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NEOEN

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Culcairn Solar Farm

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Acronyms and abbreviations

ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHCRP	Aboriginal Cultural Heritage Consultation Requirements for Proponents
AHIMS	Aboriginal Heritage Information Management System
ASIRF	Aboriginal Site Impact Recording Form
BESS	Battery Energy Storage System
CoA	Conditions of Approval (from the Development Consent)
Code of Practice	Code of Practice for Archaeological investigation of Aboriginal Objects in NSW (DECCW 2010a)
DECCW	(Former) Department of Environment, Climate Change and Water (NSW) (now DPE)
DPE	Department of Planning and Environment (NSW) (former)
DPHI	Department of Planning, Housing and Infrastructure
EIS	Environmental Impact Statement for Culcairn Solar Farm
EMS	Environmental Management Strategy
EPC	Engineering, Procurement and Construction
ha	hectares
Heritage Act	<i>Heritage Act 1977</i> (NSW)
HMP	Heritage Management Plan
HSE	Health Safety and Environment
Incident	A set of circumstances that causes or threatens to cause material harm to the environment
IPC	Independent Planning Commission
km	kilometres
LALC	Local Aboriginal Land Council
LGA	Local Government Area
m	metres
MW	Megawatt
MWh	Megawatt hours
NGH	NGH Pty Ltd
Non-compliance	An occurrence, set of circumstances or development that is a breach of the CoA but is not an incident
NPW Act	<i>National Parks and Wildlife Act 1974</i> (NSW)
NSW	New South Wales

PAD	Potential Archaeological Deposit
Project Area	The entire area within the Project Boundary
Project Owner	Neoen Australia Pty Ltd
RAP	Registered Aboriginal Party
RtS	Response to Submission Report
SEO	Site Environmental Officer
SSD	State Significant Development
The Project	Culcairn Solar Farm
WMS	Work Method Statements

1. Introduction

The Culcairn Solar Farm (or “Project”) is a State Significant Development (SSD) (SSD 10288) that represents an important contribution to renewable energy generation in New South Wales (NSW).

Development Consent was granted 25 March 2021 with Conditions of Approval (CoA) from NSW Independent Planning Commission (IPC) for construction, operation and decommissioning of Culcairn Solar Farm, located approximately 4 kilometres (km) southwest of the township of Culcairn in the Greater Hume Local Government Area (LGA). The approved development footprint of Culcairn Solar Farm is shown in Appendix A and known heritage sites within the development site shown in Appendix B.

Modification Report 1 (SSD-10288 – Mod 1) was prepared and submitted to former Department of Planning and Environment (DPE) (now referred to as Department of Planning, Housing and Infrastructure (DPHI)) in October 2023 and was determined on the 22 December 2023 with consolidated Conditions of consent issued. The modification to the Project was for minor alignment revisions and widening of the Project’s development footprint along Weeamera Road and at two creek crossings. The modification was also for minor amendments to the definitions and wording of Schedule 3 Condition 2 – Transport. Modification Report 2 (SSD-10288-Mod-2) was prepared and submitted to DPHI in October 2024 and was determined December 2024 with consolidated Conditions of Consent issued. The modification was for the expansion of the Battery Energy Storage System (BESS) from 10 Megawatt (MW) /200 Megawatt hours (MWh) up to 350 MW/800 MWh at the point of connection.

The modifications resulted in no new impacts on Aboriginal heritage and therefore no new or amended mitigation measures for Aboriginal Heritage were required or listed in the approved consolidated Conditions of consent.

The purpose of this Heritage Management Plan (HMP) is to describe how impacts on Aboriginal and historic heritage will be minimised and managed during construction, operation and decommissioning of the Project. The development of the Project is required to be carried out generally in accordance with the Environmental Impact Statement (EIS) for Culcairn Solar Farm and must comply with the CoA.

1.1 Context

The Environmental Management Strategy (EMS) prepared for the Project complies with the consent, issued by the IPC, and all applicable legislation for construction, operation and decommissioning of the Culcairn Solar Farm.

This HMP is part of the Project Owner’s (Neoen Australia Pty Ltd) Engineering, Procurement and Construction (EPC) contractor’s environmental management framework for the Project, as described in the overall EMS. This HMP has been prepared to address the CoA from the IPC and all other applicable legislation during construction, operation and decommissioning of the Project.

This HMP has been prepared by suitably qualified, independent, and experienced archaeologists Kirsten Bradley and Matthew Barber from NGH, who were endorsed by the Planning Secretary in accordance with Schedule 3 Condition 23(a) of SSD 10288 on 13 July 2023 as documented in Appendix C.

1.2 Environmental Management Strategic framework

The HMP is part of the Project Owner's and their EPC contractor's environmental management framework for the Project, as described in the EMS. Mitigation and management measures identified in this plan will be incorporated into the site induction and Work Method Statements (WMS), as outlined in the EMS, where applicable.

All Project personnel, contractors and sub-contractors will undertake a site induction prior to commencing work on the Project site and will sign to acknowledge they have understood the contents of the induction. Additionally, all personnel undertaking a task governed by a work method statement must have signed that they have participated in a toolbox training on the work method statement, and that they have read and understood their obligations prior to commencing work.

Used together, the EMS, management measures, procedures, site induction and WMS, form management guides that clearly identify required environmental management actions for reference by the personnel, contractors and sub-contractors for the Project.

As a subplan of the EMS, the review and document control processes for this HMP will be undertaken in line with standard document control policy and procedures.

Throughout the development of the Project any requirements from the Planning Secretary that come from their assessment of any strategies, plans or correspondence that are submitted in accordance with the CoA must be complied with. Any requirements, actions or measures documented by the Planning Secretary following reports, reviews or audits commissioned by the DPHI regarding the compliance of the Project with the CoA must also be complied with.

2. Purpose and objectives

2.1 Purpose and objectives

The purpose of this HMP is to describe how impacts on Aboriginal and historic heritage will be minimised and managed during construction, operation and decommissioning of the Project in line with the following relevant documents.

- The Project Environmental Impact Statement (NGH 2020a).
- The Project Aboriginal Cultural Heritage Assessment Report (NGH 2020b).
- The Project Submissions Report (NGH 2020c).
- The Project Amendment Report (NGH, 2020).
- Modification Report 1 (NGH, 2023).
- Modification Report 2 (Umwelt, 2024)
- DPHI Consolidated Development Consent (determined 19 December 2024).

If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the CoA must prevail to the extent of any inconsistency.

In addition, the HMP provides guidance for the management of any unexpected Aboriginal or historic heritage objects that may be encountered during works for the Project.

The key objectives of the HMP is to ensure that impacts to Aboriginal heritage items known to be present within the Project Area are minimised, that any impacts to heritage are within the scope permitted by the planning approval conditions and that the development of the Project is carried out generally in accordance with the EIS. To achieve this objective, the following will be undertaken:

- Ensure appropriate controls and procedures are implemented during construction, operation, and decommissioning activities to avoid (where necessary) or minimise potential adverse impacts to Aboriginal heritage in the Project footprint.
- Ensure appropriate measures are implemented to address the mitigation measures as detailed in the EIS, Aboriginal Cultural Heritage Assessment Report (ACHAR), Response to Submission Report (RtS) and CoA.
- Ensure appropriate measures are implemented to comply with all relevant legislation and other requirements as described in Section 3 of this plan.
- Facilitate engagement with the local Aboriginal community in partnership to appropriately manage the Aboriginal cultural heritage values associated with the Project.

2.2 Targets

The following targets have been established for the management of Aboriginal heritage impacts during construction, operations, and decommissioning of the Project:

- Ensure full compliance with the relevant legislative requirements.
- Ensure full compliance with relevant requirements of the EIS, ACHAR, RtS, Modification Report 1, Modification Report 2 and CoA.

- Minimise or avoid impacts, including inadvertent impacts, on known Aboriginal and/or historic heritage sites.
- Follow correct procedures and ensure notification of any previously unidentified Aboriginal objects/places uncovered during construction, operation, or decommissioning.
- Follow correct procedures and ensure notification of any previously unidentified historical objects/places uncovered during construction, operation, or decommissioning.
- Ensure Aboriginal Cultural Heritage Awareness Training is provided to all personnel in the form of induction before they begin work on site.

These targets have been established to ensure the CoA, as listed in the Development Consent for the Project, are met.

- Prevent, minimise and/or offset any adverse environmental impacts of the development;
- Set standards and performance measures for acceptable environmental performance; and
- Provide for the ongoing environmental management of the development.

2.3 Current status of Aboriginal mitigation

The Project is currently in the construction phase. The salvage of known Aboriginal heritage objects approved for impacts was undertaken prior to the commencement of works. A summary of the salvage works completed to date for the Project is provided in Appendix H. Mapping within this HMP has been updated as necessary (including within Section 6) following the completion of the salvage works.

3. Environmental requirements

3.1 Legislative and other environmental management requirements

Legislation

Legislation relevant to heritage management includes:

- *Environmental Planning and Assessment Act 1979 (EP&A Act) (NSW)*
- *Environmental Planning and Assessment Regulation 2021*
- *National Parks and Wildlife Act 1974 (NPW Act) (NSW)*
- *National Parks and Wildlife Regulations 2019 (NSW)*
- *National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2010*
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth)*
- *Heritage Act 1977 (NSW)*
- *Native Title Act 1993 (Commonwealth).*

Guidelines and standards

The main guidelines, specifications, and policy documents relevant to this Plan include:

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage OEH 2011);
- *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water (DECCW) 2010a);
- *Aboriginal cultural heritage consultation requirements for proponents 2010 (ACHCRP)* (DECCW 2010b).
- *Assessing Heritage Significance* (Heritage Office, 2001).

3.2 Development consent

Development consent was issued by the IPC on 25 March 2021 for the Project. A detailed list of heritage control measures to be implemented to ensure compliance with the CoA, EIS, RtS and heritage assessments undertaken for the Project to date is detailed in Section 7 of this document.

As noted in the CoA all reasonable and feasible measures to prevent and/or minimise any material harm to the environment is noted, this includes harm to Aboriginal heritage objects. This document outlines how this is to be achieved.

Table 3-1 below lists the CoA relevant to this Plan.

Table 3-1 Location of information in this plan addressing the heritage requirement of the CoA.

Condition	Condition of Development Consent	Location of Relevant Information
1 of Schedule 2	In meeting the specific environmental performance criteria established under this consent, the Applicant must 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 development.	This document and Section 7.
2 of Schedule 2	The Applicant must carry out the development: <ul style="list-style-type: none"> • generally, in accordance with the EIS; and • in accordance with the conditions of this consent. 	Section 1 and Section 2.1
3 of Schedule 2	If there is any inconsistency between the above documents, the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	Section 2.1
4 of Schedule 4	The Applicant must comply with any requirement/s of the Planning Secretary arising from the Department's assessment of: <ul style="list-style-type: none"> • any strategies, plans or correspondence that are submitted in accordance with this consent; • any reports, reviews or audits commissioned by the Department regarding compliance with this consent; and <p>a) the implementation of any actions or measures contained in these documents.</p>	Section 1.2 and Table 7.1
21 of Schedule 3	The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint.	CoA Table 1 of Appendix 6. HMP Table 3-2 and Figure 3-1 . Section 7
22 of Schedule 3	Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.	CoA Table 2 of Appendix 6. HMP Table 3-3, Figure 3-1, Table 7-1 and Appendix E

Condition	Condition of Development Consent	Location of Relevant Information
23 of Schedule 3	<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary. (b) be prepared in consultation with Heritage NSW and Aboriginal Stakeholders. (c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> • protecting the Aboriginal heritage items identified in Table 1 of Appendix 6 or items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6; • salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 6; • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> ○ previously unidentified heritage items are found; or ○ Aboriginal skeletal material is discovered. • ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and • ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and (d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. <p>Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	<p>This document</p> <p>Section 1.1 Appendix C</p> <p>Section 4 and Appendix D</p> <p>Section 7 and Section 8.3</p> <p>Section 7 and Appendix E</p> <p>Section 8.5 Appendix F</p> <p>Appendix F.1 Section 8.2</p> <p>Section 4 and 9</p> <p>Section 8.3, 8.4, 8.5</p> <p>Section 7</p>

Condition	Condition of Development Consent	Location of Relevant Information
2 of Schedule 4	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and (b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the: <ul style="list-style-type: none"> • submission of an incident report under condition 7 of Schedule 4; • submission of an audit report under condition 13 of Schedule 4; or • any modification to the conditions of this consent. 	<p>Section 9</p> <p>Section 9.2</p>
3 of Schedule 4	<p>With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval.</p> <p>With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> • While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	<p>Section 9.2</p>

Condition	Condition of Development Consent	Location of Relevant Information
7 of Schedule 4	The Planning Secretary must be notified 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. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.	Section 8.6
8 of Schedule 4	<p>The Department must be notified in writing via the Major Projects website within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent.</p> <p>The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.</p>	Section 8.6
11 of Schedule 4	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency:(a) within three months of commencing construction; and (b) within 3 months of commencement of operations.	Section 8.4
Appendix 7: Incident Notification and Reporting Requirements	<ol style="list-style-type: none"> 1. A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 7 of Schedule 4 or, having given such notification, subsequently forms the view that an incident has not occurred. 2. Written notification of an incident must: <ol style="list-style-type: none"> (a) identify the development and application number; (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; 	Section 8.6

Condition	Condition of Development Consent	Location of Relevant Information
	<ul style="list-style-type: none"> (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; and (h) identify a project contact for further communication regarding the incident. <p>3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.</p> <p>4. The Incident Report must include:</p> <ul style="list-style-type: none"> (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; and (d) details of any communication with other stakeholders regarding the incident. 	

The Aboriginal heritage items referred to in Table 1 of Appendix 6 of the CoA (see Appendix B of this document), which are referred to in Condition 21 of Schedule 3 of the CoA, that are to be avoided are listed in Table 3-2 and shown in Figure 3-1. No harm must occur to these Aboriginal heritage sites.

Table 3-2 Aboriginal heritage items listed in Table 1 of Appendix 6 of the CoA to be avoided.

Item Name	CoA Requirements
Culcairn Solar IF3 (Isolated Artefact)	Avoid Impacts
Culcairn Solar IF6 (Isolated Artefact)	Avoid Impacts
Culcairn Solar IF9 (Isolated Artefact)	Avoid Impacts
Culcairn Solar IF10 (Isolated Artefact)	Avoid Impacts
Culcairn Solar IF23 (Isolated Artefact)	Avoid Impacts
Culcairn Solar AFT3 (Subsurface Artefact Scatter)	Avoid Impacts
Culcairn Solar AFT6 (Artefact Scatter)	Avoid Impacts
Culcairn Solar AFT7 (Artefact Scatter)	Avoid Impacts
Culcairn Solar 497239 (Artefact Scatter)	Avoid Impacts
Cultural Solar 494492 (Artefact Scatter)	Avoid Impacts
Culcairn Solar ST1 (Scarred Tree)	Avoid Impacts
Culcairn Solar CT1 (Cultural Tree)	Avoid Impacts
Culcairn Solar 494924 (Scarred Tree)	Avoid Impacts
Culcairn Solar 494957 (Scarred Tree)	Avoid Impacts
Culcairn Solar 497151 (Cultural Tree)	Avoid Impacts
Culcairn Solar 497439 (Cultural Tree)	Avoid Impacts
Culcairn Solar 495666 (Cultural Tree)	Avoid Impacts
Culcairn Solar 498265 (Cultural Tree)	Avoid Impacts
Back Creek PAD	Avoid Impacts

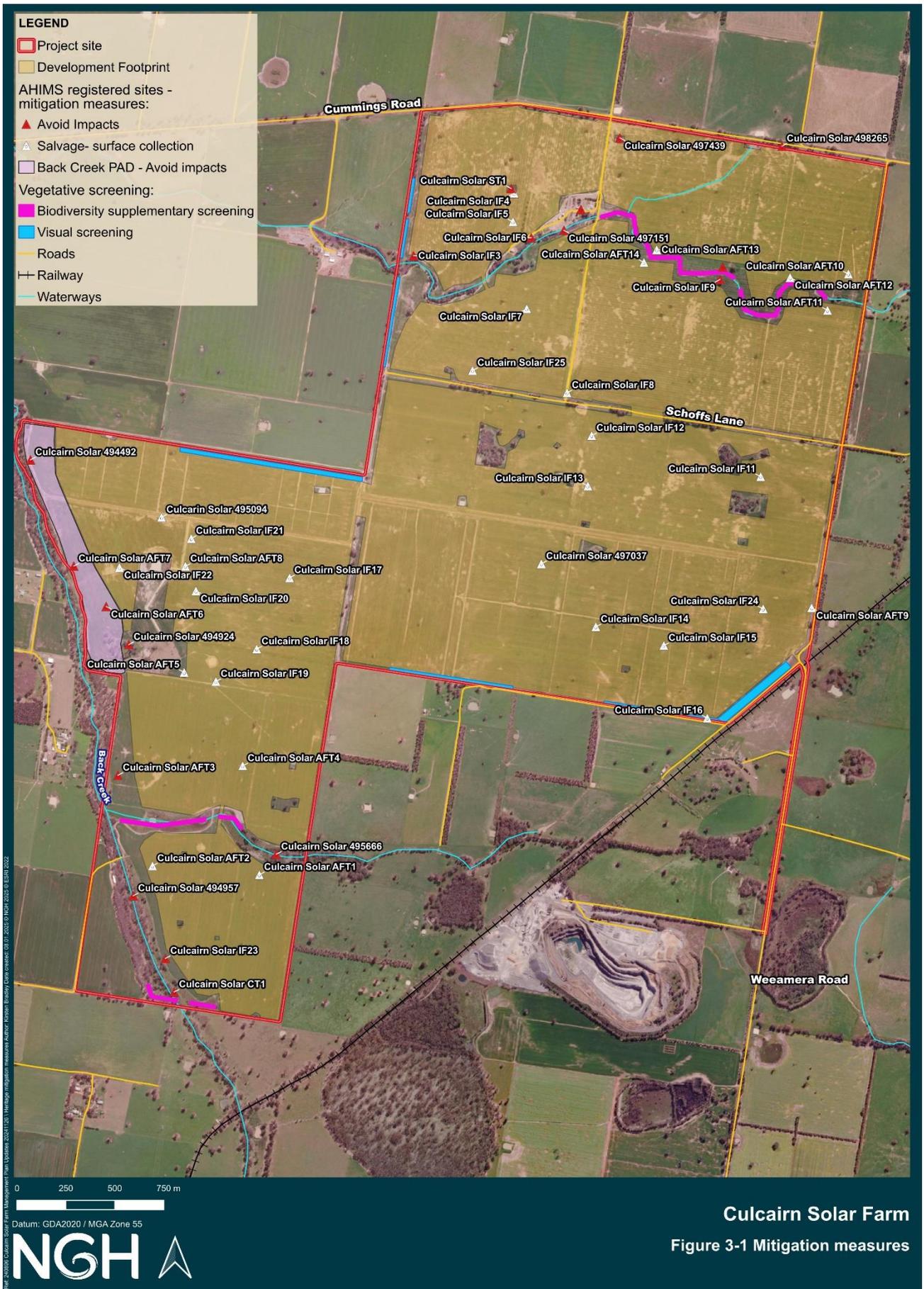


Figure 3-1 Overview of mitigation measures of known Aboriginal sites as listed in the CoA

The Aboriginal heritage items listed in Table 2 of Appendix 6 of the CoA (see Appendix B of this document), which are referred to in Condition 25 of Schedule 3 of the CoA, that are to be salvaged and relocated if impacts cannot be avoided are listed in Table 3-3 and shown in Figure 3-1. These sites were all determined as part of the ACHA (NGH 2020b) undertaken for the Project to be unable to be avoided by impacts through the development of the Project. However, in the event that the approved development footprint for the Project has changed from that assessed in the ACHA only those sites which are listed below and are within the land approved for this development may be subject to salvage via surface collection.

Table 3-3 Aboriginal heritage items listed in Table 2 of Appendix 6 of the CoA to be salvaged if they cannot be avoided by the development.

Item Name	CoA Requirements	Degree of Impact
Culcairn Solar IF4 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF5 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF7 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF8 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF11 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF12 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF13 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF14 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF15 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF16 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF17 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF18 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF19 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF20 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF21 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF22 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF24 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar IF25 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar 495094 (Isolated Artefact)	Salvage- surface collection	Whole
Culcairn Solar AFT1 (Artefact Scatter)	Salvage- surface collection	Partial

Item Name	CoA Requirements	Degree of Impact
Culcairn Solar AFT2 (Subsurface Artefact Scatter)	Salvage- surface collection	Partial
Culcairn Solar AFT4 (Artefact Scatter)	Salvage- surface collection	Whole
Culcairn Solar AFT5 (Artefact Scatter)	Salvage- surface collection	Whole
Culcairn Solar AFT8 (Artefact Scatter)	Salvage- surface collection	Whole
Culcairn Solar AFT9 (Artefact Scatter)	Salvage- surface collection	Partial
Culcairn Solar AFT10 (Artefact Scatter)	Salvage- surface collection	Partial
Culcairn Solar AFT11 (Artefact Scatter)	Salvage- surface collection	Whole
Culcairn Solar AFT12 (Artefact Scatter)	Salvage- surface collection	Partial
Culcairn Solar AFT13 (Artefact Scatter)	Salvage- surface collection	Partial
Culcairn Solar AFT14 (Artefact Scatter)	Salvage- surface collection	Partial
Culcairn Solar 497037 (Isolated Cultural Object)	Salvage- surface collection	Whole

3.3 Internal permit

An internal ground disturbance permit process will be implemented during construction (see Section 7.4). The ground disturbance permit process is integral to communicate the distinction between heritage sites which must be avoided and the ground disturbance footprints in which the EPC contractors will be working.

4. Consultation for the HMP

Condition 23(b) of Schedule 3 of the CoA requires the HMP be prepared in consultation with Heritage NSW and Aboriginal Stakeholders. The consultation process for this Project began in 2018 for the ACHAR. The consultation with Aboriginal stakeholders was undertaken in accordance with clause 80C of the National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2010 following the consultation steps outlined in the ACHCRP guide.

As a result of this process, two Aboriginal organisations and one individual are the Registered Aboriginal Parties (RAPs) for the Project as listed below and outlined in Appendix D.

- The Albury and District Local Aboriginal Land Council (Albury LALC).
- Bundyi Cultural Services; and
- Yalmambirra.

This HMP was provided as a draft to the RAPs for comment. Comments were received from the RAPs as summarised below.

- Albury LALC replied via email on 03 July 2023 and noted that they were satisfied and had no further comments.
- Yalmambirra replied via email on 23 June 2023 and noted that as he was not involved in the project fieldwork it would not be appropriate to provide comment.
- Bundyi Cultural Services replied with a letter via email on 06 July 2023 (copy provided in full in Appendix D) and a summary of the comments is provided below.
 - Any cultural training should be conducted by a Wiradjuri Knowledge Holder/RAP who is able to deliver such training. A Cultural Awareness Program should also be undertaken by a Wiradjuri Knowledge Holder/RAP who is able to deliver such training.
 - RAPs should be involved in any moving and/or relocation of Aboriginal objects.
 - The demarcation of Aboriginal sites should be undertaken with Wiradjuri Knowledge Holders/RAPs to assist with this onsite work.
 - If any modifications are proposed which would impact the area of PAD currently being avoided subsurface testing must be conducted with Wiradjuri Knowledge Holders/RAPs contracted for this work.
 - The induction material relating to Aboriginal heritage should be looked at and approved by local Wiradjuri Knowledge Holder/RAPs to ensure the information shown and written is correct and that cultural protocol is understood and relevant for the project.

Where possible and appropriate, these comments have been incorporated into this HMP.

As per Condition 23 (c) of the CoA, consultation with the Project RAPs would be ongoing during implementation of the Plan including at specific milestones such major maintenance activities and prior to decommissioning. Consultation with the RAPs will generally be provided in writing via email by the Project's Environmental Representative and/or their representative as required. All consultation with the RAPs must be recorded in a log to ensure auditable compliance.

Heritage NSW provided comment on this HMP on 08 August 2023 as documented in Appendix D. Where possible and appropriate, these comments have been incorporated into this HMP.

Approval was issued on 28 February 2025 by the nominee of the Planning Secretary for the HMP to be updated to include the modifications without requiring further stakeholder engagement (see Appendix D1.2).

5. Existing heritage

The EIS, Modification 1 and Modification 2 did not identify any historic heritage items that would be impacted by the Project.

In regard to Aboriginal heritage a total of 26 isolated finds, 16 low density artefact scatters, five cultural tree sites, three modified tree sites and a single cultural stone site were recorded. Several areas of Potential Archaeological Deposits (PADs) were recorded which were located around Back Creek, Billabong Creek and a paleochannel south of Billabong Creek. Any areas of PAD which were initially determined to be unable to be avoided by the proposed development were subject to subsurface test excavation following the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. A total of 17 stone artefacts were recovered from 13 of the 68 excavated test pits. All of the subsurface artefacts recovered from the testing programme were from the upper 20cm of the deposit excavated. All the stone artefacts recovered from the testing programme were manufactured from quartz which is a common lithic material for the area. The material recovered from the subsurface testing was stored in locked cabinet in temporary care at the NGH office. The material recovered from the subsurface testing programme was managed in accordance with long term management of sites as noted in Section 7.2 of this HMP.

The distribution of surface stone artefacts and those recovered during the test excavation suggests that the Project Area generally contains a low density of stone artefacts, which would predominantly consist of quartz, interspersed with areas with no artefactual material and that the area was likely utilised for intermittent camping, hunting, and gathering resources by Aboriginal people in the past. The Aboriginal sites recorded across the Project Area were noted to be representative of the opportunistic use and movement of small groups of Aboriginal people through the landscape occupying short term camps or traveling through the area.

The surface collection salvage of any Aboriginal heritage items (as approved in the CoA) that cannot be avoided by the development of the solar farm was carried out in line with the salvage methodology outlined in Appendix E and in accordance with long term management of sites as noted in Section 7.2 of this HMP. The details of the salvage which has occurred is outlined in Appendix H. All reasonable attempts, through the visual inspection of the site area by archaeologists with Aboriginal community representatives, was undertaken to relocate the originally recorded surface stone artefacts. Changes in the ground surface visibility and standard taphonomic and other environmental factors were noted to have impeded the relocation of all the recorded stone artefacts noted in the ACHAR. This is a typical and accepted archaeological phenomenon and therefore the salvage surface collection focused on visible artefacts within each site, which was an acceptable outcome.

6. Heritage mapping

Mapping of all the original known Aboriginal heritage items are shown below in Figure 6-1 via site type. Figure 6-2 to Figure 6-4 show the sites which remain in situ following the completion of the salvage program, including the reburial locations.

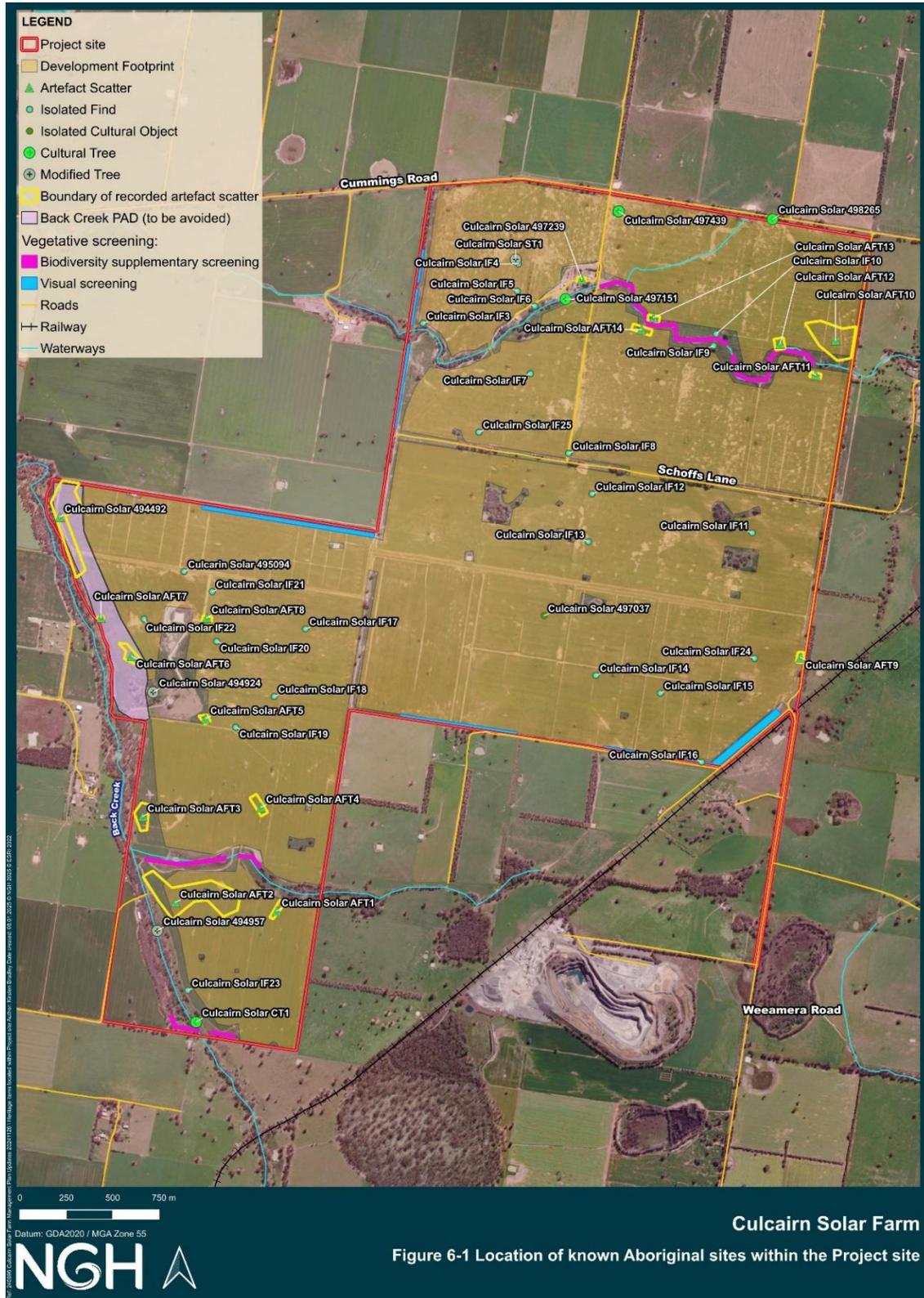


Figure 6-1 Location of all originally known Aboriginal sites with the Project Area.

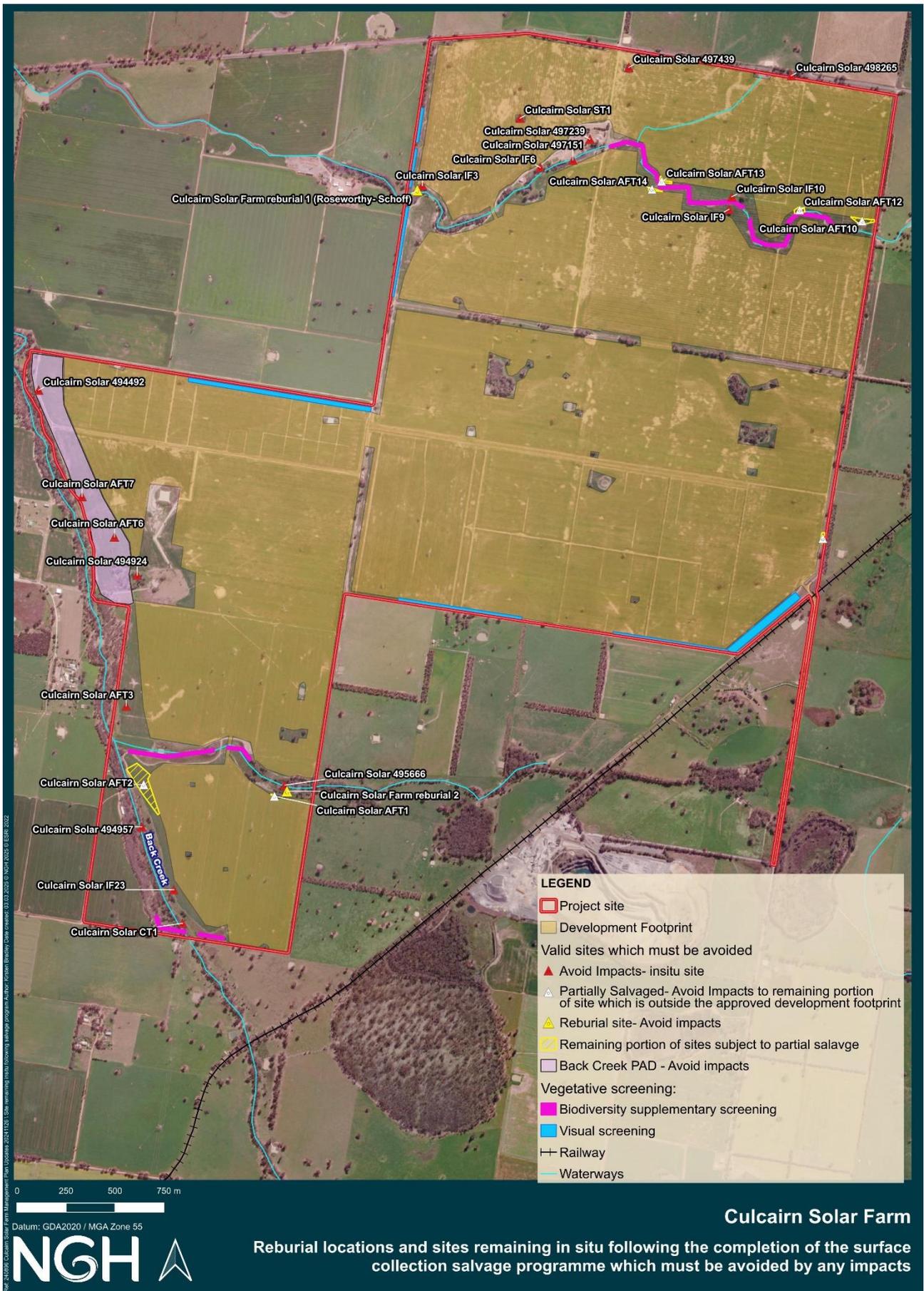


Figure 6-2 Overview of reburial locations and sites remaining in *situ* following the completion of the surface collection salvage programme which must be avoided by any impacts.

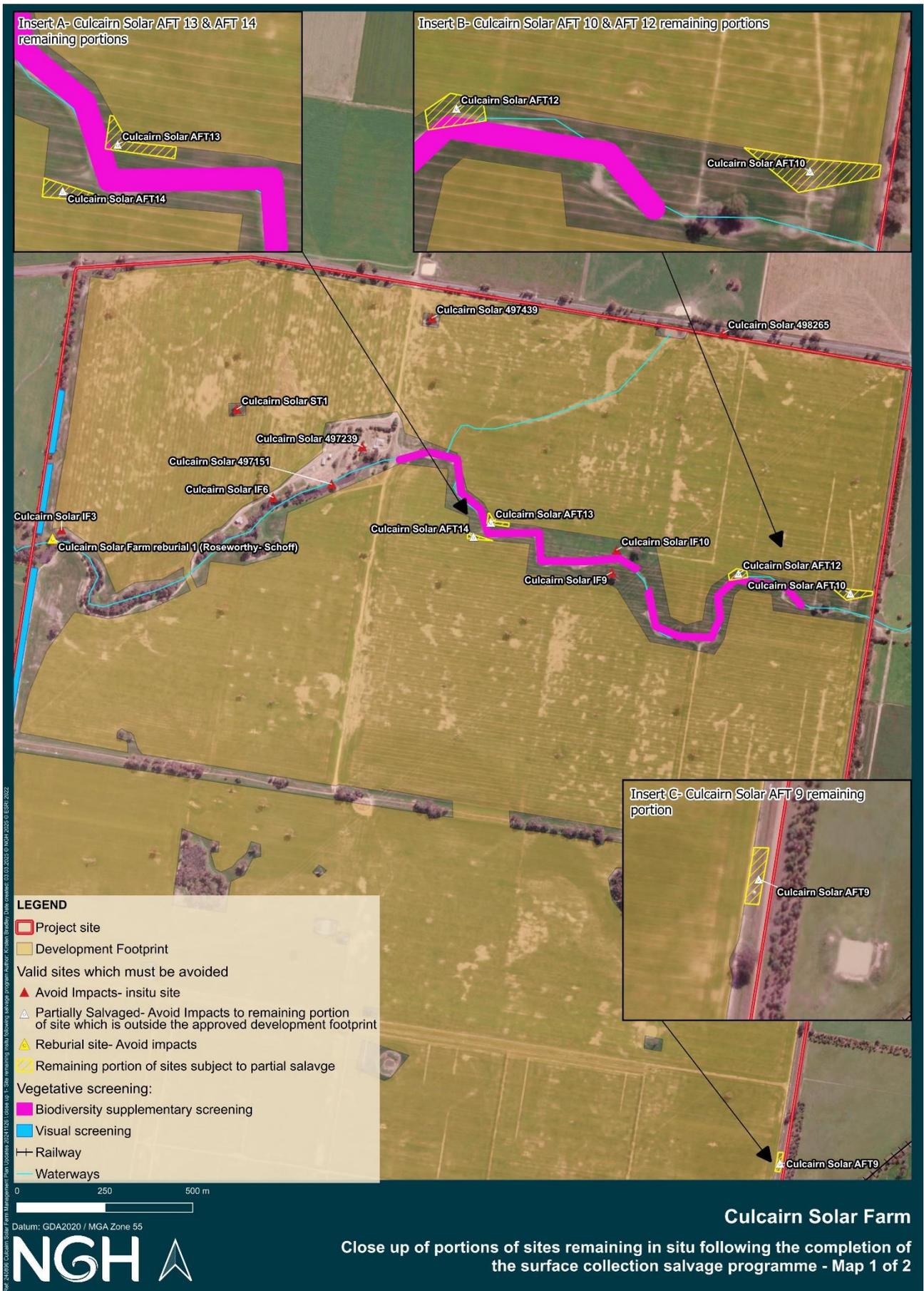


Figure 6-3 Close up of portions of sites remaining in *situ* following the completion of the surface collection salvage programme, Map 1 of 2.

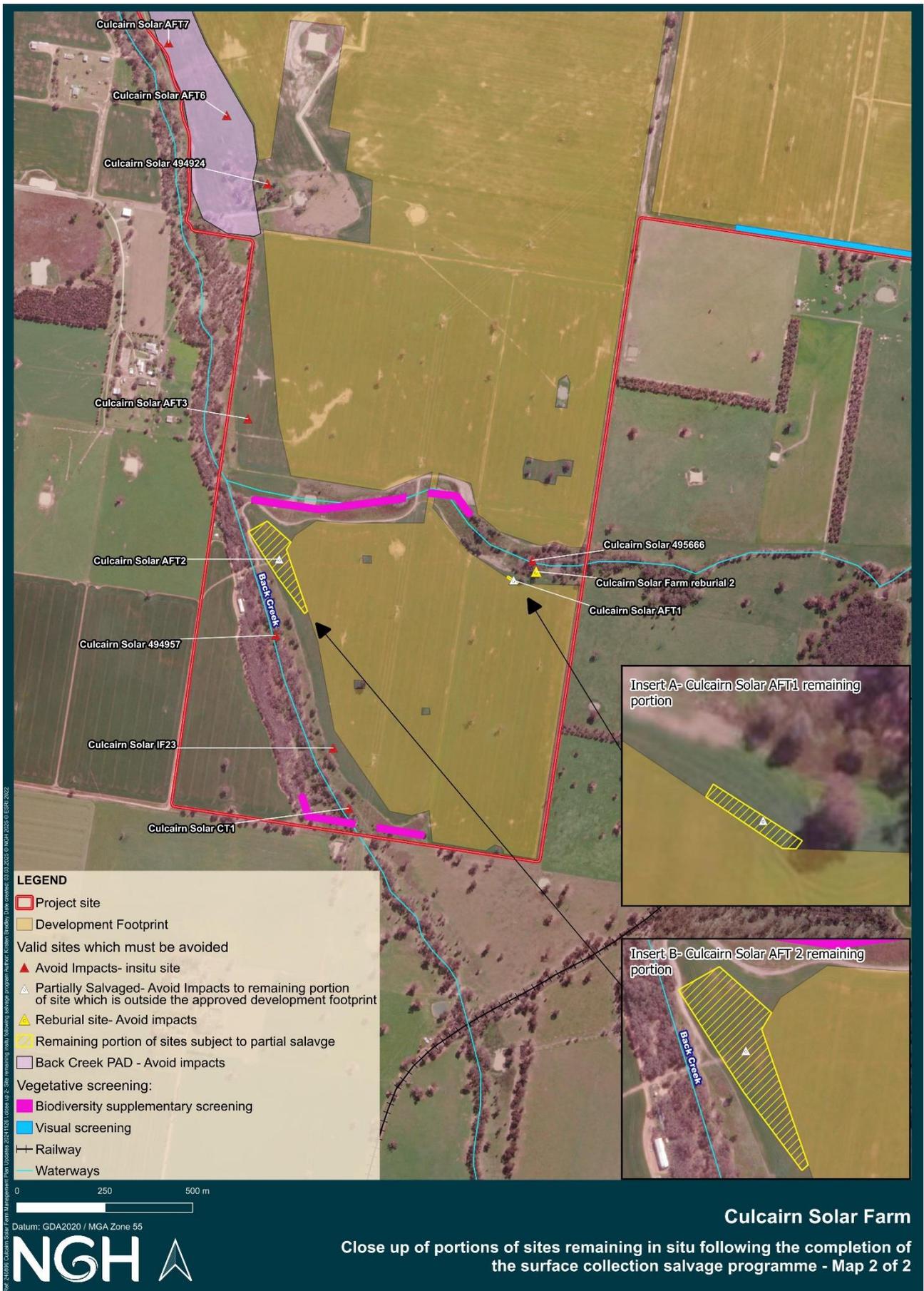


Figure 6-4 Close up of portions of sites remaining in *situ* following the completion of the surface collection salvage programme, Map 2 of 2.

7. Heritage control measures

A range of mitigation requirements and control measures are identified in the CoA, EIS, RtS and ACHAR undertaken for the Project. Specific measures and requirements to address impacts to heritage values are outlined in Table 7-1. The measures have been listed to cover broad activities throughout the project life and as such there may be some repetition of mitigation measures. The activities required for the development of the Project have been generally grouped into the categories of design, pre-construction, construction, operation and decommissioning and therefore not all individual activities are listed in this table however all Project activities should be grouped into the most appropriate overarching activity category.

Table 7-1 Heritage control measure as required under the CoA, EIS, RtS and ACHAR in relation to the Project.

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
General				
Implementation of an approved Heritage Management Plan.	This document	Pre-construction Construction Operation Decommissioning	EPC Contractor Project Manager	This document
All reasonable and feasible measures must be implemented to prevent and/or minimise any material harm to the environment, including Aboriginal objects, that may result from the construction, operation, upgrading or decommissioning of the development.	This document	Pre-construction Construction Operation Decommissioning	EPC Contractor Project Manager	This document
Throughout the development of this Project any requirements from the Planning Secretary that may arising from their assessment of any strategies, plans or correspondence that are submitted in accordance with the CoA must be complied with. Any requirements, actions or measures documented by the Planning Secretary following reports, reviews or audits regarding the compliance of the Project with the CoA must also be complied with.	This document CoA Section 9.2	Pre-construction Construction Operation Decommissioning	Project Owner EPC Contractor Project Manager	This document CoA

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<p>Ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in the CoA as sites to avoid impacting or other sites located outside the approved development footprint.</p> <p>This must be considered for all works including but not limited to, pre-construction, construction, landscape planting, erosion and soil management and road upgrades both within and outside the approved development footprint.</p> <p>Any works that are to occur outside the approved development footprint will require a modification.</p>	This document CoA	Design Pre-construction Construction Operation Decommissioning	Project Owner EPC Contractor Project Manager	This document CoA
A copy of the HMP should be kept on site during construction and operation of the Project and be readily available for reference if and as required.	This document	Pre-construction Construction Operation Decommissioning	EPC Contractor Project Manager	This document
<p>Training will be provided to all personnel involved in construction and management phases of the Project, including relevant sub-contractors on heritage requirements from this plan through inductions, toolboxes, and targeted training. All employees, contractors and utility staff working on site will receive Aboriginal Heritage Training in the form of an induction before they begin work on site. A record of this training as part of the site induction process will be kept.</p>	Induction package Toolbox training material Targeted training material	Pre-Construction Construction Operation Decommissioning	Project Manager Environmental Officer EPC Contractor	This document Section 8.2 and CoA Section 23(c)
<p>The induction material relating to Aboriginal heritage will be reviewed by the RAPs prior to its use as part of the Project's induction material. This is to ensure the information provided is culturally appropriate and relevant to the Project.</p>	Induction package	Pre-Construction	Project Manager Environmental Officer EPC Contractor	This document Section 8.2

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<p>An Aboriginal Cultural Awareness session should be conducted and recorded by a Wiradjuri Knowledge Holder/RAP for use as part of the heritage induction material.</p>	<p>Targeted training material</p>	<p>Construction Operation</p>	<p>Project Manager Environmental Officer EPC Contractor</p>	<p>This document</p>
<p>A strategy for the long-term management of any items or material that are salvaged would be developed in consultation with the registered Aboriginal parties. The artefacts recovered during salvage and those previously recovered during the test excavation would be relocated (in line with Requirement 26 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW) to a safe location within the Project area outside the approved development footprint which will not be impacted by works or subject to any ground disturbance. The relocation site is required to also be outside the required buffer zone around any Aboriginal sites not approved for impacts.</p> <p>The relocation back to the project area of the artefacts recovered during salvage and those previously found during the test excavation would, where possible, be undertaken with a representative of the RAPs (as invited by the Project Owner and/or the EPC contractor).</p>	<p>CoA Heritage reports This Document</p>	<p>Pre-construction</p>	<p>Project Manager Environmental Officer Project Archaeologist</p>	<p>This document Appendix E and Section 7.2 Appendix H</p>
<p>Further archaeological assessment would be required if the Project activity extends beyond the beyond the approved development footprint. In the event that new or modified works are required heritage impacts must be appropriately considered. This would include consultation with the registered Aboriginal parties and may include further field survey and subsurface testing.</p> <p>A formal modification to the development consent would also be required if any activity were proposed to extend beyond the area assessed and outside of the approved development footprint and granted for development approval in the CoA.</p>	<p>Heritage reports CoA</p>	<p>Design Pre-construction Construction Operation</p>	<p>Project Owner EPC Contractor Project Manager</p>	<p>CoA Heritage reports This document</p>

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
The location of all Aboriginal sites which are not approved for impacts should be clearly shown on all relevant construction mapping and plans, including drip-zone/root protection zones of culturally significant trees and buffer zones of stone artefacts.	Construction mapping and plans	Pre-construction Construction Operation Decommissioning	EPC Contractor Project Manager	This document and construction mapping and plans
Cultural Heritage must be included within any major environmental audit for the Project.	CoA This document	Pre-construction Construction Operation Decommissioning	Independent Auditor Project Manager	This document Section 8.4
Consultation with the RAPs would be ongoing over the life of the Project unless the RAPs request to no longer be contacted. All consultation with the RAPs must be recorded in a log to ensure auditable compliance. At a minimum RAP consultation will occur to notify them of the commencement of construction works and prior to decommissioning works beginning.	RAP contact details	Pre-construction Construction Decommissioning Major maintenance	Project Manager Environmental Officer	This document Section 4 and Appendix D
Design				
A minimum 5m buffer should be observed around all stone artefact sites that are being avoided by the development. This buffer zones takes into consideration the error range in standard GPS accuracy. The buffer zone of sites within the Project area being avoided by the development will be delineated by the placement of star pickets with fencing wire and appropriate signage for environmental sensitive zones placed around them to clearly denote the area to ensure no impacts prior to any construction or preconstruction works, commencing. In locations that fencing is not practical, appropriate signage or other temporary marking such as safety banner may be utilised.	Heritage reports CoA	Design Pre-construction Construction Operation	Project Owner EPC Contractor Project Manager Environmental Officer Project Archaeologist	This document. Table 3-2 Section 8.3

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<p>The initial demarcation of Aboriginal sites being avoided by the development should be undertaken by a qualified archaeologist with a representative of the RAPs (if a RAP representative is available) to ensure no inadvertent impacts occur to Aboriginal objects.</p>	<p>Heritage reports CoA</p>	<p>Pre-construction</p>	<p>Project Owner EPC Contractor Project Manager Environmental Officer Project Archaeologist</p>	<p>This document. Table 3-2 Appendix H</p>
<p>The development avoids the three modified trees and five cultural tree sites. A minimum of 10m buffer should be in place around each modified tree and cultural tree site to prevent any inadvertent impacts of the canopy and root system. The buffer zone (which includes the drip-zone/root protection zones of culturally significant trees) will be delineated by the placement of star pickets with fencing wire and appropriate signage for environmental sensitive zones placed around them to clearly denote the area to ensure no impacts. The fenced buffer zone will be extended, if required, to include the drip zone where the canopy extends beyond 10m. In locations that fencing is not practical, appropriate signage or other temporary marking such as safety banner may be utilised.</p>	<p>This document ACHAR Construction mapping and plans</p>	<p>Pre-construction Construction Operation Decommissioning</p>	<p>EPC Contractor Project Manager</p>	<p>This document Table 3-2</p>
<p>If the proposed development footprint is changed and the areas of PAD along Back Creek and/or Billabong Creek will be impacted, a subsurface testing program must be conducted at the PADs not subject to the subsurface testing program undertaken during the heritage assessment completed to date for this Project. Excavated material may need to be analysed off site and this is most likely to be undertaken in NGH offices, where the material will be analysed and then subsequently returned to site for reburial.</p> <p>A formal modification to the development consent would be required if any activity were proposed to extend beyond the area assessed and approved development footprint and granted for development approval in the CoA.</p>	<p>Heritage reports CoA</p>	<p>Design Pre-construction Construction Operation</p>	<p>Project Owner EPC Contractor Project Manager</p>	<p>CoA Heritage reports This document</p>

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
PRE-CONSTRUCTION				
<p>Until the surface collection salvage has occurred at the sites approved for impacts (as listed in the CoA) within the approved development footprint a minimum 5m buffer must be observed around each stone artefact site and the cultural stone site. No construction works can commence until the completion of the surface collection salvage within the approved development footprint.</p> <p>In the event that any pre-construction works are required to occur prior to the completion of the surface collection of the sites approved for impacts, the proposed pre-construction works area and access to the works area would be reviewed to ensure there would be no direct or inadvertent impacts to heritage sites. If any ground disturbing pre-construction work must be undertaken prior to salvage activities being completed, a qualified archaeologist is required on site to identify and ensure appropriate buffer zones are established (including drip lines of modified trees and scattered stone artefacts) prior to the works taking place.</p> <p>Heritage must be included in the toolbox prior to any pre-construction works occurring to ensure all staff are aware of the works area, the unexpected finds procedure and the required avoidance of all valid Aboriginal sites.</p>	<p>This document CoA</p>	<p>Pre-construction Construction Operation Decommissioning</p>	<p>Project Owner EPC Contractor Project Manager</p>	<p>This document CoA Appendix H</p>
<p>Ensure that the development avoids any direct or indirect impacts on the Aboriginal heritage items prior to the salvage of each site approved for impacts. This can be achieved by ensuring no works occur in close proximity to each site prior to a salvage programme being completed. The surface collection salvage of the stone artefacts and cultural stone object approved for impacts can only occur following development consent and prior to the proposed construction works commencing for the Culcairn Solar Farm. The collection and relocation of stone artefacts must be consistent with Requirement 26 of the Code of practice for Archaeological Investigation of Aboriginal Objects in NSW.</p>	<p>Heritage reports HMP CoA</p>	<p>Pre-construction Construction Operation Decommissioning</p>	<p>Project Owner EPC Contractor Environmental Officer</p>	<p>This document Section 3.2</p>

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<p>A reasonable attempt, through the visual inspection of the Aboriginal site/s by an archaeologist with an Aboriginal community representative, to collect any visible surface stone artefacts (as per the CoA list of Aboriginal sites to be salvaged if impacts cannot be avoided within the approved development footprint) is to be undertaken.</p> <p>The surface collection and salvage of Aboriginal objects, as per the CoA, must occur within the approved development footprint prior to construction works commencing. It is acknowledged that changes in the ground surface visibility and standard taphonomic and other environmental factors may impede the relocation of all the recorded stone artefacts noted in the ACHAR. This is a typical and accepted archaeological phenomenon and therefore salvage collection would focus on visible artefacts within each site, which is an acceptable outcome.</p>	<p>Code of Practice Heritage reports HMP CoA</p>	<p>Pre-construction Construction</p>	<p>EPC Contractor Project Manager Project archaeologist</p>	<p>This document Section 3.2 Appendix E Appendix H</p>
<p>Delineation by the placement of star pickets with fencing wire and appropriate signage for environmental sensitive zones for the artefact relocation site/s will also occur once the relocation of the salvaged cultural material has occurred. In locations that fencing is not practical, appropriate signage or other temporary marking such as safety banner may be utilised. A minimum 5m buffer zone is required to be placed around the artefact relocation site/s to ensure they will not be impacted into the future. Any relocation sites are required to be included in the inspection and monitoring that will occur fortnightly during construction by the Environmental Officer and every 12 months thereafter.</p>	<p>HMP</p>	<p>Pre-construction Construction Operational</p>	<p>EPC Contractor Environmental Officer</p>	<p>This document Section 8.3 Appendix H</p>
<p>A new site card/s must be completed on the AHIMS database for the relocated/reburial location of the salvage sites. This must occur within 1 month of the actions being completed for the reburial of the salvaged sites.</p>	<p>Code of Practice</p>	<p>Pre-construction</p>	<p>Project archaeologist</p>	<p>Code of Practice Section 7.2 Appendix H</p>

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
An Aboriginal Site Impact Recording Form (ASIRF) will be completed and submitted to AHIMS for any site harmed or destroyed from salvage and/or construction works. Artefact disposition and storage must be done in accordance with Requirement 26 of the Code of Practice (DECCW 2010).	Code of Practice Aboriginal Site Impact Recording Form	Pre-construction	Project Manager Project archaeologist	Code of Practice Section 7.2 Appendix H
An internal ground disturbance permit process will be implemented prior to any proposed Project ground disturbance related works (including landscape planting, erosion and sediment controls, pre- construction, construction and decommissioning works). The ground disturbance permit process is integral to communicate the distinction between heritage sites which must be avoided and the ground disturbance footprints in which the EPC contractors will be working. The internal ground disturbance permit should utilise the status of the site from the Heritage Site status database for this Project.	HMP	Pre-construction Construction Decommissioning	EPC Contractor Environmental Officer	Section 7.3 Section 7.4 Appendix G
Construction				
Where any additional, unrecorded Aboriginal or non-Aboriginal objects are encountered during works within or outside the approved development footprint (Appendix A) the Unexpected Finds Procedure will be followed.	Unexpected Finds Procedure Site Plan CoA	Construction Operational Decommissioning	EPC Contractor Project Manager Environmental Officer All personnel	This document Unexpected Finds Procedure Appendix F
If human remains are discovered on site, then all work surrounding the area must cease immediately, the area must be secured, and NSW Police notified. The Unexpected Finds Procedure will be followed to notify Heritage NSW as soon as possible. Work must not recommence in the area until this is authorised by Heritage NSW and/or NSW Police.	Unexpected Finds Procedure	Construction Operational Decommissioning	EPC Contractor Project Manager Environmental Officer All personnel	This document Unexpected Finds Procedure Appendix F.1 Section 8.5.1

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<p>Should an item of historic heritage be identified during works, the Unexpected Finds Procedure will be followed. Heritage NSW would be contacted prior to further work being carried out in the vicinity of the historic heritage item.</p>	<p>Unexpected Finds Procedure</p>	<p>Construction Operational</p>	<p>EPC Contractor Project Manager Environmental Officer All personnel</p>	<p>This document Unexpected Finds Procedure Appendix F</p>
<p>An new extensive search of the Aboriginal Heritage Information Management System (AHIMS) is required to be completed over the Project prior to any pre-construction works commencing and again prior to decommissioning works for the project commencing. If a period greater than 12 months has lapsed between the extensive AHIMS search being undertaken for the pre-construction works and the construction works commencing an additional new extensive AHIMS search is required prior to commencing construction works.</p> <p>These AHIMS searches are required to ensure no new Aboriginal sites in close proximity to the approved development footprint have been recorded which may need to be shown on mapping and/or appropriately demarcated prior to works commencing. In the event that any new Aboriginal sites are recorded within the approved development footprint for the Project they would be subject to the Unexpected Finds Procedure.</p>	<p>HMP</p>	<p>Preconstruction Construction Decommissioning</p>	<p>Project Manager Environmental Office</p>	<p>This document Unexpected Finds Procedure Appendix F</p>

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<p>The inspection and monitoring of the scarred and cultural trees which are not approved to be impacted, as per the CoA, will include documenting the tree and scar conditions and creating a photographic documentation record of the condition of each tree at least once every 24 months for the life of the project. The inspection and monitoring of the scarred and cultural trees which are not approved to be impacted, as per the CoA, should also occur following any severe weather events to document the condition of these sites over the life of the project.</p> <p>During construction the protection buffers of the scarred and cultural trees will be inspected weekly as part of the weekly environmental inspection to ensure the buffers, fencing/barriers and signage are still in place and adequately protect the site, including in instances when the drip zone of the canopy extends beyond 10m.</p>	HMP	Construction Operational Decommissioning	EPC Contractor Project Manager Environmental Office	This document Section 8.3 Appendix G.1 Appendix G.3
<p>In the event that the condition of any of the scarred and cultural trees which are not approved to be impacted, as per the CoA within the Project area, significantly deteriorate and/or are naturally felled, then further consultation will be undertaken with the RAPs to update them on the condition of these trees.</p>	HMP	Construction Operational Decommissioning	Project Manager Environmental Office	This document Section 4
<p>In the event that the future natural deterioration of the scarred and cultural trees may impact the assets of the Project, further consultation regarding their management would be required. This further consultation would be undertaken with the RAPs, DPE and Heritage NSW and may seek a modification to the approvals to facilitate safe removal of the tree or branches in a manner which will not impact the Project assets. Consultation would also include the best methods of conserving the tree (ie felling the tree and leaving it on site or felling the tree and entering a Care Agreement) so the scar can be retained by the Aboriginal community.</p>	HMP	Construction Operational Decommissioning	Project Manager Environmental Office	This document Section 9

7.1 Temporary/short term storage of artefacts

The stone artefacts previously recovered from the subsurface testing programme for this Project which were in temporary care in a locked cabinet at the NGH office have since been returned to Country as detailed in Appendix H.

All objects recovered from the surface collection salvage programme which were temporarily held at the NGH office have since been returned to Country as detailed in Appendix H.

Any unexpected Aboriginal stone artefacts recovered may be temporarily held in a secure locked cabinet at the NGH Wagga Wagga, Sydney or Canberra offices for analysis and recording.

7.2 Long term management and relocation of salvaged artefacts

The relocation sites for Aboriginal artefacts salvaged via the surface collection salvage programme and those previously recovered from the subsurface testing programme was agreed to by the landowner, Project owner, and RAPs. The relocation sites are outside the proposed approved development footprint within the Project Area and outside the required buffer zone around any Aboriginal sites not approved for impacts. The sites for the relocation of the salvaged Aboriginal objects has been noted by the submission of site cards to the Aboriginal Heritage Information Management System (AHIMS), as legally required. The relocation sites are both within the previously proposed areas as shown in Figure 7-1.

An ASIRF was completed and submitted to AHIMS following harm for each site collected or destroyed from salvage. Representatives from the RAPs (as selected by the Project owner and/or construction contractor) were provided with the opportunity to assist the Project Archaeologist with the salvage programme and relocation of the salvaged objects. Two representatives from the RAPs were invited to participate in the salvage programme. An Aboriginal representative conducted a smoking ceremony for the relocation of the recovered stone artefacts.

Following relocation of the Aboriginal objects, which had been salvaged as per the CoA, the site locations was provided to the Project owner, Project team, and the EPC contractor to ensure the sites are protected during construction, operation and decommissioning of the Project.

The mapping within the HMP has be updated to show the relocation sites as shown in Figure 7-1, Figure 6-2 to Figure 6-4.



Figure 7-1 Proposed long term relocation areas and reburial sites used.

7.3 Heritage site status database

Prior to any works occurring onsite a database of all previously recorded Aboriginal heritage sites was established (see Appendix G.1). This database included as a minimum the following information:

- AHIMS number of the site;
- Site name;
- CoA for site;
- Status of the site; and
- Comments.
- GIS Shape Files showing the location and status of all recorded sites.

This database will continue to be updated as needed by the Site Environmental Officer (SEO) within one month following the salvage of any unexpected finds within the Project area. The database will also include documenting the tree and scar conditions of the scarred and cultural trees within the Project area and creating a photographic documentation record of the condition of each site at least once every 24 months for the life of the project.

The SEO and site survey team coordinate access, updating and status of the shape files.

The purpose of this database is to ensure that the status of Aboriginal sites can be easily accessed by the SEO to ensure that appropriate heritage control measures, internal ground disturbance permits and monitoring of any valid/*in situ* sites within the Project Area occurs during construction, operation and decommissioning of the Project.

7.4 Ground disturbance protocol

The internal ground disturbance permit process will be managed by the Health, Safety and Environment (HSE) Manager and/or the SEO. The steps that will be implemented are detailed below:

- Contractors are informed in their contract and site induction that all ground disturbing activities require them to obtain an internal ground disturbance permit prior to starting the work.
- The ground disturbance permit must be submitted to the HSE Manager / SEO via email at least 48 hours before the work is commenced.
- The HSE Manager / SEO will compare the proposed ground disturbance area to the project footprint detailed in the current approved design, the heritage site status database and the heritage shape files.
- The HSE Manager/ SEO will visit the site to ensure the delineation of any *in situ* heritage sites in the vicinity of the proposed ground disturbance permit.
- The HSE Manager/ SEO will either issue the permit unamended or contact the contractor for further clarification.
- Once the permit has been issued, the EPC contractor may commence ground works as per their contract.

- Once the work has been completed (date specified in the permit), the HSE Manager/ SEO may be required to inspect the site, request any additional clean up or remediation activities and sign-off that the conditions of the permit have been met.
- If no valid/ *in situ* Aboriginal sites are present within the vicinity (within 50m) of the works area the permit may be approved without a site inspection.

The minimum requirements to be included in the ground disturbance permit form is provided in an example provided in Appendix G.2 of this plan.

8. Compliance management

8.1 Structure and responsibility

The organisational structure and overall roles and responsibilities, including those for contractors and sub-contractors, are outlined in the EMS. Specific responsibilities for the implementation of environmental controls in this document are summarised in Table 7-1 and the roles and responsibilities relevant to this plan are outlines in Table 8-1.

Table 8-1 Construction team roles and responsibilities.

Role	Responsibility	Authority and accountability
Project Owner's Project Manager	<ul style="list-style-type: none"> • Ensure resources are made available to enable works to comply with EMS and other environmental management requirements. • Fulfilling the Proponent's obligations under the CoA for the Project works. • Providing the contractor visibility and transparency to Project environmental requirements and commitments, to enable outcomes. • Advising or enabling environmental requirements and considerations in a timely manner. • Regularly monitoring environmental performance and maintaining visibility on work sites for environmental compliance. • Ensuring all Project activities are carried out in an environmentally responsible way, without environmental harm, and in compliance with the Project CoA. • Responsible for reporting incidents and non-compliance with the conditions of consent. 	<ul style="list-style-type: none"> • Order Stop-work for an activity that may cause material or environmental harm. • Release of environmental hold points, if required. • Recommend Stop-work for an activity that may cause harm to Aboriginal objects
EPC Contractor's Project Manager	<ul style="list-style-type: none"> • Ensure contractors are working in accordance with the requirements of the EMS, as required under the construction contract. 	<ul style="list-style-type: none"> • Report any issues that may have the potential to cause material or environmental harm.

Role	Responsibility	Authority and accountability
	<ul style="list-style-type: none"> • Plan construction works in a manner that avoids or minimises impact to environment. • Ensure construction personnel manage construction works in accordance with statutory and approval requirements. • Support the Site Environmental Officer in achieving the Project environmental objectives. • Ensure environmental management procedures and protection measures are implemented. • Ensure all Project personnel attend an induction prior to commencing works. • Report and raise any issues that arise that may have an environmental impact. • Report and raise the discovery of any artefacts, Aboriginal relics or places and cease work until the matter has been addressed. 	<ul style="list-style-type: none"> • Report any incidents or near-misses that may impact on the environment or breach conditions set-out in this plan of the EMS. • Recommend Stop-work for an activity that may cause harm to heritage objects. • Liaise with the Project owner and other Government authorities as required.
<p>Health Safety and Environment (HSE) Advisor and Site Environmental Officer (SEO)</p>	<ul style="list-style-type: none"> • Control field works and implement/maintain effective environmental controls. • Ensure all site workers are site inducted prior to commencement of works. The induction must include Aboriginal heritage obligations and an acknowledgement of Country. • Facilitating and developing the material for all environmental induction and toolbox talks for all site personnel. • Maintaining all environmental management documents. • Reporting of incidents. • Identifying where environmental measures are not meeting the targets and where improvements can be achieved. 	<ul style="list-style-type: none"> • Recommend Stop-work for an activity that may cause material or environmental harm. • Release of environmental hold points, if required. • Recommend Stop-work for an activity that may cause harm to Aboriginal objects. • Notify environmental incidents and reportable events immediately and submit reports.

Role	Responsibility	Authority and accountability
	<ul style="list-style-type: none"> • Monitoring and reporting environmental compliance. • Reviewing Project environmental documents. • Approval of ground disturbance permits. • Maintain heritage site database and mapping. 	
Project archaeologist	<ul style="list-style-type: none"> • Acting as an environmental subcontractor, specialist work as required. • Operate as instructed by the Project Manager/ Project Owner in compliance with all environmental requirements. 	<ul style="list-style-type: none"> • Undertake salvage works of sites as approved in the COA and subsequent reporting, including impact site cards if applicable. • Inspection of unexpected finds as required. • Recommend Stop-work for an activity that may cause harm to Aboriginal objects.
Wider Project team (including subcontractors)	<ul style="list-style-type: none"> • Complying with the relevant requirements of the HMP. • Participating in the mandatory Project/site induction program. • Reporting any heritage incidents to the site supervisor immediately or as soon as practicable if reasonable steps can be adopted to control the incident. • Be familiar with the unexpected finds procedure of this HMP. 	<ul style="list-style-type: none"> • Recommend Stop-work for an activity that may cause harm to Aboriginal objects.

Further details regarding specific responsibilities for the implementation of environmental and heritage controls are detailed in the EMS.

8.2 Training

To ensure that this HMP is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this plan.

All employees, contractors, sub-contractors and utility staff working on site will receive Aboriginal Heritage Training. It will be provided to all personnel in the form of an induction before they begin work on site. This training will address elements related to Aboriginal cultural heritage management including:

- An acknowledgment of Wiradjuri Country.

- Include some cultural information to acknowledge the cultural significance of the local area.
- Aboriginal Heritage obligations for the Project and relevant legislation.
- Identify any no-go areas and management measures.
- Identify the procedure to follow in the event of an unexpected Aboriginal heritage item and/or unexpected historical relic and the discovery of human remains during works.

A record of training will be maintained by the HSE personnel.

Training and/or cultural awareness will be developed in consultation with the Registered Aboriginal Parties or the local Aboriginal community to ensure that there is appropriate cultural content for the induction and training.

Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in heritage management. Examples of training topics include:

- Unexpected finds procedure
- No-go areas and the delineation of heritage items which are listed in the CoA as sites which must be avoided.

An Aboriginal Cultural Awareness session should be conducted and recorded by a Wiradjuri Knowledge Holder/RAP for use as part of the heritage induction material.

A refresher induction and/or additional training will be implemented following any incident that involves heritage. If future revision of the HMP occurs consideration must be given as to whether a refresher induction and/or additional training will be undertaken.

Further information regarding staff induction and training are outlined in the EMS.

8.3 Inspections and monitoring

Periodic inspection of the Aboriginal heritage sites located within the Project Area which are not approved to be impacted, as per the CoA, will take place for the duration of the construction, operation and decommissioning of the Project. The inspection of these sites that will occur fortnightly during construction by the SEO and every 12 months thereafter.

The inspection and monitoring of the scarred and cultural trees which are not approved to be impacted, as per the CoA, will include documenting the tree and scar conditions and creating a photographic documentation record of the condition of each site at least once every 24 months. The inspection and monitoring of the scarred and cultural trees which are not approved to be impacted, as per the CoA, should also occur following any severe weather events to document the condition of these sites.

The Aboriginal sites which are not approved to be impacted, as per the CoA, will be identified by the Project Archaeologist and/or the SEO and marked by fencing to ensure there are no inadvertent impacts during the construction, operation and decommissioning of the Project. The fencing of the Aboriginal sites which are not approved to be impacted will be undertaken a minimum of 7 days prior to any construction works occurring within 50m of these Aboriginal sites.

The objective of inspections and monitoring will be to measure the effectiveness of the heritage controls and implementation of this HMP, and to address any specific obligations. The Project Owner, Project Manager and their contractors will respond in a timely manner to any requests relating to monitoring or the effectiveness of heritage/environmental controls and their implementation raised by NSW Government Agencies.

The report provided by the Project Archaeologist following the completion of the salvage programme may also provide comment on the effectiveness of heritage controls relevant to the salvage programme.

The relocation site/s of the salvaged stone artefacts and subsurface artefacts recovered during the previous subsurface testing programme will also be subject to fencing, monitoring and inspection during the construction, operation, and decommissioning phases of the Project. Inspection of the relocation site/s will occur fortnightly during construction and six (6) months thereafter by the SEO.

All inspections of valid/ *in situ* heritage sites within the Project Area will be undertaken following a reporting checklist which must be incorporated into any wider environmental checklist for the Project. For Aboriginal heritage this must include at a minimum the following items.

- Visual inspection of the site.
- Is the valid/ *in situ* Aboriginal site clearly delineated.
- Has there been any direct or indirect impact to a valid/ *in situ* site.

8.4 Auditing

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this sub plan and other relevant approvals, licenses, and guidelines.

Heritage must be included within any major environmental audit of impacts undertaken during the construction, operation and decommissioning phases of works for the Project.

Audit requirements are detailed in Section 9.3 of the EMS and must comply with the CoA Schedule 4 Conditions 11-16.

8.5 Contingency plan and reporting

The contingency plan and reporting requirements and responsibilities are documented below to comply with the CoA.

8.5.1 Contingency plan and reporting human remains

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately and the Unexpected Finds Protocol which is provided in Appendix F of this Plan must be followed to report the find. The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant local police. If there are reasonable grounds to believe that the remains are Aboriginal, Heritage NSW must also be contacted as soon as practicable and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555. If the find is determined to be Aboriginal in origin Heritage NSW will provide advice on any additional reporting requirements.

Work must not recommence in the immediate area of any confirmed human remain until this is authorised in writing by to do so be the appropriate authority (i.e., Heritage NSW, DPE and/or NSW Police).

8.5.2 Contingency plan and reporting unexpected finds

If any previously unidentified heritage items are found the Unexpected Finds Protocol which is provided in Appendix F of this Plan must be followed to report the find. If impacts to the

unexpected find is determined to be covered under the land approved for development in the CoA the object/s will be salvaged in line with the mitigation and surface collection salvage methods noted in the HMP. For Aboriginal objects covered under the CoA an AHIMS site card will be completed upon the surface collection salvage of the newly identified stone Aboriginal object/s. Should the Aboriginal stone object/s be salvaged under the CoA an ASIRF must also be completed and submitted to AHIMS.

8.6 Incident and non-compliance notification and reporting

Non-compliance is defined in the CoA as an occurrence, set of circumstances or development that is a breach of the consent but is not an incident.

An incident is defined in the CoA as a set of circumstances that causes or threatens to cause material harm to the environment. Material Harm is harm that:

- involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)

Instances of non-compliance and/or incident notification will be recorded and raised as per the CoA Schedule 4 Condition 7 that note that the Planning Secretary must be notified in writing via the Major Projects website immediately after one becomes aware of an incident and within seven (7) days after a non-compliance issue.

The notification to the Planning Secretary via the Major Projects website must identify the development (including the development application number) and set out the location and nature of the incident. A non-compliance that has been notified as an incident does not need to also be notified as a non-compliance.

Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in CoA Appendix 7 which have the steps outlined below for Heritage non-compliance and incidents.

1. Written incident notification must be submitted to the Planning Secretary via the Major Projects website within seven (7) days after the incident is known about. Written notification of an incident must identify the development and application number and the following items:
 - Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
 - Identify how the incident was detected and when you became aware of the incident;
 - Identify any actual or potential non-compliance with the CoA;
 - Describe what immediate steps were taken in relation to the incident and identify further action(s) that will be taken in relation to the incident; and
 - Identify a project contact for further communication regarding the incident.
2. Within 30 days of the date on which the incident occurred (or as otherwise agreed to by the Planning Secretary), an incident report will be provided to the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary). The Incident Report must include:

- A summary of the incident;
- Outcomes of an incident investigation, including identification of the cause of the incident;
- Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
- Details of any communication with other stakeholders regarding the incident.

9. Review and improvement

9.1 Continuous improvement

Continuous improvement of this Plan will be achieved when opportunities for improvement are identified. Any proposed improvement and/or changes to this Plan are required to be approved by the Planning Secretary prior to implementation.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies.
- Verify the effectiveness of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Make comparisons with objectives and targets.
- Occur prior to carrying out any upgrading or decommissioning activities onsite.

9.2 HMP update and amendment

For the life of the Project, a hard copy of the most recent version of this Plan will be stored at the main site compound. It is the responsibility of the Environmental Officer to ensure this hard copy is the most recent version and to remove older versions of the plan once they are superseded at the main site compound.

The processes and plans described in the EMS may result in the need to update or revise this Plan. Any revision of the HMP is to ensure it incorporates any recommended measures to improve the environmental performance of the Project. Any proposed changes to this Plan are required to be approved by the Planning Secretary prior to implementation.

Instances which may trigger the revision or update of this Plan include:

- Prior to carrying out any upgrading or decommissioning activities on site.
- Updating of mapping following the completion of the salvage surface collection programme.
- Addressing requirements from the Planning Secretary following the assessment of any strategies, plans or correspondence that are submitted to DPHI in accordance with the CoA for the Project.
- Addressing any requirements, actions or measures requested by the Planning Secretary and/or DPHI following reports, reviews or audits regarding the compliance of the project.
- Following an incident or non-compliance matter relating to heritage.
- Following the approval of a modification to the CoA by the Planning Secretary which affects heritage and/or the control measure and mitigations listed in this Plan.

Prior to carrying out any upgrading or decommissioning activities on site the HMP will be updated to the satisfaction of the Planning Secretary to comply with Schedule 2 Condition 1.

A copy of the updated HMP with any changes, once approved by the Planning Secretary, will be distributed to all relevant stakeholders in accordance with the approved document control procedure (refer to the EMS) and to the RAPs as noted in Section 4 of this Plan.

In the instance of any modification to the CoA, the HMP will be reviewed within 1 month and if revisions of the plan are required the plan will be submitted to the Planning Secretary for approval and comply with the CoA Schedule 4 Condition 2 (Revision of Strategies, Plans and Programs) and CoA Schedule 4 Condition 3 (Updating and Staging of Strategies, Plans and Programs).

In the instance of an incident report (CoA Schedule 4 Condition 7) or an audit report (CoA Schedule 4 Condition 9) which notes non-compliance for Heritage, the HMP will be reviewed within 1 month and if revisions of the plan are required the plan will be submitted to the Planning Secretary for approval and comply with the CoA Schedule 4 Condition 2 (Revision of Strategies, Plans and Programs) and CoA Schedule 4 Condition 3 (Updating and Staging of Strategies, Plans and Programs).

10. General project communications

The Community Engagement and Benefits Sharing Plan details the processes that will be used to keep the local community and relevant agencies informed about the operation and environmental performance of this Project.

The main point of contact with NSW government agencies or this Project will be via the Major Projects website.

While a number of steps will be implemented in order to engage with the Aboriginal community and other stakeholders throughout the various stages of the development as detailed in the Community Engagement and Benefits Sharing Plan, one of the main portals for community engagement will be via the Culcairn Solar Farm website (<https://culcairnsolarfarm.com.au/>). The website will be used to provide updates as relevant about the progress of the solar farm development.

The website will be regularly updated throughout all stages of the proposed development and include information such as:

- Layout and general overview of the development.
- How complaints about the development can be made and a complaint handling procedure.
- Contact details of the Proponent or online contact form.
- A link to the Major Projects website is also provided, which contains information relating to:
 - The EIS.
 - Current statutory approvals for the development.

The procedures for dispute resolution will be undertaken in accordance with the Complaints Procedure which is detailed in the Community Engagement and Benefits Sharing Plan. All complaints received during construction will be recorded and responded to. It is the intention of the Project Owner, Project Manager and their contractors to maintain an open and clear relationship with all stakeholders to prevent complaints from arising. Should the resolution of a complaint not be able to be reached by both parties, following presentation of investigation results to the complainant, either party may refer the dispute to an independent mediator and/or follow the steps outlined in the complaints procedure as detailed in the Community Engagement and Benefits Sharing Plan.

11. References

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

DECCW 2010b, *Aboriginal cultural heritage consultation requirements for proponents 2010*, Department of Environment, Climate Change and Water, Sydney.

NGH 2020 *Environmental Impact Statement - Culcairn Solar Farm*.

NGH 2020 *Aboriginal Cultural Heritage Assessment Culcairn Solar Farm*

NGH 2020. *Amendment Report - Culcairn Solar Farm*.

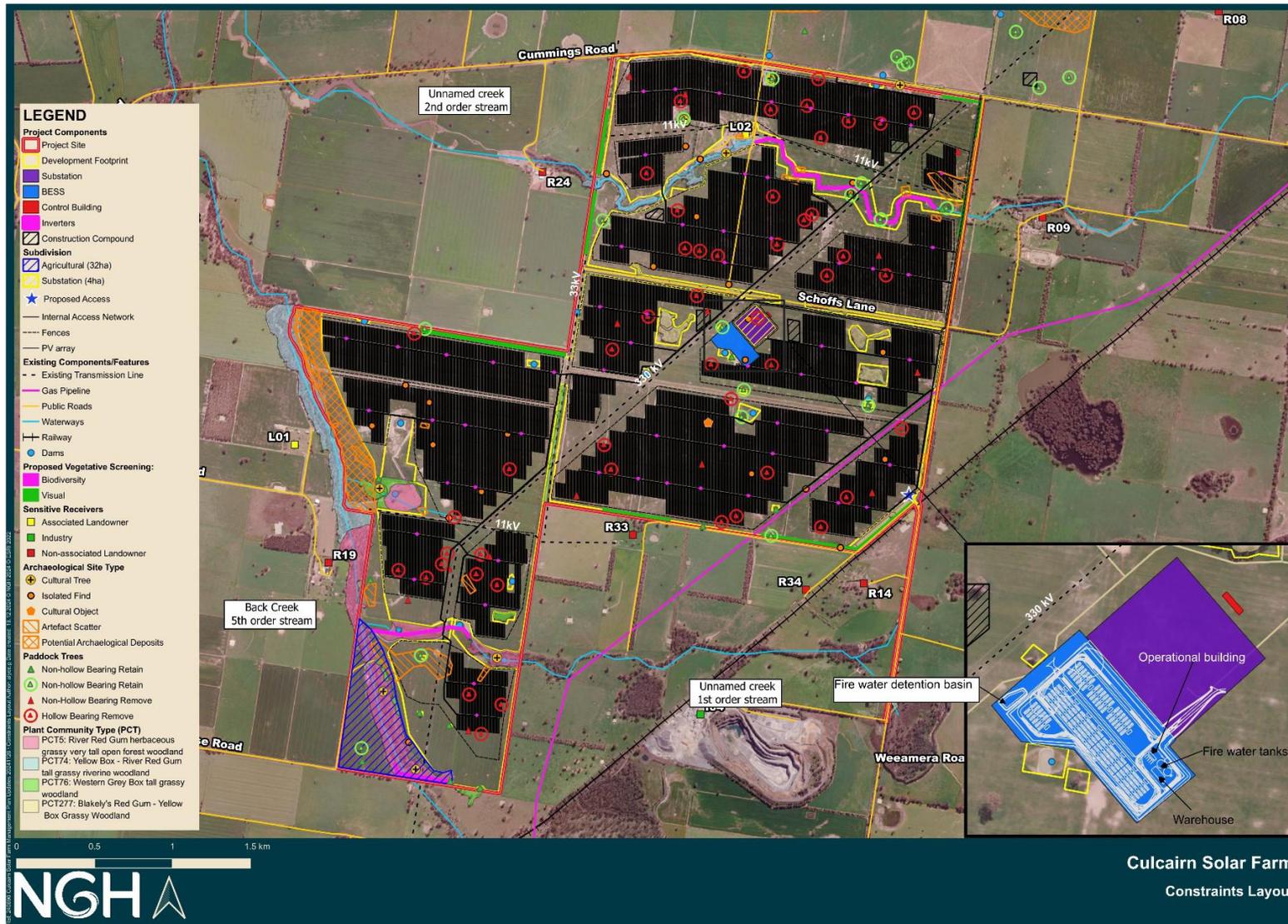
NGH2020 *Response to Submissions - Culcairn Solar Farm*.

NGH 2024 *Aboriginal Cultural Heritage Surface Collection Salvage Report - Culcairn Solar Farm*.

OEH 2011, *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*, Office of Environment and Heritage, Department of Premier and Cabinet, Sydney.

Umwelt 2024 *Culcairn Solar Farm Modification Report for an Expanded Battery Energy Storage System*.

Appendix A Approved layout of development



Appendix B Copy of consolidated development consent Appendix 6 Aboriginal heritage items

APPENDIX 6: ABORIGINAL HERITAGE ITEMS

Table 1: Aboriginal heritage items – avoid impacts

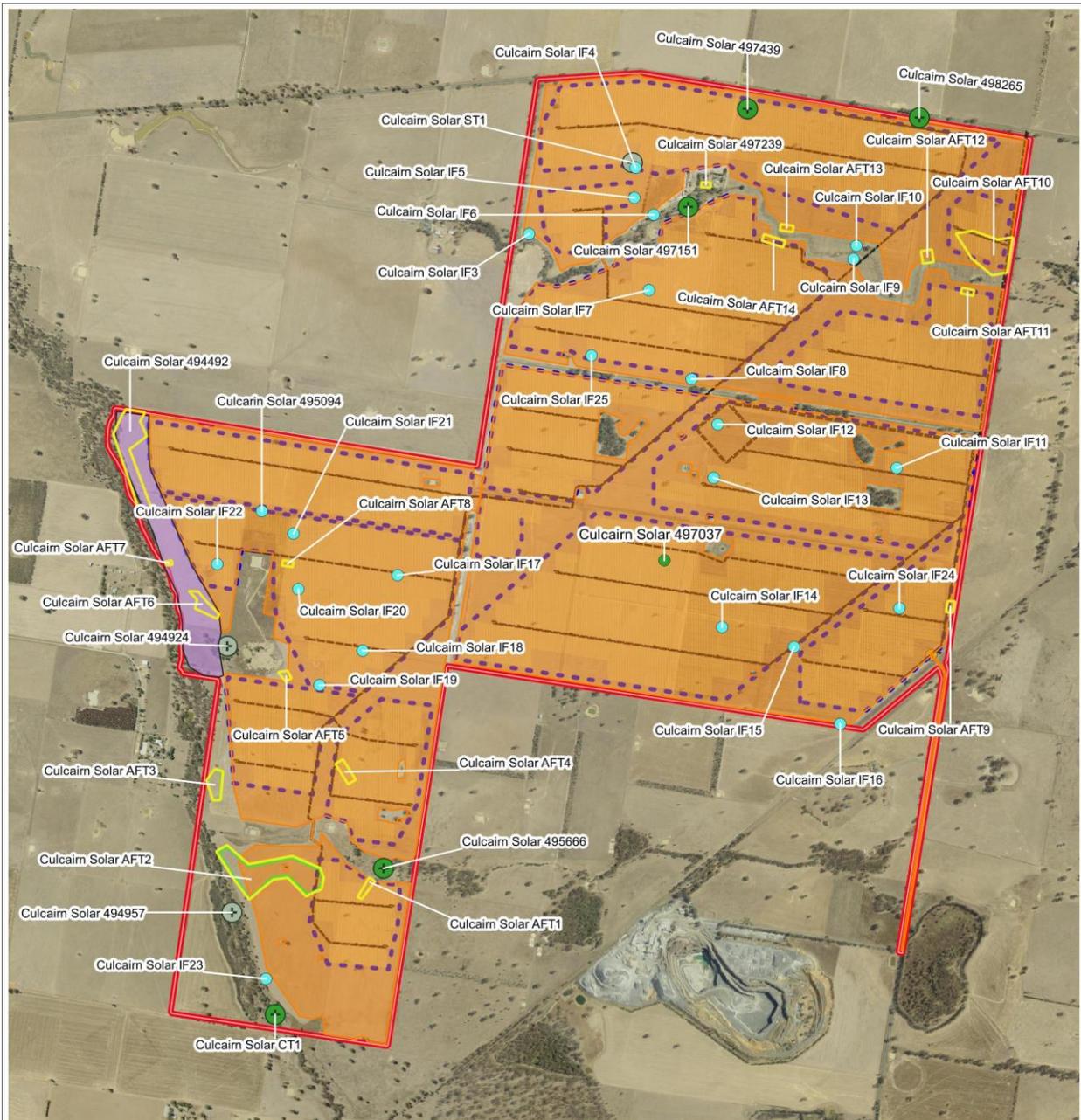
<i>Item name</i>	<i>Item name</i>
Culcaim Solar IF3 (Isolated Artefact)	Culcaim Solar ST1 (Scarred Tree)
Culcaim Solar IF6 (Isolated Artefact)	Culcaim Solar CT1 (Cultural Tree)
Culcaim Solar IF9 (Isolated Artefact)	Culcaim Solar 494924 (Scarred Tree)
Culcaim Solar IF10 (Isolated Artefact)	Culcaim Solar 494957 (Scarred Tree)
Culcaim Solar IF23 (Isolated Artefact)	Culcaim Solar 497151 (Cultural Tree)
Culcaim Solar AFT3 (Subsurface Artefact Scatter)	Culcaim Solar 497439 (Cultural Tree)
Culcaim Solar AFT6 (Artefact Scatter)	Culcaim Solar 495886 (Cultural Tree)
Culcaim Solar AFT7 (Artefact Scatter)	Culcaim Solar 498265 (Cultural Tree)
Culcaim Solar 497239 (Artefact Scatter)	Back Creek PAD
Cultural Solar 494492 (Artefact Scatter)	

* Refer to the Figure in this Appendix to identify items

Table 2: Aboriginal heritage items – salvage

<i>Item name</i>	<i>Degree of Impact</i>	<i>Item name</i>	<i>Degree of Impact</i>
Culcaim Solar IF4 (Isolated Artefact)	Whole	Culcaim Solar IF24 (Isolated Artefact)	Whole
Culcaim Solar IF5 (Isolated Artefact)	Whole	Culcaim Solar IF25 (Isolated Artefact)	Whole
Culcaim Solar IF7 (Isolated Artefact)	Whole	Culcaim Solar 495094 (Isolated Artefact)	Whole
Culcaim Solar IF8 (Isolated Artefact)	Whole	Culcaim Solar AFT1 (Artefact Scatter)	Partial
Culcaim Solar IF11 (Isolated Artefact)	Whole	Culcaim Solar AFT2 (Subsurface Artefact Scatter)	Partial
Culcaim Solar IF12 (Isolated Artefact)	Whole	Culcaim Solar AFT4 (Artefact Scatter)	Whole
Culcaim Solar IF13 (Isolated Artefact)	Whole	Culcaim Solar AFT5 (Artefact Scatter)	Whole
Culcaim Solar IF14 (Isolated Artefact)	Whole	Culcaim Solar AFT8 (Artefact Scatter)	Whole
Culcaim Solar IF15 (Isolated Artefact)	Whole	Culcaim Solar AFT9 (Artefact Scatter)	Partial
Culcaim Solar IF16 (Isolated Artefact)	Whole	Culcaim Solar AFT10 (Artefact Scatter)	Partial
Culcaim Solar IF17 (Isolated Artefact)	Whole	Culcaim Solar AFT11 (Artefact Scatter)	Whole
Culcaim Solar IF18 (Isolated Artefact)	Whole	Culcaim Solar AFT12 (Artefact Scatter)	Partial
Culcaim Solar IF19 (Isolated Artefact)	Whole	Culcaim Solar AFT13 (Artefact Scatter)	Partial
Culcaim Solar IF20 (Isolated Artefact)	Whole	Culcaim Solar AFT14 (Artefact Scatter)	Partial
Culcaim Solar IF21 (Isolated Artefact)	Whole	Culcaim Solar 497037 (Isolated Cultural Object)	Whole
Culcaim Solar IF22 (Isolated Artefact)	Whole		

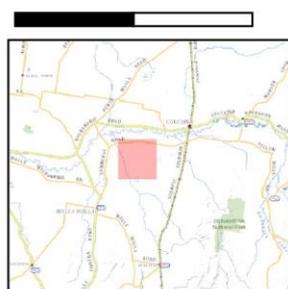
* Only items located within the development footprint are to be salvaged (refer to the Figure in this Appendix to identify items)



**Culcairn Solar Farm
Proposed Development Footprint**

- | | | | |
|-------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------------------------------|-----------------------------------|
|  | Proposal Area |  | Cultural object site |
|  | Development Footprint |  | Cultural Tree |
|  | Artefact Scatters |  | Scarred Tree |
|  | Subsurface Artefact Scatters |  | Back Creek Pad
(to be avoided) |
|  | Isolated Find | | |

0 0.5 1 km



Data Attribution
© NGH 2020
© Neoen Australia Pty Ltd 2020
© ESRI 2020

Ref: Culcairn Solar Farm \ Proposed
Development Footprint
Author: A.Ziesing
Date created: 10.11.2020
Datum: GDA94 / MGA zone 55



NGH

Appendix C Endorsement of heritage experts

Department of Planning and Environment



Our ref: SSD-10288-PA-1

Alexis Good
Project Manager
Culcairn Solar Farm
by email: alexis.good@neon.com

13/07/2023

Culcairn Solar Farm (SSD 10288): Heritage Management Plan Experts

Dear Ms Good

I refer to your request dated 11 April 2023 seeking the Secretary's endorsement of experts to prepare the Heritage Management Plan for Culcairn Solar Farm (SSD 10288) in accordance with condition 23(a) of Schedule 3 of the Development Consent.

The Department has reviewed the information you have provided, and is satisfied that the nominated experts are suitably qualified to prepare the Heritage Management Plan.

Accordingly, the Secretary has endorsed Mr Matthew Barber – General Manager - Heritage at NGH, and Ms Kristen Bradley – Principle Heritage Consultant – Heritage at NGH.

If you require further information, please contact Nestor Tsambos on [REDACTED] or by email at [REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to read "Iwan Davies".

Iwan Davies
Director
Energy Assessments

As nominee of the Planning Secretary

Appendix D Stakeholder consultation

The below stakeholder contact details are not for public display and must be redacted from any public version of this document.

The Registered Aboriginal Parties for this project are listed below.

The Albury & District LALC

Email Contact: [REDACTED]
[REDACTED]

Bundyi Cultural Services

Email Contact: [REDACTED]

Yalmambirra

Email Contact: [REDACTED]

The following consultation has occurred in the preparation of this HMP with copies of the email responses also provided.

Organisation	Action	Date Sent	Follow up	Reply Date	Replied by	Response/ Comments
Heritage NSW	Draft HMP sent via email	22/06/2023	06/07/2023	6/07/2023	Email	Please do not refer future major project matters to Heritage NSW outside of the major project portal, all referrals must come via the approved assessment pathway.
Heritage NSW	Final v1.0 sent via major project portal	NA	NA	08/08/2023	Letter via major projects portal	Heritage NSW supports the recommendations and management strategies outlined in the HMP, but recommended further information included for the provisions for the ongoing management of scarred and cultural trees within the project area
Albury LALC	Draft HMP sent via email	22/06/2023	03/07/2023	3/07/2023	Email	Thank you for providing the report. Andom has been unavailable. On behalf of Andom, I have reviewed the report and am satisfied to have no objection with the report.
Bundyi Cultural Services	Draft HMP sent via email	22/06/2023	03/07/2023	6/07/2023	Letter via email	Full copy of letter provided below.
Yalmambirra	Draft HMP sent via email	22/06/2023	NA	23/06/2023	Email	Thank you for the information. As I was not part of the project it would not be appropriate for me to comment on this.

D1.1 Documentation of RAP and Heritage NSW consultation.

The below details are not for public display and must be redacted from any public version of this document.

From: [CEO | Albury District ALC](#)
To: [Kirsten Bradley](#)
Subject: RE: SD-10288 Culcairn Solar Farm draft HMP- requesting comments from RAPs
Date: Monday, 3 July 2023 4:35:36 PM
Attachments: [image001.png](#)

Hi Kirsten,

Thank you for providing the report.

Andom has been unavailable.

On behalf of Andom, I have reviewed the report and am satisfied to have no objection with the report.

Regards,
Dennis Mirosevich
(CEO)



Albury & District Local Aboriginal Land Council



From: [valmambirra](#)
To: [Kirsten Bradley](#)
Subject: RE: SD-10288 Culcairn Solar Farm draft HMP- requesting comments from RAPs
Date: Friday, 23 June 2023 10:52:55 AM
Attachments: [46D489C9651F4A23A0F8AD6B9B235125.png](#)

Hullo Kirsten

Thank you for the information. As I was not part of the project it would not be appropriate for me to comment on this.

Stay warm and safe...

Yal

6th July 2023

SD-10288 Culcairn Solar Farm draft HMP

At Kirsten Bradley

Principal Heritage Consultant

NGH Consulting.

Yamma Kirsten,

Please find following my reply, comments and instructions for the Culcairn Solar Farm.

Section 7 Page 17 "Training will be provided".

All Wiradjuri/Aboriginal cultural training that is delivered to all staff and contractors of the Culcairn Solar Farm, must be conducted by a Wiradjuri Knowledge Holder/RAP who is also trained and able to deliver training and assessments (TAE)

Section 7 Page 17 "A strategy for the long-term management".

Before anything to do with the moving, relocation and discovery of any and all Wiradjuri items, local Wiradjuri Knowledge Holders must be informed and be on site to ensure all care and "Due Diligence" is taken. This person must also be able to record these items directly to AHIMS. These people will be contracted for this work as per our rate of pay and conditions.

Section 7 Page 17 "The location of all Aboriginal sites which are not approved for impacts".

The location and marking of any and all Wiradjuri sites are to only be undertaken with the approval of Wiradjuri Knowledge Holders/RAPs who must be onsite and contracted to assist in this work.

Section 7 Page 18 "The development avoids the three modified trees and five cultural tree sites."

The location and marking of any and all Wiradjuri sites are to only be undertaken with the approval of Wiradjuri Knowledge Holders/RAPs who must be onsite and contracted to assist in this work.

Section 7 Page 18 "Section 7 Page 18 "If the proposed development footprint is changed and the areas of PAD along Back Creek and Billabong Creek will be impacted".

This section states, "a limited subsurface testing program must be conducted at the PADs not subject to the subsurface testing program undertaken during the heritage assessment completed to date for this Project."

I would insist that if any and all alterations are made to any part of the Culcairn Solar Farm area that has been approved thus far, that "Extensive Subsurface" testing is conducted and that local Wiradjuri Knowledge Holders and RAPs are contracted for this work.

8.2 Training Page 29 *"All employees, contractors, sub-contractors and utility staff working on site will receive Aboriginal Cultural Heritage Awareness Training. It will be provided to all personnel in the form of an induction before they begin work on site".*

This training will be carried out by All Wiradjuri/Aboriginal cultural training that is delivered to all staff and contractors of the Culcairn Solar Farm, must be carried out by a Wiradjuri Knowledge Holder/RAP who is also trained and able to deliver training and assessments (TAE)

I would also insist that the induction process, be it online or face to face, that is delivered by the Culcairn Solar Farm, for their own induction processes, is to be looked at and approved by local Wiradjuri Knowledge Holder/RAP to ensure the information shown and written is correct and that cultural protocol is understood and adhered too.

Conclusion:

My main concern with this project is that to date, no Wiradjuri Cultural Programs have been delivered to staff, contractors and any person who undertakes any work with regards to the Culcairn Solar Farm. My concerns are that the people who will be or area already on the land who no or very little understanding of Wiradjuri culture and lore.

In the recent past I have had serious issues with Solar and other companies who have come into our area, have paid no respect to our Wiradjuri culture and have gone about destroying and removing our items and places. I will not allow this to happen again.

By delivering Wiradjuri Cultural Immersion Programs to all staff, contractors and others all people become better educated and understanding of our ancient culture and country.

Aboriginal items, places and songlines are protected if they are recorded or not. I will ensure that any further destruction or removal of any Wiradjuri items and places will be treated and dealt with the full force of "white fella" law.

*Yuwin Ngadhi Mark Saddler,
Bundy Culture*



Artwork Mark Saddler, "Ngumbaay Bula Bila Mayiny" (3 River people)



Alexis Good
Project Manager
Neoen Australia Pty Ltd
[REDACTED]

Your reference: SSD-10288-PA-4
Our reference: DOC23/628740

Dear Alexis,

**Aboriginal Heritage Management Plan – State Significant Development – Culcairn Solar Farm –
SSD-10288-PA-4**

Thank you for your referral seeking advice on the Heritage Management Plan (HMP) for the above State Significant Development (SSD). Thank you for the continued opportunity to comment on the project.

Heritage NSW understands the HMP has been submitted in accordance with the Minister's Conditions of Approval (CoA), Schedule 3, Condition 23. Heritage NSW supports the recommendations and management strategies outlined in the HMP, but recommends the following amendments:

- Please include provisions for the ongoing management of scarred and cultural trees within the project area. Provisions should include:
 - Monitoring of scarred trees at regular intervals (e.g., 24 months) or following adverse weather conditions. Monitoring should include both documenting the tree and scar condition as well as a visual diary containing photographs of the trees condition.
 - Provisions that outline if a trees condition deteriorates or is naturally felled then consultation will be undertaken between the Department of Planning and Environment, Heritage NSW, Registered Aboriginal Parties (RAPs), and project managers to determine best methods of conserving the tree/s (e.g., ex situ conservation, leaving tree to naturally deteriorate).
- Please include procedures for updating the Aboriginal Heritage Information Management System (AHIMS) searches and RAP consultation at regular intervals during construction, major maintenance, and decommissioning.

Following inclusion of the amendments, please resubmit the HMP to Department of Planning and Environment for approval. Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions regarding these comments, please contact Corey O'Driscoll, Senior Assessments Officer, at Heritage NSW on [REDACTED]

Yours sincerely

A handwritten signature in blue ink that reads 'Nicole Davis'.

Nicole Davis
Manager Assessments
Heritage NSW
Department of Planning and Environment
(As Delegate under National Parks and Wildlife Act 1974)
8 August 2023

Locked Bag 5020 Parramatta NSW 2124 ■
P: 02 9873 8500 ■ E: heritagemailbox@environment.nsw.gov.au

D1.2 Modification 2 -stakeholder engagement not required

Department of Planning, Housing and Infrastructure



Our ref: SSD-10288-PA-77

██████████
Construction Project Manager
Neoen Australia Pty Ltd
570 George Street
Sydney, NSW, 2000

28/02/2025

Subject: Request Regarding Consultation Requirements for Heritage Management Plan (V4)

Dear Mr Benfredj

I refer to your correspondence dated 19 February 2025 requesting the Planning Secretary's agreement to update the Heritage Management Plan (V4) without undertaking further consultation with Heritage NSW and Aboriginal Stakeholders.

Modification 2 involves an increase in the capacity of the battery energy supply system (BESS) within the approved development footprint. The Department found that given the minor nature of the proposed modification there would be negligible impacts on heritage.

In considering this request I have carefully reviewed the documentation associated with the modification and your correspondence. As nominee of the Planning Secretary, in accordance with Condition 3 of Schedule 4, I agree that the Heritage Management Plan can be updated without consulting Heritage NSW and Aboriginal Stakeholders.

If you wish to discuss the matter further, please contact Keren Halliday on ██████████

Yours sincerely

A handwritten signature in black ink, appearing to read "Iwan Davies".

Iwan Davies
Director
Energy Assessments

As nominee of the Planning Secretary

Appendix E Salvage methodology

E.1 Surface collection

Each Aboriginal site with surface stone artefacts that cannot be avoided within the approved development footprint as listed Table 2 of Appendix 6 in the CoA will need to be salvaged via surface collection prior to construction works commencing for the Project. These sites were all determined as part of the ACHA undertaken for the Project to be unable to be avoided by impacts through the development of the Project. However, in the event that the approved development footprint for the Project has changed from that assessed in the ACHA only those known sites which are approved for impact that are within the approved development footprint will be subject to salvage via surface collection. Prior to undertaking surface collection fieldwork the archaeologist undertaking the salvage work will confirm that the sites listed Table 2 of Appendix 6 in the CoA are still within the approved development footprint for the Project, and therefore are unable to be avoided by works thus requiring surface collection.

A reasonable attempt, through the visual inspection of the Aboriginal site/s listed in Table 2 of Appendix 6 in the CoA that are within the approved development footprint for the Project will be undertaken by an archaeologist with an Aboriginal community representative, to collect any visible surface stone artefacts. It is acknowledged that changes in the ground surface visibility and standard taphonomic and other environmental factors may impede the relocation of all the recorded stone artefacts noted in the ACHAR. This is a typical and accepted archaeological phenomenon and therefore salvage collection would focus on visible artefacts within each site, which is an acceptable outcome.

The salvage team, will comprise of a qualified archaeologist and selected members of the RAPs, who would also take the opportunity to examine the immediate surrounds of the recorded sites to identify any other artefacts that may be present within the approved development footprint.

The surface collection of the stone assemblage for each Aboriginal site within the approved development footprint as per the CoA, would be undertaken through the following process.

- A reasonable attempt, through the visual inspection of the Aboriginal site/s area, would be made to relocate the originally recorded surface stone artefacts. However it is acknowledged that changes in the ground surface visibility and standard taphonomic and other environmental factors may impede the relocation of all the recorded stone artefacts noted in the ACHAR. This is a typical and accepted archaeological phenomenon and therefore salvage collection would focus on visible artefacts within each site, which is an acceptable outcome.
- If any additional surface stone artefacts are identified within the approved development footprint these newly identified stone artefacts will be salvaged with the sites that they are associated with or in accordance with the Unexpected Finds Protocol (as listed in the HMP, Appendix F).
- Walk across the Aboriginal site area (within the approved development footprint), use 'pin' flags to identify and mark artefacts.
- Photograph the Aboriginal site area.
- If considered necessary, construct a collection grid of 2m x 2m or 5m x 5m or similar as appropriate to the size of the site, only larger sites or sites with higher densities of artefacts will have this strategy.

- As an alternative, GPS plot artefacts if required, this is suitable for smaller sites (~<20).
- Collect artefacts. At each collection site the artefacts will be recorded, bagged and labelled in accordance with their collection position, that is either individual number and/or their collection grid.
- Recording of stone artefacts will be conducted in line with standard archaeological practice to include raw material, type, dimensions and any other characteristics considered relevant and in accordance with the Code of Practice. Photos of particularly rare items only or those asked to be photographed by the Aboriginal representatives onsite would be taken.
- The salvaged Aboriginal objects may be temporarily stored until the long-term management and relocation of the salvaged objects can occur.
- The site of the relocated salvaged Aboriginal objects would be noted by the submission of site cards to the Aboriginal Heritage Information Management System (AHIMS) as legally required.
- An Aboriginal Site Impact Recording Form must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage.

E.2 Management of recovered material and reporting

The salvaged objects will be temporarily held at secure locked cabinet at a NGH office for analysis and recording until an appropriate time as they can be arranged to be relocated and buried within the Project Area, outside the approved development footprint. The temporary storage of salvaged objects, if required, is not intended to exceed 24 months from the conclusion of the salvage programme.

The relocation site for the Aboriginal objects which will be salvaged via the surface collection salvage programme, salvage excavation and those recovered from the subsurface testing programme which are currently in temporary care of NGH would need to be agreed to by the landowner, Project owner, Project Archaeologists and RAPs and be outside the proposed approved development footprint within the Project Area and the required buffer zone around any Aboriginal sites not approved for impacts. A map of the proposed relocation areas is provided below. The site/s for the relocation of salvaged Aboriginal objects would be noted by the submission of site cards to the Aboriginal Heritage Information Management System (AHIMS) as legally required.

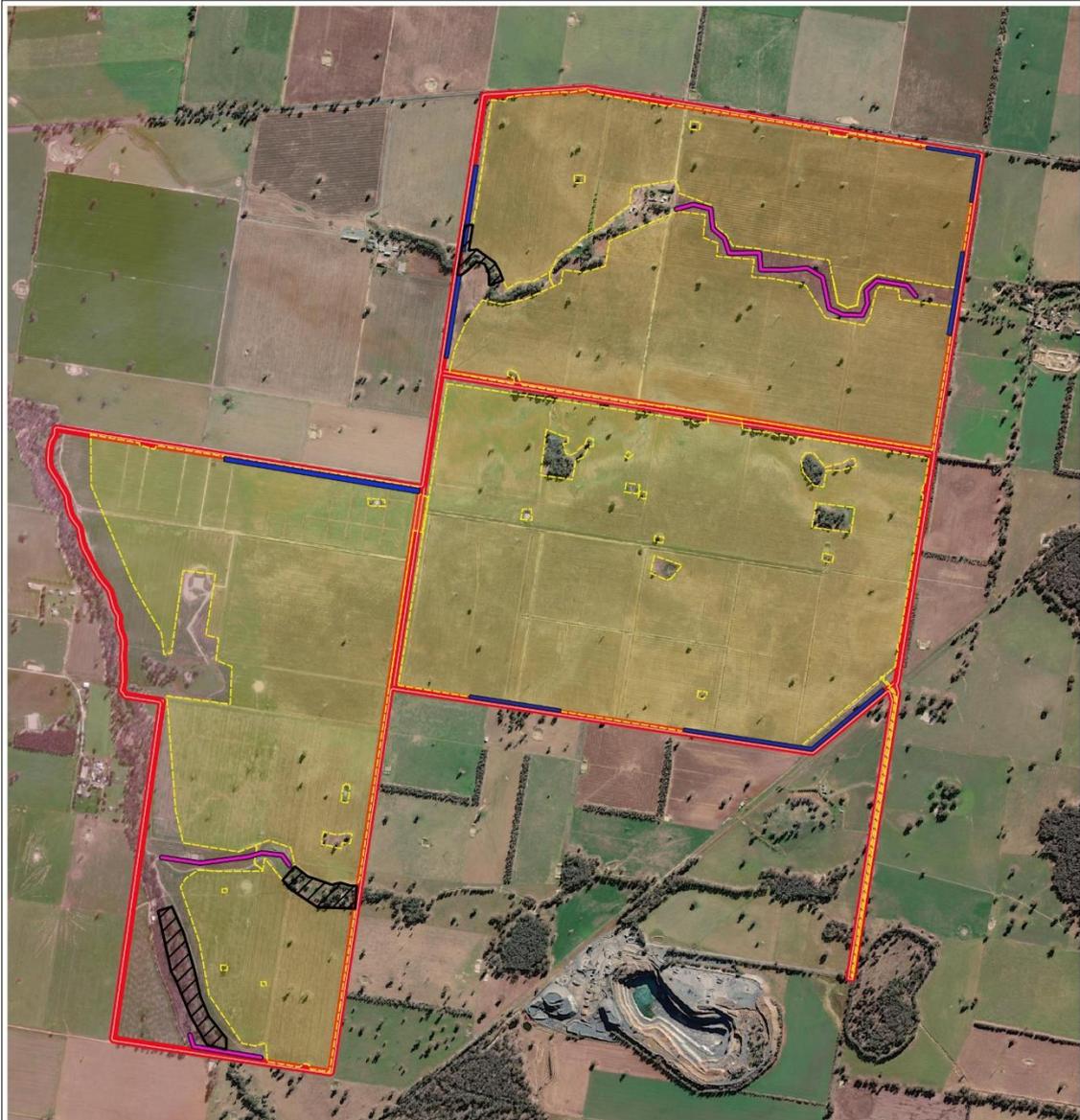
An Aboriginal Site Impact Recording Form must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage and/or construction works. Representatives from the RAPs would be provided with the opportunity to assist the Project Archaeologist with the salvage programme and the relocation of the salvaged objects. Generally, a minimum of two representative from the RAPs would be invited to participate in the salvage programme and the relocation of the Aboriginal salvaged objects. If representatives from the RAPs are not available to participate and all reasonable opportunities have been afforded, the collection and relocation of Aboriginal objects, would continue as scheduled by the Project Archaeologist.

Following the relocation of the Aboriginal objects, which have been salvaged as per the procedure in this HMP, the site location/s will also be provided to the Project owner, Project team, and the EPC contractor to ensure the site/s are protected during the construction, operation and decommissioning of the Project. The recording and relocation of artefacts will be compliant with the *Code of Practice for Archaeological Investigations*.

A salvage report will be prepared outlining the steps taken above. A copy of the report on the salvage and relocation of objects for the Project in line with the CoA would be provided to the Project Manager. The report will also be provided to Heritage NSW, the Department of Planning and Environment and the RAPs. A copy of the brief salvage report will be kept on site with a copy of the HMP. The report would document the salvage programme and its results. The report may also be used to inform the independent environmental audit, which would include heritage.

The salvage report would include, as applicable, the following:

- Introduction
- Purpose and objective
- Aboriginal involvement and consultation
- Surface collection salvage
 - Methodology
 - Results
 - Discussion
- Relocation and burial of salvaged objects
- Conclusions.



Culcairn Solar Farm
Proposed long term relocation areas.

Legend

- Project site
- Development footprint
- Vegetative visual screening
- Vegetative biodiversity screening
- Aboriginal Heritage proposed long term relocation area

0 0.5 1 km



Data Attribution
© NGH 2023
© Neoen 2023
© Esri 2023

Ref: 18-441 Culcairn SF 20230323_AG \\
Proposed long term relocation areas.
Author: K.Bradley
Date created: 21.06.2023
Datum: GDA94 / MGA zone 55



Appendix F Unexpected Finds Protocol

Introduction

This unexpected find protocol has been developed to provide a method for managing unexpected non-Aboriginal (historic) and Aboriginal heritage items identified during construction, maintenance, operation and decommissioning of the Project. The unexpected find protocol has been developed to ensure the successful delivery of the Project while adhering to the NSW *National Parks and Wildlife Act 1974* (NPW Act) and the *Heritage Act 1977* (Heritage Act).

All Aboriginal heritage objects are protected under the NPW Act Under Part 6 of the Act, though in a State Significant Development (SSD) Development Consent may be issued that allows for conditional harm to Aboriginal objects. However, there are some circumstances where despite undertaking appropriate heritage assessment prior to the commencement of works Aboriginal cultural heritage items or places are encountered that were not anticipated that may be of scientific and/or cultural significance.

Therefore, it is possible that unexpected heritage items may be identified during construction, operation, upgrade, decommissioning and maintenance works. If this happens the following unexpected find protocol will be implemented to avoid breaching obligations under the NPW Act. This unexpected find protocol provides guidance as to the circumstances under which finds may occur and the actions subsequently required.

What is a Heritage unexpected find?

An unexpected heritage find is defined as any possible Aboriginal or non-Aboriginal heritage object or place, that was not identified or predicted by the Project's heritage assessment and may not be covered by appropriate permits or development consent conditions. Such finds have potential to be culturally significant and may need to be assessed prior to development impact.

Unexpected heritage finds may include:

- Aboriginal stone artefacts, shell middens, modified trees, mounds, hearths, stone resources, rock shelters, rock art and stone arrangements;
- Human skeletal remains; and
- Remains of historic infrastructure and relics.

Aboriginal heritage places or objects

All Aboriginal objects are protected under the NSW *National Parks and Wildlife Act 1974* (NPW Act). An Aboriginal object is defined as: *Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons on non-Aboriginal extraction and includes Aboriginal remains.*

All Aboriginal objects are protected, and it is an offence to harm or desecrate an Aboriginal object or place.

Historic heritage

The *Heritage Act 1977* protects relics which are defined as: *Any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance.*

Unexpected find management procedure

In the event that any unexpected Aboriginal heritage places or objects or any substantial intact historic archaeological relics that may be of State or local significance are unexpectedly discovered during the Project, the following management protocols will be implemented. **Note: this process does not apply to human or suspected human remains. Follow Section Human Skeletal Remains below if remains or suspected remains are encountered.**

1. Works within the immediate identified heritage location will cease. Personnel should notify their supervisor of the find, who will notify the project manager.
2. Establish whether the unexpected find is located within an area covered by the approved development footprint, as per the Development Consent, or not.
3. **If the unexpected find is determined to be covered under the existing approved area of the development footprint, as per the Development Consent for the Project, undertake the following steps:**
 - Establish an appropriate buffer to allow for the assessment and management of the find. All site personnel will be informed about the buffer zone with no further works to occur within the buffer zone until notified.
 - A heritage specialist or the Project Archaeologist will be engaged to assess the Aboriginal place or object encountered and undertake appropriate salvage (generally surface collection) of the site/object, if required, in line with the mitigation methods noted in this HMP. An AHIMS site card may be completed or updated on the discovery of the newly identified Aboriginal objects / Aboriginal heritage items. Should the object(s) / heritage items be salvaged (within the approved development footprint as per the Development Consent for the Project) an Aboriginal Site Impact Recording Form must also be completed and submitted to AHIMS.
 - Salvage of Aboriginal heritage items would not include scarred trees. If previously unidentified scarred trees are identified, further consultation with Heritage NSW and Aboriginal stakeholders would need to be undertaken regarding management as avoidance is the preferred mitigation method for scarred trees.
 - Following appropriate salvage of the unexpected find works may continue at this location when notified by the project archaeologist or heritage specialist.
4. **If the unexpected find is not covered under the existing approved development footprint, as per the Development Consent for the Project, undertake the following steps:**
 - (a) All works at this location must cease.
 - An appropriate buffer zone of at least 20 metres to allow for the assessment and management of the find must be established. All site personnel will be informed about the buffer zone with no further works to occur until notified. A temporary exclusion area would be established around this buffer zone.
 - A heritage specialist or the Project Archaeologist will be engaged to assess the Aboriginal place or object encountered. Registered Aboriginal Party representatives will also be engaged (if available) to assess the cultural significance of the place or object.
 - The discovery of an Aboriginal object will be reported to the local office of Heritage NSW and works will not recommence at the heritage place or object until advised to do so by Heritage NSW. A site card will be completed and submitted to AHIMS for registration.

- If the unexpected find can be managed *in situ*, works at the location will not recommence until appropriate heritage management controls have been implemented, such as protective fencing.
- If the unexpected find cannot be managed *in situ*, works at the heritage location will not recommence until further assessment is undertaken and appropriate permits and approvals to impact Aboriginal cultural heritage are approved and issued by Heritage NSW.

For historic relics, work must cease in the affected area and the Heritage Council must be notified in writing in accordance with section 146 of the *Heritage Act 1977*. To protect the historic relics until their significance can be determined high visibility markers or temporary fencing must be immediately placed a minimum of 20m around the location of the find by site personnel. Depending on the nature of the discovery, additional assessment may be required prior to the recommencement of work in the area. At a minimum, any find should be recorded by an archaeologist.

F.1 Unexpected human skeletal remains

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately. The following plan describes the actions that must be taken in instances where human remains, or suspected human remains are discovered. Any such discovery at the activity area must follow these steps.

Discovery:

- If any human remains or suspected human remains are found during any activity, works in the vicinity **must** cease and the Project Manager must be contacted immediately.
- The remains must be left in place and protected from harm or damage. To protect the remains until their origins can be determined high visibility markers or temporary fencing which will not cause ground disturbance must be immediately placed a minimum of 10m around the location of the human remains or suspected human remains by site personnel. A minimum no work buffer zone radius of 50m must be implemented around the remains by taping off the area as an environmental sensitive zone.
- All personnel should then leave the fenced off area immediately.
- The Environmental Officer is responsible to ensure that these temporary measures are implemented onsite within 24 hours of identification.

Notification:

- The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant authorities.
- If there are reasonable grounds to believe that the remains are Aboriginal, the following must also occur:
 5. Heritage NSW must be contacted as soon as practicable, and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555.
 6. The relevant Aboriginal community groups must be notified immediately when the remains are confirmed to be Aboriginal, as advised by Heritage NSW.
 7. The relevant Project Archaeologist may be contacted to facilitate communication between the police, Heritage NSW and Aboriginal community groups.

Process:

- If the remains are considered to be Aboriginal by the Police and Heritage NSW no work can recommence at the particular location unless authorised in writing by Heritage NSW
- Recording of Aboriginal ancestral remains must be undertaken by, or be conducted under the direct supervision of, a specialist physical anthropologist or other suitably qualified person.
- Archaeological reporting of Aboriginal ancestral remains must be undertaken by, or reviewed by, a specialist physical anthropologist or other suitably qualified person, with the intent of using respectful and appropriate language and treating the ancestral remains as the remains of Aboriginal people rather than as scientific specimens.
- If the remains are considered to be Aboriginal by the Police and Heritage NSW, an appropriate management and mitigation, or salvage strategy will be implemented following further consultation with the Aboriginal community and Heritage NSW.

Appendix G Sample registers

G.1 Heritage site status database

AHIMS#	Site name	Site type	CoA for site	Site Status	Comments
55-6-0199	Culcairn Solar AFT 1	Surface Artefact scatter	Salvage	Partially destroyed	See the Aboriginal Cultural Heritage salvage report for details. Demarcation of the portion of the site boundary outside the approved development footprint completed.
55-6-0241	Culcairn Solar AFT 2	Surface Artefact scatter	Salvage	Partially destroyed	See the Aboriginal Cultural Heritage salvage report for details. Demarcation of the portion of the site boundary outside the approved development footprint completed.
55-6-0223	Culcairn Solar AFT 3	Surface Artefact scatter	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0224	Culcairn Solar AFT 4	Surface Artefact scatter	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0225	Culcairn Solar AFT 5	Surface Artefact scatter	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0226	Culcairn Solar AFT 6	Surface Artefact scatter	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0227	Culcairn Solar AFT 7	Surface Artefact scatter	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0228	Culcairn Solar AFT 8	Surface Artefact scatter	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0229	Culcairn Solar AFT 9	Surface Artefact scatter	Salvage	Partially destroyed	See the Aboriginal Cultural Heritage salvage report for details. Demarcation of the portion of the site boundary outside the approved development footprint completed.
55-6-0230	Culcairn Solar AFT 10	Surface Artefact scatter	Salvage	Partially destroyed	See the Aboriginal Cultural Heritage salvage report for details. Demarcation of the portion of the site boundary outside the approved development footprint completed.
55-6-0231	Culcairn Solar AFT 11	Surface Artefact scatter	Salvage	Valid	See the Aboriginal Cultural Heritage salvage report for details
55-6-0232	Culcairn Solar AFT 12	Surface Artefact scatter	Salvage	Partially destroyed	See the Aboriginal Cultural Heritage salvage report for details. Initial demarcation of the portion of the site boundary outside the approved development footprint completed.

AHIMS#	Site name	Site type	CoA for site	Site Status	Comments
55-6-0233	Culcairn Solar AFT 13	Surface Artefact scatter	Salvage	Partially destroyed	See the Aboriginal Cultural Heritage salvage report for details. Demarcation of the portion of the site boundary outside the approved development footprint completed.
55-6-0234	Culcairn Solar AFT 14	Surface Artefact scatter	Salvage	Partially destroyed	See the Aboriginal Cultural Heritage salvage report for details. Demarcation of the portion of the site boundary outside the approved development footprint completed.
55-6-0139	Culcairn Solar 497239	Surface Artefact scatter	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0135	Culcairn Solar 494492	Surface Artefact scatter	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0136	Culcairn Solar 495094	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0203	Culcairn Solar IF3	Isolated Find	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0204	Culcairn Solar IF4	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0205	Culcairn Solar IF5	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0206	Culcairn Solar IF6	Isolated Find	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0207	Culcairn Solar IF7	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0208	Culcairn Solar IF8	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0209	Culcairn Solar IF9	Isolated Find	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0210	Culcairn Solar IF10	Isolated Find	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0211	Culcairn Solar IF11	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0212	Culcairn Solar IF12	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0213	Culcairn Solar IF13	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details

Heritage Management Plan
Culcairn Solar Farm

AHIMS#	Site name	Site type	CoA for site	Site Status	Comments
55-6-0214	Culcairn Solar IF14	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0215	Culcairn Solar IF15	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0216	Culcairn Solar IF16	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0217	Culcairn Solar IF17	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0218	Culcairn Solar IF18	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0219	Culcairn Solar IF19	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0220	Culcairn Solar IF20	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0222	Culcairn Solar IF21	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0221	Culcairn Solar IF22	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0200	Culcairn Solar IF23	Isolated Find	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0201	Culcairn Solar IF24	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0202	Culcairn Solar IF25	Isolated Find	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
55-6-0130	Culcairn Solar 494957	Modified Tree	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0137	Culcairn Solar 494924	Modified Tree	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0238	Culcairn Solar ST1	Modified Tree	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0132	Culcairn Solar 495666	Cultural Tree Site	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0133	Culcairn Solar 498265	Cultural Tree Site	Avoid impacts	Valid	Demarcation of the site boundary completed.

AHIMS#	Site name	Site type	CoA for site	Site Status	Comments
55-6-0134	Culcairn Solar 497439	Cultural Tree Site	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0140	Culcairn Solar 497151	Cultural Tree Site	Avoid impacts	Valid	Demarcation of the site boundary completed.
N/A	Culcairn Solar CT1	Cultural Tree Site	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-0138	Culcairn Solar 497037	Cultural stone Site	Salvage	Destroyed	See the Aboriginal Cultural Heritage salvage report for details
N/A	PAD along Back Creek	PAD	Avoid impacts	NA	Demarcation of the eastern, northern, and southern boundary of the PAD completed.
55-6-2075	Culcairn Solar Farm Reburial 1 (Roseworthy- Schoff)	Reburial site for Aboriginal objects	Avoid impacts	Valid	Demarcation of the site boundary completed.
55-6-2076	Culcairn Solar Farm Reburial 2	Reburial site for Aboriginal objects	Avoid impacts	Valid	Demarcation of the site boundary completed.

G.2 Ground disturbance permit - Heritage

Project: Culcairn Solar Farm	Work No:
Requested By:	
Start Date:	Expected Completion Date:

CLEARING LOCATIONS – ATTACH DRAWINGS / SKETCHES IF NECESSARY

Location	Comments
<p>This section will be completed by either the Health, Safety and Environment (HSE) Manager or the Site Environmental Officer (SEO), with reference to constraints mapping.</p>	
<p>Are there any recorded Aboriginal Heritage sites within the vicinity (within 50m) of the works?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Has salvage of the Aboriginal Heritage sites within the vicinity (within 50m) of the works previously been completed to date.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>State the AHIMS number of the site/s present in the vicinity (within 50m) of the works if not salvaged to date.</p>	
<p>Are the Aboriginal Heritage site/s listed as do not impact in the Development Consent for the Project?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Has the site been appropriately buffered and delineated if it remains valid/ <i>in situ</i>?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Have relevant workers been given toolbox talks about working near valid/ <i>in situ</i> Aboriginal Heritage sites and the heritage unexpected finds protocol?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Is a site inspection of the work area required by the HSE or SEO (heritage sites within 50m of the works)?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Is a sign-off of this form required once works have been completed (heritage sites within 50m of the works)?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>Comments:</p> <div style="border: 1px solid black; height: 150px; width: 100%;"></div>	

APPROVALS

Site Inspection completed by HSE or SEO (if required): Signature Required	Date:
Approval by HSE or SEO: Signature Required	Date:

IS A SIGN-OFF (ONCE WORKS COMPLETED) REQUIRED

Yes No

Have the conditions of the permit been met if a sign off is required? HSE or SEO Signature Required	<input type="checkbox"/> Yes <input type="checkbox"/> No Date:
---------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------

Note: Sign off required if works within 50m of a heritage site or if other matters are raised.

G.3 Site inspection checklist - Aboriginal heritage

Project:	Culcairn Solar Farm
Site inspection personnel:	
Date of visual inspection:	
Has the Heritage Site Status Database been checked prior to undertaking this inspection to ensure the checklist includes all valid/in situ Aboriginal sites in the Project Area?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, what date was this undertaken:

Checklist item	List sites or any comments	Mark appropriate box (x)
List all valid/ in situ Aboriginal sites within the Project Area that have been visually inspected within the last 72 hours by the SEO.	Culcairn Solar IF3	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF6	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF9	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF10	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF23	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT3	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT6	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT7	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 497239	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Cultural Solar 494492	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar ST1	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar CT1	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 494924	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 494957	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 497151	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 497439	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 495666	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 498265	<input type="checkbox"/> Yes <input type="checkbox"/> No
Back Creek PAD	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Culcairn Solar AFT 1	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Checklist item	List sites or any comments	Mark appropriate box (x)
	Culcairn Solar AFT 2	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 10	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 12	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 13	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 14	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar Farm Reburial 1 (Roseworthy-Schoff)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar Farm Reburial 2	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the valid/ <i>in situ</i> Aboriginal site clearly within a delineated area?	Culcairn Solar IF3	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF6	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF9	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF10	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF23	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT3	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT6	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT7	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 497239	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Cultural Solar 494492	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar ST1	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar CT1	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 494924	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 494957	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 497151	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 497439	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 495666	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 498265	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Back Creek PAD	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 1	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 2	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 9	<input type="checkbox"/> Yes <input type="checkbox"/> No

Checklist item	List sites or any comments	Mark appropriate box (x)
	Culcairn Solar AFT 10	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 12	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 13	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 14	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar Farm Reburial 1 (Roseworthy-Schoff)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar Farm Reburial 2	<input type="checkbox"/> Yes <input type="checkbox"/> No
If any valid/ <i>in situ</i> Aboriginal sites were not clearly delineated has the identified issues been fixed to ensure appropriate heritage controls are in place in line with the HMP?	Culcairn Solar IF3	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar IF6	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar IF9	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar IF10	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar IF23	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar AFT3	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar AFT6	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar AFT7	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar 497239	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Cultural Solar 494492	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar ST1	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar CT1	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar 494924	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar 494957	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar 497151	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar 497439	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar 495666	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar 498265	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Back Creek PAD	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar AFT 1	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar AFT 2	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar AFT 9	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Culcairn Solar AFT 10	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Culcairn Solar AFT 12	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Checklist item	List sites or any comments	Mark appropriate box (x)
	Culcairn Solar AFT 13	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar AFT 14	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar Farm Reburial 1 (Roseworthy-Schoff)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Culcairn Solar Farm Reburial 2	Yes No N/A
Is there any evidence or knowledge of direct or indirect impact to a valid/ <i>in situ</i> Aboriginal sites?	Culcairn Solar IF3	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF6	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF9	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF10	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar IF23	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT3	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT6	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT7	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 497239	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Cultural Solar 494492	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar ST1	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar CT1	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 494924	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 494957	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 497151	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 497439	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 495666	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar 498265	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Back Creek PAD	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 1	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 2	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 9	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar AFT 10	<input type="checkbox"/> Yes <input type="checkbox"/> No
Culcairn Solar AFT 12	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Culcairn Solar AFT 13	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Culcairn Solar AFT 14	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Checklist item	List sites or any comments	Mark appropriate box (x)
	Culcairn Solar Farm Reburial 1 (Roseworthy-Schoff)	<input type="checkbox"/> Yes <input type="checkbox"/> No
	Culcairn Solar Farm Reburial 2	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, has this incident and/or non-compliance been reported on in line with the Project requirements (see section 8.6 of the HMP).	<input type="checkbox"/> Yes <input type="checkbox"/> No	
General Comments/ Other Actions required:		

Date for next inspection:
Site Inspection completed by SEO):
Signature Required:
Date:

Appendix H Surface collection salvage results and site demarcation

All Aboriginal sites within the approved development footprint, as per the CoA, were subject to a surface collection salvage programme prior to the commencement of any development works that could directly or indirectly impact Aboriginal heritage items. The surface collection salvage programme was undertaken in January 2024 by NGH archaeologists with two representatives from the RAPs. All reasonable and feasible measures were implemented as part of the surface collection salvage programme.

The surface collection salvage programme was undertaken at 31 Aboriginal sites within the approved development footprint in line with the CoA. The methodology for the surface collection of each site was completed in accordance with the process detailed in Appendix E of this HMP. Table H-1 provides a summary of the material recovered and results of the surface collection salvage programme. A total of 47 Aboriginal heritage items (13 stone artefacts with diagnostic features and 34 cultural stone fragments) were recovered as part of surface collection salvage programme.

Despite all efforts being undertaken during the surface collection salvage programme, no Aboriginal objects were able to be located from some of the previously recorded sites. However, these were noted to all be either isolated stone artefact sites (IF) or artefact scatter sites (AFT) which originally had very low artefact densities (ie not more than two artefacts originally recorded). The Aboriginal representatives on site for the salvage programme were satisfied that all reasonable and feasible measures and actions were undertaken to collect the Aboriginal objects within the approved development footprint for the Project prior to any development works commencing. It was noted that the recovery rates were not unexpected, given changes in the ground surface visibility and standard taphonomic and other environmental factors that can impede the relocation of Aboriginal objects. This is a typical and accepted archaeological phenomenon and the surface collection salvage focused on visible surface heritage items within each site, which was an acceptable outcome.

The stone artefacts and cultural material collected as part of the surface collection salvage programme were all characteristic of the assemblage previously recorded across the Project and within the local area. The surface collection salvage programme undertaken was deemed a success by the Project Archaeologists and the representatives from the RAPs who participated in the works.

Following the completion of the surface collection salvage programme a summary email of the results was provided to all RAPs. This information was provided to ensure it was clearly communicated and documented to all RAPs that while all sites approved for impacts within the development footprint were inspected, not all of the originally recorded Aboriginal objects listed in the ACHA were relocated despite all reasonable and feasible measures being undertaken during the salvage works. No responses were received, and the salvage report (NGH 2024) was subsequently completed. Aboriginal Site Impact Recording Forms (ASIRF) were submitted for all sites which were part of the salvage programme of works.

Table H-1 Summary of the results of the surface collection salvage programme.

Site Name (site type)	Degree of Impact approved	No. of items originally recorded	Surface Collection Salvage Results			Comments
			Artefact (diagnostic)	Cultural item	Total	
Culcairn Solar IF4 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF5 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF7 (Isolated Artefact)	Whole	1	1	1	2	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF8 (Isolated Artefact)	Whole	1	0	2	2	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF11 (Isolated Artefact)	Whole	1	0	1	1	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF12 (Isolated Artefact)	Whole	1	1	0	1	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF13 (Isolated Artefact)	Whole	1	0	1	1	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.

Site Name (site type)	Degree of Impact approved	No. of items originally recorded	Surface Collection Salvage Results			Comments
			Artefact (diagnostic)	Cultural item	Total	
Culcairn Solar IF14 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF15 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF16 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF17 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF18 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF19 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF20 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.

Site Name (site type)	Degree of Impact approved	No. of items originally recorded	Surface Collection Salvage Results			Comments
			Artefact (diagnostic)	Cultural item	Total	
Culcairn Solar IF21 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF22 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF24 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar IF25 (Isolated Artefact)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar 495094 (Isolated Artefact)	Whole	1	1	0	1	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar AFT1 (Artefact Scatter)	Partial	2	1	0	1	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar AFT2 (Subsurface Artefact Scatter)	Partial	17	6	13	19	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.

Site Name (site type)	Degree of Impact approved	No. of items originally recorded	Surface Collection Salvage Results			Comments
			Artefact (diagnostic)	Cultural item	Total	
Culcairn Solar AFT4 (Artefact Scatter)	Whole	2	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar AFT5 (Artefact Scatter)	Whole	3	2	3	5	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar AFT8 (Artefact Scatter)	Whole	2	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar AFT9 (Artefact Scatter)	Partial	3	0	1	1	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar AFT10 (Artefact Scatter)	Partial	8	0	9	9	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar AFT11 (Artefact Scatter)	Whole	2	0	3	3	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar AFT12 (Artefact Scatter)	Partial	2	1	0	1	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.

Site Name (site type)	Degree of Impact approved	No. of items originally recorded	Surface Collection Salvage Results			Comments
			Artefact (diagnostic)	Cultural item	Total	
Culcairn Solar AFT13 (Artefact Scatter)	Partial	2	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar AFT14 (Artefact Scatter)	Partial	2	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
Culcairn Solar 497037 (Isolated Cultural Object)	Whole	1	0	0	0	A reasonable attempt of surface collection was undertaken by NGH archaeologists with RAPs at this site. Works within the approved development footprint can now occur.
TOTAL	-	65	13	34	47	-

After the completion of the surface collection salvage programme, the initial demarcation of the Aboriginal sites listed to be avoided by the development works in the CoA (and the portions of sites which remain in situ adjacent to the approved development footprint) was completed. These initial demarcations works were completed by NGH archaeologists with RAP representatives in January 2024.

The demarcation of Aboriginal sites being avoided by the Project was completed in line with the required mitigation measures noted in the HMP for the Project. As part of these works the boundary of Back Creek PAD was demarcated. In consultation with the RAP representatives onsite and the Project Owner, it was determined that the Aboriginal sites located within the larger Back Creek PAD area did not warrant individual demarcation as sufficient flagging had occurred through the demarcation of the eastern boundary of Back Creek PAD which incorporated these sites.

A summary of the sites which were subject to initial demarcation by NGH archaeologists with RAP representatives for the Project are summarised below in Table H-2.

Table H-2 Summary of sites subject to initial demarcation as part of heritage works.

Item Name	CoA Requirements	Demarcation
Culcairn Solar IF3 (Isolated Artefact)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar IF6 (Isolated Artefact)	Avoid Impacts	Initially demarcation of the site completed.

Item Name	CoA Requirements	Demarcation
Culcairn Solar IF9 (Isolated Artefact)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar IF10 (Isolated Artefact)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar IF23 (Isolated Artefact)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar AFT3 (Subsurface Artefact Scatter)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar AFT6 (Artefact Scatter)	Avoid Impacts	Site sufficiently demarcated by Back Creek PAD
Culcairn Solar AFT7 (Artefact Scatter)	Avoid Impacts	Site sufficiently demarcated by Back Creek PAD
Culcairn Solar 497239 (Artefact Scatter)	Avoid Impacts	Initially demarcation of the site completed.
Cultural Solar 494492 (Artefact Scatter)	Avoid Impacts	Site sufficiently demarcated by Back Creek PAD
Culcairn Solar ST1 (Scarred Tree)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar CT1 (Cultural Tree)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar 494924 (Scarred Tree)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar 494957 (Scarred Tree)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar 497151 (Cultural Tree)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar 497439 (Cultural Tree)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar 495666 (Cultural Tree)	Avoid Impacts	Initially demarcation of the site completed.
Culcairn Solar 498265 (Cultural Tree)	Avoid Impacts	Initially demarcation of the site completed.
Back Creek PAD	Avoid Impacts	Initially demarcation of the eastern, northern, and southern boundary of the PAD completed.
Culcairn Solar AFT1 (Artefact Scatter)	Partial impact approved only	Initial demarcation of the portion of the site boundary outside the approved development footprint completed.
Culcairn Solar AFT2 (Subsurface Artefact Scatter)	Partial impact approved only	Initial demarcation of the portion of the site boundary outside the approved development footprint completed.

Item Name	CoA Requirements	Demarcation
Culcairn Solar AFT9 (Artefact Scatter)	Partial impact approved only	Initial demarcation of the portion of the site boundary outside the approved development footprint completed.
Culcairn Solar AFT10 (Artefact Scatter)	Partial impact approved only	Initial demarcation of the portion of the site boundary outside the approved development footprint completed.
Culcairn Solar AFT12 (Artefact Scatter)	Partial impact approved only	Initial demarcation of the portion of the site boundary outside the approved development footprint completed.
Culcairn Solar AFT13 (Artefact Scatter)	Partial impact approved only	Initial demarcation of the portion of the site boundary outside the approved development footprint completed.
Culcairn Solar AFT14 (Artefact Scatter)	Partial impact approved only	Initial demarcation of the portion of the site boundary outside the approved development footprint completed.

Following the analysis of the heritage items recovered from the surface collection salvage programme they were returned to Country in March 2024 with the material previously recovered from the subsurface test excavation programme for the Project. The items were relocated in accordance with Requirement 26 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* between two separate locations which were both outside the approved development footprint, in areas that will not be impacted into the future, within the proposed relocation areas outline in Figure 7-1. A smoking ceremony was undertaken onsite prior to the reburial being conducted.

After the reburial had been completed new site cards for each relocation site was submitted to the AHIMS register. These sites were recorded as:

- *Culcairn Solar Farm Reburial 1 (Roseworthy- Schoff)* AHIMS# 55-6-2075
- *Culcairn Solar Farm Reburial 2* AHIMS# 55-6-2076

The location of the relocation/reburial sites is show in Figure 7-1 with the sites remaining *in situ* following the completion of the surface collection salvage programme are shown in Figure 6-2 to Figure 6-4.

Based on the results of the surface collection salvage programme and initial demarcation works undertaken, the following conclusions were provided in the Aboriginal Cultural Heritage Salvage report (NGH 2024) for this Project.

- In line with the CoA for SSD 10288 and the approved HMP for the Project, the surface collection salvage was sufficiently carried out for the Aboriginal sites within the approved development footprint.
- Schedule 3 Condition 22 of the CoA for the Project which specifically notes that “*prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6, must salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*” is considered to have been sufficiently met by undertaking a surface collection salvage programme

at the identified Aboriginal heritage sites that cannot be avoided by impacts within the approved development footprint.

- Salvage, via surface collection of Aboriginal heritage items, has been sufficiently carried out in line with the CoA and HMP for the Project by NGH archaeologists with Aboriginal community RAP representatives. It is acknowledged that in some instances changes in the ground surface visibility and standard taphonomic and other environmental factors have impeded the relocation of all the recorded stone artefacts noted in the ACHA. This is a typical and accepted archaeological phenomenon which is an acceptable outcome (as noted in the HMP).
- It was confirmed by the NGH archaeologists and the Aboriginal community RAP representatives who participated in the surface collection salvage programme that all reasonable and feasible measures were undertaken at each site inspected as part of the salvage programme and that no further mitigation was warranted.
- Aboriginal Site Impact Recording Forms (ASIRF) were completed and submitted to the AHIMS Register as part of this scope of works for all sites listed within the approved development footprint and approved for impacts under the CoA for this Project that were inspected and subject to salvage, even in the event that no objects were able to be located during the salvage programme.
- The heritage items recovered from the initial test excavation and recent surface collection salvage programme were subject to long term management in line with the HMP and relocated between two separate locations. This was also completed in accordance with Requirement 26 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* and new sites cards were submitted to the AHIMS register for Culcairn Solar Farm reburial 1 (Roseworthy – Schoff) (AHIMS#55-6-0275) and Culcairn Solar Farm reburial 2 (AHIMS#55-6-2076). These two relocation sites must be avoided and protected during the construction, operation and decommissioning of the Project. A minimum 5 m buffer zone has been demarcated around each of these relocation sites.
- The initial demarcation/delineation of Aboriginal sites being avoided by the Project was completed in line with the required mitigation measures noted in the HMP for the Project by a qualified archaeologist with representatives of the RAPs to ensure no inadvertent impacts occur to Aboriginal objects.
- The HMP and CoA must continue to be followed to ensure the compliance of the Project (SSD 10288).