



New England Solar Farm

Aboriginal heritage management plan

Prepared for UPC/AC Renewables Australia Pty Ltd
May 2021





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UPC Renewables Australia Pty Ltd

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1 Background

1.1 The project

UPC\AC Renewables Australia Pty Ltd (UPC) *has approval to* develop the New England Solar Farm; a significant grid-connected solar farm and battery energy storage system (BESS) along with associated infrastructure, approximately 6 kilometres (km) east of the township of Uralla, which lies approximately 19 km south of Armidale in the Uralla Shire local government area (LGA) (the project) (Figure 1.1).

The project is classed as a State Significant Development (SSD) under the State Environmental Planning Policy (State and Regional Development) 2011. A development application (DA) and environmental impact statement (EIS) was submitted under Part 4, Division 4.1 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act).

The project was approved, subject to conditions, by the IPC on 9 March 2020 (SSD-9255). The conditions of consent imposed by the IPC are designed to prevent, minimise and/or offset adverse environmental impacts and impacts on the community.

The main elements of the project are summarised in Table 1.1 and an indicative layout is provided in Figure 1.2.

Table 1.1 **Project overview**

Aspect	Description
Project summary	The project includes: • a generating capacity of approximately 720 MW, including about 500 MW generated by the northern array and 220 MW from the central array; • approximately 2.4 million single-axis tracking solar panels (up to 4.3 m high) and 150 power conversion units (up to 2.7 m high); • a grid substation in the northern array area and connection to TransGrid's 330 kV transmission line; • an internal substation in the central array area at one of two locations; • a battery storage facility (200 MW/400 MWh) located adjacent to one or both of the substations and within a number of small enclosures (up to 2.9 m high) or larger battery buildings (up to 5.5 m high); • a train unloading area, internal access tracks, staff amenities, maintenance buildings (up to 8 m high), offices, laydown areas, car parking and security fencing; and • subdivision of land within the site for the grid substation.
Project area	• Site: 3,362 ha (project boundary on Figure 1.2). • Total development footprint: 2,061 ha, including: – Northern array: 1,394 ha; – Central array: 624 ha; and – Electrical cabling and site access corridors: 43 ha.
Access route	• All vehicles will access the site via the New England Highway, Barleyfields Road (north of Big Ridge Road) and Big Ridge Road.

Table 1.1 **Project overview**

Aspect	Description
Site entry and road upgrades	• Two new site entry points will be constructed on Big Ridge Road with a rural property access type. • Upgrades to the intersection of: – the New England Highway and Barleyfields Road; and – Barleyfields Road and Big Ridge Road. • Upgrades to: – Barleyfields Road between the New England Highway and Big Ridge Road, including sealing with a width of 7.2 m and 1 m gravel shoulders; and – Big Ridge Road including sealing sections to a width of 7.2 m and 1 m gravel shoulders and upgrading sections with a gravel surface to a width of 8.7 m.
Rail transport	• Construction materials may be transported to the site via a combination of road and rail (average of 2 trains per week). • A train unloading area and materials storage area may be constructed adjacent to the Main Northern Railway. Materials would be stored in shipping containers (up to 2.9 m high) until required on-site.
Construction	• The construction period would last for approximately 40 months. • Construction hours limited to Monday to Friday 7am to 6pm, and Saturday 8am to 1pm.
Operation	• The expected operational life of the project is approximately 30 years. However, the project may involve infrastructure upgrades that could extend the operational life.
Decommissioning and rehabilitation	• The project also includes decommissioning at the end of the project life, which would involve removing all infrastructure.
Hours of operation	• Once operational, the site will be operated 24 hours per day, 7 days a week.
Subdivision	• Subdivision of the lots on which the proposed grid substation will be located.
Employment	• Up to 700 construction jobs and 15 full-time equivalent operational jobs.

1.2 Purpose and scope of this plan

1.2.1 Overview

As part of the EIS, EMM Consulting Pty Limited (EMM) prepared an Aboriginal cultural heritage assessment report (ACHA) for the project, inclusive of an addendum report issued after the public exhibition phase in early 2019 (EMM 2018; 2019a; 2019b). The ACHA recommended that an Aboriginal heritage management plan (AHMP) be developed to manage post-approval conservation and mitigation of Aboriginal heritage within and adjacent to the development footprint. This AHMP has been prepared by EMM on behalf of UPC and in accordance with relevant Conditions of Approval (CoA) (Table 1.2).

The primary purpose of this plan is to define management of Aboriginal heritage values within the development footprint. The term 'management' includes both Aboriginal heritage protection as well as mitigation of impacts on Aboriginal heritage. This AHMP includes:

- a list of all Aboriginal sites identified in the project boundary;
- management procedures for Aboriginal cultural heritage values within and adjacent to the project boundary;
- provisions for updates of Aboriginal site status and the status of management measures towards their completion;
- measures to ensure ongoing consultation with the project's registered Aboriginal parties (RAPs) Heritage NSW regional archaeologist;
- protocols for RAP access arrangements for a selection of significant sites for educational purposes;
- protocols for educating staff and contractors of their obligations relating to Aboriginal cultural heritage values through a site induction process;
- protocols for newly identified sites;
- protocols for suspected human skeletal materials;
- protocols for the ongoing care of salvaged Aboriginal objects within a keeping place;
- reporting requirements and site database update requirements;
- provisions for continuous improvement to the plan through auditing and plan modification; and
- provisions for review and updates of the AHMP.

1.2.2 Area to which this plan applies

This AHMP applies to the project boundary as shown on Figure 1.2 and represents an envelope covering the development footprint of the two solar arrays and associated infrastructure. The AHMP also provides management measures for Aboriginal sites that occur on the border of the project boundary or extend beyond the project boundary, comprising sites NE58, NE26 and NE73.

The AHMP includes provisions for management measures outside the project boundary, including the establishment and maintenance of an Aboriginal keeping place and other post site salvage measures including the cataloguing, analysis, treatment and storage of Aboriginal objects.

1.2.3 Relevant conditions of consent

Conditions 16–18 of SSD-9255 address Aboriginal heritage requirements. The conditions listed in Table 1.2 refer to the relevant sections of this plan which address them.

Table 1.2 Conditions of SSD-9255 relevant to this AHMP

Condition	Where addressed in this document
17. Prior to the commencing the development, the Applicant must undertake consultation with Aboriginal stakeholders, in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> (DECCW 2010a), or its latest version.	Section 2.3
18. 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 5 or the historic heritage items identified in Table 1 of Appendix 6, or any Aboriginal or historic heritage items located outside the approved development footprint. Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 5, 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 2010b), or its latest version. <i>Note: The location of the Aboriginal heritage and historic heritage items referred to in this condition are shown in the figures in Appendix 5 and Appendix 6, respectively.</i>	Section 4.2 (protective measures and establishment of keeping place) Section 4.3 (salvage measures) Note that this plan does not address historic heritage items – this is addressed separately in a historic heritage management plan (HHMP)
19. Prior to commencing the development, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:	Whole document
be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;	Section 1.3
be prepared in consultation with BCD, Aboriginal Stakeholders and Council;	Section 1.2.4 (Heritage NSW (formerly BCD) and Council) Section 2.3 (Aboriginal stakeholders (ie RAPS))
include a description of the measures that would be implemented for:	
protecting the Aboriginal heritage items identified in Table 1 of Appendix 5 or items located outside the approved development footprint, including fencing off Aboriginal heritage items prior to commencing construction and providing ongoing access and management opportunities for Aboriginal people to NE09 and NE68;	Section 4.2 (protective measures) Section 2.4.2 (access to sites and objects)
salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 5;	Section 4.3 (salvage measures) Section 4.2.4 (keeping place for salvaged objects)
protecting the historic heritage items identified in Table 1 of Appendix 6 or items located outside the approved development footprint;	Note that this plan does not address historic heritage items – this is addressed separately in a HHMP
managing the impact of the development on the historic heritage items identified in Table 2 of Appendix 6, including photographic archival records prepared in accordance with Heritage Council of NSW Guidelines for archival recordings;	Note that this plan does not address historic heritage items – this is addressed separately in a HHMP
a contingency plan and reporting procedure if:	
previously unidentified heritage items are found; or	Section 5.1 to Section 5.3.

Table 1.2 **Conditions of SSD-9255 relevant to this AHMP**

Condition	Where addressed in this document
Aboriginal skeletal material is discovered;	Section 5.3
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	Chapter 6
ongoing consultation with Aboriginal stakeholders during the implementation of the plan;	Section 2.3.2 (ongoing consultation) Section 7.2.3 (Aboriginal consultation for AHMP review process)
include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project	Section 6.4

1.2.4 Regulatory consultation

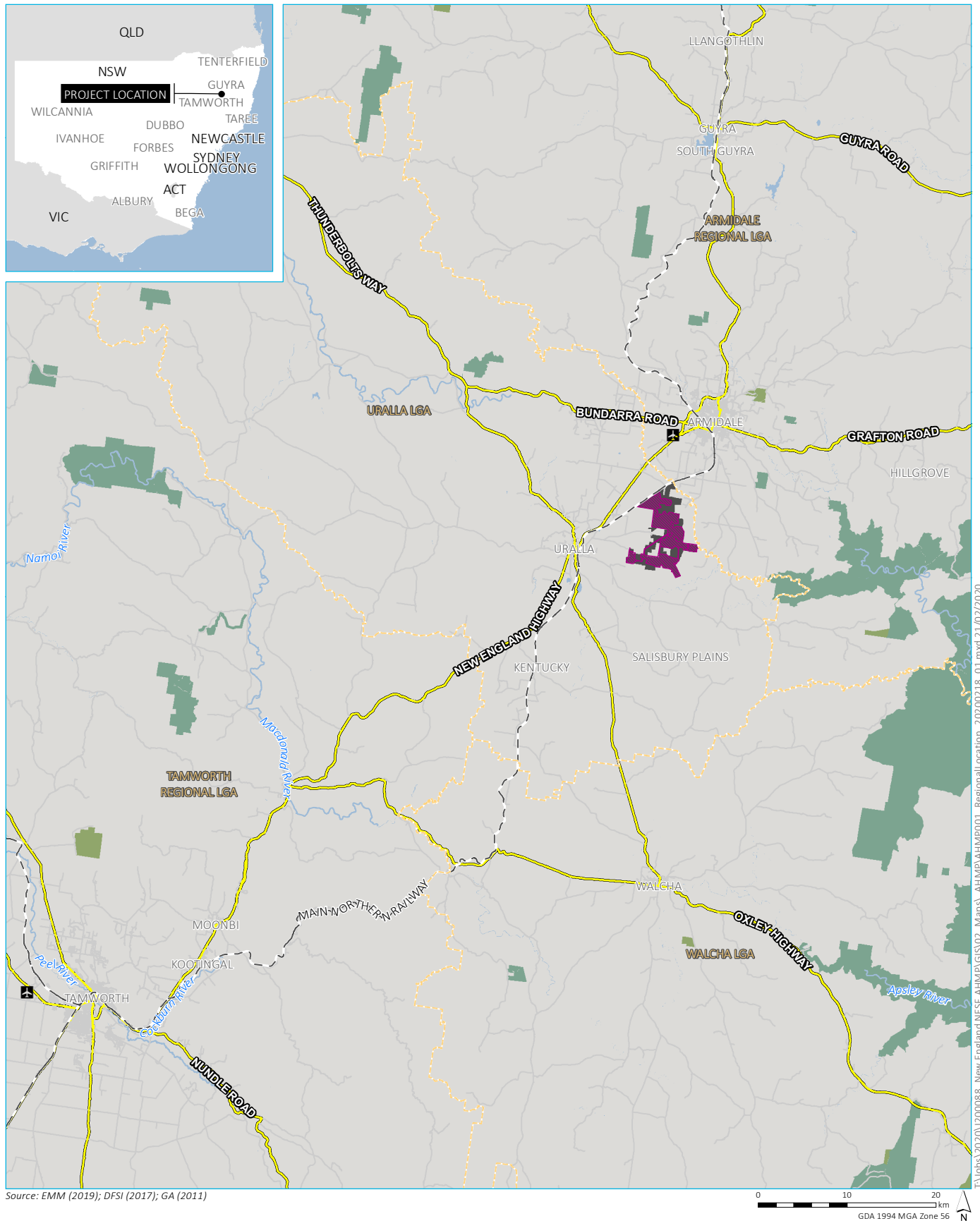
In accordance with CoA 18(b), EMM on behalf of UPC consulted with Heritage NSW regional archaeologist Roger Mehr and Uralla Shire Council (Council) on the AHMP. Consultation with the Aboriginal community is addressed in Section 2.

EMM initially contacted Heritage NSW on 27 March 2020 during the preparation of the AHMP via telephone. Key content items were discussed including the desired approach of Heritage NSW's review of the AHMP. Heritage NSW advised of their preference to review the AHMP after the RAP review period and its submission to DPIE.

Heritage NSW provided their comments via letter on 28 October 2020 which was included in a package of documents that also included DPIE's comments on the AHMP. Responses to these regulatory comments are provided in Appendix C.2 which refers to sections of the AHMP that were updated to address the comments. UPC issued Council a draft of the AHMP on 19 August 2020 after the draft had been updated from the RAP review period. Council responded on 26 August 2020 stating that Council did not wish to provide comment on the AHMP (refer Appendix C.3).

1.3 Authorship

This plan was prepared by EMM Associate Archaeologist Ryan Desic (BA (hons) Historical and Prehistoric Archaeology) and reviewed by EMM Archaeologist Associate Director Dr Alan Williams FSA MAACA. In accordance with Schedule 3, CoA 18 (a), Ryan Desic was endorsed to prepare the AHMP by the DPIE Secretary (refer Appendix C).

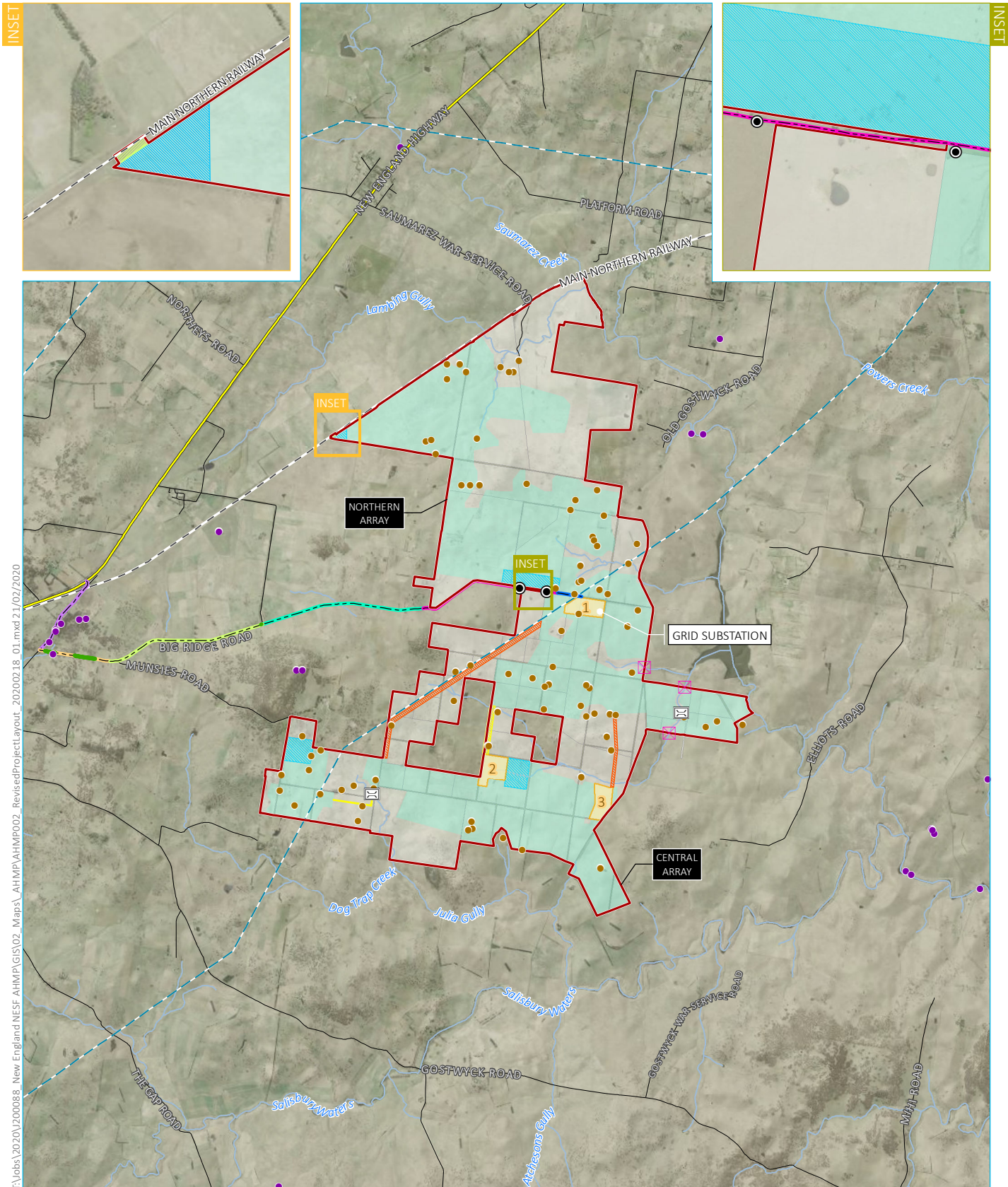


KEY

- Development footprint
- Project boundary
- Airport
- Rail line
- Main road
- Local road
- Watercourse/drainage line
- Waterbody
- Local government area
- NPWS reserve
- State forest

Regional context

New England Solar Farm
Aboriginal Heritage Management Plan
Figure 1.1



Source: EMM (2019); DFSI (2017); UPC (2019)

*The extent of Lot 1 of DP 227322 within the development footprint is 205.4 hectares, which represents approximately 8.4% of the total lot. Subsequently, the full extent of Lot 1 of DP 227322 has been excluded from the project boundary.
 ** The grid substation (location 1) and only one of potential substation location numbers 2 or 3 to be constructed

KEY

- 330 kV transmission line
- Rail line
- Main road
- Local road
- Watercourse/drainage line
- Project boundary *
- Identified Aboriginal sites (EMM ACHA)
- AHIMS sites (previously recorded)

- Development footprint
- Solar array
- Potential electrical cabling
- Potential site access/electrical cabling
- Potential laydown area/site compound
- Potential substation/BESS footprint
- Potential substation/BESS footprint (location number) **
- Hardstand in rail corridor
- Potential creek crossing
- Proposed primary site access point
- Indicative location of security fencing across third order watercourses

- Primary vehicle access route
- Barleyfields Road
- Big Ridge Road - segment 1
- Big Ridge Road - segment 2
- Big Ridge Road - segment 3
- Big Ridge Road - segment 4
- Big Ridge Road - segment 5

Project layout

New England Solar Farm
 Aboriginal Heritage Management Plan
 Figure 1.2

2 Aboriginal consultation protocols

2.1 Registered Aboriginal parties

There are nine Aboriginal groups registered for the project (Table 2.1). The RAPs were identified, registered and consulted as part of the ACHA (EMM 2018, 2019a, 2019b). Previous consultation included discussion of the management measures which were outlined in the ACHA and detailed in this AHMP.

Table 2.1 List of registered Aboriginal parties

Organisation	Contact		Date of registration
Armidale Local Aboriginal Land Council	Tom	Briggs	24-Apr-18
Nunawanna Aboriginal Corporation	Colin	Ahoy	16-Apr-18
Armidale and New England Gumbaynggirr Descendants	Hazel	Green	26-Apr-18
Les Townsend	Les	Townsend	03-May-18
Steven Ahoy Consultants (now Iwatta Aboriginal Corporation)	Steven	Ahoy	06-May-18
Culturally Aware Aboriginal Heritage Consultancy	Cheryl	Kitchener	07-May-18
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Rhonda	Kitchener	07-May-18
Aaron Broad	Aaron	Broad	02-May-18
Nganyawana Clan Group	Les	Ahoy	14-May-18

2.2 Consultation process for the EIS

The following summary of the Aboriginal consultation process followed for the EIS is based on the more extensive account given in the ACHA (EMM 2018, 2019a, 2019b).

The *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010a) were used for the ACHA. RAPs were invited to provide cultural information about the study area, were provided with draft assessment and fieldwork methods for review and kept consulted about project updates and management via consultation meetings, letters and emails and provided with assessment documentation for review and comment. A summary of the main consultation components during the EIS phase is provided in Table 2.2.

Table 2.2 Summary of consultation for the EIS

Component	Key features
April–November 2018 (EMM 2018) Main ACHA consultation component	This phase included: - the identification, notification and registration of RAPs; - presentation of project information and assessment methodologies (including on-site meeting on 21 May 2018); - gathering cultural information; - archaeological survey with RAP involvement; - provision of draft ACHA for RAP review, including a consultation meeting at the Armidale Bowling Club on 19 October 2019; and - provision of final ACHA to RAPs as part of EIS lodgement.

Table 2.2 **Summary of consultation for the EIS**

Component	Key features
February–June 2019 (EMM 2019a) Additional assessment for ACHA Addendum to resolve outstanding commitments.	EMM undertook additional assessment and consultation during the RTS phase of the project subsequent to EIS lodgement. The additional assessment addressed outstanding commitments in the ACHA, comprising survey for additional scar trees, expert scar tree assessment and an archaeological test excavation. RAPs were notified of the additional assessment, participated in field investigations and were invited to comment on the ACHA Addendum report.
August–September 2019 (EMM 2019b) Additional assessment for project-related road upgrades and intersection improvements between the New England Highway and the development footprint.	RAPs were notified about the additional assessment in August 2019 and RAP representatives were invited to participate in archaeological survey on 8 August 2019. The assessment was issued to RAPs on 9 September 2019 for review and comment.

2.3 Consultation in developing this plan

2.3.1 Initial plan development

In accordance with CoA 16 and 18(b), EMM consulted RAPs in developing this plan. Documentation of the consultation process is included in Appendix B.

Aboriginal consultation for this AHMP was approached in a manner consistent with the requirements set out in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a). Consultation was undertaken with existing RAPs who have been involved in the consultation process since the preparation of the ACHA (refer Section 2.2).

RAPs were notified via letter about the intention for EMM to prepare the AHMP on 11 February 2020. The notification letter outlined the consultation process for the AHMP and identified key matters to be discussed for the AHMP.

A draft of this AHMP was provided to all of the RAPs on 15 May 2020 allowing for a 28 day review period. The draft report included highlighted text indicating sections where RAP input was sought in reference to particular management decisions, such as the keeping place location. RAPs were also issued with a cover letter explaining the review process and highlighting where key input was sought.

A consultation meeting between RAPs, EMM and UPC during the AHMP review period was originally planned to discuss the contents of the AHMP, focusing on the details of specific management measures. However, due to the Coronavirus COVID-19 pandemic, the meeting was cancelled for the health and safety of all stakeholders. Notwithstanding, feedback on the AHMP was still sought in writing and/or via telephone.

Responses were received by Nganywana Clan Group (Les Ahoy), Nunawanna Aboriginal Corporation (Colin Ahoy Snr. And Colin Ahoy Jr.) and Iwatta Aboriginal Corporation (Steven Ahoy). A summary of RAP submissions and outcomes relating to the AHMP are presented in Table 2.3.

Table 2.3 Outcomes of consultation with RAPs (RAP submissions attached in Appendix B)

Stakeholder	Issue or recommendation (EMM paraphrase from submission)	Response and where issue is addressed in AHMP if applicable
Les Ahoy (Nganyawana Clan Group)	The submission raised concern that the AHMP focuses too greatly on the scientific and tangible (archaeological) aspects of Aboriginal heritage rather than the non-tangible socio-cultural and historic aspects. The submission reiterated the input provided in the NESF ACHA that the project area is likely to be part of Aboriginal meeting place Ooralla (Section 7.2 of EMM 2019a). Overall the submission requested that the AHMP “take into consideration the non-tangible aspects which even though cannot be measured from a scientific perspective, should be inclusive from a traditional oral Aboriginal historical perspective of teaching and passing on culture through the process of storytelling, dance and such gathering as with Ooralla site. It has just as much historical importance to me as an Aboriginal Cultural Knowledge Holder as do the artefacts found at this location.”	EMM acknowledge that the AHMP is structured in a way that sets out the management of primarily archaeological material associated with the project. We would like to emphasise that the AHMP is structured in a practical way to set out management requirements rather than being a cultural heritage assessment, which was previously completed in 2019 (EMM 2019a). Section 7.2 of the project ACHA (EMM 2019a) includes reference to Ooralla and Les Ahoy’s original submission about Ooralla is included in Appendix A of the ACHA. Notwithstanding, EMM acknowledges that the submission highlights that the focus of Aboriginal heritage management in the draft was on archaeological management and did not set out avenues for oral history recording and other measures that facilitates the teaching of cultural values to the Aboriginal community about Ooralla. EMM contacted Les Ahoy on 3 July 2020 to discuss his desired outcomes to accommodate more emphasis on intangible cultural aspects of the project area. The primary outcomes of the discussion were the request for appropriate acknowledgement of country through signage and interpretation at the grinding groove site NE09 and the possibility of signage to the main entrance of the project area. Additionally, Les Ahoy requested that oral history regarding Ooralla was appropriately recorded. These discussions have been formulated into management commitments set out in Section 4.4.

Table 2.3 Outcomes of consultation with RAPs (RAP submissions attached in Appendix B)

Stakeholder	Issue or recommendation (EMM paraphrase from submission)	Response and where issue is addressed in AHMP if applicable
Colin Ahoy Jr. (Nunawanna Aboriginal Corporation)	The submission requested that UPC employ an Aboriginal cultural heritage officer during project construction and during operation. The requested included that an Aboriginal person from the local community should be present on site at all times given the high significance of the location of the solar farm.	Aboriginal community members will be involved in a number of tasks under the AHMP. This will involve Aboriginal community employment in carrying out Aboriginal heritage management measures (Section 2.4.3) and induction and training aspects of fostering cultural awareness (6.2.2). Outside of the Aboriginal community involvement detailed in this AHMP, UPC wish to keep Aboriginal employment opportunities for UPC staff separate to AHMP requirements. Notwithstanding, UPC acknowledges the importance of cultural heritage support from the Aboriginal community and this will be considered when forming the construction project management team.
Colin Ahoy Snr. (Nunawanna Aboriginal Corporation)	The submission firstly supported Les Ahoy's submission relating to providing some avenue for oral history recording of the project, but left the matter to Les Ahoy to expand on specifics of what this would entail. Furthermore, the submission stated for the preference to have all salvaged materials kept at the Armidale and Region Aboriginal Cultural Centre and Keeping Place.	A response to Les Ahoy's submission is provided in the response to Nganywana Clan Group in the table above. In relation to the keeping place, the AHMP has been updated to confirm that salvaged materials will be kept at the Armidale and Region Aboriginal Cultural Centre and Keeping Place (refer Section 4.2.4).
Steven Ahoy (Iwatta Aboriginal Corporation)	The submission stated that the Armidale and Region Aboriginal Cultural Centre and Keeping Place was the only suitable place for storage and the alternatives presented (McCrossin's Mill Museum and Uralla Visitor Centre in Uralla) are not suitable. The submission also responded to the item requiring resolution about whether any salvaged objects not placed on display at the keeping place should be reburied on Country in a safe location. This request was originally proposed by Cheryl and Rhoda Kitchener during the ACHA review period (EMM 2019a). Iwatta requested that more significant salvaged artefacts should be placed on display with the remaining to be reburied on Country in line with Cheryl and Rhonda Kitchener's request.	These requests and input have been incorporated into Section 4.2.4 of this document. The request to have the salvaged material deposited at the Armidale and Region Aboriginal Cultural Centre and Keeping Place is in keeping with the other RAP submissions received to date.

Table 2.3 Outcomes of consultation with RAPs (RAP submissions attached in Appendix B)

Stakeholder	Issue or recommendation (EMM paraphrase from submission)	Response and where issue is addressed in AHMP if applicable
	The submission requested that there should be a nominated spokesperson that represents the interests of the RAPs and would assist in coordinating future works and give clear progress updates to RAPs regularly.	UPC acknowledges this request and will continue to keep all RAPs informed as per the requirements of this AHMP. Notwithstanding, UPC welcomes the use of a central contact or spokesperson to speak on behalf of project RAPs. However, UPC request that this should be a RAP directed task: whereby if a central contact is to be nominated by RAPs, UPC would require confirmation from all willing RAP participants that they are comfortable with the nominated contact.

2.3.2 AHMP revision 1

In March 2021, EMM/UPC initiated consultation with RAPs regarding proposed changes to the approved AHMP in accordance with the consultation protocols set out in Section 2.4.1 of this plan. The revised AHMP was in relation to proposed changes to project heritage management measures and involved updates to the following sections: *Section 4.2.2 (ii) Barriers*, *Section 4.3.1 (ii) Additional requirements for unsuccessful site collection attempts*, and *Section 4.3.1 (iii) Additional collection for Aboriginal stone hatchets*. Details of RAP consultation for this revision is presented in Appendix B.3.

Additionally, during this AHMP revision period, EMM/UPC consulted RAPs regarding proposed methods for further preservation and display of salvaged Aboriginal scar tree NE49. These measures were conducted in accordance with the existing AHMP provisions in Section 4.3.2 of the AHMP. Details of this consultation are provided in Appendix B.3.

2.4 Ongoing consultation

2.4.1 All RAPs to be kept informed

The RAPs will continue to be consulted on matters of Aboriginal heritage management for the project. Primary communication will be via letter which may be emailed or posted depending on RAP preferred means of communication. Issues raised in conversations, whether by telephone or in person, should be documented in a letter by the person raising the issue within a reasonable time of the conversation. Only suitably documented issues will be subject to further action by UPC with the RAPs.

Instances where consultation is required is set out throughout this report. In summary, consultation will be undertaken for (but may not be limited to) the following circumstances:

- when making changes to this plan, including the circumstances that trigger required changes to the plan (refer Section 7.2.3) (note this also requires notification to Heritage NSW as specified in Section 7.2.3);
- when additional Aboriginal heritage assessment, investigation, protection or mitigation is required for the project; and

- when new Aboriginal sites and/or potential ancestral remains are discovered and input on their management is required (refer Section 5). Note that Section 5 requires Heritage NSW to be notified where specified in relation to new sites and/or potential ancestral remains.

UPC will be responsible for consulting with the RAPs. Issues requiring the attention of RAPs will be communicated no later than one week of the issue arising. Feedback from RAPs is required no later than two weeks from the date correspondence is issued by UPC.

2.4.2 Access to Aboriginal sites and objects

In accordance with CoA18(c), special provisions are included in the AHMP for Aboriginal community access arrangements to Aboriginal grinding groove sites NE09 and NE68. The primary aims of Aboriginal community access of these sites will be to achieve intergenerational equity through maintaining a cultural connection to Country and using the sites as cultural education tools.

Local Aboriginal community site visitation access to NE09 and/or NE68 will be subject to the following provisions:

- visitation access will be provided during the operational phase of the project (after construction is fully completed), in line with all safety and security requirements;
- access must comply with the facility's operational work health and safety (WHS) requirements, including appropriate travel to the Aboriginal heritage sites and a UPC or Operations and Maintenance (O&M) contractor site escort, if applicable;
- all visitors must log their attendance on a register made available by UPC/the O&M contractor to all RAPs (held on site);
- RAPs must give at least two business days' notice to UPC or its delegate (O&M contractor or alternative) about their intent to access the site and which sites will be visited (NE09 and/or NE68);
- a RAP member may escort other members of the local Aboriginal community or other persons for research or educational reasons, on the condition that all proposed attendees give at least two business days' written notice;
- local Aboriginal community members seeking access to NE09 and/or NE68 without a RAP escort must receive prior written endorsement from one of the RAPs which identifies the name of the person, briefly describes their basis of interest and nominates the timeframe for access to the Aboriginal sites in order to provide confidence to UPC or their delegate and RAPs that the access request is authentic. One week's notice will need to be provided to UPC or its delegate.

At UPC/its contractor's discretion, local Aboriginal community access to Aboriginal sites other than NE09 and NE68 on land managed by UPC may be made available subject to reasonable WHS and security requirements being met; landowner permission (if applicable) being obtained; the sites being located within the facility's boundary; at least one week's prior notification; and availability of UPC or O&M contractor staff to provide supervision.

Access to stored Aboriginal objects will be provided subject to the procedures described for the keeping place detailed in Section 4.2.4. In summary, for security purposes the Aboriginal objects must not be removed from their storage location; however, should be available for those wanting to view the material, subject to keeping place space protocols. A keeping place visitor log book must be signed by persons accessing stored Aboriginal objects and the persons must have prior RAP endorsement – this log book will be kept and maintained by the keeping place manager (not UPC/O&M contractor).

2.4.3 Aboriginal involvement in Aboriginal heritage management measures

UPC will give consideration to expressions of interest from suitably skilled, equipped and insured Aboriginal persons to provide services to protect and maintain Aboriginal sites in active protection areas (refer Section 4.2.2i).

RAPs will be invited to provide a fieldwork representative to participate in the preliminary demarcation of active avoidance areas and salvage activities as described in 4 under contractual arrangement with UPC. Depending on the scope of specific management tasks, RAP fieldwork representatives may be required to work to a roster in an equal manner consistent with that employed during the ACHA. All fieldwork management tasks will include at least one project archaeologist and will work in accordance with this plan.

RAPs will also be invited to assist in relevant Aboriginal heritage related fieldwork related to additional assessments as outlined in Section 6.5, where required.

3 Aboriginal sites and objects

3.1 Overview

The Aboriginal cultural heritage values related to the project boundary were identified during the preparation of the ACHA through archaeological investigation and Aboriginal community consultation with RAPs (EMM 2018, 2019a, 2019b). This section provides an overview of the Aboriginal sites and Aboriginal socio-cultural values relevant to the project boundary as detailed in the ACHA.

3.2 Socio-cultural values

During ACHA preparation, the RAPs were consulted to determine whether any socio-cultural or historic heritage value relates specifically to the study area more broadly regardless of archaeological evidence. The general consensus was that, prior to the survey, RAPs did not know of the location of specific sites within the broader study area but were told by their Elders that such site types may exist within the landscape. RAPs acknowledged that this was partly due to the physical and cultural dislocation from the landscape faced by local Aboriginal people after colonial settlement.

Overall, the Aboriginal community has identified that heritage values in the study area are directly linked with the Aboriginal sites identified during the survey. No specific historical connection has been linked to the identified sites apart from a broader notion that the study area may have formed part of what was known as Oorala, a local Anaiwan word meaning “a camp”, “meeting place” or “a place where people come together” (EMM 2018, p.92).

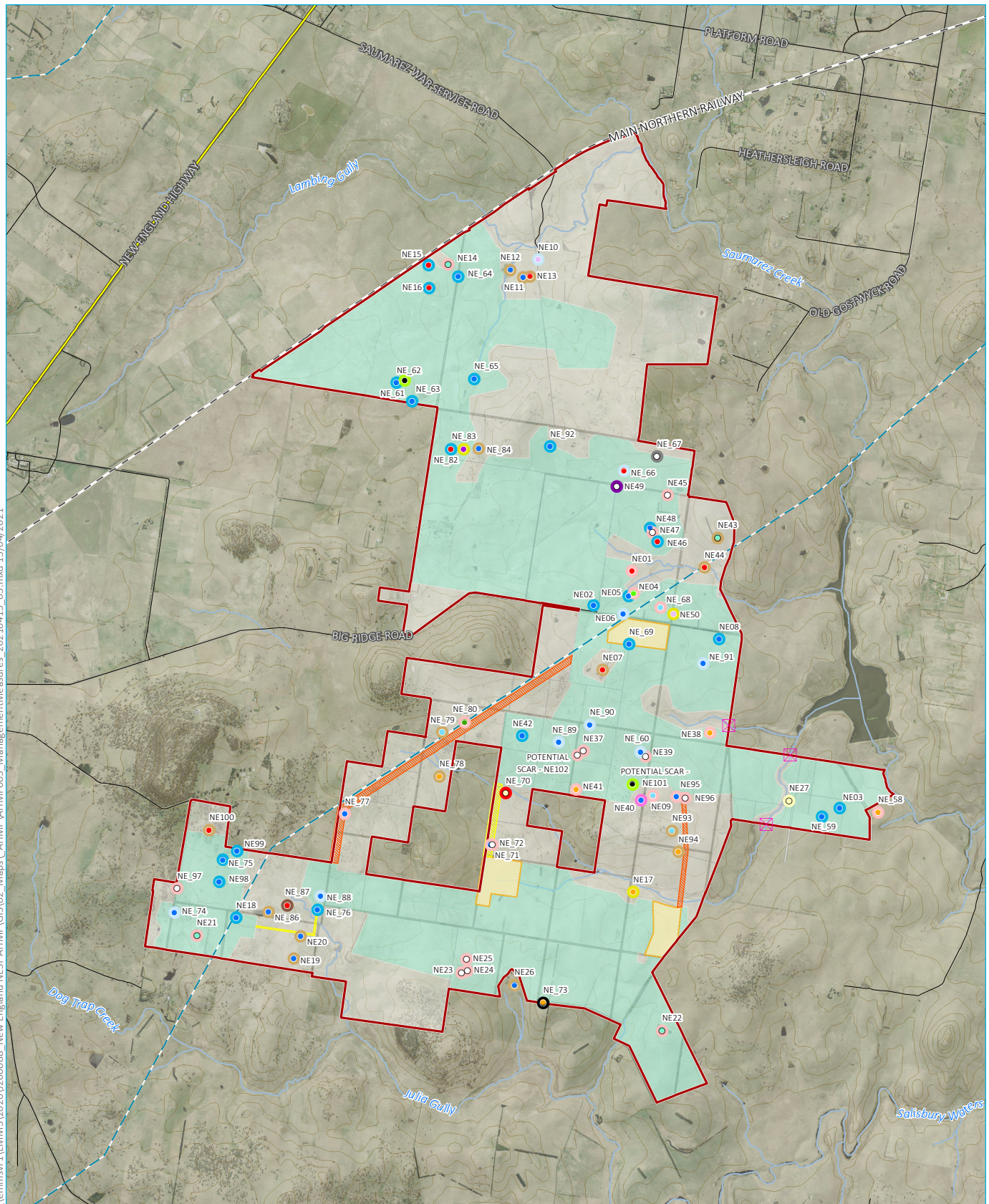
Aboriginal sites with archaeological evidence are all of value to the Aboriginal community through the tangible connection that they represent with pre-colonial Aboriginal land use. Although all Aboriginal sites have significance to the Aboriginal community, RAPs repeatedly emphasised the importance of grinding groove and open camp site NE09 primarily for its high aesthetic and educational values and also the prominent tangible link it provides the Aboriginal community with their ancestors.

3.3 Aboriginal sites

A total of 100 Aboriginal sites were identified during the course of the ACHA, inclusive of the ACHA addendum investigations and assessment (EMM 2018, 2019a, 2019b). Aboriginal sites were identified and assessed through targeted archaeological survey, targeted test excavation and expert assessment of a selection of potential Aboriginal scar trees. Through project design revisions, resulting in the removal of the southern array area, there are 82 Aboriginal sites within the project boundary that require management under this plan. The Aboriginal sites and their required management is shown on Figure 3.1 and in further detail on Figure 3.1A to 3.1F. Details for the management of the 82 sites are presented in Chapter 4 and a summary of management measures are listed in Table A.1 in Appendix A. Site details and their management status are kept digitally in the NESF Aboriginal Heritage Database as detailed in Section 7.3.

The location and extent of Aboriginal sites are represented by GIS data shown on Figure 3.1 and 3.1 A to 3.1F. Sites are either represented as ‘point’ data, or point data encompassed by polygons representing ‘site areas’. Site points and site areas represent the spatial extent of the visible Aboriginal objects. Potential archaeological deposit (PAD) areas (‘PAD areas’) are also shown as GIS polygons and represent the predicted extent of concentrated subsurface Aboriginal objects in a particular area. PAD areas have been supported through extrapolations made from archaeological test excavation and are assigned to landforms that are distinguishable from the surrounding landscape as being likely to retain higher artefact densities than the assumed ‘background scatter’ of archaeological material in the broader landscape.

\\emmsvr1\EMM3\2020\200088 New England NESF AHMP\GIS\02 Maps\ AHMP\AHMP003 ManagementMeasures_20210415_03.mxd 15/04/2021



Source: EMM (2019); DFSI (2017); GA (2011); UPC (2019)

*The extent of Lot 1 of DP 227322 within the development footprint is 205.4 hectares, which represents approximately 8.4% of the total lot. Subsequently, the full extent of Lot 1 of DP 227322 has been excluded from the project boundary.

KEY

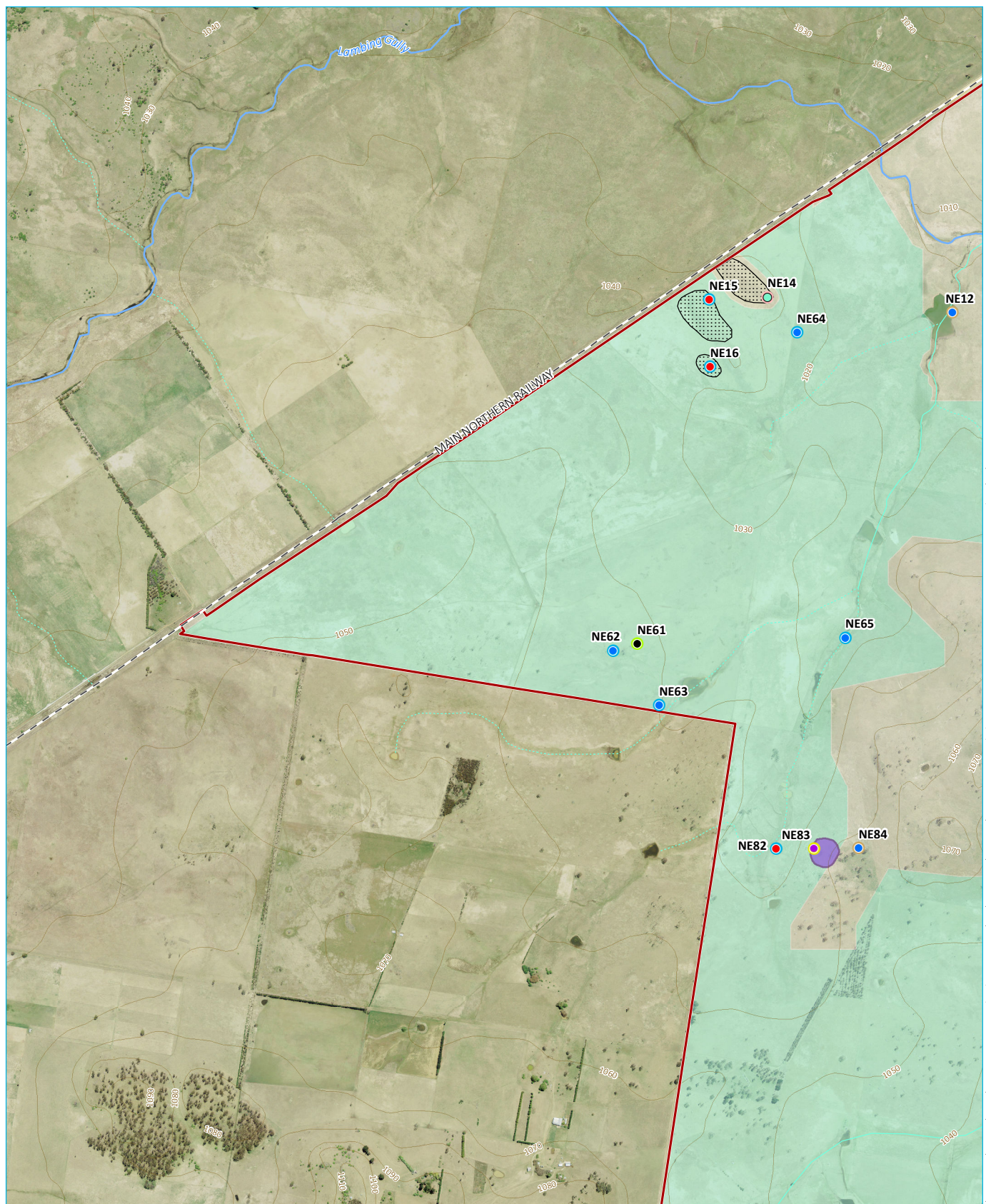
- 330 kV transmission line
- Main road
- Local road
- Rail line
- Contour (10 m)
- Project boundary *
- Development footprint
 - Solar array
 - Potential ETL easement
 - Potential site access/ETL easement
 - Potential substation/BESS footprint
- Indicative location of security fencing across third order watercourses
- Management measure
 - Avoidance – active
 - Avoidance – active; avoid significant area by active protection of mapped PAD area
 - Avoidance – active; avoid significant area by active protection of mapped PAD area; collect stone hatchet
 - Avoidance – active; collect stone hatchet

- Avoidance – active; within NE09 active protection area
- Avoidance – active; within project boundary
- Avoidance – passive
- Avoidance – passive; collect stone hatchet
- Salvage: remove and relocate
- Surface collection
- Surface collection; additional attempt
- Unmitigated impact; tree has collapsed
- No management required: not an Aboriginal scar tree

- Site type
 - Artefact scatter
 - Artefact scatter, PAD
 - Artefact scatter, confirmed deposit, PAD
 - Grinding groove
 - Grinding groove, PAD
 - Grinding groove, artefact scatter, PAD
 - Isolated find
 - Isolated find, PAD
 - Isolated find, confirmed deposit, PAD
 - Quarry, artefact scatter, PAD
 - Scattered tree
 - Not an Aboriginal scar tree

Management measure for Aboriginal sites overview

New England Solar Farm
Aboriginal Heritage Management Plan
Figure 3.1



Source: EMM (2019); DFSI (2017); UPC (2019)

KEY

- Main road
- Rail line
- Contour (10 m)
- Project boundary
- Development footprint
- Solar array

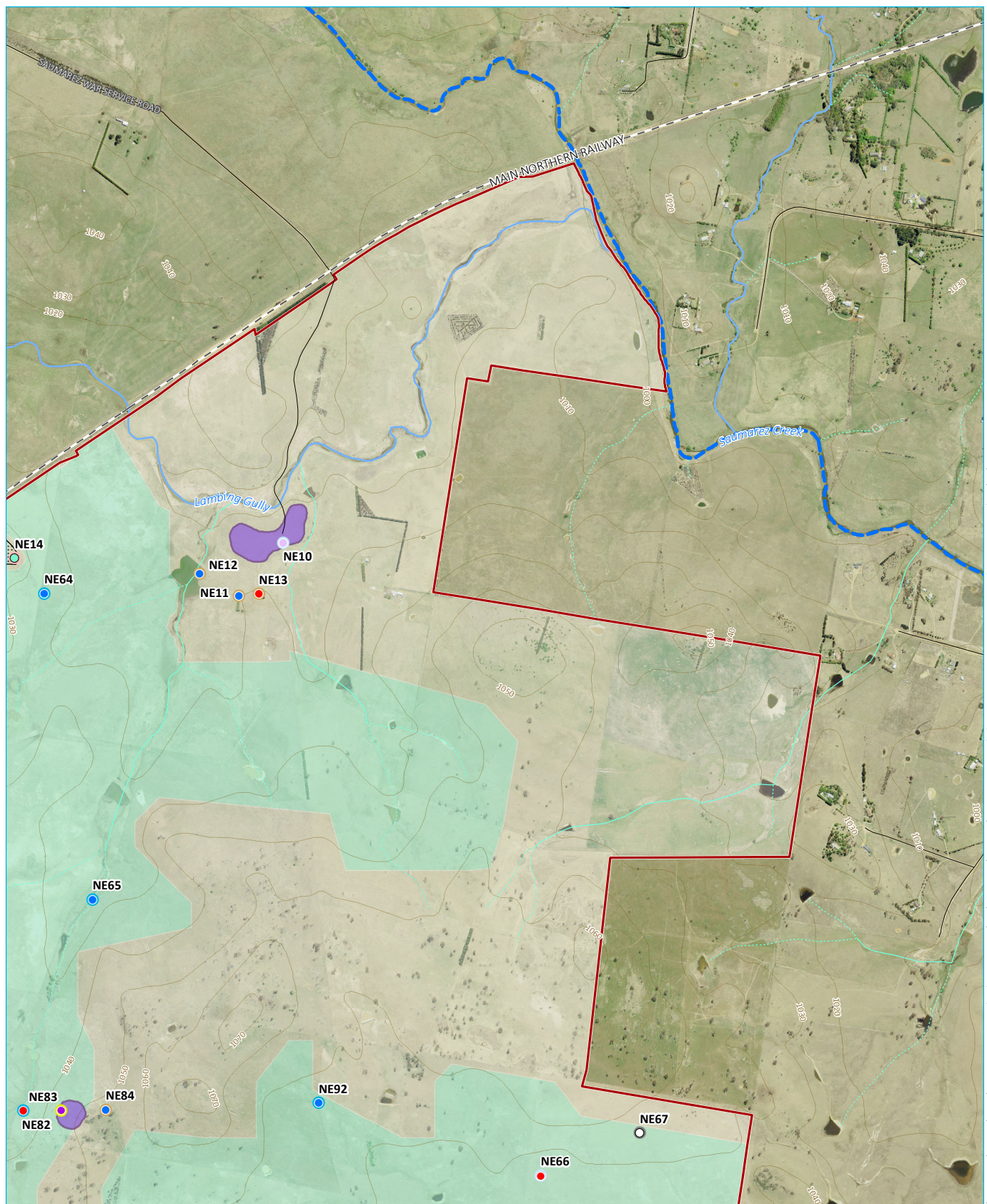
- Site type
- Artefact scatter
 - Isolated find
 - Isolated find, confirmed deposit, PAD
 - Quarry, artefact scatter, PAD
 - Not an Aboriginal scar tree
 - PAD/minimum avoidance area
 - Site area

- Management measure
- Avoidance – active
 - Avoidance – active; collect stone hatchet
 - Avoidance – passive
 - Surface collection; additional attempt
 - No management required: not an Aboriginal scar tree.

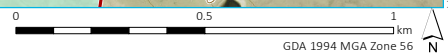
- Strahler stream order
- 1st order
 - 2nd order
 - 3rd order

Revised management and mitigation measures

New England Solar Farm
Aboriginal cultural heritage
assessment addendum report
Figure 3.1A



Source: EMM (2019); DFSI (2017); UPC (2019)



KEY

- Local road
- Rail line
- Contour (10 m)
- Project boundary
- Development footprint
- Solar array

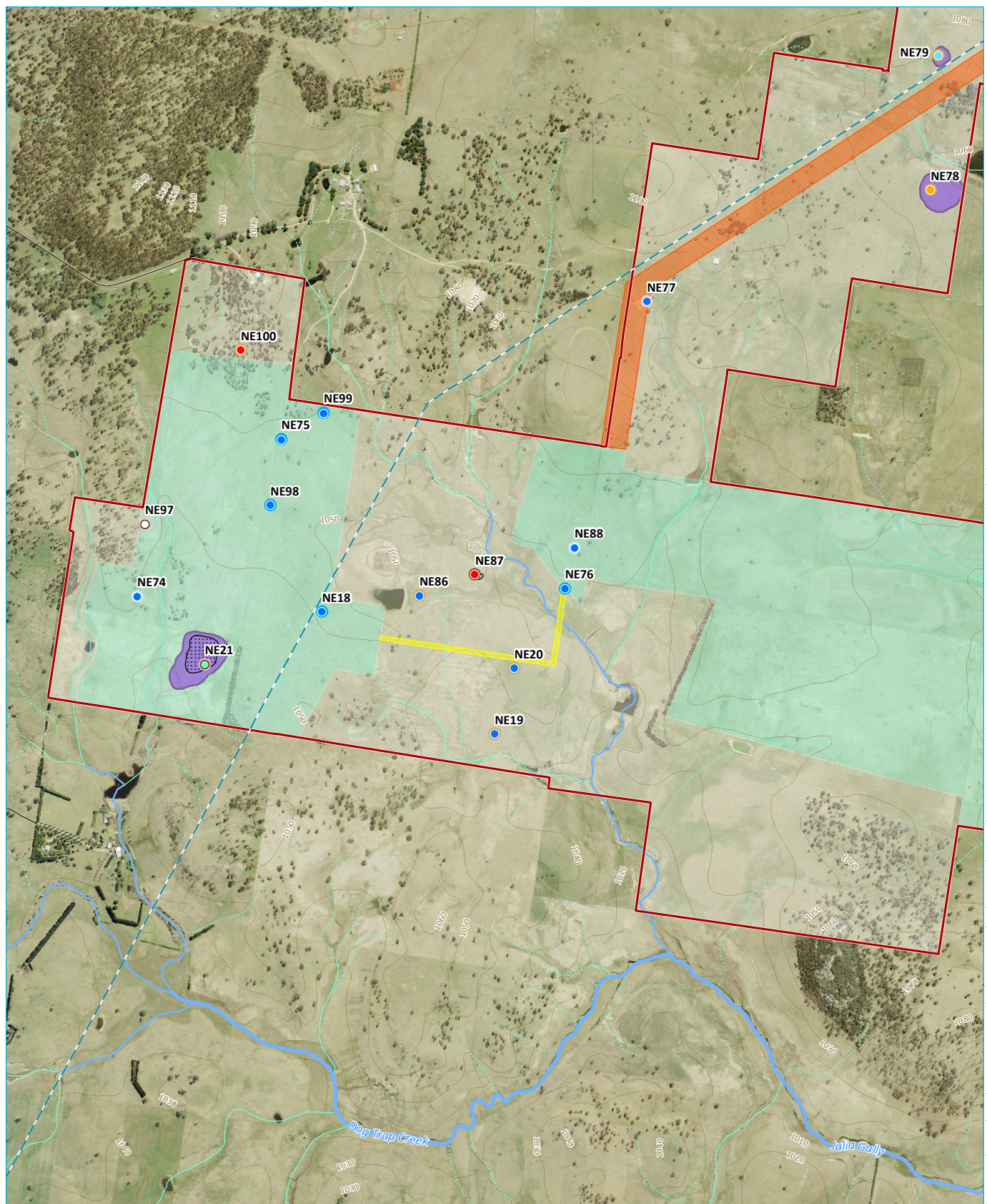
- Site type
- Artefact scatter
- Isolated find
- Isolated find, PAD
- Isolated find, confirmed deposit, PAD
- Quarry, artefact scatter, PAD
- Scarred tree
- PAD/minimum avoidance area
- Site area

- Management measure
- Avoidance – active
- Avoidance – active; collect stone hatchet
- Avoidance – passive
- Surface collection
- Surface collection; additional attempt
- Unmitigated impact; tree has collapsed

- Strahler stream order
- 1st order
- 2nd order
- 3rd order
- 5th order

Revised management and mitigation measures

New England Solar Farm
Aboriginal cultural heritage
assessment addendum report
Figure 3.1B



Source: EMM (2019); DFSI (2017); UPC (2019)

0 0.5 1 km
GDA 1994 MGA Zone 56

KEY

- Local road
- Contour (10 m)
- 330 kV transmission line
- Project boundary
- Development footprint
- Solar array
- Potential ETL easement
- Potential site access/ETL easement

- Site type
- Artefact scatter
- Artefact scatter, PAD
- Grinding groove, artefact scatter, PAD
- Isolated find
- Quarry, artefact scatter, PAD
- Scarred tree
- PAD/minimum avoidance area
- Site area

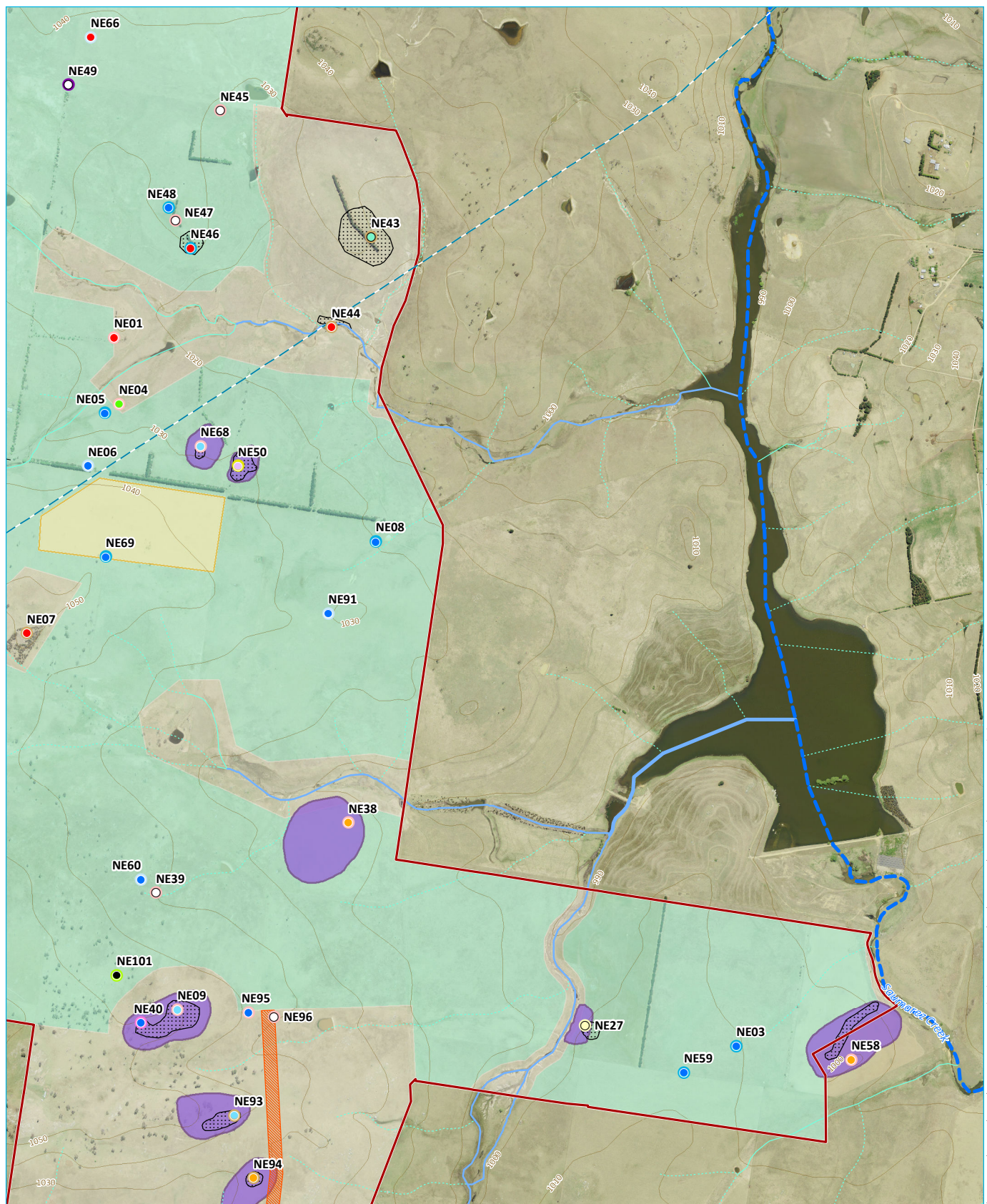
- Management measure
- Avoidance – active
- Avoidance – passive
- Avoidance – passive; collect stone hatchet
- Surface collection
- Surface collection; additional attempt

- Strahler stream order
- 1st order
- 2nd order
- 3rd order
- 4th order

Revised management and mitigation measures

New England Solar Farm
Aboriginal cultural heritage
assessment addendum report
Figure 3.1C





KEY

- Local road
- Contour (10 m)
- 330 kV transmission line
- Project boundary
- Development footprint
- Solar array
- Potential ETL easement
- Potential substation/BESS footprint

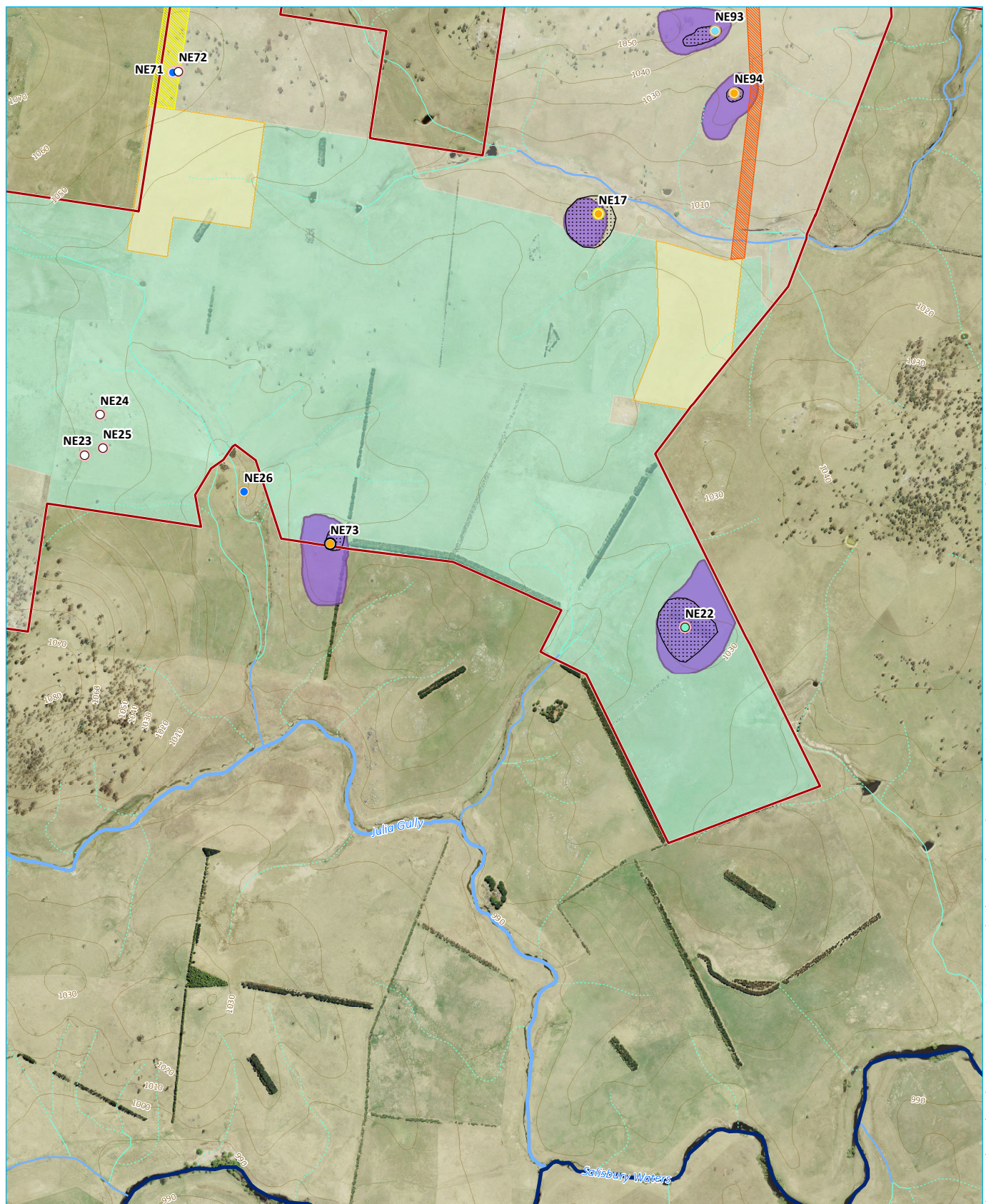
- Site type
- Artefact scatter
- Artefact scatter, PAD
- Artefact scatter, confirmed deposit, PAD
- Grinding groove
- Grinding groove, artefact scatter, PAD
- Isolated find
- Isolated find, PAD
- Quarry, artefact scatter, PAD
- Scarred tree
- Not an Aboriginal scar tree
- PAD/minimum avoidance area
- Site area

- Management measure
- Avoidance – active
- Avoidance – active; avoid significant area by active protection of mapped PAD area; collect stone hatchet
- Avoidance – active; collect stone hatchet
- Avoidance – active; within NE09 active protection area
- Avoidance – passive
- Salvage: remove and relocate
- Surface collection
- Surface collection; additional attempt
- No management required: not an Aboriginal scar tree.

- Strahler stream order
- 1st order
- 2nd order
- 3rd order
- 4th order
- 5th order

Revised management and mitigation measures

New England Solar Farm
Aboriginal cultural heritage
assessment addendum report
Figure 3.1E



Source: EMM (2019); DFSI (2017); UPC (2019)

KEY

Contour (10 m)	Site type	Management measure	Strahler stream order
Project boundary	Artefact scatter, PAD	Avoidance – active	1st order
Development footprint	Grinding groove, artefact scatter, PAD	Avoidance – active; collect stone hatchet	2nd order
Solar array	Isolated find	Avoidance – active; within project boundary	3rd order
Potential ETL easement	Quarry, artefact scatter, PAD	Avoidance – passive	4th order
Potential site access/ETL easement	Scarred tree		6th order
Potential substation/BESS footprint	PAD/minimum avoidance area		
	Site area		

Revised management and mitigation measures

New England Solar Farm
Aboriginal cultural heritage
assessment addendum report
Figure 3.1F

4 Aboriginal heritage management

4.1 Overview – management of known sites

Aboriginal heritage management over the life of the project will primarily take the form of either protective measures for avoided sites, or salvage as mitigation for sites that will be impacted. Project impacts to Aboriginal heritage are anticipated to occur at 35 known sites, whereby 28 sites will be totally disturbed; 2 sites will be partially disturbed; and 3 sites will be subject to total loss.

Aboriginal sites close to the development footprint that are not salvaged but are scheduled for protection from project impacts will be actively protected. Active protection measures will vary depending on site type and other specific requirements.

All surface artefact sites (artefact scatters and isolated finds) impacted by the project will be collected. This will involve collecting the entire visible contents of 26 isolated artefacts and 6 artefact scatters. One felled and sawn in half Aboriginal scar tree, NE49, will also be collected. Notwithstanding the intention of collection, this will be subject to successfully locating and identifying the artefacts which may have moved since first identified, for example due to being disturbed by grazing stock, stormwater runoff etc.

Ongoing management will be required for scarred tree sites, NE09, NE68 and salvaged archaeological material. This will be completed with the involvement of RAPs and suitably qualified archaeologists. A summary of the Aboriginal sites identified in the project boundary, how each of the sites will be managed, and their current management status is presented in Table A.1.

4.2 Aboriginal heritage protection

4.2.1 Active or passive protection

Aboriginal sites that are not identified as being impacted by the ACHA will be protected. Either active or passive protection measures will be implemented. Active management means construction of temporary or permanent barriers, installation of signage and controls on access by those undertaking activities within the project boundary. Passive management means no fencing or signage will be applied as the sites are at limited risk of inadvertent impacts because they are a suitable distance from the development footprint.

4.2.2 Active protection close to development footprint

i Overview

The sites scheduled for avoidance within, or within 20 m of, the development footprint will be managed through active protection using stakes and wire fencing for scarred trees and grinding groove sites, and bollards or wire fencing supported on concrete blocks for the remaining sites to provide active protection during project construction. Additionally, the highly significant Aboriginal grinding groove site NE09 will be managed through active protection despite the site area occurring over 100 m from the development footprint.

ii Barriers

Barriers (either bollards or wire fencing) will be erected prior to construction occurring in the vicinity of the relevant sites. Fencing will be on the boundaries marked by the project archaeologist and at least one RAP representative with assistance by a qualified surveyor or fencing contractor. These boundaries will be guided by Aboriginal site

‘point’, ‘site area’ and ‘PAD area’ GIS data layers contained in the New England Solar Farm Aboriginal Heritage Database (NESF AH Database).

“The barriers and fencing will incorporate a 20 m minimum buffer from site features (eg no additional buffer is required from PAD area boundaries). There are special provisions for grinding groove sites NE09 owing to their high cultural value warranting a greater visual buffer so that they can be appreciated in context with the natural landscape. A construction buffer of 100 m will be applied to the ‘site area’ boundaries of NE09 beyond their fenced boundaries.”

Note: This section has been amended to remove the 100 m construction buffer previously applied to NE68. Upon review of project design and layout, UPC have aimed to maintain existing vegetation on site where feasible. This will require trenching north of the pine tree wind row that lines Big Ridge Road, which would otherwise require clearance if the 100 m buffer was applied to NE68’s southern boundary. This activity will require trenching works only, which is necessary for cabling (underground) as part of the project design. This will not affect the original intention of the buffer, which was to serve as a visual buffer from project elements applied to the site for landscape views to assist in future RAP access and visitation for cultural and learning experiences. Moreover, NE68 has a north, north-westerly aspect overlooking a drainage feature which will not be impacted visually or by project construction. Maintaining the wind row of trees along Big Ridge Rd, where possible, will maintain a visual barrier to the substation when viewed from NE68. As such, the proposed change will not result in additional visual or cultural object impacts and the original significant site curtilage will be retained.

The ‘PAD boundary’ for NE68 now represents the avoidance area for this site. No known stone artefacts or grinding grooves will be disturbed by this proposed change, as the PAD area already incorporates a buffer beyond the recorded site features which are within a concentration of outcropping silcrete bedrock expanses. UPC would like to note that a 100 m visual buffer referred to in the ACHA will still be maintained as to not affect the curtilage of the site, however underground works will need to be installed within 100 m of NE68 but still outside of the PAD boundary.

The fencing contractor will be guided by boundary markers according to spatial data and/or mapping provided by the project archaeologist.

A durable sign will be attached to the fencing including words to the effect of:

Environmentally sensitive area

Do not disturb

Contact the Property Manager on [phone number].

At the end of construction, UPC will assess the need for ongoing active protection of the sites given operations of the facility is low impact. If UPC determines that the site does not require active protection during operations, UPC may remove the barriers with the exception of scarred tree and grinding groove sites.

iii Weed management within wire and stake protected areas

Aboriginal sites subject to protective wire and stake fencing will require ongoing weed management to ensure the sites are not impacted by grass and weed infestation. This will require non-invasive weed management measures such as slashing, weeding, treatment with weed control products to prevent grass and weed overgrowth.

As per Section 2.4.3, where is practical and feasible to employ suitably qualified and certified Aboriginal person(s) if required for weed management activities relating to the Aboriginal sites, UPC and/or its contractors will aim to prioritize this.

Areas protected by bollards will have sufficient spaces left to allow grazing animals to continue to manage vegetation growth. These areas only comprise open stone artefact sites in existing ploughed and grazed paddocks, so the continuation of animal grazing is considered a suitable management strategy.

iv Provisions for protected Aboriginal scar trees

The 12 identified standing Aboriginal scar trees within the project boundary will be avoided through stake and wire active protection measures. Additional management is required to address their long-term management given that all examples are dead trees and most are in a highly deteriorated condition. The following long-term measures will be undertaken:

- after active protection measures are implemented the trees will be left in-situ to weather naturally.
- The trees will be inspected at five-year intervals to assess the trees' condition. The inspection will identify any structural and material issues with the trees. Alternatively, if structural or material issues are observed outside of these monitoring timeframes, RAPs and an archaeologist will be notified to determine if the step listed below is warranted.
- If through natural events or other unforeseen circumstances, the tree(s) break, fall or deteriorate beyond preservation, the tree(s) will be offered to the Aboriginal community (RAPs) for salvage and relocation to the Aboriginal keeping place as specified in Section 4.2.4. RAPs may decline the offer to salvage the tree(s) depending on the condition of the tree. If salvage is possible and desired by RAPs, salvage will involve sawing the tree at a suitable buffer above and below the scar(s) and extracting the scarred section. Any salvaged trees to be kept in the keeping place will be subject to the same provisions as specified for Aboriginal tree NE49.
- The duration of UPC's management commitments for the trees will be limited to the life of the project's operation.

Note: Scar Tree Site NE67 was identified by EMM as collapsed and deteriorated beyond salvage in January 2021 during fieldwork with RAPs. RAPs considered the tree to be in a condition beyond salvage and did not nominate to salvage the tree (refer consultation material in Appendix B.3). As such, unmitigated impacts over the site area applies (refer Table A.1).

4.2.3 Passive protection away from project activities

Passive management will apply to the Aboriginal sites identified for avoidance on land within the project boundary but over 20 m from the development footprint. While no fencing, signage or active land management measures are proposed for these sites, their locations are kept on the NESF AH Database for persons working on or visiting the project boundary. Their presence in the landscape will be demarcated by at least one high visibility peg, stake or other marker to alert persons to their location. These locations will be marked by the project archaeologist and at least one RAP representative.

4.2.4 Keeping place and reburial of salvaged material

A keeping place is a designated long-term secure area for the purpose of storing and curating Aboriginal cultural materials and their associated documentation.

Recovered stone artefacts will be temporarily stored at a designated location during cataloguing and analysis. At the completion of cataloguing and analysis, the recovered objects will be transferred to a long-term facility. A dedicated storage facility will be established at the Armidale and Region Aboriginal Cultural Centre and Keeping Place (96-104 Kentucky Street, Armidale NSW).

The keeping place will store a representative sample of the Aboriginal stone artefacts collected and excavated as part of the project. The keeping place will also store Aboriginal scar tree NE49 and any other unexpected finds salvaged under the AHMP.

A suitable sample of collected artefacts, as advised by RAP representatives, will be made available for display in a display case. The display case will include relevant signage for contextual, informational and educational purposes. The keeping place will also include facilities for inspecting the materials including appropriate table, chairs and lighting.

Where objects are too large for inside storage, such as Aboriginal scar tree NE49, they may be installed in a suitably secure location on the grounds of the keeping place with interpretative signage.

All associated reports and records bound in a hard copy and digital form will be stored in the same location as the salvaged artefacts.

All stored materials are to be held in locked cabinets with access managed by the keeping place manager or delegate in accordance with instructions by RAPs. The cabinet is to be clearly labelled with the contents and conditions for access.

The selection of salvaged materials will be retained at the keeping place for the life of the project unless otherwise determined by RAPs and approved by Heritage NSW a Section 85 Care Agreement.

After salvage collection activities, cataloguing and the selection of display materials, the RAPs may consider it appropriate to rebury surplus material on Country. If reburial is determined by RAPs, the location of the reburial will be decided upon in consultation with UPC and relevant Landholders if applicable. Any location chosen will need to be suitable for long term conservation and not be at risk of any foreseeable impacts.

The reburial activity would be guided by the stone artefact disposition procedures as set out in Section 3.7 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010).

Any reburial fieldwork will be undertaken by a qualified archaeologist so that it is recorded appropriately. RAPs who wish to be involved in the activity will also be requested to participate.

If the nominated keeping place closes or can no longer accommodate the project Aboriginal objects, consideration of an alternative location will be determined with RAP consultation. Where no facility can be identified, the material should be reburied within the project boundary in a secure manner that allows later retrieval at a location notified to DPIE Heritage NSW in the designated manner.

4.2.5 Care Agreement required

The NSW *National Parks and Wildlife Act 1974* (NPW Act) provides for the transfer of Aboriginal objects to Aboriginal owners. Aboriginal owners are defined in the Act as persons whose names are entered on the Register of Aboriginal Owners because of the persons' cultural association with particular land under the NSW *Aboriginal Land Rights Act 1983*¹. If Aboriginal owners under this definition cannot be identified, a Care Agreement can facilitate the transfer to other persons.

A NPW Section 85a 'Care Agreement' will be entered into with Heritage NSW and the Armidale and Region Aboriginal Cultural Centre and Keeping Place (96-104 Kentucky Street, Armidale NSW), which will allow for the transfer to the facility for safekeeping. The Armidale and Region Aboriginal Cultural Centre and Keeping Place will

¹ There is currently no such defined registered Aboriginal owner for the project to whom the Aboriginal objects can be transferred.

be the custodian for the purposes of safekeeping, with a person delegated from the Board of Custodians being the responsible person.

The designated Care Agreement application will be submitted to DPIE prior to, or early in the salvage fieldwork period, with the intention of obtaining a care agreement as soon as possible.

4.3 Aboriginal heritage salvage measures

4.3.1 Surface artefact collection

i Method

Salvage surface collection of all Aboriginal sites in the development footprint will be completed by the project archaeologist and RAP representatives. This will be undertaken prior to any ground disturbance related to the project in the vicinity of the Aboriginal sites.

Additionally, based on the outcomes of RAP consultation, the surface artefacts of two sites (NE10 and NE13) will also be collected despite not being within the development footprint (refer to EMM 2018, p.117).

The collection will be undertaken by qualified archaeologists and RAP representatives. The collection method will be as follows:

1. Site coordinates and area polygons for each site will be entered into mobile GPS devices to re-locate and confirm the location. It is noted that it may not be possible to find all of the recorded artefacts.
2. The general vicinity of each site location will be inspected by the field team. Stone artefacts will be flagged on the ground and a photo taken of the flagged site. Each flagged artefact will be marked as a waypoint in the GPS.
3. All artefacts will be collected into snap lock plastic bags or similar, marked with the project name, site name, collection date and waypoint number.
4. All artefacts will be sorted and recorded post-fieldwork with respect to technological type, implement type, raw material, maximum block length and weight.
5. The collected artefacts will be incorporated into a salvage report detailing the results of the fieldwork, the artefacts recovered at each site and GIS figures showing the artefact locations.
6. The Aboriginal Heritage Information Management System (AHIMS) records will be updated with a site impact recording form for each collected site.

ii Additional requirements for unsuccessful site collection attempts

a Overview

In January 2021, EMM and RAPs attempted to collect all 32 stone artefact sites designated with the salvage collection management measure. However, not all stone artefact sites were possible to collect due to ground visibility constraints associated with extensive grass and weed growth since the original site identification surveys; and natural environmental factors that may have resulted in the movement and/or loss of previously identified cultural materials. The artefacts of 21 sites could not be re-located for collection (status incomplete), and two sites only had a portion of their contents collected (status partially collected). These 23 sites will require further management provisions prior to project development.

EMM assessed the condition and contents of each site to put forward potential management measures for RAP consideration via an updated draft of the AHMP. The potential measures were also the outcome of discussions with RAPs during fieldwork. Only one response from RAPs (Armidale and New England Gumbyngggirr Descendants) which proposed an alternative method. EMM/UPC's response to this submission is provided in Appendix B.3.

Overall, RAPs indicated that an additional attempt to salvage the outstanding sites was warranted and UPC have aimed to accommodate this request. As such, all 22 sites of the 23 sites will undergo a further collection attempt as outlined below. The remaining site NE13 is outside of the project footprint and will be managed as passive avoidance.

b Additional collection attempts – vegetation clearance and raking

UPC proposes that a method with as minimal ground disturbance as possible is employed in attempts relocate and salvage nominated sites (refer to sites listed as 'surface collection (additional attempt)' in Table A.1). Further management attempts may be staged but must occur prior to ground disturbance related to the project in the vicinity of the Aboriginal site.

1. UPC will engage a landscape maintenance/management contractor to clear vegetation over the site areas. This may be achieved using a combination of mechanical slashing, mowing and line trimmer (as required). An archaeologist and RAP representatives (as engaged per Section 2.4.3) will monitor the vegetation clearance and provide guidance to ensure it is employed to a level satisfactory to reveal the ground surface for the identification of Aboriginal objects.
2. The vegetation clearance will cover the mapped site area of the relevant sites. For isolated finds without mapped site areas, this will require clearing an area of up to approximately 10 m x 10 m over the original site coordinates.
3. Following vegetation clearance, RAPs and an archaeologist will inspect the cleared areas. If the artefacts are not identified through vegetation clearance alone, the RAPs and an archaeologist will use suitably fine gauged steel rakes over the areas to reveal artefacts for collection.
4. Any artefacts identified within these areas will be recorded and collected in accordance with the surface artefact collection method in this AHMP.
5. Regardless of whether stone artefacts are identified during this process, no further collection attempts or mitigation measures will be required after the exercise is completed for each relevant site. Following this procedure, the management status of these sites will be regarded as completed and project related development may proceed without further heritage measures.

iii Additional collection for Aboriginal stone axes

Through ongoing Aboriginal consultation, a selection of RAPs has requested that all Aboriginal stone axes (ie stone artefacts with evidence of flaking as 'blanks' or with ground edges) within the project area be collected for deposition and display at the nominated keeping place. Some of these have been collected as part of the 32 artefact sites designated with a salvage collection management measure. However, the remaining stone hatchets are associated with sites designated for avoidance. As part of the updated AHMP, all outstanding hatchets will have collection attempts in accordance with Section 4.3.1 (i). However, if during the initial collection attempts at these sites are unsuccessful due to poor ground surface visibility, then the sites will be left in-situ. In this scenario RAPs and UPC may consult about future collection attempts when visibility conditions may improve in the future.

The details of the axes identified during the archaeological survey phase of the ACHA are summarised in Table 4.1. Additionally, Table 4.1 features information relevant to the outcomes of a recent DPIE compliance investigation

regarding the unauthorised collection and movement of stone axes across archaeological sites within the project area (January–February 2021). The outcome resulted in four stone axes being placed within the site boundary of grinding groove site NE09 as an interim protective measure. In January–February 2021 during the compliance investigation, EMM identified that two of the four moved axes were from sites NE87 and NE50, but the remaining two axes could not be associated with any existing site. In April 2021, EMM conducted further review of AHIMs site card data, our internal site information databases, and photographic records to investigate the provenance of the two unknown items. EMM determined that one of the axes is from site potential axe quarry site NE83. However, the final unknown item could not be identified through the review process. As such, the object is still likely to have derived from the project area, but further contextual information cannot be speculated. In conclusion, the four moved stone axes currently at NE09 will be collected under the updated version of this AHMP. The ‘management status’ column of Table 4.1 provides further detail of the four moved items requiring collection.

The proposed additional collection measures are also tracked in the management inventory (Table A.1).

Additionally, any previously unrecorded stone hatchet artefacts identified in the future within existing site boundaries also have the provision to be recorded, collected, catalogued and transferred to the nominated keeping place.

Table 4.1 **Details of stone hatchets (axes) in project area**

Site Name	Comment:	Prior management measure	Management status
NE87	Single retouched axe blank	Passive avoidance	Axe was involved in compliance issue and was moved from its original location at NE98 – the axe is currently relocated at site NE09 as an interim protective measure.
NE83	Basalt axe blank (Axe 1) retouched completely around one lateral margin and one flake removal from ventral surface. Two additional basalt axes (Axe 2 and Axe 3) were identified on the surface during subsequent inspections and test excavation program.	Active avoidance	Site demarcated and valid – Axe 1 was identified to have been moved from NE83 to site NE09 as the result of DPIE compliance investigation. As such, Axe 1 is at NE09 as an interim protective measure and Axes 2 and 3 remain at site NE83 awaiting collection.
NE90	Basalt axe blank with initial retouch	Collection	Collection completed as part of the Stage 1 surface salvage collection in January 2021. No further action required.
NE50	Basalt axe blank with initial retouch	Active avoidance	Axe blank was involved in compliance issue and moved from its original location at NE50 – Axe is currently relocated at site NE09 as interim protective measure.
NE27	Basalt axe blank with initial retouch	Active avoidance	Site valid
NE17	Very fine-grained greywacke or basalt possibly very small axe head, bifacial retouch along all margins	Active avoidance	Site valid
NE10	Stone axe head of basalt with bifacial retouch but no evidence of ground edges observed.	Collection	Collection completed as part of the Stage 1 surface salvage collection in

Table 4.1 **Details of stone hatchets (axes) in project area**

Site Name	Comment:	Prior management measure	Management status
			January 2021. No further action required.
Provenance Unknown	Potential stone hatchet manufactured from atypical raw material, likely to be a coarse grained, hard quartzite material. Bifacial flaking and stone axe form suggest item may be axe rather than a core tool.	Not applicable – item provenance was unable to be determined through review of site database information.	Stone artefact is currently placed at site NE09 as an interim protective measure.

iv Analysis

Collected artefacts will be catalogued in a database with the basic attributes of each artefact recorded. Analysis of collected stone artefacts will include:

- initial sorting and cleaning of salvaged material;
- establishment of a computer database to record artefact provenance; and
- measuring and recording basic artefact attributes, comprising:
 - artefact type;
 - raw material type;
 - maximum length;
 - weight; and
 - implement type (if applicable).

The analysis team will comprise of the project archaeologist and assisting archaeologists.

v Reporting

A salvage report will be prepared describing the work and including a catalogue of all recovered Aboriginal objects. The report will be prepared with reference to the findings of the ACHA. The report will be prepared upon the completion of salvage activities set for known sites in this plan and will be completed within one year of completion of salvage activities.

The salvage report will be distributed to RAPs and Heritage NSW's AHIMS database for their records.

4.3.2 Aboriginal scar tree removal

The felled and sawn in half Aboriginal scar tree, NE49, will be salvaged prior to project construction. The salvage method for the tree will be as follows:

- A suitably qualified person in scar tree management (eg archaeologist with scar tree specialisation, arbor-culturalist or arborist) will be engaged to determine a suitable removal method in consultation with RAPs. This may involve the requirement to saw the tree above the scar location allowing a suitable buffer from the scar feature. The process of removal will be photographed.
- The removed tree and scar may be treated to preserve the scar to prevent its further deterioration. Any treatment option would be completed in consultation with RAPs, UPC and a suitably qualified curator.
- The tree will be relocated to the Aboriginal keeping place as specified in Section 4.2.4 and appropriately displayed using suitable materials in consultation with UPC and RAPs.

The outcomes of the tree management activity will be documented in a short letter report including records of the original and new tree location.

The AHIMS records will be updated with a site impact recording form for the site.

Note: the salvage activity for NE49 was completed in January 2021 and is in the process of undergoing display arrangements at the keeping place (April 2021).

4.4 Cultural interpretation and recording of oral histories

The request for cultural interpretation measures and the recording of oral histories was raised through Aboriginal consultation in developing this plan (refer submission from Nganyawana Clan Group in Table 2.3).

Interpretative signage will be installed within the proposed fence area of grinding groove site NE09. The final location, content, medium and design of the signage will be prepared in consultation with RAPs and may involve contracting a qualified interpretive design company facilitate the task. This signage will be installed within one year after project construction is completed and access is made available to RAPs and the community.

UPC will also explore opportunities to incorporate an acknowledgement of Country into signage for the solar farm entrance, subject to location and project design considerations.

An oral history based on Aboriginal knowledge holder information about Ooralla will be recorded and stored at the Armidale and Region Aboriginal Cultural Centre and Keeping Place. This will involve interviewing interested and willing RAP knowledge holders (such as Les Ahoy from Nganyawana Clan Group) via audio and/or video mediums. The content of oral histories would be at the direction and discretion of knowledge holders. All documented material will be stored on archival quality digital mediums and stored at the nominated keeping place in association with salvaged archaeological material. The availability of this information to the broader community would be at the discretion of the knowledge provider or delegated person.

5 New finds procedures

5.1 Discovery of new Aboriginal sites

In the event of discovery of new Aboriginal sites within the project boundary (outside of previously identified Aboriginal site and PAD areas), the following will apply.

- a minimum of 10 m around the site will be secured to protect the find with temporary fencing and the find will be immediately reported to the work supervisor who will immediately advise the UPC environmental manager or other nominated senior staff member;
- an archaeologist must be contacted within five days of the find to validate the find and determine the archaeological significance of the objects(s);
- if the object is determined not to be an Aboriginal object by the archaeologist, works may continue upon receipt of a written confirmation by the project archaeologist;
- if considered cultural, the site will be recorded in accordance with current best practice archaeological methods and guidelines;
- assessments of archaeological significance will be documented in a letter report in a manner consistent with the significance assessment for the ACHA (EMM 2018; 2019a);
- if the find is determined to be an Aboriginal object, RAPs will be contacted to determine the cultural significance of the find and have input into desired management measures;
- any new sites will be registered in the NESF AH Database and the AHIMs database (refer Chapter 7); and
- any new sites will be added to the AHMP site inventory within one month of the find.

5.2 Management of new Aboriginal sites

Newly identified sites that are not at risk of impact (ie over 20 m from approved disturbance areas of the development footprint) will be avoided through passive protection (Section 4.2.3). Avoidable sites that are within 20 m of approved disturbance areas of the development footprint will be managed through active protection measures identified in this plan (refer Section 4.2.2). Note that avoidance of newly identified Aboriginal objects is always the preferred heritage outcome. Mitigation measures should only be employed when it can be reasonably demonstrated that avoidance is not feasible.

Table 5.1 sets out the measures that are proposed for newly identified Aboriginal sites. Heritage NSW must be notified about any plans to move, collect or salvage newly identified sites.

All proposed salvage measures must be completed by a qualified archaeologist(s) with participation of at least one RAP representative. All salvaged objects will be relocated to the nominated keeping place, if practical to do so (i.e. there is still sufficient capacity to accommodate new objects), and managed as per Section 4.2.4.

Table 5.1 Management of newly identified sites

Site type	Can the site be avoided?	If avoidance is not feasible, the following management will be proposed.
Open stone artefact site or potential remnants of a stone quarry.	Apply active or passive protection measures as per Sections 4.2.2 and 4.2.3.	For sites of low to moderate archaeological significance, surface collection will be employed as per Section 4.3.1. For sites of high archaeological significance, or with potential to be of high archaeological significance through the identification of significant PAD, as determined by the project archaeologist, test excavation may be employed to a methodology prepared in consultation with UPC and RAPs. For a site to reach the threshold of high archaeological significance, it would need to be of a similar character to other open sites assessed as high significance, such as NE70 (artefact scatter with PAD and confirmed deposit) and NE83 (potential basalt quarry). Any salvage excavation program would require a report on the methods and outcomes of the excavation.
Modified trees	Apply active or passive protection measures as per Sections 4.2.2 and 4.2.3.	Follow Aboriginal scar tree removal procedure as guided by the methodology for NE49 as set out in Section 4.3.2.
Grinding grooves	Apply active or passive protection measures as per Sections 4.2.2 and 4.2.3.	Determine grinding groove recovery procedure in consultation with UPC and RAPs. The process for removal must involve: • A site meeting between project archaeologist, RAPs and suitably qualified earthmoving or grinding groove recovery specialist to discuss logistics of the removal. • If removal of the grooves carries a significant risk of their destruction through cracking or breaking, the removal will not continue and active management measures will be employed. • Archival recording of features using photogrammetric methods must be undertaken prior to removal. • Any grooves requiring removal will either be relocated and installed within the project boundary on land that is designated for long-term conservation without the risk of foreseeable future impact. • If possible and desired by RAPs, grooves may be relocated to the nominated keeping place and installed securely with suitable signage and interpretation.
Hearths	Apply active or passive protection measures as per Sections 4.2.2 and 4.2.3.	Archaeological excavation of the hearth will be employed and will involve taking suitable dating and soil samples if feasible as determined by the archaeologist.
Other site types not known to occur in the project boundary (eg stone arrangements, rock art, middens etc).	Apply active or passive protection measures as per Sections 4.2.2 and 4.2.3.	As other site types have a very limited chance of being identified in the project boundary, no specific management methodology has been devised. If other site types not previously identified in the project boundary are identified, a salvage method must be prepared by the project archaeologist in consultation with RAPs. This may be established through an extraordinary meeting with RAPs or through letter correspondence with a reasonable timeframe for review. Any salvage activity would require a report on the methods and results of the exercise.

5.3 Discovery of Aboriginal ancestral remains

In the event that known or suspected human skeletal remains are encountered during the activity, the following procedure presented in Table 5.2.

Table 5.2 Procedure for the discovery of potential Aboriginal ancestral remains

Stage	Actions
1. Stop work and secure site	- The immediate vicinity will be secured to protect the find and the find will be immediately reported to the work supervisor who will immediately advise the site supervisor or other nominated senior staff member. - A no-go zone will be established around the immediate area of the site. - Complete review of activities to enable compliance and continued operations.
2. Notification to authorities and stakeholders	- The environmental manager or other nominated senior staff member will notify: - Police and State Coroner on the same day as the find; - Heritage NSW (1300 361 967) or Environment Line (131 555); - Engage suitably qualified archaeologist or forensic anthropologist to assist Police in monitoring of skeletal material. Heritage NSW and DPIE will be advised within 5 working days of the find being made. DPIE will require notification via the Major Projects website.
3. Determination of the find and further notification	- If it is determined that the skeletal material is of ancestral Aboriginal remains, RAPs contacted and consultative arrangements will be made to discuss ongoing care of the remains. - Engage project archaeologist to assist and/or facilitate management of the Aboriginal ancestral remains with RAPs and UPC. - Heritage NSW will be notified of these discussions and proposed action. - If the skeletal material is not human, resume work. Ensure determination of non-human material is provided by relevant experts (eg Coroner or Police) before resuming work. Heritage NSW and DPIE will be advised of this outcome in writing. - If the remains are historic but non-Aboriginal human remains, the NSW Heritage Council (or delegate of the Heritage Council, Heritage NSW) will be consulted to determine requirements in accordance with the NSW <i>Heritage Act 1977</i> and relevant guidelines. Further actions are likely to require adherence with the following NSW Heritage Council guidelines: <i>Conservation Management Documents: Guidelines on Conservation Management Plans and other Management Documents.</i> <i>Skeletal Remains; Guidelines for Management of Human Skeletal Remains.</i> - If the remains are non-Aboriginal and non-historic human remains, coordinate UPC's involvement with police. Works will not proceed until written approval is granted from relevant authorities (ie Coroner and/or NSW Police).

Table 5.2 Procedure for the discovery of potential Aboriginal ancestral remains

Stage	Actions
4. Initial planning and reporting if it is determined that the remains are Aboriginal ancestral remains.	- Aboriginal ancestral remains certificate to be submitted to the Police/Coroner to address the Coroners Act. - In consultation with RAPs and archaeologist, establish investigation area and any additional protocols to be adhered to during further investigation. The investigation will aim to establish whether any other burials are within or likely to occur nearby. Suitable methods could include controlled and monitored hand or machine excavation and/or non-invasive techniques such as geophysical techniques. - Engage an archaeologist to record the site and undertake significance and impact assessment of the burial site with RAPs and archaeologist. Site recordings must involve drawings and photography. Additional technical studies and samples may be taken with the consent of RAPs such as those for dating and biological information (eg age, sex and health of deceased). - Record burial site on the NESF AH Database and AHIMs register, noting any restricted access requirements requested by RAPs.
5. Engagement with construction and operation manager to determine whether disturbance of the burial site(s) can be avoided.	- If the Aboriginal ancestral remains cannot be avoided: - Consult with RAPs and project archaeologist to facilitate recovery and reburial protocols and actions. (Heritage NSW will be advised of the proposed actions). Recovery methods must include: - Exhumation in a controlled archaeological method and in consultation with RAPs and placed into a secure, temperate controlled storage location until a final reburial site can be identified. - Access to the secure storage location containing any human remains will be managed and facilitated by UPC in consultation with RAPs. - RAPs will determine if further studies, media releases or other investigations are appropriate for the finds. - Where required, UPC will help facilitate any culturally appropriate reburial or ceremonial methods. - Prepare report for Heritage NSW and RAPs on the outcome of relevant investigation, recovery and reburial outcomes. - Update AHMP. - Works will not recommence until written approval is received from relevant authorities. - If the Aboriginal ancestral remains can be avoided: - develop appropriate management and mitigation measures in consultation with RAPs and archaeologists; - prepare report for DPIE, Heritage NSW and RAPs; - update AHMP; and - works will not recommence until written advice is provided from the project archaeologist that the remains are suitably protected and away from project impacts.

6 Ongoing operational and training protocols

6.1 Obligation to protect Aboriginal cultural heritage

6.1.1 Obligation to avoid harm

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

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

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

6.1.2 Obligation to protect and implement management measures

Site personnel, contractors and subcontractors responsible for land management or construction have an obligation to protect Aboriginal heritage within their area or work responsibility. Protection means active recognition of known Aboriginal heritage and active measure to avoid Aboriginal heritage. This may include fencing, erosion control and modification of work plans to avoid impacts to Aboriginal heritage, as well as facilitating a process where work personnel are aware of the nearby heritage.

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

6.2 Aboriginal heritage induction and permitting process

6.2.1 Site inductions

All employees, contractors, sub-contractors involved in ground-disturbing activities will undergo an Aboriginal cultural heritage induction conducted either by a representative of the RAP, the lead contractor (once appropriately trained to present the induction), or their subcontractor (once appropriately trained to present the induction). In addition, visitors to the project and general contractors not involved in ground-disturbing activities will be made aware of their obligation to avoid harm to Aboriginal heritage through an Aboriginal heritage component of the general site induction. Records of these inductions will be kept by UPC/its contractors.

The Aboriginal heritage induction / relevant sub-component of the site induction will be planned in consultation with RAPs. UPC will seek input from RAPs regarding appropriate materials for input and key issues that RAPs would like raised to all inductees. This may involve sending relevant draft material (such as induction booklets or slideshow slides) to RAPs for their review and comment within a reasonable timeframe (minimum one week).

The following points will be conveyed through site induction material:

- Aboriginal sites have been identified across the project boundary and beyond;
- Aboriginal sites are of high significance to the Aboriginal community, are important to the wider community and must be treated with respect;
- Aboriginal sites are protected by law and that project approval includes conditions allowing impacts to certain specified Aboriginal sites in accordance with this plan;
- Aboriginal sites have included grinding grooves, scarred trees, quarries, stone artefact sites;
- Aboriginal sites can be hard to recognise, therefore reference must be made to the Aboriginal heritage maps in this AHMP in order to clearly identify demarcated site boundaries;
- certain sites must be protected or salvaged by the project archaeologist and RAPs prior to ground disturbance activities; and
- that there are new finds procedures which involve stopping work if suspected new Aboriginal sites or skeletal material is identified on-site.

6.2.2 Fostering cultural heritage awareness

UPC will provide opportunities for RAP representatives to participate in activities related to training and fostering cultural heritage awareness in the project boundary. This will involve UPC exploring opportunities to involve RAPs in training the lead contractor and/or relevant subcontractors to give cultural heritage inductions, toolbox sessions during construction and operations (as may be relevant) and provide updates on Aboriginal heritage matters for the project. UPC will also explore opportunities to work with suitable Aboriginal people to develop and implement Cultural Heritage Awareness Training for the life of the project.

6.3 Implementation of this plan

The individuals responsible for the implementation of the plan are provided in Table 6.1. The plan will be stored in UPC / its contractor's document control system; the latest version will be available electronically at all times. As the document owner, UPC is the contact point for this plan and its requirements and will provide guidance and training to any person that requires additional training regarding this plan.

Table 6.1 Roles and responsibilities for Aboriginal heritage management

Role	Responsibilities
UPC Project Director	• Ensure the implementation of this plan is carried out appropriately during construction/operations.
Contractor Project Director	• Ensure adequate financial and personnel resources are made available for the implementation of this plan.
Contractor Construction/operations manager	• Manage the implementation of this plan during construction/operations.
UPC Environmental Manager	• Primary contact with RAPs. • Oversee signage and fencing of areas containing artefacts in accordance with this plan. • Ensure the Aboriginal heritage management measures required to be undertaken prior to construction are conducted in accordance with the measures outlined in this plan. • Ensure signage and fencing of Aboriginal sites is maintained. • Ensure inclusion of Aboriginal heritage in work inductions through delivery or input to induction documents. • Distribute copies of this plan as required. • Engage and coordinate relevant specialist personnel to undertake management measures or additional assessment as specified in this plan. • Maintain records of Aboriginal consultation. • Ensure relevant reporting, data management and registration is conducted, maintained and updated. • Arrange for a review of this plan in accordance with review cycles and conditions specified in this plan.

6.4 Measuring performance

Actions undertaken under the plan will be reported as part of required Independent Environmental Audits to DPIE. Compliance with the plan will be measured by standard environmental auditing procedures undertaken at regular intervals. The audit will include an assessment of compliance with development consent conditions and will include auditing the following measures:

- collection of all nominated sites;
- protection of all nominated sites;
- inductions are taking place and include appropriate material;
- a keeping place is suitably established and collected material is suitably stored and presented; and
- the NESF AH Database is updated and maintained as required by this plan.

UPC may engage either a heritage consultant to assist with reporting compliance as part of an Independent Environmental Audit. Any incidents and non-compliance notifications will follow requirements set out in Schedule 4 of the project Conditions of Approval.

6.5 Ground disturbance proposed outside of development footprint

Ground disturbance proposed outside of the approved development footprint, or outside other existing approved areas under the development consent, will not occur without prior Aboriginal heritage assessment and other relevant legislative and internal approvals. Further, it is noted that UPC has no rights outside of the development footprint given that it is not the owner of the land; its rights are limited to the boundary of the Leased areas and that any development or construction activities outside of the approved development footprint would require a modification of the DA.

Depending on the scope, nature and approval pathway of the proposed ground disturbance, the following may apply:

- If the proposed activity requires additional environmental assessment, such as a modification to the existing development consent, an Aboriginal heritage assessment will be completed in accordance with relevant assessment requirements as specified by DPIE.
- If the proposed activity is permissible under the existing SSD development consent (ie Aboriginal heritage impact permit (AHIP) not required), an Aboriginal heritage assessment must initially be completed to a level consistent with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010b). Any potential impacts to known or newly identified Aboriginal objects will be managed in accordance with the new finds procedures set out in Chapter 5.
- If the proposed activity requires a separate approval pathway not permissible as part of SSD under the EP&A Act, then an Aboriginal heritage assessment must initially be completed to a level consistent with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010b). Depending on the outcomes of the due diligence assessment, further investigation may be required in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales* (DECCW 2010c) and relevant subdocuments. If Aboriginal objects are likely to be impacted, an AHIP would need to be pursued under the NPW Act to allow harm to Aboriginal objects.

7 Reporting, review and data management

7.1 Statutory reporting requirements

Notifications to Heritage NSW are required in relation to discovery, impact and care of Aboriginal objects under the NPW Act. This will be the responsibility of the UPC Environmental Manager.

7.1.1 Discovery of Aboriginal objects

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

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

7.1.2 Care agreements

Under s85A of the NPW Act, Aboriginal objects remain the property, and under the protection of, the Crown until formal transfer to a person or persons of a class prescribed by the regulations occurs. A Care Agreement should be lodged with Heritage NSW for the recovered objects specified in this plan (Section 4.2.5).

Care Agreement application forms can be downloaded at:

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

7.1.3 Reporting impact to Aboriginal sites

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

- a) a result of test excavation carried out in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW*;
- b) authorised by an Aboriginal Heritage Impact Permit (AHIP) issued by DPIE;
- c) undertaken for the purpose of complying with Secretary's environmental assessment requirements issued by DPIE for:
 - i) state significant development (SSD),
 - ii) state significant infrastructure (SSI), or
 - iii) a major project, or
- d) authorised by a SSD/SSI/former Part 3A consent/approval under the EP&A Act.

Completed forms must be submitted to the AHIMS Registrar at:

www.environment.nsw.gov.au/contact/AHIMSRegistrar.htm.

Aboriginal Site Impact Recording Forms can be downloaded at:

<http://www.environment.nsw.gov.au/resources/cultureheritage/120558asirf.pdf>.

7.2 AHMP review

7.2.1 Review cycle for this plan

This AHMP will be reviewed within three months of submitting a modification for the project, and following any incident or independent audit where issues are found.

7.2.2 Making changes to this plan

Changes to the plan will be made in the following circumstances:

- where approved modifications to the project introduce new impacts on Aboriginal heritage which are not generally covered by the AHMP;
- where approved changes to the project change or remove previously planned impacts on Aboriginal heritage where mitigation was proposed in the plan but is no longer required; and/or
- where other conditions or situations arise that require the updating of this plan.

It is noted that the AHMP may require modification to the project approval if not aligned with the current project conditions of approval. However the document provides a framework for post-approval heritage management, and where issues are identified, the AHMP may require updating and/or modification. Where such updates are required, DPIE will be consulted and a modification to approval would only be sought if deemed necessary by DPIE. UPC will be guided by DPIE whether the nature of any proposed changes require endorsement by Heritage NSW.

7.2.3 Aboriginal consultation for AHMP review

Where changes are made to the AHMP, a draft of the modified plan will be provided to RAPS for their review and comment (14 calendar day review period).

Matters raised during consultation which are specific to any proposed changes in the plan will be acknowledged and addressed in the modified plan. Further requirements for Aboriginal consultation are set out in Chapter 2.

7.3 New England Solar Farm Aboriginal Heritage Database

The NESF AH Database will be created and maintained by UPC. The database will be a 'live' document of the Aboriginal heritage resources within the project boundary that will be continuously updated to reflect new finds and the management status of all Aboriginal sites within the project boundary.

The database must include:

- a record of current management status, location and boundaries of Aboriginal sites, site areas and PAD boundaries; and
- a record of Aboriginal heritage survey coverage (represented by GPS survey tracks).

The database will comprise datasets available in both MS Excel format and Geographical Information System (GIS) Format. GIS data will be made available for mapping purposes to assist in the identification and management of Aboriginal heritage sites and areas during the life of the project. The database will be 'version controlled' to ensure that all relevant parties involved in Aboriginal heritage management are working with the most up to date datasets.

UPC/its contractors will be responsible for ensuring that all relevant employees, RAPs and subcontractors are provided with up to date datasets.

The database will be updated within 28 days in the following circumstances:

- discovery of a confirmed new Aboriginal site or human remains;
- changes or incidents to existing Aboriginal sites;
- changes to the management status of Aboriginal sites and areas; and/or
- the completion of Aboriginal heritage activities such as survey, excavation, surface collection, and protective measures.

Note that any newly identified Aboriginal object must be registered on AHIMS as specified in Section 7.1.1.

7.4 Complaints

The community complaints protocol as set out in the Construction Environmental Management Plan (CEMP) for the project will apply in regard to complaints from the Aboriginal community.

The environmental manager will keep a complaints register for all complaints.

References

EMM Consulting Pty Limited (EMM) 2018, *New England Solar Farm - Aboriginal cultural heritage assessment*, prepared for UPC November 2018,

- 2019a, *New England Solar Farm - Addendum to the Aboriginal cultural heritage assessment report*, prepared for UPC June 2019.
- 2019b, *New England Solar Farm, Proposed Road Upgrades, addendum to the Aboriginal cultural heritage assessment report*, prepared for UPC September 2019.
- 2019c, *New England Solar Farm Amendment Report*, prepared for UPC June 2019.
- 2019d, *New England Solar Farm Response to Submissions*, prepared for UPC June 2019.

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

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

Abbreviations

Table 7.1 **Abbreviations**

Abbreviation	Full term
AHIMS	Aboriginal Heritage Information Management System
AHMP	Aboriginal heritage management plan
AR	Amendment report
BESS	Battery energy storage system
CoA	Conditions of Approval
Council	Uralla Shire Council
EIS	Environmental impact statement
EMM	EMM Consulting Pty Limited
DPIE	NSW Department of Planning, Industry and Environment
IPC	Independent Planning Commission
LGA	Local government area
MW	Megawatt
RTS	Response to submissions
SSD	State Significant Development
UPC	UPC\AC Renewables Australia Pty Ltd

Appendix A

Aboriginal site inventory

A.1 Aboriginal site inventory

Table Legend:

	Management completed
	Management partially completed
	Collection of stone axe (hatchet(s)) required

Table A.1 Aboriginal site inventory and management

Site name:	AHIMS	Site type	Significance rating	Array area	Level of impact	Impact Type	Management	Status (April 2021)
NE01	(21-4-0196)	Artefact scatter	Low	Northern	None	None	Avoidance – active	Demarcation completed Fencing required
NE02	(21-4-0197)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE03	(21-4-0198)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE04	(21-4-0199)	Grinding groove	Moderate	Northern	None	None	Avoidance – active	Demarcation completed Fencing required
NE05	(21-4-0200)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE06	(21-4-0201)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection	Salvage completed
NE07	(21-4-0202)	Artefact scatter	Moderate	Northern	None	None	Avoidance – passive	Demarcation completed
NE08	(21-4-0203)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete

Table A.1 **Aboriginal site inventory and management**

Site name:	AHIMS	Site type	Significance rating	Array area	Level of impact	Impact Type	Management	Status (April 2021)
NE09	(21-4-0204)	Grinding groove, artefact scatter,	High	Northern	None	None	Avoidance – active	Demarcation completed Fencing required
NE10	(21-4-0205)	Isolated find, PAD	Moderate	Northern	Other	Other	Surface collection	Salvage completed Stone hatchet collected
NE11	(21-4-0206)	Isolated find	Low	Northern	None	None	Avoidance – passive	Demarcation completed
NE12	(21-4-0207)	Isolated find	Low	Northern	None	None	Avoidance – passive	Demarcation completed
NE13	(21-4-0208)	Artefact scatter	Low	Northern	Other	None	Avoidance – passive	Demarcation required
NE14	(21-4-0209)	Quarry, artefact scatter, PAD	Moderate	Northern	None	None	Avoidance – active	Demarcation completed Fencing required
NE15	(21-4-0210)	Artefact scatter	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE16	(21-4-0211)	Artefact scatter	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE17	(21-4-0212)	Artefact scatter, PAD	Moderate	Central	None	None	Avoidance – active Collect stone hatchet	Management incomplete
NE18	(21-4-0213)	Isolated find	Low	Central	Total loss	Substation/BESS footprint	Surface collection (additional attempt)	Management incomplete
NE19	(21-4-0214)	Isolated find	Low	Central	None	None	Avoidance – passive	Management incomplete
NE20	(21-4-0215)	Isolated find	Low	Central	None	None	Avoidance – passive	Management incomplete
NE21	(21-4-0216)	Quarry, artefact	Moderate	Central	None	None	Avoidance – active	Management incomplete
NE22	(21-4-0217)	Quarry, artefact	Moderate	Central	None	None	Avoidance – active	Management incomplete

Table A.1 **Aboriginal site inventory and management**

Site name:	AHIMS	Site type	Significance rating	Array area	Level of impact	Impact Type	Management	Status (April 2021)
NE23	(21-4-0218)	Scarred tree	Moderate	Central	None	None	Avoidance – active	Management incomplete
NE24	(21-4-0219)	Scarred tree	Moderate	Central	None	None	Avoidance – active	Management incomplete
NE25	(21-4-0220)	Scarred tree	Low	Central	None	None	Avoidance – active	Management incomplete
NE26	(21-4-0221)	Isolated find	Low	Central	None	None	Avoidance – passive	Management incomplete
NE27	(21-4-0222)	Artefact scatter, confirmed deposit, PAD	Moderate	Northern	Partial disturbance	Peripheral impact by array	Avoidance – active Avoid significant area by active protection of mapped PAD area Collect stone hatchet.	Management incomplete
NE28	(21-4-0223)	Artefact scatter	Low	Southern (now removed)	None	None	N/A	
NE29	(21-4-0224)	Artefact scatter	Low	Southern (now removed)	None	None	N/A	
NE30	(21-4-0225)	Isolated find	Low	Southern (now removed)	None	None	N/A	
NE31	(21-4-0226)	Artefact scatter	Low	Southern (now removed)	None	None	N/A	
NE32	(21-4-0227)	Isolated find	Low	Southern (now removed)	None	None	N/A	
NE33	(21-4-0228)	Isolated find	Low	Southern (now removed)	None	None	N/A	
NE34	(21-4-0229)	Isolated find	Low	Southern (now removed)	None	None	N/A	

Table A.1 **Aboriginal site inventory and management**

Site name:	AHIMS	Site type	Significance rating	Array area	Level of impact	Impact Type	Management	Status (April 2021)
NE35	(21-4-0230)	Scarred tree	Moderate	Southern (now removed)	None	None	N/A	
NE36	(21-4-0231)	Isolated find	Low	Southern (now removed)	None	None	N/A	
NE37	(21-4-0232)	Scarred tree	Moderate	Central	None	None	Avoidance – active	Demarcation completed Fencing required
NE38	(21-4-0233)	Artefact scatter,	Moderate	Northern	None	None	Avoidance – active	Management incomplete
NE39	(21-4-0234)	Scarred tree	Moderate	Northern	None	None	Avoidance – active	Demarcation completed Fencing required
NE40	(21-4-0235)	Isolated find	Moderate	Northern	None	None	Avoidance – active (within NE09 active protection area)	Demarcation completed Fencing required
NE41	(21-4-0236)	Artefact scatter, PAD	Moderate	Northern	None	None	Avoidance – active	Demarcation completed Fencing required
NE42	(21-4-0237)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE43	(21-4-0238)	Quarry, artefact	Moderate	Northern	None	None	Avoidance – passive	Demarcation completed
NE44	(21-4-0239)	Artefact scatter	Moderate	Northern	None	None	Avoidance – passive	Demarcation completed
NE45	(21-4-0240)	Scarred tree	Moderate	Northern	None	None	Avoidance – active	Demarcation completed Fencing required
NE46	(21-4-0241)	Artefact scatter	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete

Table A.1 **Aboriginal site inventory and management**

Site name:	AHIMS	Site type	Significance rating	Array area	Level of impact	Impact Type	Management	Status (April 2021)
NE47	(21-4-0242)	Scarred tree	Moderate	Northern	None	None	Avoidance – active	Demarcation completed Fencing required
NE48	(21-4-0243)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE49	(21-4-0244)	Scarred tree	Moderate	Northern	Total loss	Array impact	Salvage: remove and relocate.	Salvage completed. Transferred to keeping place
NE50	(21-4-0245)	Isolated find, PAD	Moderate	Northern	None	None	Avoidance – active Collect stone hatchet.	Demarcation completed Fencing required Collect stone hatchet
NE51	(21-4-0246)	Artefact scatter	Low	Southern (now removed)	None	None	N/A	
NE52	(21-4-0247)	Isolated find	Low	Southern (now removed)	None	None	N/A	
NE53	(21-4-0248)	Isolated find	Low	Southern (now removed)	None	None	N/A	
NE54	(21-4-0249)	Isolated find	Low	Southern (now removed)	None	None	N/A	
NE55	(21-4-0250)	Isolated find	Low	Southern (now removed)	None	None	N/A	
NE56	(21-4-0251)	Artefact scatter	Low	Southern (now removed)	None	None	N/A	
NE57 - Historical site	N/A	Dry stone wall (historical site)	Undetermined	Southern (now removed)	None	None	N/A	

Table A.1 **Aboriginal site inventory and management**

Site name:	AHIMS	Site type	Significance rating	Array area	Level of impact	Impact Type	Management	Status (April 2021)
NE58	(21-4-0252)	Artefact scatter,	Moderate	Northern	None	None	Avoidance – active	Management incomplete
NE59	(21-4-0253)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE60	(21-4-0254)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection	Salvage completed
NE61	N/A	Not an Aboriginal scar tree	Not applicable	Northern	Total loss	Array impact	No management required: not an Aboriginal scar tree.	None required
NE62	(21-4-0255)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE63	(21-4-0256)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE64	(21-4-0257)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE65	(21-4-0258)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE66	(21-4-0259)	Artefact scatter	Low	Northern	Total disturbance	Array impact	Surface collection	Salvage completed
NE67	(21-4-0260)	Scarred tree	Low	Northern	None	None	Unmitigated impact (tree has collapsed)	None required
NE68	(21-4-0261)	Grinding groove, artefact scatter,	High	Northern	None	None	Avoidance – active	Demarcation completed Fencing required
NE69	(21-4-0262)	Isolated find	Low	Northern	Total loss	Substation/BESS footprint	Surface collection (additional attempt)	Management incomplete

Table A.1 **Aboriginal site inventory and management**

Site name:	AHIMS	Site type	Significance rating	Array area	Level of impact	Impact Type	Management	Status (April 2021)
NE70	(21-4-0263)	Artefact scatter, confirmed deposit, PAD	High	Central-North	Partial disturbance	Peripheral impact by access road	Avoidance – active Avoid significant area by active protection of mapped PAD area	Demarcation completed Fencing required
NE71	(21-4-0264)	Isolated find	Low	Central-North	None	None	Avoidance – active	Management incomplete
NE72	(21-4-0265)	Scarred tree	Low	Central-North	None	None	Avoidance – active	Management incomplete
NE73	(21-4-0266)	Artefact scatter, PAD	Moderate	Central	None	None	Avoidance – active (within project boundary)	Management incomplete
NE74	(21-4-0267)	Isolated find	Low	Central	Total disturbance	Array impact	Surface collection	Salvage completed
NE75	(21-4-0268)	Isolated find	Low	Central	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE76	(21-4-0269)	Isolated find	Low	Central	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE77	(21-4-0270)	Isolated find	Low	Central-North	None	None	Avoidance – active	Demarcation completed Fencing required
NE78	(21-4-0271)	Artefact scatter,	Moderate	N/A	None	None	Avoidance – passive	Demarcation completed
NE79	(21-4-0272)	Grinding groove, artefact scatter,	High	Central-North	None	None	Avoidance – passive	Demarcation completed Fencing required
NE80	(21-4-0273)	Grinding groove, PAD	High	Central-North	None	None	Avoidance – active	Demarcation completed Fencing required
NE81	(21-4-0274)	Isolated find	Low	Southern (now removed)	None	None	N/A	

Table A.1 **Aboriginal site inventory and management**

Site name:	AHIMS	Site type	Significance rating	Array area	Level of impact	Impact Type	Management	Status (April 2021)
NE82	(21-4-0275)	Artefact scatter	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE83	(21-4-0276)	Isolated find, confirmed deposit, PAD	High	Northern	None	None	Avoidance – active Collect stone hatchet.	Demarcation completed Fencing required Collection of hatchets required.
NE84	(21-4-0277)	Isolated find	Low	Northern	None	None	Avoidance – passive	Management incomplete
NE85	(21-4-0278)	Artefact scatter	Low	ETL South to Central (now ..	None	None	N/A	
NE86	(21-4-0279)	Isolated find	Low	ETL Central	None	None	Avoidance – passive	Management incomplete
NE87	(21-4-0280)	Artefact scatter	Low	ETL Central	None	None	Avoidance – passive Collect stone hatchet.	Management incomplete
NE88	(21-4-0281)	Isolated find	Low	Central	Total disturbance	Array impact	Surface collection	Salvage completed
NE89	(21-4-0282)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection	Salvage completed
NE90	(21-4-0283)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection	Salvage completed Stone hatchet collected
NE91	(21-4-0284)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection	Salvage completed
NE92	(21-4-0285)	Isolated find	Low	Northern	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE93	(21-4-0286)	Grinding groove,	Moderate	Central-North	None	None	Avoidance – passive	Management incomplete
NE94	(21-4-0287)	Artefact scatter,	Moderate	Central-North	None	None	Avoidance – passive	Management incomplete
NE95	(17-4-0049)	Isolated find	Low	Central-North	None	None	Avoidance – active	Management incomplete

Table A.1 **Aboriginal site inventory and management**

Site name:	AHIMS	Site type	Significance rating	Array area	Level of impact	Impact Type	Management	Status (April 2021)
NE96	(21-4-0288)	Scarred tree	Moderate	Central-North	None	None	Avoidance – active	Management incomplete
NE97	(21-4-0289)	Scarred tree	Moderate	Central	None	None	Avoidance – active	Management incomplete
NE98	(21-4-0290)	Isolated find	Low	Central	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE99	(21-4-0291)	Isolated find	Low	Central	Total disturbance	Array impact	Surface collection (additional attempt)	Management incomplete
NE100	(21-4-0292)	Open artefact	Low	Central	None	None	Avoidance – passive	Management incomplete
NE101	N/A	Not an Aboriginal scar tree	Not applicable	Northern	Total loss	Array impact	No management required: not an Aboriginal scar tree.	Management incomplete
NE102	(21-4-0293)	Scarred tree	Moderate	Northern	None	None	Avoidance – active	Demarcation completed Fencing required



Appendix B

Aboriginal consultation for this plan



Appendix B

Aboriginal consultation for this plan

B.1 Consultation log (entire project)

Aboriginal Consultation Log: New England Solar Farm Consultation log	Contact type	Date	Comment
Post EIS Exhibition: Scar tree survey and archaeological test excavation: notice of survey and test excavation methods			
Organisation	Contact type	Date Sent	Comments
Nunawanna Aboriginal Corporation (NAC)	Email	18-Feb-19	Colin Ahoy replied requesting involvement in fieldwork (18/02/2019)
Armidale Local Aboriginal Land Council	Email	18-Feb-19	
Armidale and New England Gumbaynggirr Descendants	Email	18-Feb-19	Bruce Cohen replied requesting involvement in fieldwork (19/02/2019)
Aaron Broad	Email	18-Feb-19	No response provided
Les Townsend	Letter	18-Feb-19	No response provided
Steven Ahoy	Email	18-Feb-19	Steve Ahoy replied requesting involvement in fieldwork (26/02/2019)
Culturally Aware	Email	18-Feb-19	No response provided
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	18-Feb-19	No response provided
Nganyawana Clan Group	Email	18-Feb-19	Les Ahoy replied requesting involvement in fieldwork (20/02/2019)
Post EIS Exhibition: Scar tree verification update and approach email			
Organisation	Contact type	Date Sent	Comments
Nunawanna Aboriginal Corporation (NAC)	Email	24-Apr-19	
Armidale Local Aboriginal Land Council	Email	24-Apr-19	
Armidale and New England Gumbaynggirr Descendants	Email	24-Apr-19	
Aaron Broad	Email	24-Apr-19	
Les Townsend	Letter	24-Apr-19	
Steven Ahoy	Email	24-Apr-19	Ryan Desic talked to Steve Ahoy about the proposed approach as described in the email. Steve indicated that RAPs would wait until the report detailing the results was issued before making comment.
Culturally Aware	Email	24-Apr-19	
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	24-Apr-19	
Nganyawana Clan Group	Email	24-Apr-19	
Issue of ACHA amendment report to RAPs			
Organisation	Contact type	Date Sent	Comments
Nunawanna Aboriginal Corporation (NAC)	Email	04-Jun-19	
Armidale Local Aboriginal Land Council	Email	04-Jun-19	
Armidale and New England Gumbaynggirr Descendants	Email	04-Jun-19	
Aaron Broad	Email	04-Jun-19	
Les Townsend	Letter	04-Jun-19	
Steven Ahoy	Email	04-Jun-19	
Culturally Aware	Email	04-Jun-19	
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	04-Jun-19	
Nganyawana Clan Group	Email	04-Jun-19	
Notification of Haulage Road Upgrade survey and methods			
Organisation	Contact type	Date Sent	Comments
Nunawanna Aboriginal Corporation (NAC)	Email	05-Aug-19	Email to notify RAPs of proposed road upgrade work
Armidale Local Aboriginal Land Council	Email	05-Aug-19	Email to notify RAPs of proposed road upgrade work
Armidale and New England Gumbaynggirr Descendants	Email	05-Aug-19	Email to notify RAPs of proposed road upgrade work
Aaron Broad	Email	05-Aug-19	Email to notify RAPs of proposed road upgrade work
Les Townsend	Letter	13-Aug-19	Email to notify RAPs of proposed road upgrade work, tracking number 604 46858 402 092
Steven Ahoy	Email	05-Aug-19	Email to notify RAPs of proposed road upgrade work
Culturally Aware	Email	05-Aug-19	Email to notify RAPs of proposed road upgrade work
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	05-Aug-19	Email to notify RAPs of proposed road upgrade work
Nganyawana Clan Group	Email	05-Aug-19	Email to notify RAPs of proposed road upgrade work
Haulage Road Upgrade survey and methods			
Organisation	Contact type	Date Sent	Comments
Nunawanna Aboriginal Corporation (NAC)	Email	01-Aug-19	Emailed to find availability for survey efforts the following week
Steven Ahoy	Email	01-Aug-19	Emailed to find availability for survey efforts the following week
Armidale and New England Gumbaynggirr Descendants	Email	01-Aug-19	Emailed to find availability for survey efforts the following week
Nunawanna Aboriginal Corporation (NAC)	Email	05-Aug-19	Emailed survey work details for Thursday 8 August
Steven Ahoy	Email	05-Aug-19	Emailed survey work details for Thursday 8 August
Armidale and New England Gumbaynggirr Descendants	Email	05-Aug-19	Emailed survey work details for Thursday 8 August
Issue of Road Upgrades addendum report to RAPs			
Organisation	Contact type	Date Sent	Comments
Nunawanna Aboriginal Corporation (NAC)	Email	06-Sep-19	Email to notify RAPs of proposed road upgrade work
Armidale Local Aboriginal Land Council	Email	06-Sep-19	Email to notify RAPs of proposed road upgrade work
Armidale and New England Gumbaynggirr Descendants	Email	06-Sep-19	Email to notify RAPs of proposed road upgrade work
Aaron Broad	Email	06-Sep-19	Email to notify RAPs of proposed road upgrade work
Les Townsend	Letter	06-Sep-19	Email to notify RAPs of proposed road upgrade work, tracking number 604 46858 402 092
Steven Ahoy	Email	06-Sep-19	Email to notify RAPs of proposed road upgrade work
Culturally Aware	Email	06-Sep-19	Email to notify RAPs of proposed road upgrade work
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	06-Sep-19	Email to notify RAPs of proposed road upgrade work

Nganyawana Clan Group	Email	06-Sep-19	Email to notify RAPs of proposed road upgrade work
Notice of preparation of Aboriginal heritage management plan			
Organisation	Contact type	Date Sent	Comments
Nunawanna Aboriginal Corporation (NAC)	Email	11-Feb-20	
Armidale Local Aboriginal Land Council	Email	11-Feb-20	
Armidale and New England Gumbaynggirr Descendants	Email	11-Feb-20	
Aaron Broad	Email	11-Feb-20	
Les Townsend	Letter	11-Feb-20	
Steven Ahoy	Email	11-Feb-20	
Culturally Aware	Email	11-Feb-20	
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	11-Feb-20	
Nganyawana Clan Group	Email	11-Feb-20	
Issue of draft Aboriginal heritage management plan to RAPs			
Organisation	Contact type	Date Sent	Comments
Les Townsend	Express post - mail	15-May-20	No response received
Nunawanna Aboriginal Corporation (NAC)	Email	15-May-20	Responses received 25 and 27 May 2020
Armidale Local Aboriginal Land Council	Email	15-May-20	No response received
Armidale and New England Gumbaynggirr Descendants	Email	15-May-20	No response received
Aaron Broad	Email	15-May-20	No response received
Steven Ahoy	Email	15-May-20	Response received 25 May 2020
Culturally Aware	Email	15-May-20	No response received
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	15-May-20	No response received
Nganyawana Clan Group	Email	15-May-20	Response received 15 May 2020
Modification 1 Road Upgrades - Provision of assessment (no impacts identified)			
Organisation	Contact type	Date Sent	Comments
Les Townsend	Express post - mail	18-Sep-20	
Nunawanna Aboriginal Corporation (NAC)	Email	18-Sep-20	
Armidale Local Aboriginal Land Council	Email	18-Sep-20	
Armidale and New England Gumbaynggirr Descendants	Email	18-Sep-20	
Aaron Broad	Email	18-Sep-20	
Steven Ahoy	Email	18-Sep-20	
Culturally Aware	Email	18-Sep-20	
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	18-Sep-20	
Nganyawana Clan Group	Email	18-Sep-20	
Notification email of DPIE approved AHMP for the project			
Organisation	Contact type	Date Sent	Comments
Les Townsend	Express post - mail	8/12/2020	
Nunawanna Aboriginal Corporation (NAC)	Email	8/12/2020	
Armidale Local Aboriginal Land Council	Email	8/12/2020	
Armidale and New England Gumbaynggirr Descendants	Email	8/12/2020	
Aaron Broad	Email	8/12/2020	
Steven Ahoy	Email	8/12/2020	
Culturally Aware	Email	8/12/2020	
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	8/12/2020	
Nganyawana Clan Group	Email	8/12/2020	
Issue of draft updated AHMP to RAPs (proposed 14-day review period)			
Organisation	Contact type	Date Sent	Comments
Les Townsend	Express post - mail	16/03/2021	Follow up call on 24/03/21 - Les stated that he had no input and would be happy to rely on other RAPs.
Nunawanna Aboriginal Corporation (NAC)	Email	16/03/2021	Follow up call on 24/03/21 - No feedback on AHMP provided. Ryan reminded Colin to review the updated sections and provided feedback if desired.
Armidale Local Aboriginal Land Council	Email	16/03/2021	Follow up call on 24/03/21 - No response.
Armidale and New England Gumbaynggirr Descendants	Email	16/03/2021	Response received (Bruce Cohen) on 30 March 2021. Addressed in email and letter.
Aaron Broad	Email	16/03/2021	Emailed only - Aaron Broad is based in Wollongong and has not been involved in the ACHA or AHMP since registration in 2017.
Steven Ahoy	Email	16/03/2021	Follow up call on 24/03/21 - No feedback on AHMP provided, except that the collection of stone axes was supported. Ryan reminded Steven to review the updated sections and provided feedback if desired.
Culturally Aware	Email	16/03/2021	Follow up call on 24/03/21 - Ryan discussed proposed management changes with Cheryl Kitchener. Ryan reminded Cheryl to review the AHMP but talked through changes. Cheryl supported the collection of stone axes. Cheryl also supported vegetation removal and the premise of another collection attempt for nominated stone artefact sites.
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	16/03/2021	Follow up call on 24/03/21 - No feedback on AHMP provided. Ryan reminded Rhonda to review the updated sections and provided feedback if desired.
Nganyawana Clan Group	Email	16/03/2021	Follow up call on 24/03/21 - No response. Left message.
Issue of proposed preservation and display of Scar Tree NE49 at Keeping Place			
Organisation	Contact type	Date Sent	Comments
Les Townsend	Express post - mail	22-Mar-21	EMM called and discussed approach. Les informed that we was happy to follow the RAP consensus on management measures.

Nunawanna Aboriginal Corporation (NAC)	Email	22-Mar-21	Colin Ahoy Snr originally responding suggested alternative keeping place options as he thought the ACCKP would not store the tree. Ryan called Colin and clarified the matter based on the letter contents. Colin did no raise any issues with the proposed method. Colin noted that it is important to keep the European scar from fencing construction on the side of the tree trunk. Furthermore, he suggested that the tree be cut slightly higher above the scar than that shown in the methods letter – this was to ensure the scar apex will still be visible after cutting.
Armidale Local Aboriginal Land Council	Email	22-Mar-21	No response received.
Armidale and New England Gumbaynggirr Descendants	Email	22-Mar-21	Response received (Bruce Cohen) on 30 March 2021. Addressed in email and letter.
Aaron Broad	Email	22-Mar-21	Emailed only - Aaron Broad is based in Wollongong and has not been involved in the ACHA or AHMP since registration in 2017.
Steven Ahoy	Email	22-Mar-21	The methods presented were originally made in consultation with Steven as he has been working closely with the ACCKP for the management of this tree. Steven supports the proposed methods.
Culturally Aware	Email	22-Mar-21	In late January 2020 Cheryl provided the ACCKP with tree management advice gathered from a curator from the Australian Museum (Logan Metcalfe). Cheryl provided this information to EMM recently and is generally consistent with the proposed methods in the EMM methods letter. An additional point included the advice to “ensure the tree is completely secure and bound to avoid further splitting”.
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	22-Mar-21	Ryan contacted Rhonda over the phone and requested any feedback she would like to make. No issues were raised.
Nganyawana Clan Group	Email	22-Mar-21	Email and call attempted – no response received. However, subsequent correspondence via email shows Les's support on 30 March and 1 April 2021

Draft AHMP update reminder to RAPs for review			
Organisation	Contact type	Date Sent	Comments
Les Townsend	Express post - mail	29-Mar-21	
Nunawanna Aboriginal Corporation (NAC)	Email	29-Mar-21	
Armidale Local Aboriginal Land Council	Email	29-Mar-21	
Armidale and New England Gumbaynggirr Descendants	Email	29-Mar-21	
Aaron Broad	Email	29-Mar-21	
Steven Ahoy	Email	29-Mar-21	
Culturally Aware	Email	29-Mar-21	
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	29-Mar-21	
Nganyawana Clan Group	Email	29-Mar-21	

Notice of completion of further management of Scar Tree NE49			
Organisation	Contact type	Date Sent	Comments
Les Townsend	Express post - mail	01-Apr-21	
Nunawanna Aboriginal Corporation (NAC)	Email	01-Apr-21	
Armidale Local Aboriginal Land Council	Email	01-Apr-21	
Armidale and New England Gumbaynggirr Descendants	Email	01-Apr-21	
Aaron Broad	Email	01-Apr-21	
Steven Ahoy	Email	01-Apr-21	
Culturally Aware	Email	01-Apr-21	
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	01-Apr-21	
Nganyawana Clan Group	Email	01-Apr-21	

Notice of finalisation of 1st AHMP revision			
Organisation	Contact type	Date Sent	Comments
Les Townsend	Express post - mail	14-Apr-21	
Nunawanna Aboriginal Corporation (NAC)	Email	14-Apr-21	
Armidale Local Aboriginal Land Council	Email	14-Apr-21	
Armidale and New England Gumbaynggirr Descendants	Email	14-Apr-21	
Aaron Broad	Email	14-Apr-21	
Steven Ahoy	Email	14-Apr-21	
Culturally Aware	Email	14-Apr-21	
Nyakka Aboriginal Culture Heritage Corporation Archaeological and Cultural Heritage Consultants	Email	14-Apr-21	
Nganyawana Clan Group	Email	14-Apr-21	

B.2 AHMP consultation correspondence – initial AHMP November 2020

11 February 2020

Ground floor, 20 Chandos Street
St Leonards NSW 2065
PO Box 21
St Leonards NSW 1590

Registered Aboriginal Party for the New England Solar Farm

T 02 9493 9500

E info@emmconsulting.com.au

www.emmconsulting.com.au

Re: New England Solar Farm: Notice of preparation of Aboriginal heritage management plan

Dear Registered Party,

1 Introduction

Thank you for your continued involvement in Aboriginal cultural heritage matters for the New England Solar Farm (the project) at Uralla NSW. This letter is to advise your party that EMM Consulting Pty Limited (EMM) has been engaged on behalf of the proponent UPC Renewables Australia Pty Limited (UPC) to prepare an Aboriginal heritage management plan (AHMP) for the project.

The project is classed as a State Significant Development (SSD) under the State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP). A development application (DA) and environmental impact statement (EIS) was submitted under Part 4, Division 4.1 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act). Project approval is anticipated in March 2020 and we are initiating the Aboriginal consultation early.

As part of the EIS, EMM prepared an Aboriginal cultural heritage assessment report (ACHAR) for the project, inclusive of an addendum report issued after the public exhibition phase in early 2019. The ACHAR included an Aboriginal heritage impact assessment and outlined management measures that are required to be detailed in an AHMP.

The primary aims of this letter is to notify your party that the AHMP is being prepared and to gather upfront input and feedback about the management commitments outlined in the project ACHAR. Further comments and feedback will be sought once the draft AHMP is prepared and issued to all registered Aboriginal parties (RAPs), and during a proposed consultation meeting in Armidale planned for March 2020 (date to be advised).

2 Scope of AHMP

An AHMP will be prepared based on the management recommendations set out in the ACHAR. The AHMP will involve the following main tasks:

- Consultation with the DPIE Biodiversity and Conservation Division (BCD) regional archaeologist (Roger Mehr) and RAPs about the details of the AHMP;
- Preparation of a draft AHMP for RAP review, which will provide details of;
 - all Aboriginal sites identified during the archaeological investigation for the project;
 - management measures and their progress towards completion;
 - measures to ensure ongoing consultation and involvement of project RAPs;

- RAP access arrangements for a selection of significant sites for educational purposes;
 - protocols for newly identified sites;
 - protocols for educating staff and contractors of their obligations relating to Aboriginal cultural heritage values through a site induction process;
 - protocols for suspected human skeletal materials;
 - protocols for the ongoing care of salvaged Aboriginal objects within a keeping place; and
 - provisions for review and updates of the AHMP;
- preparation of a revised AHMP incorporating the outcomes of RAP consultation;
 - preparation of a final draft for BCD and Uralla Shire Council (Council) review and comment; and
 - preparation of the final AHMP, based on RAP, Council and BCD review, for issue to, and to be endorsed by, the Secretary of DPIE.

3 Key matters to be addressed in the AHMP

Important matters requiring RAP feedback include:

1. The methods and materials for site avoidance and conservation (including stone artefact sites, grinding grooves and scar trees).
2. Management of significant grinding groove sites NE09 and NE68, including fencing and long-term cultural/educational access and maintenance by RAPs.
3. The methods and procedures for conducting surface salvage of Aboriginal objects within the project impact area, including the collection of 26 isolated artefacts and six artefact scatters.
4. The methods for the salvage, curation and presentation of the felled and sawn in half scar tree NE49.
5. The details of the proposed Aboriginal keeping place at the Armidale and Region Aboriginal Cultural Centre and Keeping Place (96-104 Kentucky Street, Armidale NSW), McCrossins Mill Museum, and/or the Uralla Visitor Information Centre.

EMM will proceed to draft the first version of the AHMP and will incorporate best practice archaeological measures and methods into the document for RAP consideration. However, we will be seeking feedback from RAPs throughout the process (in writing and during the proposed consultation meeting) so that the final AHMP considers the views and input of RAPs. We welcome any feedback upfront about the items listed above.

4 Next steps

EMM will proceed to draft the AHMP which will be issued to RAPs within the next month. RAPs will be provided with 28 days to review the AHMP and provide written feedback. During the RAP review period, we plan to hold a meeting with UPC, EMM and RAPs in Armidale to workshop the details of the proposed management measures.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Desic', with a stylized flourish at the end.

Ryan Desic

Associate Archaeologist - Heritage Team Leader

rdesic@emmconsulting.com.au

Ryan Desic

From: Ryan Desic
Sent: Friday, 15 May 2020 4:59 PM
To: 'nganyawana@gmail.com'; 'steven1ahoy@gmail.com'; 'minnamunning@gmail.com'; 'ceo@alalc.org.au'; Bruce Cohen; Colin Ahoy; colinahoy57@gmail.com; Green, Kevin; Cheryl Kitchener; rhonda kitchener; 'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy; colinahoy57@gmail.com
Subject: Provision of Draft Aboriginal Heritage Management Plan for the New England Solar Farm
Attachments: J200088_NESF_AHMP_Draft.pdf

Dear Registered Party for the New England Solar Farm Project,

Thank you for your continued involvement in Aboriginal cultural heritage matters for the New England Solar Farm (the project) at Uralla NSW. The report attached provides the draft Aboriginal heritage management plan (AHMP) for the project. In accordance with project approval conditions, RAPs must be given 28 days to review the AHMP and given the opportunity to provide feedback on the plan.

Once the review period has ended, EMM will collate the feedback, address issues or concerns where relevant and finalise the plan for approval by the Department of Planning, Industry and Environment (DPIE). After the Aboriginal community review process, the AHMP will also be reviewed by DPIE regional archaeologist Roger Mehr along with Uralla Shire Council and additional changes to the plan may be required.

Of particular note, EMM and UPC no longer intend to hold a consultation meeting due to the COVID-19 pandemic and the risks associated with travel and face to face meetings. We apologise for this, but believe it is the safest option based on current health advice. As such, I (Ryan) will be happy to take calls and discuss items, issues and concerns during the review period. Please do not hesitate to contact me on my details below.

Apart from the content within the whole AHMP that requires review and feedback, I would like to draw attention to some key decisions that still require resolution and feedback on:

- Where the Keeping place of Aboriginal objects will be (refer Section 4.2.4 of the document). Please express your opinions. The current options are:
 - Armidale and Region Aboriginal Cultural Centre and Keeping Place (96-104 Kentucky Street, Armidale NSW) (first preference)
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 - Any reburial fieldwork will be undertaken by a qualified archaeologist so that it is recorded appropriately. RAPs who wish to be involved in the activity will also be invited to participate.

Our preference is that any party wishing to provide feedback, to provide it via email or letter. Please reference relevant sections (eg Section 4.3.2) of the AHMP to assist in us providing targeted responses to your feedback. I will

be happy to take calls to clarify and discuss certain items but I would request that your feedback is followed up in writing.

Once again, thank you for your time and I hope you are all doing well.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader



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15 May 2020

Mr. Les Townsend
3/14 Hunter Place
Uralla
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Ground floor, 20 Chandos Street
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St Leonards NSW 1590

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E info@emmconsulting.com.au
www.emmconsulting.com.au

Re: Provision of Draft Aboriginal Heritage Management Plan for the New England Solar Farm

Dear Registered Party for the New England Solar Farm Project,

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Our preference is that any party wishing to provide feedback, to provide it via email or letter. Please reference relevant sections (eg Section 4.3.2) of the AHMP to assist in us providing targeted responses to your feedback. I will be happy to take calls to clarify and discuss certain items, but I would request that your feedback is followed up in writing.

Once again, thank you for your time and I hope you are all doing well.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Desic', with a stylized flourish at the end.

Ryan Desic

Associate Archaeologist and Heritage Team Leader
rdesic@emmconsulting.com.au

Ryan Desic

From: Colin Ahoy <cahoy7@myune.edu.au>
Sent: Wednesday, 27 May 2020 11:47 AM
To: Ryan Desic
Subject: Re: Provision of Draft Aboriginal Heritage Management Plan for the New England Solar Farm

This is just an inquiry but I feel that an Aboriginal person from the community should be on site at all times given the highly cultural significance to the location of the solar farm. Or would that be something that should be taken up with UPC?

Regards

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From: Colin Ahoy <cahoy7@myune.edu.au>
Sent: Wednesday, May 27, 2020 11:43:50 AM
To: Ryan Desic <rdesic@emmconsulting.com.au>
Subject: Re: Provision of Draft Aboriginal Heritage Management Plan for the New England Solar Farm

Hello Ryan,

With regards to the AHMP for the New England Solar Farm could it be possible that EMM in conjunction with UPC hire a Cultural and Heritage officer as part of the construction and on going work associated with the solar farm?

I have seen in other AHMP for the construction of Dungowan Dam that EMM and Water NSW have appointed two available position for local Aboriginal people to be apart of there team as cultural and heritage advisors over that particular project and I was wandering if the same could apply for the Solar Farm?

Regards

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From: Ryan Desic <rdesic@emmconsulting.com.au>
Sent: Monday, May 18, 2020 9:22:27 AM
To: Colin Ahoy <cahoy7@myune.edu.au>
Subject: RE: Provision of Draft Aboriginal Heritage Management Plan for the New England Solar Farm

Hi Colin,

I hope you are well. In general, if those grooves are outside of the footprint (and outside UPC's project area), UPC won't have any involvement in the site and it will be up to the landholder to just make sure they don't impact the site.

It would be firstly good to get some GPS coordinates for this site so we are sure it is outside of the project footprint. I doubt it is within our footprint as we surveyed all outcrops of stone.

If it is outside UPC's responsibility I would advise you to complete an AHIMS site card for the site and submit it to the AHIMS register. I am sure Wendy and John could assist with that task. I would also make sure you advise the landholder of this site and advise they are obliged not to harm the site.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader



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From: Colin Ahoy <cahoy7@myune.edu.au>
Sent: Friday, 15 May 2020 6:16 PM
To: Ryan Desic <rdesic@emmconsulting.com.au>
Subject: Re: Provision of Draft Aboriginal Heritage Management Plan for the New England Solar Farm

Hello Ryan,

I have found another Grinding Groove site in Uralla but i think it might be just outside of the solar farm footprint but it's on Richard Munsie property we have counted a total of around 120. What will happen to these grooves?

Regards

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From: Ryan Desic <rdesic@emmconsulting.com.au>
Sent: Friday, May 15, 2020 4:58:43 PM
To: 'nganyawana@gmail.com' <'nganyawana@gmail.com'>; 'steven1ahoy@gmail.com' <'steven1ahoy@gmail.com'>; 'minnamunnung@gmail.com' <'minnamunnung@gmail.com'>; 'ceo@alalc.org.au' <'ceo@alalc.org.au'>; Bruce Cohen <bruce.cohey@yahoo.com.au>; Colin Ahoy <cahoy4@une.edu.au>; colinahoy57@gmail.com <colinahoy57@gmail.com>; Green, Kevin <kevin.green@alsnswact.org.au>; Cheryl Kitchener <anaiwannation@gmail.com>; rhonda kitchener <rhondakitchener09@hotmail.com>; 'Bruce.Cohen@hnehealth.nsw.gov.au' <'Bruce.Cohen@hnehealth.nsw.gov.au'>; Colin Ahoy <cahoy7@myune.edu.au>; colinahoy57@gmail.com <colinahoy57@gmail.com>
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Once again, thank you for your time and I hope you are all doing well.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader



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Ryan Desic

From: Colin Ahoy Ahoy <colinahoy57@gmail.com>
Sent: Monday, 25 May 2020 6:20 PM
To: Ryan Desic; les.ahoy@lwb.org.au
Cc: Bruce Cohen; Colin Ahoy; Green, Kevin
Subject: Re: Provision of Draft Aboriginal Heritage Management Plan for the New England Solar Farm

Hullo Ryan,

Thanks for the opportunity to respond to the report.

Firstly I give support to Les Ahoy's response on the history of the proposed site and the area that has been surveyed. I'm not sure where Les wants to go from here with the oral history but in relation to the storage of artefacts that will be salvaged, my preference would be the Armidale Aboriginal Keeping Place.

The management of the keeping place has come through some important changes recently and is now owned and controlled by the Aboriginal community in Armidale.

Yours

Colin Ahoy

On Friday, 15 May 2020, Les Ahoy <nganyawana@gmail.com> wrote:

G'day Ryan and RAP's,

My concern with the report is that it focuses on the scientific tangible aspects of the survey site e.g. artefacts etc. And not on the non-tangible aspects. Let me explain why I have this concern and hopefully I want be long winded.

NOTE: this is as told to me by my Great Great Grandparents and Great Grand Parents (and is inclusive of Allan Mackenzie and his then partner Aunty Dulcie Brown) and was supported by the many conversations I had with Uncle Warner Saunders, Uncle Mick Saunders and Uncle Herb Ritchie (all Guiwan Clans Men of the Biripi Nation and now deceased). All these people I will refer to as my Elders as I held all with the utmost respect as being initiated cultural knowledge holders.

My Elders often spoke of a gathering place between Armidale and Uralla in which 3 clans, the Nganyawana (Armidale area), the Oban (east of Guyra as they were referred to by the Elders), the Niangala mob (south of Walcha as they were referred to by the Elders) and then at times the Guiwan Clan of the Biripi Nation from Taree area. This place was called Ooralla which in language means 'Meeting Place'. The Elders spoke of how each clan had its own area to camp, to tell stories, perform their own dances and ceremonies. They often spoke of the camp fires at night and how beautiful it was to look across 'country' to see the clans dancing by the fire light. Then when all was right, how they all came together for big dancing, talking and trading. This gathering lasted many days as the Elders would say and when it was all over, everyone went back to their own 'country'. The Niangala Mob and Biripi went south together. The Oban north and Nganyawana back to their camp ground which was located on the slopes of the now Armidale Lookout.

NOTE: my Elders when speaking of Ooralla never spoke of either Gumbangirr nor Dhunghutti attending these gathering. My Elders only spoke of Gumbangirr when speaking of the Nimborder area and Dhunghutti when speaking of Kunderang Camp Site and so because of this I have not included them..

I am convinced that the survey area is the Ooralla in which over many hundreds of years, meetings and gathering were held at this location in restrengthening ties, exchanging news and to trade. This is supported by the nearby town of Uralla which is the English spelling of Ooralla. The UNE also have a centre with the title of Ooralla (meaning meeting place). And this is where my concern lies, in that the report does not have any mention of this non-tangible aspect, which to me is just as important as the tangible aspects. And if the Ooralla is not mentioned in the report in the context I have written about then, personally the report will fail my people greatly in that another part of our oral culture will have disappeared like much culture previously.

As such, I strongly urge yourself (Ryan) and the other RAP's to, while supporting or not supporting the report as is, to request that the report take into consideration the non-tangible aspects which even though cannot be measured from a scientific perspective, should be inclusive from a traditional oral Aboriginal historical perspective of teaching and passing on culture through the process of story telling, dance and such gathering as with Ooralla site. It has just as much historical importance to me as an Aboriginal Cultural Knowledge Holder as do the artefacts found at this location.

Happy to discuss further as required

On Fri, 15 May 2020 at 16:59, Ryan Desic <rdesic@emmconsulting.com.au> wrote:

Dear Registered Party for the New England Solar Farm Project,

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Regards,

Ryan Desic

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--

Les Ahoy JP
Nganyawana Cultural Knowledge Holder
M: 0481 524 377
E: nganyawana@gmail.com

--

Les Ahoy JP
Nganyawana Cultural Knowledge Holder
M: 0481 524 377
E: nganyawana@gmail.com

--

Colin Ahoy

Ryan Desic

From: Les Ahoy <nganyawana@gmail.com>
Sent: Friday, 15 May 2020 8:36 PM
To: Ryan Desic
Cc: Bruce Cohen; Colin Ahoy; colinahoy57@gmail.com; Green, Kevin; Cheryl Kitchener; rhonda kitchener; Colin Ahoy
Subject: Re: Provision of Draft Aboriginal Heritage Management Plan for the New England Solar Farm

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My Elders often spoke of a gathering place between Armidale and Uralla in which 3 clans, the Nganyawana (Armidale area), the Oban (east of Guyra as they were referred to by the Elders), the Niangala mob (south of Walcha as they were referred to by the Elders) and then at times the Guiwan Clan of the Biripi Nation from Taree area. This place was called Ooralla which in language means 'Meeting Place'. The Elders spoke of how each clan had its own area to camp, to tell stories, perform their own dances and ceremonies. They often spoke of the camp fires at night and how beautiful it was to look across 'country' to see the clans dancing by the fire light. Then when all was right, how they all came together for big dancing, talking and trading. This gathering lasted many days as the Elders would say and when it was all over, everyone went back to their own 'country'. The Niangala Mob and Biripi went south together. The Oban north and Nganyawana back to their camp ground which was located on the slopes of the now Armidale Lookout.

NOTE: my Elders when speaking of Ooralla never spoke of either Gumbangirr nor Dhunghutti attending these gathering. My Elders only spoke of Gumbangirr when speaking of the Nimborder area and Dhunghutti when speaking of Kunderang Camp Site and so because of this I have not included them..

I am convinced that the survey area is the Ooralla in which over many hundreds of years, meetings and gathering were held at this location in strengthening ties, exchanging news and to trade. This is supported by the nearby town of Uralla which is the English spelling of Ooralla. The UNE also have a centre with the title of Ooralla (meaning meeting place). And this is where my concern lies, in that the report does not have any mention of this non-tangible aspect, which to me is just as important as the tangible aspects. And if the Ooralla is not mentioned in the report in the context I have written about then, personally the report will fail my people greatly in that another part of our oral culture will have disappeared like much culture previously.

As such, I strongly urge yourself (Ryan) and the other RAP's to, while supporting or not supporting the report as is, to request that the report take into consideration the non-tangible aspects which even though cannot be measured from a scientific perspective, should be inclusive from a traditional oral Aboriginal historical perspective of teaching and passing on culture through the process of story telling, dance and such gathering as with Ooralla site. It has just as much historical importance to me as an Aboriginal Cultural Knowledge Holder as do the artefacts found at this location.

Happy to discuss further as required

On Fri, 15 May 2020 at 16:59, Ryan Desic <rdesic@emmconsulting.com.au> wrote:

Dear Registered Party for the New England Solar Farm Project,

Thank you for your continued involvement in Aboriginal cultural heritage matters for the New England Solar Farm (the project) at Uralla NSW. The report attached provides the draft Aboriginal heritage management plan (AHMP) for the project. In accordance with project approval conditions, RAPs must be given 28 days to review the AHMP and given the opportunity to provide feedback on the plan.

Once the review period has ended, EMM will collate the feedback, address issues or concerns where relevant and finalise the plan for approval by the Department of Planning, Industry and Environment (DPIE). After the Aboriginal community review process, the AHMP will also be reviewed by DPIE regional archaeologist Roger Mehr along with Uralla Shire Council and additional changes to the plan may be required.

Of particular note, EMM and UPC no longer intend to hold a consultation meeting due to the COVID-19 pandemic and the risks associated with travel and face to face meetings. We apologise for this, but believe it is the safest option based on current health advice. As such, I (Ryan) will be happy to take calls and discuss items, issues and concerns during the review period. Please do not hesitate to contact me on my details below.

Apart from the content within the whole AHMP that requires review and feedback, I would like to draw attention to some key decisions that still require resolution and feedback on:

- Where the Keeping place of Aboriginal objects will be (refer Section 4.2.4 of the document). Please express your opinions. The current options are:
 - Armidale and Region Aboriginal Cultural Centre and Keeping Place (96-104 Kentucky Street, Armidale NSW) (first preference)
 - McCrossin's Mill Museum (Salisbury St, Uralla NSW) OR Uralla Visitor Information Centre (104 Bridge St, Uralla NSW 2358) (alternative)
- Additional item to be resolved – Cheryl and Rhonda Kitchener requested that any additional collected objects not placed on display should be reburied on Country in a safe location. The outcomes of the RAP review period will establish the following:
 - whether the consensus of RAPs agree for reburial of collected objects;
 - if reburial is determined by RAPs, the location of the reburial will need to be decided upon in consultation with UPC and relevant Landholders if applicable;
 - any reburied location will receive the same active protection as presented in Section 4.2.3;
 - any reburial procedure will follow the stone artefact disposition procedures as set out in Section 3.7 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010).
 - Any reburial fieldwork will be undertaken by a qualified archaeologist so that it is recorded appropriately. RAPs who wish to be involved in the activity will also be invited to participate.

Our preference is that any party wishing to provide feedback, to provide it via email or letter. Please reference relevant sections (eg Section 4.3.2) of the AHMP to assist in us providing targeted responses to your feedback. I will be happy to take calls to clarify and discuss certain items but I would request that your feedback is followed up in writing.

Once again, thank you for your time and I hope you are all doing well.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader



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--

Les Ahoy JP
Nganyawana Cultural Knowledge Holder

M: 0481 524 377
E: nganyawana@gmail.com

--

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Nganyawana Cultural Knowledge Holder
M: 0481 524 377
E: nganyawana@gmail.com

Ryan Desic

From: Steven Ahoy <steven1ahoy@gmail.com>
Sent: Monday, 25 May 2020 10:59 AM
To: Ryan Desic
Subject: Re: Provision of Draft Aboriginal Heritage Management Plan for the New England Solar Farm

Hello Ryan,
How are you?

I will express Iwatta Aboriginal Corporation's opinion to your questions:

- - Where the Keeping place of Aboriginal objects will be (refer Section 4.2.4 of the document). Please express your opinions. The current options are:
 - Armidale and Region Aboriginal Cultural Centre and Keeping Place (96-104 Kentucky Street, Armidale NSW) (first preference)
 - McCrossin's Mill Museum (Salisbury St, Uralla NSW) OR Uralla Visitor Information Centre (104 Bridge St, Uralla NSW 2358) (alternative)

The Armidale and Region Aboriginal Cultural Centre and Keeping Place is the only place suitable for storage and display of the Artefact's, the facilities that McCrossin's Mill Museum (Salisbury St, Uralla NSW) OR Uralla Visitor Information Centre has to offer are insufficient for this purpose.

- Additional item to be resolved – Cheryl and Rhonda Kitchener requested that any additional collected objects not placed on display should be reburied on Country in a safe location. The outcomes of the RAP review period will establish the following:
 - whether the consensus of RAPs agree for reburial of collected objects;
 - if reburial is determined by RAPs, the location of the reburial will need to be decided upon in consultation with UPC and relevant Landholders if applicable;
 - any reburied location will receive the same active protection as presented in Section 4.2.3;
 - any reburial procedure will follow the stone artefact disposition procedures as set out in Section 3.7 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010).
 - Any reburial fieldwork will be undertaken by a qualified archaeologist so that it is recorded appropriately. RAPs who wish to be involved in the activity will also be invited to participate.

Iwatta requests that the more significant artefact's with educational potential be collected and displayed at the Armidale and Region Aboriginal Cultural Centre and Keeping Place (96-104 Kentucky Street, Armidale NSW). these Artefacts include the located various stone Axe's, scrapper's, the scarred trees that have been unnaturally cut down by human and the rarer Artefact's as determined by the RAP'S.
All other Artefact's to be reburied as requested.

We also recommend that the RAP'S nominated a spokes person for all the stakeholder groups involved, a spokes person will help to coordinate future works and give precise and clear progress updates regularly.

I am happy to discuss these matters further with anyone that has concerns or questions.

Thank you Steven Ahoy
0413990868

On Fri, May 15, 2020 at 4:59 PM Ryan Desic <rdesic@emmconsulting.com.au> wrote:

Dear Registered Party for the New England Solar Farm Project,

Thank you for your continued involvement in Aboriginal cultural heritage matters for the New England Solar Farm (the project) at Uralla NSW. The report attached provides the draft Aboriginal heritage management plan (AHMP) for the project. In accordance with project approval conditions, RAPs must be given 28 days to review the AHMP and given the opportunity to provide feedback on the plan.

Once the review period has ended, EMM will collate the feedback, address issues or concerns where relevant and finalise the plan for approval by the Department of Planning, Industry and Environment (DPIE). After the Aboriginal community review process, the AHMP will also be reviewed by DPIE regional archaeologist Roger Mehr along with Uralla Shire Council and additional changes to the plan may be required.

Of particular note, EMM and UPC no longer intend to hold a consultation meeting due to the COVID-19 pandemic and the risks associated with travel and face to face meetings. We apologise for this, but believe it is the safest option based on current health advice. As such, I (Ryan) will be happy to take calls and discuss items, issues and concerns during the review period. Please do not hesitate to contact me on my details below.

Apart from the content within the whole AHMP that requires review and feedback, I would like to draw attention to some key decisions that still require resolution and feedback on:

- Where the Keeping place of Aboriginal objects will be (refer Section 4.2.4 of the document). Please express your opinions. The current options are:
 - Armidale and Region Aboriginal Cultural Centre and Keeping Place (96-104 Kentucky Street, Armidale NSW) (first preference)
 - McCrossin's Mill Museum (Salisbury St, Uralla NSW) OR Uralla Visitor Information Centre (104 Bridge St, Uralla NSW 2358) (alternative)
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 - whether the consensus of RAPs agree for reburial of collected objects;
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- Any reburial fieldwork will be undertaken by a qualified archaeologist so that it is recorded appropriately. RAPs who wish to be involved in the activity will also be invited to participate.

Our preference is that any party wishing to provide feedback, to provide it via email or letter. Please reference relevant sections (eg Section 4.3.2) of the AHMP to assist in us providing targeted responses to your feedback. I will be happy to take calls to clarify and discuss certain items but I would request that your feedback is followed up in writing.

Once again, thank you for your time and I hope you are all doing well.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader



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B.3 AHMP consultation correspondence – first revision April 2021

B.3.1 AHMP update consultation

Ryan Desic

From: Ryan Desic
Sent: Tuesday, 16 March 2021 5:16 PM
To: 'nganyawana@gmail.com'; 'steven1ahoy@gmail.com'; 'minnamunnung@gmail.com'; 'ceo@alalc.org.au'; Bruce Cohen; Colin Ahoy; colinahoy57@gmail.com; Green, Kevin; Cheryl Kitchener; rhonda kitchener; 'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy; colinahoy57@gmail.com; Iwatta Aboriginal Corporation
Cc: Tim Kirk
Subject: New England Solar Farm: Proposed Updates to the Aboriginal Heritage Management Plan
Attachments: J200088_NESF_AHMP_Update_RAPDraft.pdf

Dear Registered Party,

In accordance with the outcomes and discussions had during the January 2021 surface artefact collection fieldwork stint, it was determined that the current Aboriginal heritage management plan (AHMP) for the New England Solar Farm project requires an update to permit a number of management measure changes required for all of UPC/AC Renewables' commitments to be fulfilled. Accordingly, I have attached a draft of the updated AHMP for your review and comment within a 14 day timeframe as specified in the existing AHMP.

To be clear about which sections have changed and require your review, please refer to the following sections of the AHMP:

- Section 4.2.2 (ii) Barriers
- Section 4.3.1 (ii) Additional requirements for unsuccessful site collection attempts
- Section 4.3.1 (iii) Additional collection for Aboriginal stone hatchets.

I am currently on fieldwork this week, however I intend to call each registered party throughout next week to verbally explain the changes and gather any comments and feedback you wish to make. Written responses and feedback is also acceptable and encouraged.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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Ryan Desic

From: Ryan Desic
Sent: Monday, 29 March 2021 1:34 PM
To: 'nganyawana@gmail.com'; 'steven1ahoy@gmail.com'; 'minnamunning@gmail.com'; 'ceo@alalc.org.au'; Bruce Cohen; Colin Ahoy; colinahoy57@gmail.com; Green, Kevin; Cheryl Kitchener; rhonda kitchener; 'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy; colinahoy57@gmail.com; Iwatta Aboriginal Corporation
Cc: Tim Kirk; Tim Greenaway
Subject: RE: New England Solar Farm: Proposed Updates to the Aboriginal Heritage Management Plan
Attachments: J200088_NESF_AHMP_Update_RAPDraft.pdf

Dear Registered Party,

I would like to remind everyone that the 14-day response timeframe for the AHMP updates as specified in the email below will be coming to a close tomorrow on 30 March 2021. I have discussed the content with all those available via telephone during other discussions about the scar tree NE49 at the keeping place.

Presently I have not yet received any formal responses or alternative proposed methods to that provided in the AHMP. Of primary interest, the proposed additional surface collection methods shown in 4.3.1 (ii) (a) provides a table with site condition and management summaries for each site. EMM has presented our recommendations on the feasibility of the sites being salvaged from an archaeological perspective. Sites highlighted orange in the table indicate where EMM considers collection could be potentially successful with additional measures. Sites highlighted red in the table indicate where EMM considers that further collection attempts would be unsuccessful, and therefore no further collection or mitigation is recommended. Finally, site NE13 is outside of the proposed disturbance footprint and is highlighted green as it will not be disturbed and will not require further management. As such, if no alternatives are offered, the updated AHMP will be submitted as per the recommendations set out in the draft plan.

If you require further time to review the plan or would like to discuss further, please contact me on my details below.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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From: Ryan Desic

Sent: Tuesday, 16 March 2021 5:16 PM

To: 'nganyawana@gmail.com'; 'steven1ahoy@gmail.com'; 'minnamunnung@gmail.com'; 'ceo@alalc.org.au'; Bruce Cohen <bruce.cohey@yahoo.com.au>; Colin Ahoy <cahoy4@une.edu.au>; colinahoy57@gmail.com; Green, Kevin <kevin.green@alsnswact.org.au>; Cheryl Kitchener <anaiwannation@gmail.com>; rhonda kitchener <rhondakitchener09@hotmail.com>; 'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy <cahoy7@myune.edu.au>; colinahoy57@gmail.com; Iwatta Aboriginal Corporation <iwattaac@gmail.com>

Cc: Tim Kirk <Tim.Kirk@upc-ac.com>

Subject: New England Solar Farm: Proposed Updates to the Aboriginal Heritage Management Plan

Dear Registered Party,

In accordance with the outcomes and discussions had during the January 2021 surface artefact collection fieldwork stint, it was determined that the current Aboriginal heritage management plan (AHMP) for the New England Solar Farm project requires an update to permit a number of management measure changes required for all of UPC/AC Renewables' commitments to be fulfilled. Accordingly, I have attached a draft of the updated AHMP for your review and comment within a 14 day timeframe as specified in the existing AHMP.

To be clear about which sections have changed and require your review, please refer to the following sections of the AHMP:

- Section 4.2.2 (ii) Barriers
- Section 4.3.1 (ii) Additional requirements for unsuccessful site collection attempts
- Section 4.3.1 (iii) Additional collection for Aboriginal stone hatchets.

I am currently on fieldwork this week, however I intend to call each registered party throughout next week to verbally explain the changes and gather any comments and feedback you wish to make. Written responses and feedback is also acceptable and encouraged.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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Ryan Desic

From: Bruce Cohen (Hunter New England LHD) <Bruce.Cohen@health.nsw.gov.au>
Sent: Tuesday, 30 March 2021 9:11 AM
To: Ryan Desic; 'nganyawana@gmail.com'; 'steven1ahoy@gmail.com'; 'minnamunnung@gmail.com'; 'ceo@alalc.org.au'; Bruce Cohen; Colin Ahoy; colinahoy57@gmail.com; Green, Kevin; Cheryl Kitchener; rhonda kitchener; 'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy; colinahoy57@gmail.com; Iwatta Aboriginal Corporation
Cc: Tim Kirk; Tim Greenaway
Subject: RE: New England Solar Farm: Proposed Updates to the Aboriginal Heritage Management Plan

CAUTION: This email originated outside of the Organisation.

Hello Ryan,

Its Bruce Cohen (Armidale and New England Gumbynggirr Descendants). I would like to add my comments on the Aboriginal Heritage Management Plan.

Practise Due Diligence. Sites being salvaged but due to them not being found and environmental factors also come into play with drought, rain, long grass and live stock.

Further RAP monitoring when ground disturbance starts on the roads and sites themselves.

If you did get a chance to take a look at Walcha diamond tree in the pioneer cabin last year. It has been standing for at least 40 – 50 years within in a glass and wooden cabinet. It is protected from the elements but it could be better constructed. Also I have some ideas on how to assist the protect the scared tree.

Yours sincerely,

Bruce Cohen
(Armidale and New England Gumbynggirr Descendants)

From: Ryan Desic [mailto:rdesic@emmconsulting.com.au]
Sent: Monday, 29 March 2021 1:34 PM
To: 'nganyawana@gmail.com'; 'steven1ahoy@gmail.com'; 'minnamunnung@gmail.com'; 'ceo@alalc.org.au'; Bruce Cohen <bruce.cohey@yahoo.com.au>; Colin Ahoy <cahoy4@une.edu.au>; colinahoy57@gmail.com; Green, Kevin <kevin.green@alsnswact.org.au>; Cheryl Kitchener <anaiwannation@gmail.com>; rhonda kitchener <rhondakitchener09@hotmail.com>; 'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy <cahoy7@myune.edu.au>; colinahoy57@gmail.com; Iwatta Aboriginal Corporation <iwattaac@gmail.com>
Cc: Tim Kirk <Tim.Kirk@upc-ac.com>; Tim Greenaway <tim.greenaway@upc-ac.com>
Subject: RE: New England Solar Farm: Proposed Updates to the Aboriginal Heritage Management Plan

Dear Registered Party,

I would like to remind everyone that the 14-day response timeframe for the AHMP updates as specified in the email below will be coming to a close tomorrow on 30 March 2021. I have discussed the content with all those available via telephone during other discussions about the scar tree NE49 at the keeping place.

Presently I have not yet received any formal responses or alternative proposed methods to that provided in the AHMP. Of primary interest, the proposed additional surface collection methods shown in 4.3.1 (ii) (a) provides a table with site condition and management summaries for each site. EMM has presented our recommendations on the feasibility of the sites being salvaged from an archaeological perspective. Sites highlighted orange in the table

Ryan Desic

From: Ryan Desic
Sent: Tuesday, 13 April 2021 3:52 PM
To: Bruce Cohen (Hunter New England LHD)
Subject: RE: New England Solar Farm: Proposed Updates to the Aboriginal Heritage Management Plan

Hi Bruce,

Thank you for your feedback regarding the update NESF AHMP. I would firstly like to respond to your comment on management of the scar tree NE49 at the Armidale and Region Cultural Centre and Keeping Place. We are currently sourcing a quote for a cabinet construction for the tree. It will be generally made in the same manner as the Walcha Diamond Tree as it will involve a cabinet (either timber or steel) and clear display casing (either glass, Perspex or similar transparent material for viewing). We welcome any further suggestions on protecting and displaying the tree in the keeping place. Once received, we will pass it on to the keeping place for further consideration.

Your second point refers to the proposed management of the 23 stone artefact sites where the previous collection attempt in January 2021 was unsuccessful. Your suggestion was "Further RAP monitoring when ground disturbance starts on the roads and sites themselves". We would firstly like to clarify that the new AHMP section 4.3.1 (ii) (b) "Additional collection attempts – vegetation clearance and raking" is proposed as an alternative to (and not additional to) any monitoring of ground disturbance activities. Upon careful consideration of the nature of the sites (the characteristics of the artefacts and the current condition of the sites) and their archaeological significance, we propose that additional vegetation clearance and raking is a better suited option in the attempt to re-identify and collect the outstanding sites. These sites typically feature very small artefacts in small frequencies (18 isolated artefacts and the remaining are small artefact scatters (between 2 and 7 artefacts)). We acknowledge that vegetation clearance and raking may not be successful, but propose that alternative measures would have equal, if not lesser, success and with greater hazard risks and ground disturbance.

Construction ground disturbance monitoring, or monitoring controlled grader scrapes prior to construction, can sometimes be employed to monitor for previously un-recorded sub-surface artefact material. However, we propose that such methods are not appropriate for the following reasons:

- As the artefacts were previously identified on the surface, grader scrapes or other machine excavation likely gather the artefacts in the resulting mounded soil, thus obscuring the ground surface, displacing the artefacts, and reducing the chance of re-identifying the artefacts.
- The artefacts are typically isolated finds or small artefact scatters. Their generally small size would make it very difficult for identification during ground disturbance activities.
- There are also project-related risks of having non-construction team personnel on site during the construction phase. There is increased hazard risks of having people monitoring on site next to heavy machinery.
- Employing grader scrapes over sites may result in greater ground disturbance than actual project-related ground disturbance. Broader scale grader scrapes over some of the site areas (eg NE15 which had a sparsely scattered 7 artefacts over an approx. 200 m by 100 m area) would constitute a far greater net surface disturbance than originally planned. UPC are working under a principle to employ as little ground disturbance as possible.

We believe that the proposed method of vegetation removal and raking is better suited for the following reasons:

- It will provide RAPs with another attempt to identify and collect artefacts that are culturally important to the Aboriginal community;
- It will attempt to return the ground surface to a similar 'bare-surface' condition to when the sites were originally identified; and
- It will result in as minimum ground disturbance as possible to the sites.

Unfortunately, we are often faced with this issue in post-approval surface collection for projects across NSW. Overall, we would like to remind that one of the key reasons of salvage collection is to gather a representative sample of artefacts within a project area for analysis, reporting, safekeeping and display. It is commonly acknowledged that not every stone artefact in a project area can be identified and collected. One of the ways UPC has offered to offset this issue has been to update the management plan permit the collection all re-identifiable Aboriginal stone axes in the project area for display at the keeping centre. This decision has been made in consultation with the Aboriginal community as particular significance has been placed on these items. As such, as per the updated AHMP, once a further attempt of salvage collection has been made for the nominated 23 sites, there will be no further attempts to identify and collect those artefacts. Notwithstanding, any artefact identified during the life of the project will be subject to the unexpected finds protocol as per chapter 5 of the AHMP.

I hope this information helps. Please feel free to contact me with any further queries, questions or comments.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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14 April 2021

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E info@emmconsulting.com.au

www.emmconsulting.com.au

Re: New England Solar Farm: Revision of Aboriginal heritage management plan - notice of finalisation

Dear Registered Party,

EMM on behalf of UPC/AC Renewables would like to advise your party that UPC/AC Renewables intends to submit the updated New England Solar Farm Aboriginal Cultural Heritage Management Plan (AHMP) to the Department of Planning Industry and Environment (DPIE) for approval. This follows the issue of the draft updated AHMP to all parties on 16 March 2021, followed by requests for feedback via phone the following week. In summary, the updated AHMP included changes under the following sections:

- *Section 4.2.2 (ii) Barriers.*
- *Section 4.3.1 (ii) Additional requirements for unsuccessful site collection attempts.* Note that this section contained a draft table that provided site condition details for each site. EMM presented recommendations on the feasibility of the sites being salvaged from an archaeological perspective. Sites highlighted orange in the table indicated where EMM considered collection could be potentially successful with additional measures. Sites highlighted red in the table indicated where EMM considered that further collection attempts would be unsuccessful, and therefore no further collection or mitigation was recommended. Despite this initial recommendation, UPC/AC Renewables has resolved to attempt to all these orange and red highlighted sites regardless of the prior recommendation. This is proposed to demonstrate that UPC are committed to giving all outstanding sites appropriate attempts at resolving their management.

Finally, site NE13 is outside of the proposed disturbance footprint and is highlighted green as it will not be disturbed and will not require further management.

- The table also included the recommendation to allow unmitigated impacts to scar tree NE67 which was observed during fieldwork to have collapsed. RAPs considered the tree to be in a condition beyond salvage and did not nominate to salvage the tree. This recommendation has been included in the updated AHMP.
- *Section 4.3.1 (iii) Additional collection for Aboriginal stone hatchets.*

One response to the AHMP was provided by Bruce Cohen of Armidale and New England Gumbynggirr Descendants which is provided below:

"Practise Due Diligence. Sites being salvaged but due to them not being found and environmental factors also come into play with drought, rain, long grass and live stock. Further RAP monitoring when ground disturbance starts on the roads and sites themselves.

If you did get a chance to take a look at Walcha diamond tree in the pioneer cabin last year. It has been standing for at least 40 – 50 years within in a glass and wooden cabinet. It is protected from the elements but it could be better constructed. Also I have some ideas on how to assist the protect the scared tree."

Regarding Scar Tree NE49: We are currently sourcing a quote for a cabinet construction for the tree. It will be generally made in the same manner as the Walcha Diamond Tree as it will involve a cabinet (either timber or steel) and clear display casing (either glass, Perspex or similar transparent material for viewing). We welcome any further suggestions on protecting and displaying the tree in the keeping place. Once received, we will pass it on to the keeping place for further consideration.

The second point refers to the proposed management of the stone artefact sites where the previous collection attempts in January 2021 was unsuccessful. The suggestion was “Further RAP monitoring when ground disturbance starts on the roads and sites themselves”. We would firstly like to clarify that the new AHMP section 4.3.1 (ii) (b) “Additional collection attempts – vegetation clearance and raking” is proposed as an alternative to (and not additional to) any monitoring of ground disturbance activities and focused on the site areas rather than the general construction footprint. Upon careful consideration of the nature of the sites (the characteristics of the artefacts and the current condition of the sites) and their archaeological significance, it is proposed that additional vegetation clearance and raking is a better suited option in the attempt to re-identify and collect the outstanding sites. These sites typically feature very small artefacts in small frequencies (18 isolated artefacts and the remaining are small artefact scatters (between 2 and 7 artefacts)). It is acknowledged that vegetation clearance and raking may not be successful, but propose that alternative measures would have equal, if not lesser, success and with greater hazard risks and ground disturbance.

Construction ground disturbance monitoring, or monitoring controlled grader scrapes prior to construction, can sometimes be employed to monitor for previously un-recorded sub-surface artefact material. However, it is proposed that such methods are not appropriate for the following reasons:

- As the artefacts were previously identified on the surface, grader scrapes or other machine excavation would likely gather the artefacts in the resulting mounded soil, thus obscuring the ground surface, displacing the artefacts, and reducing the chance of re-identifying the artefacts.
- The artefacts are typically isolated finds or small artefact scatters. Their generally small size would make it very difficult for identification during ground disturbance activities.
- There are also project-related risks of having non-construction team personnel on site during the construction phase. There are increased hazard risks of having people monitoring on site next to heavy machinery.
- Employing grader scrapes over sites may result in greater ground disturbance than actual project-related ground disturbance. Broader scale grader scrapes over some of the site areas (eg NE15 which had a sparsely scattered 7 artefacts over an approx. 200 m by 100 m area) would constitute a far greater net surface disturbance than originally planned. UPC are working under a principle to employ as little ground disturbance as possible.

It is proposed that the method of vegetation removal and raking is better suited for the following reasons:

- It will provide RAPs with another attempt to identify and collect artefacts that are culturally important to the Aboriginal community;
- It will attempt to return the ground surface to a similar ‘bare-surface’ condition to when the sites were originally identified; and
- It will result in as minimum ground disturbance as possible to the sites.

Unfortunately, we are often faced with the issue of being unable to re-locate sites in post-approval surface collection for projects across NSW. One of the key reasons of salvage collection is to gather a representative sample of artefacts within a project area for analysis, reporting, safekeeping and display. It is commonly acknowledged that not every stone artefact in a project area can be identified and collected. One of the ways

UPC/APC Renewables proposes to offset this issue has been to update the management plan permit the collection all re-identifiable Aboriginal stone axes in the project area for display at the keeping centre. This decision has been made in consultation with the Aboriginal community as particular significance has been placed on these items, and this measure has been integrated into the updated AHMP.

As such, as per the updated AHMP, once a further attempt of salvage collection has been made for the nominated sites, there will be no further attempts to identify and collect those artefacts. Notwithstanding, any artefact identified during the life of the project will be subject to the unexpected finds protocol as per Chapter 5 of the AHMP.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ryan Desic', with a stylized flourish at the end.

Ryan Desic

Associate Archaeologist - Heritage Team Leader

rdesic@emmconsulting.com.au

B.3.2 Management of NE49

Ryan Desic

From: Ryan Desic
Sent: Monday, 22 March 2021 7:59 PM
To: 'nganyawana@gmail.com'; 'steven1ahoy@gmail.com'; 'minnamunnung@gmail.com'; 'ceo@alalc.org.au'; Bruce Cohen; Colin Ahoy; colinahoy57@gmail.com; Green, Kevin; Cheryl Kitchener; rhonda kitchener; 'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy; colinahoy57@gmail.com; Iwatta Aboriginal Corporation; director@acckp.com.au
Cc: Tim Greenaway
Subject: New England Solar Farm: Proposed preservation and display of Scar Tree NE49 at Keeping Place
Attachments: J200088_NE49_mgmt_details_v1.pdf

Dear Registered Party,

Please find attached a proposed methods for the further preservation and display of the scar tree NE49 that is currently in temporary storage at the Armidale Cultural Centre and Keeping Place (ACCKP). The ACCKP has advised that further steps are relatively urgent to free storage space for other collections and manage potential insect problems arising from the tree. As such, we would appreciate it if you could review and respond to the letter as soon as possible. I will be calling registered parties this week to seek feedback and comments too; however, comments in writing are always preferred.

Thank you for your time.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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22 March 2021

Level 1, 146 Hunter Street
Newcastle NSW 2300

T 02 4907 4800

E info@emmconsulting.com.au

www.emmconsulting.com.au

Re: New England Solar Farm: Further details on the management of Aboriginal Scar Tree NE49

Dear Registered Party,

Thank you for your continued participation in Aboriginal cultural heritage matters for the New England Solar Farm project. This letter provides detail on the proposed preservation and display of Aboriginal scar tree NE49 for your input and/or comment. Scar tree NE49 was salvaged and relocated to the Armidale Cultural Centre and Keeping Place (ACCKP) on 8 January 2021 in accordance with Section 4.3.2 of the project Aboriginal Heritage Management Plan (AHMP). The fieldwork was completed by EMM Archaeologist Ryan Desic, NESF RAPs Steven Ahoy, Colin Ahoy and Cheryl Kitchener, and arborists Bells Tree Service. The tree is currently stored temporarily at the ACCKP in a holding room awaiting arrangements for its display.

EMM on behalf of UPC/AC Renewables (UPC) has recently discussed tree preservation and display options with the ACCKP and Registered Aboriginal Party Steven Ahoy. There are two key actions required to progress the AHMP commitments for tree display and signage:

- ACCKP has advised that the current size of the tree portion is too large in height and weight to display appropriately at the centre. As such, it requires a reduction in size to fit within a movable display case.
- Insects, including termites, within the tree must be eliminated prior to display. As the tree was already dead and decaying in the field, it is probable that insects observed recently by the ACCKP have been transported with the tree. The ACCKP have raised this as an issue requiring immediate attention so as not to compromise other parts of the collection.

UPC propose the following method which is in accordance with Section 4.3.2 of the project AHMP:

- To reduce the current size of the tree, an Arborist will be engaged to shorten the tree to a suitable length that preserves the tree scar and does not compromise the structural integrity of the tree. The ACCKP raised the possibility of cutting the tree vertically and retain the scar in a semi-cylinder trunk form; however, this would not comply with the current AHMP provisions and therefore is unlikely to be permitted unless the AHMP is changed. Furthermore, there is a farmer-made notched square in the side of the tree that would be lost by vertical cut method, but RAP Colin Ahoy has requested for it to be retained as it demonstrates why the tree was originally felled.
- An indicative proposed cut line is shown in Plate 1 below. It is estimated that the tree length would be 1.2-1.5 m after further cutting.

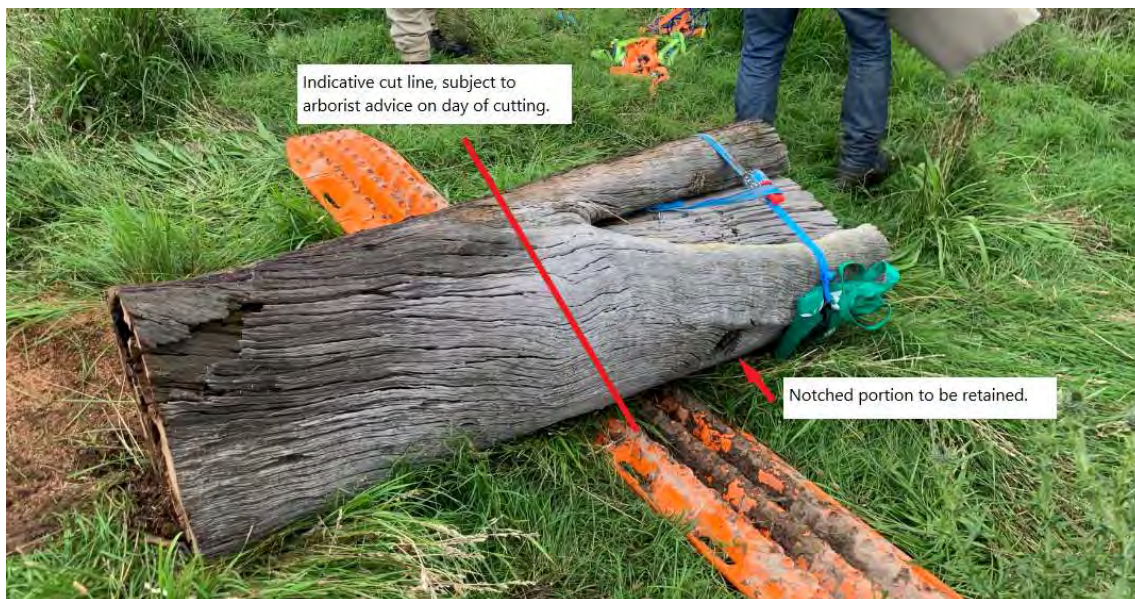


Plate 1 Indicative tree cut line and notched portion that requires to be retained.

- After the tree is cut to size, the overhanging portion will be removed and discarded. The section with the scar will be taken outside and further cleaned to remove as much decayed wood as possible from the inside of the trunk. This may involve using hand tools and power tools to an arborists discretion to effectively remove insects and their habitat from the centre of the tree. Once the tree is suitably cleaned it will be placed in a dry and secure location to aerate. This temporary location may either be at the keeping place or at the pest control specialist's workshop, in preparation for insect treatment.
- A pest control specialist will be engaged to treat the tree once suitably dry. After application, the tree may be covered for a period to ensure treatment absorption. The scar tree will be returned to the keeping place after treatment.

The tree cutting and cleaning procedure will be overseen by an EMM archaeologist, a RAP representative, and a representative of the ACCKP.

After the tree is treated, a contractor will be engaged to build a display case to accommodate the tree. The display case will be transparent to allow appropriate viewing and security for the tree. The display will also include signage containing details of the tree and its provenance. The ACCKP will be further consulted for UPC to provide a suitable display case.

Please provide feedback to the proposed methods as soon as possible to allow the ACCKP to progress with the required treatment and display of the tree. If you have any questions about the proposed methods feel free to contact me via email or telephone.

Yours sincerely,

Ryan Desic
Associate Archaeologist - Heritage Team Leader
rdesic@emmconsulting.com.au

Ryan Desic

From: Ryan Desic
Sent: Wednesday, 24 March 2021 8:36 AM
To: Colin Ahoy Ahoy
Subject: RE: New England Solar Farm: Proposed preservation and display of Scar Tree NE49 at Keeping Place
Attachments: J200088_NESF_AHMP_Update_RAPDraft.pdf

Hi Colin,

Thank you for your response and consideration. Unfortunately we are previously committed to placing the tree in the Armidale Regional Community Centre and Keeping Place (ARCCCKP). This is where the tree is temporarily stored right now and the ARCCCKP have already made arrangements to have the tree on display. This is in accordance with the approved Aboriginal heritage management plan attached as set out in Section 4.3.2. I have attached the AHMP again for your reference.

Other than the location for the tree to be displayed, have you any issues about the proposed management of the scar tree?

I will give you a call this week to discuss the matter further and also touch base on the requested AHMP updates that review your review and comment.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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From: Colin Ahoy Ahoy <colinahoy57@gmail.com>
Sent: Tuesday, 23 March 2021 8:47 PM
To: Ryan Desic <rdesic@emmconsulting.com.au>
Subject: Re: New England Solar Farm: Proposed preservation and display of Scar Tree NE49 at Keeping Place

CAUTION: This email originated outside of the Organisation.

Hi Ryan,

My apologies I didn't read right through the email so therefore I missed the shot of the tree.

Any way just looking at the size of the tree and if the Arborist could do the trimming I'm pretty sure that

management of the Aboriginal Oorala centre at the University of New England would put the tree on display

Should the other raps be in agreeance to this proposal I would like to be there when the tree doctor does his thing trimming.

Cheer Ryan

Colin Ahoy Senior

On Monday, 22 March 2021, Ryan Desic <rdesic@emmconsulting.com.au> wrote:

Dear Registered Party,

Please find attached a proposed methods for the further preservation and display of the scar tree NE49 that is currently in temporary storage at the Armidale Cultural Centre and Keeping Place (ACCKP). The ACCKP has advised that further steps are relatively urgent to free storage space for other collections and manage potential insect problems arising from the tree. As such, we would appreciate it if you could review and respond to the letter as soon as possible. I will be calling registered parties this week to seek feedback and comments too; however, comments in writing are always preferred.

Thank you for your time.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader

Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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--

Colin Ahoy

Ryan Desic

From: Colin Ahoy <cahoy7@myune.edu.au>
Sent: Wednesday, 24 March 2021 2:04 PM
To: Ryan Desic
Subject: Re: New England Solar Farm: Proposed preservation and display of Scar Tree NE49 at Keeping Place

CAUTION: This email originated outside of the Organisation.

Hello Ryan,

I do not have an issue with some of the trunk being cut down but I would like where you have drawn the line to be brought back as it seems to be where the scar is healing. As stated I do not agree with the tree being cut vertically.

Kind regards

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From: Ryan Desic <rdesic@emmconsulting.com.au>
Sent: Monday, March 22, 2021 7:59:12 PM
To: 'nganyawana@gmail.com' <'nganyawana@gmail.com'; 'steven1ahoy@gmail.com' <'steven1ahoy@gmail.com'; 'minnamunnung@gmail.com' <'minnamunnung@gmail.com'; 'ceo@alalc.org.au' <'ceo@alalc.org.au'; Bruce Cohen <bruce.cohey@yahoo.com.au>; cahoy4 <cahoy4@une.edu.au>; colinahoy57@gmail.com <colinahoy57@gmail.com>; Green, Kevin <kevin.green@alsnswact.org.au>; Cheryl Kitchener <anaiwannation@gmail.com>; rhonda kitchener <rhondakitchener09@hotmail.com>; 'Bruce.Cohen@hnehealth.nsw.gov.au' <'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy <cahoy7@myune.edu.au>; colinahoy57@gmail.com <colinahoy57@gmail.com>; Iwatta Aboriginal Corporation <iwattaac@gmail.com>; director@acckp.com.au <director@acckp.com.au>
Cc: Tim Greenaway <tim.greenaway@upc-ac.com>
Subject: New England Solar Farm: Proposed preservation and display of Scar Tree NE49 at Keeping Place

Dear Registered Party,

Please find attached a proposed methods for the further preservation and display of the scar tree NE49 that is currently in temporary storage at the Armidale Cultural Centre and Keeping Place (ACCKP). The ACCKP has advised that further steps are relatively urgent to free storage space for other collections and manage potential insect problems arising from the tree. As such, we would appreciate it if you could review and respond to the letter as soon as possible. I will be calling registered parties this week to seek feedback and comments too; however, comments in writing are always preferred.

Thank you for your time.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
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Ryan Desic

From: Cheryl Kitchener <anaiwannation@gmail.com>
Sent: Sunday, 28 March 2021 8:12 AM
To: Ryan Desic
Cc: Bruce Cohen; Colin Ahoy; colinahoy57@gmail.com; Green, Kevin; rhonda kitchener; Colin Ahoy; Iwatta Aboriginal Corporation; director@acckp.com.au; Tim Greenaway
Subject: Re: New England Solar Farm: Proposed preservation and display of Scar Tree NE49 at Keeping Place

CAUTION: This email originated outside of the Organisation.

Good Morning Ryan,

Thank you for the update.

In January during the collection of artefacts and removal of the scar tree to the ACCKP, I was tasked with the job of contacting the relevant agency to seek advice on how to proceed with the protection and maintenance of the tree.

I contacted colleagues from the Australian Museum who outlined the process, I forwarded this information onto Steven and Rose Lovelock via email, I will forward the email onto you for your reference.

Regards

Cheryl

Cheryl Kitchener

M: 0431 519 607

E: anaiwannation@gmail.com

On Mon, Mar 22, 2021 at 7:59 PM Ryan Desic <rdesic@emmconsulting.com.au> wrote:

Dear Registered Party,

Please find attached a proposed methods for the further preservation and display of the scar tree NE49 that is currently in temporary storage at the Armidale Cultural Centre and Keeping Place (ACCKP). The ACCKP has advised that further steps are relatively urgent to free storage space for other collections and manage potential insect problems arising from the tree. As such, we would appreciate it if you could review and respond to the letter as soon as possible. I will be calling registered parties this week to seek feedback and comments too; however, comments in writing are always preferred.

Thank you for your time.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader

Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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Ryan Desic

From: Cheryl Kitchener <anaiwannation@gmail.com>
Sent: Sunday, 28 March 2021 8:14 AM
To: Ryan Desic
Subject: Fwd: Scar Tree Treatment

CAUTION: This email originated outside of the Organisation.

Good Morning Ryan,

FYI

Regards

Cheryl

Cheryl Kitchener

M: 0431 519 607

E: anaiwannation@gmail.com

----- Forwarded message -----

From: Cheryl Kitchener <anaiwannation@gmail.com>
Date: Wed, Jan 20, 2021 at 12:11 PM
Subject: Scar Tree Treatment
To: Steven <steven1ahoy@gmail.com>, <director@acckp.com.au>

Good Morning Steven and Rose,

I have contacted the Australian Museum, Indigenous Team for advice on the treatment of the Scar Tree. I spoke to Logan Metcalfe, Acting Manager, Indigenous Team.

Logan's team do not work on the conservation of cultural materials but have suggested you speak with Colin McGegor who is an expert in this form of conservation. Colin is currently retired but Logan is suggesting that Colin would be happy to assist. Colin's contact number is 0405737437.

In the initial stages of conservation for scar tree, Logan has suggested:

1. The carpet surrounding the Scar tree is to be removed as soon as possible as the carpet would be a breeding ground for termites, beetles, insects etc.
2. Cut tree to the required size before treating
3. Brush tree carefully to remove outstanding soil, dead insects etc
4. Ensure tree is completely secure and bound to avoid further splitting
5. Cover the tree completely with thick black plastic, making sure the tree is airtight

There are two ways to treat the tree:

1. Freeze tree in a large freezer for a week. UPC would need to hire a cold storage freezer for a week.
2. Pest Control: UPC would have to hire a Pest Controller to get rid of termites, borers, beetles etc

For further information contact Logan on 0422 162 809 and logan.metcalf@australian.museum

I hope this information is of assistance.

Regards

Cheryl

Cheryl Kitchener

M: 0431 519 607

E: anaiwannation@gmail.com

Ryan Desic

From: Ryan Desic
Sent: Monday, 29 March 2021 11:52 AM
To: 'nganyawana@gmail.com'; 'steven1ahoy@gmail.com'; 'minnamunnung@gmail.com'; 'ceo@alalc.org.au'; Bruce Cohen; Colin Ahoy; colinahoy57@gmail.com; Green, Kevin; Cheryl Kitchener; rhonda kitchener; 'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy; colinahoy57@gmail.com; lwatta Aboriginal Corporation; director@acckp.com.au
Cc: Tim Greenaway
Subject: New England Solar Farm - Aboriginal heritage management plan and scar tree management

Dear Registered Party,

You may recall that last Monday, EMM sent a letter regarding the proposed methods for further preservation and display of the scar tree NE49 that is currently in temporary storage at the Armidale Cultural Centre and Keeping Place (ACCKP). This letter requested any feedback or comments you may have. I also attempted to call each party to gather feedback, the majority of which was successful. Overall, there were no significant issues raised with the proposed methods, and the feedback gathered represents only slight changes to the original letter. A summary of feedback from consultation is provided in the table below. Apologies if I am paraphrasing your comments and let me know ASAP if what I have written is not a reflection of your feedback. If you have not yet responded and wish to, please do so as soon as possible.

RAP	Comment	Outcomes
Steve Ahoy (lawatta)	The methods presented were originally made in consultation with Steven as he has been working closely with the ACCKP for the management of this tree. Steven supports the proposed methods.	Steven will be present during the proposed cutting and cleaning of the tree.
Rose Lovelock (ACCKP)	Ryan (EMM) and Rose had multiple telephone discussions to discuss the proposed approach provided in the letter. It was resolved that the approach should proceed as soon as possible.	To arrange management measures as soon as possible.
Cheryl Kitchener (Culturally Aware)	In late January 2020 Cheryl provided the ACCKP with tree management advice gathered from a curator from the Australian Museum (Logan Metcalfe). Cheryl provided this information to EMM recently and is generally consistent with the proposed methods in the EMM methods letter. An additional point included the advice to "ensure the tree is completely secure and bound to avoid further splitting".	The arborist will be consulted to determine if the tree requires to be bound to avoid splitting. Note that the tree is not currently split so it may not be an issue. If required, we will apply strapping to bind the tree as an interim measure, but binding suitable for display would need to be considered further.
Rhonda Kitchener (Nyakka)	Ryan contacted Rhonda over the phone and requested any feedback she would like to make. No issues were raised.	Not applicable

Colin Ahoy Senior (Nunawanna)	Colin originally responding suggested alternative keeping place options as he thought the ACCKP would not store the tree. Ryan called Colin and clarified the matter based on the letter contents. Colin did not raise any issues with the proposed method.	Not applicable
Colin Ahoy Junior (Nunawanna)	Colin noted that it is important to keep the European scar from fencing construction on the side of the tree trunk. Furthermore, he suggested that the tree be cut slightly higher above the scar than that shown in the methods letter – this was to ensure the scar apex will still be visible after cutting.	The tree will be cut approximately 10 cm above the indicative line shown in the methods letter to accommodate this request.
Les Ahoy (Nganyawana Clan Group)	Email and call attempted – no response received.	Not applicable
Les Townsend	EMM called and discussed approach. Les informed that we was happy to follow the RAP consensus on management measures.	Not applicable
Bruce Cohen (Armidale and New England Gumbyngirr Descendants)	Email and call attempted – no response received.	Not applicable
Aaron Broad	Email and call attempted – no response received. Note that Aaron did not participate in consultation for the NESF and resides in the South Coast of NSW.	Not applicable
Armidale Local Aboriginal Land Council	No response received	Not applicable.

The next steps will be to organise an Arborist as soon as possible to undertake the works. I will let everyone know once sourced.

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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Ryan Desic

From: Ryan Desic
Sent: Thursday, 1 April 2021 6:52 PM
To: 'nganyawana@gmail.com'; 'steven1ahoy@gmail.com'; 'minnamunnung@gmail.com'; 'ceo@alalc.org.au'; Bruce Cohen; Colin Ahoy; colinahoy57@gmail.com; Green, Kevin; Cheryl Kitchener; rhonda kitchener; 'Bruce.Cohen@hnehealth.nsw.gov.au'; Colin Ahoy; colinahoy57@gmail.com; Iwatta Aboriginal Corporation
Cc: Tim Greenaway
Subject: New England Solar Farm: Further Management of Scar Tree NE49

Dear Registered Party,

Further management of scar tree NE49 was completed successfully on Wednesday 31 March 2021. Arborists CJW Tree Services, Steve Ahoy (Iwatta Corp) and representatives of the keeping place attended, including Adam Spencer and director Rose Lovelock. The tree was cut to approximately 1 m in length and then thoroughly cleaned and placed under a covered area at the Keeping Place to dry prior to pest control treatment. It is noted that the tree is in a fragile condition and has been re-strapped around the girth of the for additional support. EMM recommends that the strapping is left on the tree while it is being moved and mounted in its display case in the future. The strapping should only be removed once the tree is positioned and secured well in its display case.

The temporary storage area under an outdoor covered area was nominated by Keeping Place staff Adam Spencer and RAP Steve Ahoy who confirmed that the area is a suitable temporary space that will be monitored regularly. It is anticipated that the tree will require up to 2 weeks to dry prior to pest control treatment.

In the meantime, Steve Ahoy is arranging for a local cabinet maker to measure the tree to construct a suitable display case. Photographs of the proceedings are shown below.



Tree prior to cutting



Tree after being cut by arborist in consultation with RAP Steve Ahoy and Keeping Place staff Adam Spencer



Tree after cleaning and removal of rot and insects



Tree is strapped and placed under a covered area at the keeping place to allow to dry

Regards,

Ryan Desic

Associate Archaeologist – Heritage Team Leader
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)



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Appendix C

Regulatory consultation



Appendix C

Regulatory consultation

C.1 Endorsement of author

Killian Wentrup
Head of Solar Development
UPC Renewables
Level 14, 77 King Street
Sydney, NSW 2000

06/04/2020

Dear Killian

**New England Solar Farm (SSD 9255)
Request for endorsement to prepare Heritage Management Plan**

I refer to the letter dated 25 March 2020 requesting endorsement for suitably qualified and experienced persons to prepare a Heritage Management Plan for the New England Solar Farm.

The Department has reviewed the nominations and information provided and is satisfied that the proposed consultants are suitably qualified and experienced to prepare a Heritage Management Plan for the development, in accordance with condition 19, Schedule 3 of the Development Consent.

Accordingly, the Secretary has endorsed Ryan Desic and Pamela Kottaras to prepare a Heritage Management Plan.

If you wish to discuss the matter further, please contact Javier Canon on 02 9373 2821 or at Javier.Canon@planning.nsw.gov.au

Yours sincerely



Nicole Brewer
Director
Energy Assessments

C.2 Consultation with Heritage NSW and DPIE



Our ref: EF20/29501
Senders ref: SSD-9255-PA-4

Heidi Watters
Team Leader Compliance
Energy, Industry & Compliance | Planning & Assessment
Department of Planning, Industry and Environment
By email: heidi.watters@planning.nsw.gov.au

Dear Ms Watters

RE: New England Solar Farm Aboriginal Cultural Heritage Management Plan

Thank you for your request, uploaded to the Major Projects portal on 1 October 2020, about the draft Aboriginal Cultural Heritage Management Plan (ACHMP) for the New England Solar Farm development in the Uralla Shire local government area seeking comments from the Department of Premier and Cabinet, Heritage NSW (DPC). I appreciate the opportunity to provide input and apologise for the delay in responding.

We have reviewed the draft ACHMP and can provide in principle support however we note some areas where changes will be necessary before we can provide full endorsement.

We note a number of references to "BCD" within the document. Although many of these refer to historical events and should therefore remain, any references to relevant ongoing, or future, activities must be amended to refer to 'Heritage NSW'.

Section 2.4.1 of the draft ACHMP outlines some instances, including proposed changes to the ACHMP, where consultation with the project RAPs will be required. This section should be revised to include Heritage NSW in the consultation process for the instances referred to in that section. We also note references throughout the ACHMP to possible future changes to the ACHMP. Although we recognise that in some, very rare instances, changes to the ACHMP may be warranted we take this opportunity to note the following.

- 1 The ACHMP is a binding document directly referred to by certain conditions of approval for the project thus any changes to the ACHMP after its ratification would require a modification to the project approval.
- 2 Any proposed changes to the ACHMP after its ratification must be endorsed by Heritage NSW prior to being finalized.

Section 5 of the draft ACHMP outlines chance finds procedures to be followed for previously unknown Aboriginal objects or human remains are located during works. We note that these measures include; conservation *in-situ*, movement, test excavation and/or salvage. We further note that these various options for management are provided for all chance finds including ancestral human remains, grinding grooves, culturally modified trees, intact hearths and other site types. We also note that, apart from in the case of human remains, no provision for, or requirement of, notification to Heritage NSW is included in the protocols and measures outlined in the draft ACHMP. We require that this section is amended to ensure that Heritage NSW are

notified of all new Aboriginal and/or human remains discovered during the works. We furthermore require that any management measures (e.g. movement, collection or salvage), apart from conservation *in-situ*, must be endorsed by Heritage NSW prior to their being carried out. We furthermore take this opportunity to advise that Heritage NSW are extremely unlikely to endorse the harm, salvage or movement of ancestral human remains, grinding grooves or culturally modified trees as part of the construction, or ongoing life, of this project.

Section 6.2 of the draft ACHMP concerns Aboriginal Cultural Heritage site inductions. We note that facility is provided in the draft for site inductions to be done by non-Aboriginal people. We strongly recommend that a representative of the RAPs is present for all ACH site inductions.

If you have any questions about this advice, please do not hesitate to contact Mr Roger Mehr, Archaeologist, roger.mehr@environment.nsw.gov.au or 0459075354.

Yours sincerely



Dr Samantha Higgs
Senior Team Leader
Aboriginal Cultural Heritage Regulation - North
Heritage NSW

Date: 28 October 2020

**New England Solar Farm
Post Approval Review**



Document: Aboriginal Heritage Management Plan

Revision: Version V4 Dated 21 September 2020

Reviewed: Heidi Watters on 30 September 2020

<i>Heritage MP, Condition 19, Schedule 3</i>	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
Prior to commencing the development, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:				
a) Be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;	Yes	Appendix C – letter from Department endorsing Ryan Desic and Pamela Kottaras		N/A
b) Be prepared in consultation with BCD, Aboriginal Stakeholders and Council;	Partial	Section 1.2.4 - Regulatory consultation - BCD is now part of Heritage NSW. Heritage NSW consulted but has not yet reviewed management plan - Council – consulted and did not wish to provide comment Section 2.3 - Aboriginal stakeholder consultation - Table 2.3	Include correspondence from Heritage NSW regarding consultation in Appendix C3 Update plan as per HNSW comments (attached)	Attached as Appendix C.2 including this document Plan is updated – specific responses are addressed under 'Other Agency Comments in this table'
c) Include a description of the measures that would be implemented for: Protecting the Aboriginal heritage items identified in Table 1 of Appendix 5 or items located outside the approved development footprint, including fencing off Aboriginal		Section 4.2 - Protecting Aboriginal heritage items identified in Table 1 of Appendix 5 Section 2.4.2 - Providing ongoing access to NE09 and NE68 (subject to provisions)		N/A

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heritage items prior to commencing construction and providing ongoing access and management opportunities for Aboriginal people to NE09 and NE68;				
Salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 5;	Partial	Section 4.3 Aboriginal heritage salvage measures 4.3.1 (iii) Reporting – who will receive copies of salvage reports? Section 4.2.4 Keeping place and reburial of salvaged material	Clarify who will receive salvage reports	Addressed in relevant section. The salvage report will be distributed to RAPs and Heritage NSW for their records.
Protecting the historic heritage items identified in Table 1 of Appendix 6 or items located outside the approved development footprint;	N/A	<i>To be addressed in a separate management plan (Historic Heritage Management Plan)</i>		N/A
Managing the impact of the development on the historic heritage items identified in Table 2 of Appendix 6, including photographic archival records prepared in accordance with the Heritage Council of NSW Guidelines for archival recordings;	N/A	<i>To be addressed in a separate management plan (Historic Heritage Management Plan)</i>		N/A
A contingency plan and reporting procedure if:	Partial	Section 5.1 Management of new Aboriginal sites	Update cross reference in Table 1.2 from Section 1.1 to Section 5.3)	Addressed in relevant report sections.

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- Previously unidentified heritage items are found; or - Aboriginal skeletal material is discovered;		Section 5.3 Discovery of Aboriginal ancestral remains - Table 5.2 – Stage 2 – when will Heritage NSW be notified? DPIE will also be required to be notified via the Major Projects website as per Schedule 4 condition 7 of the development consent. - Table 5.2 – Stage 3 – define “relevant authorities”	Update Table 5.2 as per comments See also Heritage NSW comments in section below.	
• 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	Yes	Section 6.2 Aboriginal heritage induction and permitting process		N/A
• Ongoing consultation with Aboriginal stakeholders during the implementation of the plan;	Partial	Section 2.4 Ongoing consultation • Does not include consultation with Heritage NSW. Section 7.2.3 Aboriginal consultation for AHMP review	Revise Section 2.4.1 to include consultation with Heritage NSW	This section aimed at setting out ongoing consultation with RAPs. Consultation requirements with Heritage NSW is referred to in relevant sections of the AHMP elsewhere. Section 2.4.1 has been updated to clarify that Heritage NSW is also required to be consulted for new finds or ancestral remains. Section 7.2.3 has been updated to address DPIE and Heritage NSW involvement in any required changes to the plan.
d) Include a program to monitor and report on the effectiveness of these	Yes	Section 6.4 Measuring performance - To be reported in IEAs		N/A

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measures and any heritage impacts of the project.				
Following the Secretary's approval, the Applicant must implement the Heritage Management Plan				
Condition 17, Schedule 3	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response
Prior to commencing the development, the Applicant must undertake consultation with Aboriginal stakeholders, in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> (DECCW, 2010), or its latest version.	Yes	Section 2 Aboriginal consultation protocols - Section 2.3		N/A
Protection of Heritage Items, Condition 18, Schedule 3	Sufficient (Yes/No/Partial)	Document reference and comment	Action Required	Company Response

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The Applicant must ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items identified in Table 1 of Appendix 5 or the historic heritage items identified in Table 1 of Appendix 6, or any Aboriginal or historic heritage items located outside the approved development footprint. Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 5, 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. <i>Note: The location of the Aboriginal heritage and historic heritage items referred to in this condition are shown in the figures of Appendix 5 and Appendix 6, respectively.</i>	Partial	Section 4.2 Aboriginal heritage protection Section 4.3 Aboriginal heritage salvage measures <i>Noted that historic heritage is to be addressed in a separate management plan (Historic Heritage Management Plan)</i>	Refer comments for Condition 19(c)	No comments requiring for Condition 19(c) were provided in this table provided by DPIE.
Other Agency Comments – Heritage NSW – letter dated 28 October 2020			Action Required	Company Response
We note a number of references to “BCD” within the document. Although many of these refer to historical events and should therefore remain, any references to relevant ongoing, or future, activities must be amended to refer to ‘Heritage NSW’.			Amend references to BCD to ‘Heritage NSW’, where relevant	Addressed. EMM has completed a search function for BCD and it is only quoted in Table 1.2 as per original wording of the conditions of approval.
Section 2.4.1 of the draft ACHMP outlines some instances, including proposed changes to the ACHMP, where consultation with the project RAPs will be required. This section should be revised to include Heritage NSW in the consultation process for the instances referred to in that section.			Revise Section 2.4.1 to address comments	This section is intended to specify consultation required for RAPs specifically as it falls under the larger heading of Chapter 2 – Aboriginal consultation protocols. Notwithstanding, this section is cross referenced to other sections such as 7.2.3 and Section 5 which details that

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		consultation with Heritage NSW is required in the event that changes are required to the plan (Section 7.2.3) and when new sites or potential remains are discovered (Section 5). Heritage NSW also state that changes to the AHMP after its ratification will require a modification to project approval, and any changes to the AHMP must be endorsed by Heritage NSW. This issue has been addressed in Section 7.2.2 of this report. It is noted that the AHMP may require modification to the project approval if not aligned with the current project conditions of approval; however DPIE will be consulted and a modification to approval would only be sought if deemed necessary by DPIE. Heritage NSW must be notified about changes to the AHMP and UPC will be guided by DPIE whether the nature of any proposed changes require endorsement by Heritage NSW.
Section 5 to be amended to ensure Heritage NSW: - Are notified of all new Aboriginal and/or human remains discovered during the works - Endorse any management measures (e.g. movement, collection or salvage), apart from conservation in-situ, prior to their being carried out.	Revise Section 5 to address comments	Addressed: Table 5.2 Stage 2 specifies that Heritage NSW and DPIE will be advised within 5 working days of the find being made. DPIE will require notification via the Major Projects website.
Section 6.2 - strongly recommend that a representative of the RAPs is present for all ACH site inductions	Review Section 6.2 to address comment	
General Comments	Action Required	Company Response
Section 1.1 Background – The project does not necessarily need to include detail regarding the assessment process (EIS exhibition period, number of submissions, RTS submission date). It may simply state that the project was approved by the IPC on 9 March 2020.	Review comment	
Table 1.2 – incorrect condition numbers are referenced – should be 17, 18, 19	Revise condition numbers in Table 1.2	

C.3 Consultation with Council

From: Tim Kirk tim.kirk@upc-ac.com
Subject: Re: New England Solar Farm - management plans for Council's review
Date: 27 August 2020 at 1:29 pm
To: Matt Clarkson MClarkson@uralla.nsw.gov.au
Cc: Terence Seymour TSeymour@uralla.nsw.gov.au

TK

Hi Matt,

Thank you for the response.

Kind Regards,

Tim Kirk | Project Development Manager
UPC\AC Renewables Australia
A UPC Renewables and AC Energy Company



M: [+61 403 857 079](tel:+61403857079)

E: tim.kirk@upc-ac.com

Hobart: Suite 2, Level 2, 15 Castray Esplanade, Battery Point, TAS 7004

Melbourne: 61 Cromwell Street, Collingwood VIC 3066

Sydney: Level 14, 77 King Street, Sydney, NSW 2000

www.upc-ac.com

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From: Matt Clarkson <MClarkson@uralla.nsw.gov.au>
Date: Wednesday, 26 August 2020 at 1:53 pm
To: Tim Kirk <Tim.Kirk@upc-ac.com>
Cc: Terence Seymour <TSeymour@uralla.nsw.gov.au>
Subject: RE: New England Solar Farm - management plans for Council's review

Hi Tim

I've reviewed the plans and Council does not wish to provide comment.

Regards
Matt Clarkson
Manager of Development and Planning

Uralla Shire Council | Po Box 106 Uralla NSW 2358
p 02 6778 6310 | **f** 02 6778 6349 | **m** 0419 861 719



From: Tim Kirk [mailto:Tim.Kirk@upc-ac.com]
Sent: Wednesday, 26 August 2020 12:10 PM
To: Matt Clarkson
Cc: Tim Greenaway
Subject: Re: New England Solar Farm - management plans for Council's review

Hi Matt,

Can you please confirm receipt of the below email? I also left a message on your phone yesterday.

Kind Regards,

Tim Kirk | Project Development Manager
UPC\AC Renewables Australia
A UPC Renewables and AC Energy Company



M: +61 403 857 079
E: tim.kirk@upc-ac.com

Hobart: Suite 2, Level 2, 15 Castray Esplanade, Battery Point, TAS 7004
Melbourne: 61 Cromwell Street, Collingwood VIC 3066
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From: Tim Kirk <Tim.Kirk@upc-ac.com> on behalf of Tim Kirk <Tim.Kirk@upc-ac.com>

Date: Wednesday, 19 August 2020 at 3:07 pm

To: Matt Clarkson <MClarkson@uralla.nsw.gov.au>

Cc: Tim Greenaway <tim.greenaway@upc-ac.com>

Subject: New England Solar Farm - management plans for Council's review

Hi Matt,

Hope you have been well.

UPC are currently preparing for the commencement of construction of the New England Solar Farm. Before we are allowed to start construction we are required to consult with Uralla Shire Council on a number of management plans pursuant to Schedule 3, item 19 of the New England Solar Farm's Development Consent.

UPC are seeking Uralla Shire Council's review and feedback on the **Historic Heritage Management Plan** and **Aboriginal Heritage Management Plan**, both attached to this email. The UPC team are available for a teleconference if required.

Please let me know if you have any questions.

Kind Regards,

Tim Kirk | Project Development Manager
UPC\AC Renewables Australia
A UPC Renewables and AC Energy Company



M: [+61 403 857 079](tel:+61403857079)

E: tim.kirk@upc-ac.com

Hobart: Suite 2, Level 2, 15 Castray Esplanade, Battery Point, TAS 7004

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Appendix D

New England Solar Farm Aboriginal Heritage Database (NESF AH Database)

D.1 Database contents

The NESF AH Database is a digital and live appendix kept by UPC which contains the following:

- A MS Excel spreadsheet of Aboriginal site details and survey transect data;
- GIS shapefiles of the following:
 - Aboriginal site point data;
 - Aboriginal site areas;
 - Aboriginal PAD areas;
 - GPS tracks of survey transects completed for the ACHA.



