating to include a consultation log/register as a heritage record for the project.	
4PSQ, 12 Darcy Street, Parramatta NSW, 2150 Locked Bag 5020, Parramatta 2124	(02) 9873 8500 www.environment.nsw.gov.au/topics/heritage
1	

4. In the discussion of incident/non-compliances in Section 6.2.1.4, Section 6.2.2 (Aboriginal heritage) and Section 6.3.1.1 (Historical heritage) please add a cross-reference to the relevant section of the HMP which discusses the notification and reporting requirements for incidents and non-compliance (i.e. Section 10).
5. Please update the unexpected finds protocol in Section 6.4.4 for newly discovered Aboriginal sites identified within the approved Development Footprint to include notification of DPHI/Heritage NSW and include a cross-reference to Section 10.2 of the HMP which covers NPW Act requirements relating to the discovery of Aboriginal objects.
6. Please update Section 9.2 to include the provision of any revised HMPs to RAPs where revisions relate to changes to the management of Aboriginal cultural heritage.

Following revision of the HMP to address the above comments, please provide a copy of the finalised document to Heritage NSW for our records.

If you have any questions about this correspondence, please contact Marika Low, 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*
9 January 2025

4PSQ, 12 Darcy Street, Parramatta NSW, 2150
Locked Bag 5020, Parramatta 2124

(02) 9873 8500

www.environment.nsw.gov.au/topics/heritage

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RESPONSE TO HERITAGE NSW – APPROACH TO HERITAGE NSW COMMENTS

Comments were received the from the Heritage NSW (ref: HMS ID 8076) on 9 January 2025 following review of the Goulburn River Solar Farm – Heritage Management Plan. Lightsource bp have addressed each comment with responses provided in **Appendix 1 Table 2**.

Appendix 1 Table 2: Heritage NSW Response

ID	Heritage NSW Comment	Lightsource bp Response
1	As noted in our previous comments on the project (DOC23/512441 and DOC24/471227-2) the Aboriginal Cultural Heritage Information Management System (AHIMS) indicates that Aboriginal site AHIMS #37-1-0053 is located within the Project Area and remains valid. Please update the HMP to include reassessment and detailed mapping of this site.	Lightsource bp has revised Section 6.2, Table 4.1 and Appendix 4 of the HMP to include reassessment and detailed mapping of Aboriginal site AHIMS #37-1-0053.
2	Please update existing figures (e.g. Figure 6-1 and Figure 6-2) or provide additional maps to clearly illustrate the boundaries of recorded Aboriginal sites relevant to the HMP area.	Figure 6-1 and Figure 6-2 in the HMP have been updated to clearly illustrate the boundaries of recorded Aboriginal sites relevant to the HMP area.
3	Please update Section 5.2.3 (Ongoing consultation protocol) to include details of how ongoing consultation will be recorded (i.e., the consultation log in Appendix 2 of the HMP will be updated and maintained by Lightsource bp recording details of the six-monthly email updates to Registered Aboriginal Parties (RAPs) and any other additional consultation that may occur throughout the life of the project). Note that, Section 7.1 may also require updating to include a consultation log/register as a heritage record for the project.	Lightsource bp has revised Section 5.2.3 of the HMP to specify that the consultation log in Appendix 2 of the HMP will be updated and maintained by Lightsource bp recording details of the six-monthly email updates to Registered Aboriginal Parties (RAPs) and any other additional consultation that may occur throughout the life of the project. Lightsource bp has also revised Section 7.1 of the HMP to specify that records of the consultation log shown in Appendix 2 Table 1 and any associated updates will be kept by Lightsource bp.

ID	Heritage NSW Comment	Lightsource bp Response
4	In the discussion of incident/non-compliances in Section 6.2.1.4, Section 6.2.2 (Aboriginal heritage) and Section 6.3.1.1 (Historical heritage) please add a cross-reference to the relevant section of the HMP which discusses the notification and reporting requirements for incidents and non- compliance (i.e. Section 10).	Lightsource bp has revised Section 6.2.1.4, Section 6.2.2 (Aboriginal heritage) and Section 6.3.1.1 (Historical heritage) of the HMP to include a cross reference to Section 10 of the HMP.
5	Please update the unexpected finds protocol in Section 6.4.4 for newly discovered Aboriginal sites identified within the approved Development Footprint to include notification of DPHI/Heritage NSW and include a cross-reference to Section 10.2 of the HMP which covers NPW Act requirements relating to the discovery of Aboriginal objects.	Lightsource bp has revised Section 6.4.4 of the HMP to include a requirement to notify DPHI/Heritage NSW of the find and reference to Section 10.3 of the HMP which covers NPW Act requirements relating to the discovery of Aboriginal objects.
6	Please update Section 9.2 to include the provision of any revised HMPS to RAPs where revisions relate to changes to the management of Aboriginal cultural heritage.	Lightsource bp has revised Section 9.2 of the HMP to include provision of revisions to changes to the management of Aboriginal cultural heritage.


APPENDIX 2: ABORIGINAL STAKEHOLDER CONSULTATION RECORDS


Appendix 2 Table 1: Aboriginal Consultation Log on this HMP.

Date	Organisation	Comment	Method
19.11.24	A1 Indigenous group	Catherine Burrowes (CB) emailed ACHMP - closing date 17.12.24	Email
19.11.24	Corroboree Aboriginal Corporation	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Didge Ngunawal Clan	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Gomeroi People	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Hunter Traditional Owner	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Hunters & Collectors	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Junburra Aboriginal Consultancy Services	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Merrigarn	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Murra Bidgee Mullangari Aboriginal Corporation	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Rose Nean	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Ungooroo Aboriginal Corporation	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Walhallow Local Aboriginal Land Council	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Wanaruah Local Aboriginal Land Council	CB emailed ACHMP - closing date 17.12.24	Email
19.11.24	Widescope Indigenous Group	CB emailed ACHMP - closing date 17.12.24	Email
20.11.24	Murra Bidgee Mullangari Aboriginal Corporation	CB received email - I endorse the recommendations made	Email
21.11.24	Murra Bidgee Mullangari Aboriginal Corporation	CB replied with thanks	Email

Appendix 2 Figure 1: Email (BCC) to RAPs Seeking Review of the Draft of this HMP.

Goulburn River Solar Farm - Heritage Management Plan

 Catherine Burrowes
To: beth.kramer@lightsourcebp.com
Cc: [REDACTED]
Bcc: [REDACTED]

 V2.0_FINAL DRAFT_Goulburn River Solar Farm_HMP.pdf
.pdf File

Tue 19/11/2024 11:08 AM

Reply Reply All Forward

Dear Members

Thank you for your continued participation as a Registered Aboriginal Party (RAP) for the Goulburn River Solar Farm (the project).

Lightsource Development Services Australia Pty Ltd, (the Proponent) would like to offer you the opportunity to provide feedback on the draft Heritage Management Plan (HMP) which has been developed in accordance with the Development Consent issued in August 2024.

We are particularly interested in your preference regarding the long-term management of Aboriginal objects which will be salvaged (refer to Section 6.2.3.7 of the HMP).

We ask that any comments or feedback on the HMP is provided within twenty-eight (28) days. This period closes on Tuesday 17 December 2024.

Should our office not be contacted within this timeframe, we will presume that you are satisfied with the contents of the HMP as it stands.

If you need any help supplying feedback or have any queries, please do not hesitate to contact our office.

Regards, Catherine



Catherine Burrowes
OzArk Environment & Heritage
Office Manager
(02) 6882 0118

Appendix 2 Figure 2: Responses received from the RAPs.

From: Ryan Johnson [REDACTED]
Sent: Wednesday, 20 November 2024 5:22 PM
To: Catherine Burrowes <catherine@ozarkehm.com.au>
Subject: Re: Goulburn River Solar Farm - Heritage Management Plan

Hi
I have read the project information and draft management plan for the above project, I endorse the recommendations made
Thanks
Darleen
[REDACTED]

APPENDIX 3: ABORIGINAL ARTEFACT IDENTIFICATION

	
<p>Retouched blades (scale = 1cm)</p>	<p>Flake</p>
	
<p>Microliths (scale = 1cm)</p>	<p>Scraper (scale = 1cm)</p>
	
<p>Flake characteristics (scale = 1cm)</p>	<p>Core from which flakes have been removed (scale = 1cm)</p>

APPENDIX 4: MANAGEMENT COMMITMENTS

Appendix 4 Table 1 describes the heritage mitigation and management measures for the development. From left to right, the columns of **Appendix 4 Table 1** describe:

- The 'ID': a unique identifier for each mitigation strategy identified in this HMP.
- The 'Aspect': a high-level summary of what heritage matter is being mitigated.
- The 'Mitigation / Management Measure': the actions that will be undertaken to reduce the heritage impacts of the development, including a summary of any proposed techniques that will be used to implement the heritage mitigation and/or management measures.
- The 'Development Phase': identifies what part of the development phase the heritage mitigation and/or management measure will apply. A heritage mitigation and/or management measure can apply to multiple development phases.
- The 'Responsible Party': identifies which group is responsible for implementing the applicable heritage mitigation and/or management measure. The 'Personnel Responsible' column identifies the individual from the 'Responsible Party' who is to implement the heritage mitigation and/or management measure. Numbers 1–5 have been used to represent which individual is responsible, as follows:
 - 1) Lightsource bp Development Principal.
 - 2) Construction Contractor or O&M Site Manager
 - 3) HSE Coordinator
 - 4) Contractor Archaeologist.
 - 5) All Employees and Contractors

Note: for some mitigation measures, there is more than one 'Responsible Party' and 'Personnel Responsible'.

- The 'Timing/Frequency': describes when a mitigation and/or management measure is to be implemented.
- The 'Implementation Action': describes the procedures that show how the proposed techniques for the heritage mitigation and/or management measures are practically being done within the development area. These procedures are described in **Section 6** to **Section 8**.
- The 'Compliance Record': identifies the record that will be used to maintain compliance with the applicable heritage mitigation and/or management measure.

Appendix 4 Table 1: Heritage mitigation and management measures for the development.

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
HMP 01	Heritage (General)	37-1-1033 (Killoe Creek GG1) is outside of the Access route. The site will be included on all applicable construction plans, regardless of if works need to take place at the Killoe Creek crossing on Ringwood Road.	✓	✓	-	-	✓	✓	-	1 & 2	As required. Will need to be included on all plans prior to and throughout construction	Section 6.2.3.2 Additional investigation at 37-1-1033 (Killoe Creek GG1)	Daily Briefing Record Construction Plans
HMP 02	Heritage (General)	37-1-0053 (Poggy;Mt Misery;) is outside of the Development Footprint. The site will be included on all applicable construction plans	✓	✓	-	-	✓	✓	-	1 & 2	As required. Will need to be included on all plans prior to and throughout construction	Section 6.2.3.1	Daily Briefing Record Construction Plans
HMP 03	Heritage (General)	Within 12 months of construction commencing, additional investigation will be carried out at 37-1-1033 (Killoe Creek GG1) and 37-1-0053 (Poggy;Mt Misery;). This investigation will include: <ul style="list-style-type: none"> • Description of the current site condition • Mapping of site features • Submission of a site card update with the results of the investigation. 	✓	✓	-	-	✓	-	-	1	Within 12 months of construction commencing	Section 6.2.3.2 Additional investigation at 37-1-1033 (Killoe Creek GG1), Section 6.2.3.3 Additional investigation at	Salvage Report. Updated site card

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
												37-1-0053 (Poggy;Mt Misery;).	
HMP 04	Heritage (General)	Undertake the mapping, description, and collection of surface artefacts prior to commencement of construction.	✓	-	-	-	✓	✓	-	1	Prior to development activities in the vicinity (100 m) of sites to be salvaged	Section 6.2.1.3 Obligation to implement management measures	Salvage Report
HMP 05	Heritage (General)	The Aboriginal cultural heritage sites outside of the Development Footprint but inside the Project Area identified in Table 6.1 will be protected by: <ul style="list-style-type: none"> All ground disturbance being restricted to the approved Development Footprint All sites outside of the Development Footprint being identified on applicable plans Restricting vehicle traffic to established roads and tracks Ensuring all contractors working in the vicinity of the sites being informed of their location and management requirements. 	✓	✓	✓	✓	✓	✓	✓	1,2,3 & 4	Prior to construction and on-going	Section 6.2.3.10 Protection of known sites outside the Development Footprint	Construction Plans

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
HMP 06	Heritage (Salvage)	<p>These sites will be salvaged through the recording and collection of the surface artefacts prior to construction works proceeding. The sites to be salvaged are:</p> <ul style="list-style-type: none"> • 37-1-1028 (Rocky Creek Slope IF2) • 37-1-1029 (Wollara Road IF3) • 37-1-1030 (Monaghans Creek IF4) • 37-1-1031 (Rocky Creek Gully IF5) • 37-1-1034 (Redlynch Creek OS2) • 37-1-1035 (Redlynch Creek OS1) • 37-1-1036 (Redlynch Creek OS3). 	✓	-	-	-	✓	-	-	1	Prior to development activities in the vicinity (100 m) of sites to be salvaged	Section 6.2.3.5 Aboriginal sites approved for salvage	Salvage Report
HMP 07	Heritage (Aboriginal Objects)	<p>The methodology for the collection will include the following measures:</p> <ul style="list-style-type: none"> • All visible surface artefacts will be flagged in the field • The sites will be photographed after flagging (orange) and before recording • All artefacts will have the following artefact information recorded: <ul style="list-style-type: none"> ○ Location ○ Artefact class ○ Artefact type ○ Size ○ Reduction level ○ Raw material ○ Notes. 	✓	✓	✓	-	✓	-	-	1	Prior to development activities in the vicinity (100 m) of sites to be salvaged	Section 6.2.3.7 Surface collection methodology for Aboriginal sites	This Heritage Management Plan Salvage Report

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
		<ul style="list-style-type: none"> A selection of indicative and / or unusual artefacts from each site will be photographed Once all recording is complete, the artefacts will be collected according to site with artefacts from each site being kept separate The recording of the artefacts recovered will be completed in the field and this data would be incorporated into a report An ASIRF will be submitted by the archaeologist detailing the collection process and results at the sites. 											
HMP 08	Heritage (General)	Avoid the visible standing posts associated with HS01 by all works associated with the Project to conserve their important values by implementing a minimum 20 m no-go buffer around the visible remains of the ruins	✓	✓	✓	✓	-	✓	✓	1,2 & 3	Prior to construction	Section 6.2.3.4 Management of HS01	Construction Plans Photographic Record
HMP 09	Heritage (General)	Include HS01 on all site construction plans and induction materials to ensure that the location is protected. Install permanent fencing (post and cable) and signage around HS01 to ensure that it is not harmed.	✓	✓	✓	✓	-	✓	✓	1,2 & 3	Construction	Section 6.2.3.4 Management of HS01 Section 6.3.1 Historical Heritage Management Measures	Construction Plans Daily Briefing Record

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
HMP 10	Heritage (Aboriginal Objects)	<p>The long-term management of the Aboriginal objects salvaged for the Project, as well as any additional artefacts discovered during construction and operation of the Project will include either:</p> <ul style="list-style-type: none"> The reburial of artefacts at a location outside of the development footprint but within the Project Area, or A RAP group nominating themselves to apply for a Care Agreement to retain the artefacts. Any Care Agreement will require the approval of Heritage NSW. <p>Any long-term management of Aboriginal objects will be done in consultation with the RAPs.</p>	✓	✓	-	-	✓	✓	✓	1	Construction / Ongoing Implementation	Section 6.2.3.8 Long-term Management of Aboriginal Objects	Stakeholder Records
HMP 11	Heritage (Unexpected Finds)	<p>Protocols related to the discovery of suspected human skeletal material include:</p> <ul style="list-style-type: none"> When suspected human skeletal remains are exposed or uncovered, all work is to cease immediately in the near vicinity of the find location An exclusion zone with a radius of 20 m is to be cordoned off by temporary fencing around the outer extent of the exposed suspected human skeletal remains site 	✓	✓	✓	✓	-	✓	✓	1,2,3, 4 & 5	Prior to Construction / Ongoing Implementation	Section 6.4.2 Identification of Potential Human Skeletal Remains	Stakeholder Records

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
		<ul style="list-style-type: none"> The Construction/Operation Contractor Site Manager is to notify Lightsource bp and the New South Wales Police immediately If the New South Wales Police determine that the remains are modern and human, the area will become a crime scene under the jurisdiction of the NSW Police. They may request that a suitably qualified forensic anthropologist or archaeologist be engaged to assist If the remains are identified as ancient Aboriginal remains, Heritage NSW and RAPs are to be formally notified in writing and the procedure set out in Figure 6-6 followed If the remains are identified as historical, non-Aboriginal human remains, the site is to be secured, and Heritage NSW contacted If the remains are identified as non-human, work can recommence immediately. 											

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
HMP 12	Heritage (Aboriginal Objects)	<p>Implement the following procedures for any newly identified Aboriginal objects within the development footprint:</p> <ul style="list-style-type: none"> The site will be temporarily fenced with an exclusion buffer of at least 5 m The site will be assessed by a qualified archaeologist and one RAP representative If found to be of cultural significance, the site location will be registered with AHIMS Depending on the Aboriginal cultural heritage values at the site and the degree of immediate threat to the site, the site will be salvaged according to the appropriate management process in the HMP A brief report of the salvage will be produced to record the findings On the completion of salvage at such sites, an ASIRF will be completed soon after completion of salvage fieldwork and certainly within four months. Copies of the forms will be archived All artefacts salvaged will be subject to the approved long-term management process set out in the HMP. 	✓	✓	✓	✓	-	✓	✓	1,2,3, 4 & 5	Ongoing Implementation	Section 6.4.3 Discovery of unrecorded Aboriginal object(s)	Stakeholder Records Aboriginal Site Card

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
HMP 13	Heritage (General)	<p>Manage any new Aboriginal site identified outside the approved impact footprint in accordance with the following procedure:</p> <ul style="list-style-type: none"> The site will be assessed by a qualified archaeologist and one representative of the RAPs The site will be considered for fencing depending on its proximity to the impact footprint If found to be of cultural significance, the site location will be registered with AHIMS, and a site card submitted. The site will not be able to be harmed without an AHIP. 	✓	✓	✓	✓	-	✓	✓	1,2,3, 4 & 5	Ongoing Implementation	Section 6.4.5 New Sites outside the development consent	Stakeholder Records Aboriginal Site Card
HMP 14	Heritage (General)	Following development consent of the Project, the proponent will develop an HMP which is to be agreed to by the RAPs and DPPI (with input from Heritage NSW).	✓	✓	✓	✓	✓	-	-	1	One off	This HMP	This HMP
HMP 15	Heritage (General)	<p>The HMP will include an unanticipated finds protocol, unanticipated skeletal remains protocol, protocols related to heritage inductions for work crews, and long-term management of any Aboriginal sites being impacted.</p> <p>37-1-0053 (Poggy;Mt Misery;), 37-1-1033 (Killoe Creek GG1), 37-1-1037 (Rocky Creek Gully</p>	✓	✓	✓	✓	✓	✓	-	1 & 3	One off / Ongoing Implementation	This HMP	This HMP

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
		OS4), 37-1-1027 (Redlynch Creek IF1), and 37-1-1032 (Ringwood Gully IF6) will not be harmed by the Project as they are located outside the Access route and the Development Footprint.											
HMP 16	Heritage (Salvage)	The entire extent of 37-1-1035 (Redlynch Creek OS1) should be salvaged as the portion of the site outside the Development Footprint will continue to be harmed by ongoing erosion.	✓	✓	-	-	✓	✓	-	1,2,& 4	Construction	Section 6.2.3.7 Surface Collection Methodology for Aboriginal Sites	Aboriginal Site Impact Recording Form
HMP 17	Heritage (Salvage)	The three trees of community interest (CST1, and CST4–CST5) that are liable to be impacted must be included in a site visit and photographic recording with RAPs at the time of the surface artefact collection. The results of the photographic recording and any comments from the RAPs about the trees will be included in the salvage report that will be produced following all salvage activities.	✓	✓	-	-	✓	✓	-	1,2, 3 & 4	Prior to construction	Section 6.2.3.9 Management of Community Interest Trees	Salvage Report
HMP 18	Heritage (General)	All land-disturbing activities must be confined to within the Development Footprint.	✓	✓	✓	-	✓	✓	-	1,2,3 & 5	Ongoing Implementation	This HMP	Daily Briefing Record construction Plans
HMP 19	Heritage (General)	Should design modifications occur and the development footprint encroaches on HS01, If further assessment and investigation would be required prior to the commencement of	✓	✓	-	-	✓	✓	-	1, 3 & 4	Ongoing Implementation	Section 6.3.1.1 Historical Heritage Management	Archaeological Assessment

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
		construction activities. This would include the preparation of an archaeological research design (in consultation with Heritage NSW) and test excavation methodology to confirm the extent of historical archaeological remains present, and the likely significance level of any historical archaeological remains on the site. An update to the HMP with the results of any archaeological investigations would be required,											
HMP 20	Heritage (Awareness)	All contractors and project team for the Project will be made aware of the archaeological potential and heritage sensitivity of HS01 through a heritage-specific induction which outlines their requirements under the <i>Heritage Act 1977</i> and the Project Approvals.	✓	✓	✓	✓	✓	✓	✓	1, 2, 3 & 5	Ongoing implementation	Section 6.2.3.4 Management of HS01 Section 7.2 Cultural Heritage Awareness Training	Induction Record
HMP 21	Heritage (Unexpected Finds)	An unexpected heritage finds protocol will be implemented for the construction works in the unlikely event that historical archaeological remains should be encountered during construction works	✓	✓	-	-	✓	-	-	1, 2 & 3	Construction	Section 6.4.1 Unanticipated Finds Procedure	Stakeholder Records Aboriginal Site Card
HMP 22	Heritage (General)	Six-monthly email updates from Lightsource bp to the RAPs will be made during construction of the Project. Once the Project is operational, RAPs will be provided with contact details of the Lightsource	✓	✓	-	-	✓	-	-	1	Construction	Section 5.2.3 Ongoing Consultation Protocols	Stakeholder Records

ID	Aspect	Mitigation / Management Measure	Development Phase				Responsible Party				Timing/ Frequency	Implementation Action	Compliance Record
			Early Works - Preconstruction	Main Works – Construction Activities	Operations and Maintenance	Decommissioning	Principal (Lightsource bp)	Construction Contractor	Operation and Maintenance Contractor	Personnel Responsible			
		<p>bp Development Principal in case they wish to make enquiries and/or raise any concerns with regards to the Project.</p> <p>The consultation log in Appendix 2 Table 1 will be updated and maintained by Lightsource bp recording details of the six-monthly email updates to RAPs and any other additional consultation that may occur throughout the life of the Project.</p>											