

Cultural Heritage Management Plan

WELLINGTON SOLAR FARM



DECEMBER 2019



Document Verification



Project Title:

WELLINGTON SOLAR FARM

Project Number:		19-110		
Project File Name:		Wellington SF CHMP Final_1.3		
Revision	Date	Prepared by (name)	Reviewed by (name)	Approved by (name)
Draft	27/03/19	M Barber, C Jones and A Ziesing	M Barber	E Budde
Final 1.0	14/05/19	M Barber, K Bradley and E Dillon,	M Barber	M Barber
Final 1.1	06/06/19	M Barber, C Jones and A Ziesing	E Budde	E Budde
Final 1.2	20/06/19	M Barber and K Bradley	M Barber and K Bradley	M Barber
Final 1.3	01/08/19	M Barber and K Bradley	M Barber and K Bradley	M Barber
Final 1.5	25/10/19	T Hastings	Brooke Marshall	Brooke Marshall
Final 1.5	19/12/19	Michelle Patrick		

Plan Control

The latest version of this plan will be available on the electronic document management system for the Project for relevant Project personnel. The plan would also be available on the Project Website. Distribution of the plan will be to those detailed in the distribution listing below. This distribution will be electronic.

Copy Number	Issued To	Date	Name
1	Department of Planning and Environment	27/03/19	Leesa Johnston
2	Department of Planning and Environment	06/06/19	Leesa Johnston
3	Lightsource BP Infrastructure Project Manager		
4	Elliott Green Power Project Manager		
5	Site HSEQ		
6	Essential Energy Project Manager		
7	Department of Planning and Environment	19/12/19	Rob Beckett

NGH Environmental prints all documents on environmentally sustainable paper including paper made from bagasse (a by-product of sugar production) or recycled paper.

NGH Environmental Pty Ltd (ACN: 124 444 622. ABN: 31 124 444 622)

CONTENTS

ACRONYMS AND ABBREVIATIONS	III
1 INTRODUCTION.....	5
1.1 THE PROJECT	5
1.2 ENVIRONMENTAL MANAGEMENT STRATEGIC FRAMEWORK	6
2 PURPOSE AND OBJECTIVES	6
2.1 PURPOSE AND OBJECTIVES	6
2.2 TARGETS.....	7
3 ENVIRONMENTAL REQUIREMENTS	7
3.1 LEGISLATIVE AND OTHER ENVIRONMENTAL MANAGEMENT REQUIREMENTS.....	7
3.2 CONDITIONS OF CONSENT	8
4 CONSULTATION.....	9
5 EXISTING HERITAGE.....	11
5.1 KNOWN ABORIGINAL HERITAGE WITHIN THE PROJECT	11
5.1.1 Potential Impacts to Aboriginal Sites and Objects.....	11
5.2 NARRAWA HOMESTEAD	13
5.2.1 Potential impacts to the Narrawa Homestead	14
6 HERITAGE CONTROL MEASURES	14
7 COMPLIANCE MANAGEMENT	18
7.1 STRUCTURE AND RESPONSIBILITY	18
7.2 TRAINING	18
7.3 INSPECTIONS AND MONITORING.....	18
7.4 AUDITING	19
7.5 REPORTING.....	19
8 REVIEW AND IMPROVEMENT	19
8.1 CONTINUOUS IMPROVEMENT	19
8.2 CHMP UPDATE AND AMENDMENT.....	19
9 REFERENCES.....	20
APPENDIX A HERITAGE CONSTRAINTS MAP	21
APPENDIX B GENERAL LAYOUT OF DEVELOPMENT.....	24
APPENDIX C UNEXPECTED FINDS PROTOCOL	25
APPENDIX D SALVAGE METHODOLOGY AND POTENTIAL TEST EXCAVATION	28
APPENDIX E ABORIGINAL COMMUNITY CONSULTATION.....	30

APPENDIX F	CONSULTATION LETTER	32
APPENDIX G	ENDORSEMENT OF HERITAGE EXPERT	36

TABLES

Table 1	Location of information in this plan addressing the requirements of Conditions of Consent.....	8
Table 2	Archaeological significance assessment of Aboriginal sites and management recommendations (NGH Environmental 2017).....	12
Table 3	SHI inventory sheet for Narrawa Homestead	13
Table 4	Monitoring and reporting as required under the CoC in relation to the Project.....	15
Table 5	Consultation with RAPs as part of this CHMP	30

FIGURES

Figure 1	Overview of recorded Aboriginal heritage sites in Project.....	21
Figure 2	Close up of recorded Aboriginal heritage sites in Project (Figure 1 of 2).	22
Figure 3	Close up of recorded Aboriginal heritage sites in Project (Figure 2 of 2).	23
Figure 4	Figure from CoC Appendix 1 General layout of development.....	24

ACRONYMS AND ABBREVIATIONS

The Applicant	Lightsource BP
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHCRP	Aboriginal cultural heritage consultation requirements for proponents
AS	Artefact Scatter
BAL	Basic Left Turn
BAR	Basic Right Turn
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan
CoC	Conditions of Consent
Code of Practice	Code of Practice for Archaeological investigation of Aboriginal Objects in NSW
DPE	(NSW) Department of Planning and Environment
EIS	Environmental Impact Statement
EMS	Environmental Management System
EPA	Environment Protection Authority (Previously DECCW and/or OEH)
EWMS	Environmental Work Methods Statement
HSEQ	Health Safety and Environment and Quality
HSP	Heritage Salvage Plan
HTH	Hearth
IF	Isolated Find
kV	kilovolt
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
LP	Landscape Plan
m	Meters
Mw	Megawatt

NHA	Narrawa Homestead Advice
NPW Act	National Parks and Wildlife Act
NSW	New South Wales
OAM	Operation and Maintenance Facility
OEH	Office of Environment and Heritage
PAD	Potential Archaeological Deposit
PV	Photovoltaic
RAPs	Registered Aboriginal Parties
RMM	Response to Submissions, Revised Mitigation Measures
SEO	Site Environmental Officer
SHI	State Heritage Inventory
ST	Scarred Tree
The Proponent	LightsourceBP
The Project	Wellington Solar Farm, includes both the Solar Farm and an Energy Storage Facility

1 INTRODUCTION

Planning approval was received on 25 May 2018 for the construction and operation of a 174 megawatt (Mw) photovoltaic (pv) solar farm with an energy storage facility, located 2 km north-east of Wellington within the Dubbo Local Government Area (LGA).

On December 11, 2019, a Modification Application (NGH 2019) was approved by the Department of Planning, Industry and Environment (DPIE) to expand the existing substation on Goolma Road and change the transmission connection to it. This was required to facilitate connection of the project to the substation.

The Wellington Solar Farm is a State Significant Development and represents an important contribution to renewable energy generation in New South Wales which includes the construction and operation of a Solar Farm and an Energy Storage Facility at Wellington ('the Project').

An Environmental Management Strategy (EMS) has been prepared to comply with the Conditions of Consent (CoC) from the New South Wales Minister for Planning and all applicable legislation, during the construction and operation of the Project which includes the Solar Farm and an Energy Storage Facility. This Cultural Heritage Management Plan (CHMP) forms part of the Construction Environmental Plan (CEMP) for the Project.

This CHMP is applicable for all construction and operation works as approved for the Project which consists of the Solar Farm and the Energy Storage Facility. It will be implemented for all works, regardless of any construction that may occur at a later date outside the main construction period or any staged approach to the construction and operation of the Solar Farm and an Energy Storage Facility

The purpose of this CHMP is to describe how impacts on Aboriginal and non-Aboriginal heritage will be minimised and managed during construction and operation of the Project, which also includes the construction and operation of an energy storage facility.

Initial conversations were held with OEH and the Registered Aboriginal Parties (RAPs) while drafting this plan. All comments initially provided by OEH and the RAPs were incorporated into a draft CHMP that was provided to the RAPs for comments.

This CHMP has been prepared by suitably qualified, independent and experienced archaeologists Matthew Barber from NGH, who is endorsed by the Secretary as a heritage expert for the Wellington Solar Project. The Secretary approved this CHMP on the 18 August 2019.

After the approval of the Modification Application, which involved notification to RAPs, this plan was updated to include the new project scope. No changes to the mitigation strategies were required.

1.1 THE PROJECT

The Scope of Works under the contract includes all works necessary to design, construct, test, commission, energise, decommission, and train staff in the operation of a 170 MW_{AC} solar farm including energy storage (approximately 25 Mw / 100 Mw rated capacity), and inverter stations.

The Scope of Works consists of but is not limited to:

- Approximately 520,000 solar panels (up to 4.5 metres (m) in height) and approximately 135 inverter stations (up to 4 m in height).

- An energy storage facility (approximately 25 Mw / 100 Mw rated capacity) with up to 6 purpose-built blocks (which will be constructed at a later date outside the main construction period).
- Underground 33kV, 132 kV or 330 kilovolt (kV) transmission cables connecting the energy storage facility to the Transgrid substation.
- Internal access tracks, staff amenities, car parking, laydown area and security fencing.
- The substation expansion includes underground transmission cables and an additional substation bench (located on the western edge of the existing substation).

During construction, the Project will be accessed off Goolma Road, approximately 4.6 km north of the intersection with the Mitchell Highway. Key road works for the Project will involve upgrading the intersection of Goolma Road and the Project access point with a Basic Right Turn (BAR) and Basic Left Turn (BAL) treatment.

The construction period will last for up to 12 months from the commencement of site establishment works and include a peak period of 6 months.

1.2 ENVIRONMENTAL MANAGEMENT STRATEGIC FRAMEWORK

This CHMP is part of Lightsource BPs environmental management framework for the Project, as described in the overall Environmental Management System (EMS).

Used together this CHMP and other sub-plans, procedures and management guides clearly identify required environmental management actions for reference by Lightsource BP Infrastructure personnel and contractors.

This CHMP is applicable for all construction and operation works as approved for the Project which consists of the Solar Farm and an Energy Storage Facility. It will be implemented for all works, regardless of any construction that may occur at a later date outside the main construction period or any staged approach to the construction and operation of the Solar Farm and the Energy Storage Facility.

The CHMP provides mitigation and management measures that will be incorporated into site or activity specific Environmental Work Method Statements (EWMS).

The review and document control processes for this plan are described in the EMS.

2 PURPOSE AND OBJECTIVES

2.1 PURPOSE AND OBJECTIVES

The purpose of this CHMP is to describe how impacts on Aboriginal and non-Aboriginal heritage will be minimised and managed during construction of the Project.

The key objective of the CHMP is to ensure that impacts to Aboriginal and non-Aboriginal heritage are minimised and are within the scope permitted by the planning approval. To achieve this objective, the following will be undertaken:

- Ensure appropriate controls and procedures are implemented during construction activities to avoid (where necessary) or minimise potential adverse impacts to Aboriginal and non-Aboriginal heritage in the project footprint.

- Ensure appropriate measures are implemented to address the mitigation measures detailed in the EIS, CoC and Response to Submissions, Revised Mitigation Measures (RMM).
- Ensure appropriate measures are implemented to comply with all relevant legislation and other requirements as described in Section 3 of this plan.
- Facilitate engagement with the local Aboriginal community in partnership to appropriately manage the Aboriginal cultural heritage values associated with the Project.

2.2 TARGETS

The following targets have been established for the management of Aboriginal and non-Aboriginal heritage impacts during construction of the Project:

- Ensure full compliance with the relevant legislative requirements.
- Ensure full compliance with relevant requirements of the EIS and CoC.
- Minimise or avoid impacts on known Aboriginal and non-Aboriginal heritage sites.
- Follow correct procedure and ensure notification of any previously unidentified Aboriginal and non-Aboriginal objects/places uncovered during construction.
- Ensure Aboriginal Cultural Heritage Awareness Training is provided to all personnel in the form of induction before they begin work on site.

3 ENVIRONMENTAL REQUIREMENTS

3.1 LEGISLATIVE AND OTHER ENVIRONMENTAL MANAGEMENT REQUIREMENTS

Legislation relevant to heritage management includes:

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

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

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

3.2 CONDITIONS OF CONSENT

The CoC were issued by the NSW Department of Planning and Environment (DPE) on 25 May 2018. Modified Approval and update to the CoC were provided in December 11, 2019. Details of the CoC in relation to Aboriginal and non-Aboriginal heritage are provided verbatim in Table 1.

Details of the CoC in relation to the Administrative Conditions (Schedule 2) for non-Aboriginal heritage items are noted in Condition 8 while the Environmental Conditions (Schedule 3) for Aboriginal and non-Aboriginal heritage are noted in Conditions 17 to 19.

Table 1 Location of information in this plan addressing the requirements of Conditions of Consent

Condition number	Condition of Consent	Location of relevant information
8	<p>The Applicant may only construct the purpose-built operation and maintenance facility (OAM building) on the site if it has demonstrated to the satisfaction of the Secretary that repurposing the Narrawa Homestead is not reasonable or feasible.</p> <p>In seeking this approval, the Applicant must:</p> <ol style="list-style-type: none"> justify why it is not reasonable or feasible to repurpose the Narrawa Homestead; provide a detailed final layout plan for the operation and maintenance facility location on the site; and demonstrate that construction and operation of the operation and maintenance facility location would not adversely affect the heritage values of the Narrawa Homestead. 	<p>-CHMP Table 4</p> <p>-CoC</p>
17	<p>Prior to the commencement of construction, the Applicant must salvage and relocate all Aboriginal heritage items located within the approved development footprint to suitable alternative locations on site, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.</p>	<p>-CHMP Table 4 and Appendix D</p> <p>-CoC</p>
18	<p>The Applicant must:</p> <ol style="list-style-type: none"> Ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items and potential archaeological deposits located outside the approved development footprint; Minimise any impacts on the historic heritage item, and the potential archaeological deposits located within the approved development footprint; and Undertake a program of test excavation and salvage of the potential archaeological deposits located within the approved development footprint, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version. 	<p>-CHMP Table 4 and Appendix D</p> <p>-CoC</p>
19	<p>Prior to the commencement of construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ol style="list-style-type: none"> be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; be prepared in consultation with OEH and Aboriginal Stakeholders; 	-This document

Condition number	Condition of Consent	Location of relevant information
	<p>c) include a description of the measures that would be implemented for:</p> <ul style="list-style-type: none"> ▪ protecting the Aboriginal heritage items and potential archaeological deposits located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction and/or pre-construction minor works; ▪ salvaging and relocating the Aboriginal heritage items located within the approved development footprint; ▪ minimising and managing the impacts of the development on the historic heritage item, and the potential archaeological deposits located within the development footprint, including: <ul style="list-style-type: none"> ○ undertaking test excavation and salvage at the potential archaeological deposits, and ○ a strategy for the long-term management of any Aboriginal heritage items or material collected during the test excavation works; ▪ a contingency plan and reporting procedure if: <ul style="list-style-type: none"> ○ previously unidentified Aboriginal heritage items are found; or ○ Aboriginal skeletal material is discovered; ▪ ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and ▪ ongoing consultation with Aboriginal stakeholders during the implementation of the plan; <p>d) a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	

4 CONSULTATION

CoC requires the CHMP be prepared in consultation with OEH and Aboriginal Stakeholders (in relation to Aboriginal Heritage).

The consultation process began in 2017 for the Aboriginal Cultural Heritage Assessment Report (ACHAR). The consultation with Aboriginal stakeholders was undertaken in accordance with clause 80C of the *National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2010* following the consultation steps outlined in the ACHCRP guide provided by OEH.

As a result of this process, five groups contacted the consultant to register their interest in the project. The groups who registered interest in the project are listed below.

- Wellington Local Aboriginal Land Council;
- Wellington Valley Wiradjuri Aboriginal Corporation;
- Gallangabang Aboriginal Corporation;
- Binjang Wellington Wiradjuri Heritage Survey; and
- Wiradjuri Central West Republic.

No other party registered their interest, including the entities and individuals recommended by OEH.

The fieldwork was organised and all the groups who registered an interest in the project were invited to participate in the fieldwork.

A copy of the draft ACHAR was provided to the registered parties for comment. Their responses indicated that the report was accepted and they agreed with the recommendations. Some additional comments were provided on the recommendations with the main points relevant to this CHMP outlined below.

- If Wellington Scarred Tree 1 should fall over it was requested that a suitable structure be erected by the Proponent that is deemed suitable to the Aboriginal Community.
- That a smoking ceremony take place to cleanse the artefacts and reburial site during the salvage program of works.

The proponent accepted the request to house the scar tree should it fall and noted that the continued monitoring of the tree's condition will be included as part of the CHMP for the project. The request for a Cultural Smoking Ceremony as part of the salvage works was also acknowledged and accepted and will be incorporated into the CHMP and salvage methodology.

For this CHMP additional consultation, as required by the CoC, was undertaken with OEH and the registered Aboriginal parties (Appendix E). This additional consultation initially involved phone conversations with the RAPs and OEH in February 2019. During these conversations the RAPs provided comments in relation to what they wanted to see in the CHMP. The main points noted were:

- To make sure the scarred tree was protected or that if it falls the Proponent would protect or help salvage it.
- To ensure the PADs were tested if they were going to be impacted.
- That the storage of artefacts should be on country with reburial the preferred option in an area that would not be disturbed.

OEH also identified some key points that the CHMP should contain. These include:

- Ensure the Unexpected Finds Procedure is an easy to follow plan with actions for people to follow.
- Ensure the CHMP includes clear strategies and clear statements for managing heritage and the potential for finds to occur.
- Recommends RAPs should be involved in collections of known sites and any further finds.
- Ensure that if skeletal material was found, contact should be made to police but to also include joint contact with OEH.
- Ensure the salvage description includes some detail regarding the methods to be utilised.
- Include potential alternative strategies to accommodate different scenarios in response to progression of works.

All comments initially provided by OEH and the RAPs were incorporated into a draft CHMP. The draft CHMP was provided to the RAPs for consideration and comment on the 15 April 2019. OEH were provided the draft CHMP on the 14 May 2019.

This CHMP v1.3 was approved by the Secretary on the 18 August 2019 (see Appendix F).

After the approval of the Modification Application, which involved notification to RAPs, this plan was updated (v1.4) to include the new project scope. No changes to the mitigation strategies and no additional consultation were required.

5 EXISTING HERITAGE

NGH Heritage (2017) prepared an ACHAR for the proposed Wellington Solar Farm. The findings of the ACHAR were summarised within the EIS and a brief summary is also included below (NGH Environmental 2017). Additionally, a historical heritage chapter was prepared as part of this EIS and a brief summary of its findings is also included below (NGH Environmental 2017).

5.1 KNOWN ABORIGINAL HERITAGE WITHIN THE PROJECT

There were 61 stone artefacts found across the Project area that were recorded as 25 site occurrences. These archaeological features have been recorded as ten artefact scatters (AS) and 15 isolated finds (IF). A single scarred tree (ST) and a possible hearth (HTH) were also recorded. Based on the land use history, visibility, an appraisal of the results from the field survey and the archaeological background of the area, it was concluded that two areas of Potential Archaeological Deposit (PAD) were identified within the proposal area that have potential for subsurface finds. Both of these PAD areas (PAD 1 and PAD 2) had a higher density of surface artefacts compared to the rest of the Project area and appear to have a good depth of deposit.

The results of previous archaeological surveys in the Wellington region show that there are sites and artefacts present across the landscape. The predictions based on the modelling for the Project area were that stone artefacts and scarred trees were the most likely manifestation of Aboriginal occupation of the area. It was noted that while Aboriginal sites may be expected throughout all landscapes the most archaeologically sensitive areas occur in proximity to water. The survey results have confirmed this prediction with stone artefacts recorded as isolated finds and artefact scatters across the Project area. The sites were all identified on low slopes and flats within proximity of a creek line or water source, even in areas highly disturbed by farming activities (NGH Environmental 2017). The cultural significance of the sites is only determined by the local Aboriginal community.

5.1.1 Potential Impacts to Aboriginal Sites and Objects

The Project involves the construction of a solar farm and associated infrastructure. The impact to Aboriginal heritage sites is likely to be most extensive where earthworks occur and would involve the removal, breakage or displacement of artefacts. This is considered a direct impact on the Aboriginal objects by the development in its present form.

The impact to the scientific values of the sites is outlined in Table 2 below. The isolated artefacts have little research value apart from what has already been gained from the information obtained during the present assessment. This information relates more to the presence of the artefacts and in the development of Aboriginal site modelling, which has largely now been realised by the recording. The scarred tree site, Wellington Solar Farm ST 1, will not be impacted by the solar farm.

Aboriginal objects, their significance, and proposed management are listed in Table 2 below and Appendices A and B outline their locations.

Table 2 Archaeological significance assessment of Aboriginal sites and management recommendations (NGH Environmental 2017)

AHIMS #	Site name	Type of harm	Degree of harm	Consequence of harm	Recommendations from ACHAR
36-4-0142	Wellington Solar Farm IF 1	Nil	Nil	Nil	N/A- outside of development area.
36-4-0155	Wellington Solar Farm IF 2	Nil	Nil	Nil	N/A- outside of development area.
36-4-0156	Wellington Solar Farm IF 3	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0158	Wellington Solar Farm IF 4	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0159	Wellington Solar Farm IF 5	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0157	Wellington Solar Farm IF 6	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0141	Wellington Solar Farm IF 7	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0138	Wellington Solar Farm IF 8	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0139	Wellington Solar Farm IF 9	Nil	Nil	Nil	N/A- outside of development area.
36-4-0140	Wellington Solar Farm IF 10	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0137	Wellington Solar Farm IF 11	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0136	Wellington Solar Farm IF 12	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0135	Wellington Solar Farm IF 13	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0134	Wellington Solar Farm IF 14	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0143	Wellington Solar Farm IF 15	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0144	Wellington Solar Farm AS 1	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0145	Wellington Solar Farm AS 2	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0147	Wellington Solar Farm AS 3	Direct	Partial	Partial loss of value	Salvage object prior to development.
36-4-0146	Wellington Solar Farm AS 4	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0148	Wellington Solar Farm AS 5	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0149	Wellington Solar Farm AS 6	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0150	Wellington Solar Farm AS 7	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0151	Wellington Solar Farm AS 8	Direct	Total	Total loss of value	Salvage object prior to development.
36-4-0152	Wellington Solar Farm AS 9	Nil	Nil	Nil	N/A- outside of development area.
36-4-0153	Wellington Solar Farm AS 10	Direct	Total	Total loss of value	Salvage object prior to development.

AHIMS #	Site name	Type of harm	Degree of harm	Consequence of harm	Recommendations from ACHAR
36-4-0154	Wellington Solar Farm ST 1	Nil	Nil	Nil	N/A- outside of development area.
N/A	Wellington Solar Farm HTH 1	Nil	Nil	Nil	N/A- outside of development area.
N/A	PAD 1	Direct	Partial	Unknown loss of value	Further archaeological investigation should be undertaken via testing.
N/A	PAD 2	Direct	Partial	Unknown loss of value	Further archaeological investigation should be undertaken via testing.

5.2 NARRAWA HOMESTEAD

The results of the historical heritage investigations for the Project indicated that a single known heritage site, the Narrawa Homestead, was located within the Project area. The Narrawa Homestead is a site of local significance listed on the Wellington Local Environmental Plan (LEP) 2012. The LEP listing for the property (Item I49) identified that that homestead is located at 6916 Goolma Road (Lot 90, DP 588075) and that it holds historical and aesthetic heritage significance at a local level.

Dubbo Regional Council manage a heritage inventory (State Heritage Inventory) database for heritage items listed on the LEP. The Narrawa Homestead State Heritage Inventory (SHI) listing number is 2640149. The SHI inventory sheet for the property is summarised in Table 3.

The Narrawa Homestead was inspected separately by the Dubbo Regional Council Heritage Advisor and NGH archaeologists for this Project. The property, and the region, has historically been the site of agricultural activities and the solar farm will introduce solar panel structures into what has historically been agricultural farmland. While the solar farm will alter the historical agricultural context into which the Narrawa Homestead was built the homestead will remain and the solar farm will eventually be decommissioned with the opportunity of returning the land to agricultural use.

The solar farm proposal was not considered likely to have a significant impact in accordance with the NSW *Heritage Act 1977*, the EP&A Act, or the EPBC Act, in terms of non-Aboriginal heritage and specifically upon the locally listed Narrawa Homestead.

Table 3 SHI inventory sheet for Narrawa Homestead

Criteria	Description
Physical Description	The homestead at Narrawa was built in 1908. It is a typical large country home with Federation features in its ceilings, joinery and detail. The owners have extended the original house. These extensions were carried in line with the original design.
Statement of Significance	The brick homestead is a large house with strong elements of the Federation Queen Anne style and with a sympathetic addition and complementary garden setting in keeping with the ambience of the house. Historically important as an example of a type of residence erected on prosperous country properties pre-World War I.

5.2.1 Potential impacts to the Narrawa Homestead

Condition 18 b of the CoC notes that the applicant must minimize any impacts on historic heritage items within the approved footprint. This condition specifically relates to the Narrawa Homestead.

The Narrawa Homestead is within the Project area and any potential impacts would need to be ascertained through an assessment informed by a proposed design for repurposing of the homestead as an operations and maintenance facility (OAM building).

Should the construction of a purpose built OAM building be proposed, Lightsource BP must make an application to the Secretary demonstrating to the satisfaction of the Secretary that repurposing the Narrawa Homestead for the OAM building is not reasonable or feasible as per the CoC.

6 HERITAGE CONTROL MEASURES

A range of mitigation requirements and control measures are identified in the EIS (and Submissions Report), CoC, RMM and ACHAR. Specific measures and requirements to address impacts to heritage values for the Project, which included the construction and operation of both the Solar Farm and the Energy Storage Facility, are outlined in Table 4. The measures have been listed to cover broad activities and as such there may be some repetition of mitigation measures.

It should be noted that should the construction of a purpose built OAM building be proposed, Lightsource BP must make an application to the Secretary demonstrating to the satisfaction of the Secretary that repurposing the Narrawa Homestead for the OAM building is not reasonable or feasible.

Table 4 Monitoring and reporting as required under the CoC in relation to the Project.

Measure / Requirement	Resources needed	When to implement	Responsibility	References
GENERAL				
Training will be provided to all personnel involved in construction and management phases of the Project, including relevant sub-contractors on heritage requirements from this plan through inductions, toolboxes and targeted training.	Induction package Toolbox training material Targeted training material	Pre-construction Construction Operation	LightsourceBP Environmental Officer HSEQ Personnel	This document Section 7.2 and EMS
A strategy for the long-term management of any items or material that are collected during any of these archaeological works would be developed in consultation with the registered Aboriginal Party. The artefacts recovered from the testing program and salvage collection would be buried in a safe location within the Project area outside the development footprint.	CoC Wellington Solar Farm ACHA	Pre-construction Construction Operation	LightsourceBP	This document Section 7.3
If the site Wellington Solar Farm ST 1 should fall during the construction, operational or decommissioning of the solar farm a suitable structure must be erected by the Proponent that is deemed suitable to the Aboriginal Community for its safe keeping.	CoC Wellington Solar Farm ACHA	Pre-construction Construction Operation	LightsourceBP	This document Section 7.3
Implementation of an approved Cultural Heritage Management Plan	This document	Pre-construction Construction Operation	LightsourceBP	This document
The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the Building Code of Australia.	Wellington Solar Farm EIS RMM	Pre-construction Construction Operation	LightsourceBP	This document
The Narrawa Homestead should not be altered whilst in use as an Office and Maintenance building for the solar farm.	Wellington Solar Farm EIS RMM	Pre-construction Construction Operation	LightsourceBP	This document
Any proposal for the re-purposing of the Narrawa Homestead must consider the potential impact upon the identified heritage significance. An appropriate impact assessment must be undertaken to ensure the homestead and its heritage characteristics and values are identified and managed adequately.	Wellington Solar Farm EIS SOHI (to be completed)	Design Pre-construction	LightsourceBP	This document
DESIGN				
Construction of the purpose-built operation and maintenance facility (OAM) building may only occur on site if it has demonstrated to the satisfaction of the Secretary that repurposing the Narrawa Homestead is not reasonable or feasible.	Narrawa Homestead Advice Letter Report Wellington Solar Farm EIS CoC	Design Pre-construction	LightsourceBP must make an application to the Secretary	This document section 3.2 and 5.2.1 CoC 8
Demonstrate that construction and operation of the OAM building location would not adversely affect the heritage values of the Narrawa Homestead.	Narrawa Homestead Advice Letter Report Wellington Solar Farm EIS CoC	Design Pre-construction	LightsourceBP	This document section 3.2 and 5.2.1 CoC 8

Measure / Requirement	Resources needed	When to implement	Responsibility	References
If construction of the OAM building is to be undertaken, having met the requirements of the CoC, all reasonable measures must be undertaken to ensure that no impact occurs to the Narrawa homestead. This will include consideration of the buildings location and may include a restricted works buffer zone that incorporates the homestead to ensure the use of any heavy machinery in close proximity to the homestead does not cause any impact to the building or its heritage values.	Narrawa Homestead Advice Letter Report CoC Wellington Solar Farm EIS	Pre-construction Construction Operation	LightsourceBP	This document section 3.2 and 5.2.1
Ensure that the development avoids (as far as practicable) any direct or indirect impacts on the Aboriginal and non-Aboriginal heritage items	CoC Wellington Solar Farm ACHA Wellington Solar Farm EIS This document	Design Construction Operation Decommissioning	LightsourceBP Environmental Officer	This document
The design of the solar farm must avoid the site Wellington Solar Farm ST 1 and include a minimum 10m buffer to protect the tree root zone.	CoC Wellington Solar Farm ACHA	Design	LightsourceBP Environmental Officer	This document Section 4, Appendix A
PRE-CONSTRUCTION				
Delineation and signage of Aboriginal sites that will not be impacted by the proposed development works will be put in place prior to construction and or preconstruction minor works. This includes around the site Wellington Solar Farm ST 1. A minimum 5m buffer will be placed about stone artefact sites that will not be impacted by the proposed development. Continued periodic monitoring of these sites will occur	Wellington Solar Farm ACHR CHMP	Pre-construction Construction Operation	LightsourceBP Environmental Officer	This document Section 7.3
Salvage and relocate all Aboriginal heritage items located within the approved development footprint to a suitable alternative location/s on site. Salvage would be conducted by an archaeologist with representatives of the Registered Aboriginal Parties. A smoking ceremony would take place to cleanse the artefacts and reburial location/s during the salvage program of works	Code of Practice Wellington Solar Farm ACHA CoC	Pre-construction	LightsourceBP	This document Chapter 5 Appendix D
Undertake a program of test excavation and salvage at the potential archaeological deposits (PAD 1 and PAD 2) located within the approved development footprint.	Code of Practice Wellington Solar Farm ACHR	Pre-construction	LightsourceBP	This document Chapter 5 Appendix D
Further archaeological assessment would be required if the Project activity extends beyond the area assessed in the ACHAR. This would include consultation with the registered Aboriginal parties and may include further field survey.	Wellington Solar Farm ACHA	Pre-construction	LightsourceBP	This document Section 6
Inspection of the conditions of Wellington Solar Farm ST 1 and its fencing will occur for the duration of construction and operations.	Wellington Solar Farm ACHA CHMP	Pre-Construction Construction Operational Decommissioning	LightsourceBP Environmental Officer HSEQ Officer	This document Section 7.3
CONSTRUCTION				
Where any additional, unrecorded Aboriginal or non-Aboriginal objects are encountered during construction, the Unexpected Finds Procedure will be followed.	Unexpected Finds Procedure	Construction Operational Decommissioning	LightsourceBP	This document Appendix C
If human remains are discovered on site, then all work surrounding the area must cease, and the area must be secured. The Unexpected Finds Procedure will be followed to notify police and OEH as soon as possible. Work must not recommence in the area until this is authorised by OEH.	Unexpected Finds Procedure	Construction Operational Decommissioning	LightsourceBP	This document Appendix C

Measure / Requirement	Resources needed	When to implement	Responsibility	References
Monitoring of heritage sites within the project area outside the development footprint to ensure no impacts or inadvertent impacts. This includes monitoring of the reburial location/s of Aboriginal objects collected during the salvage program and/or the testing program.	Wellington Solar Farm ACHA CHMP	Construction Operational Decommissioning	LightsourceBP Environmental Officer HSEQ Officer	This document Section 7.3
Should an item of historic heritage be identified, the Heritage Division (OEH) would be contacted prior to further work being carried out in the vicinity.	Wellington Solar Farm EIS RMM	Construction Operational Decommissioning	LightsourceBP Environmental Officer	This document
The existing cultural plantings around the Narrawa Homestead and its driveway should be maintained.	Wellington Solar Farm EIS RMM	Construction Operational Decommissioning	LightsourceBP	This document

7 COMPLIANCE MANAGEMENT

7.1 STRUCTURE AND RESPONSIBILITY

The Lightsource BP Project Team's organisational structure and overall roles and responsibilities are outlined in the EMS. Specific responsibilities for the implementation of environmental controls will be detailed in the CEMP.

If Lightsource BP propose a purpose built OAM building, they must demonstrate to the satisfaction of the Secretary that repurposing the Narrawa Homestead for the OAM building is not reasonable or feasible and must meet all required CoC.

7.2 TRAINING

To ensure that this CHMP is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this strategy. Health Safety and Environment and Quality (HSEQ) will coordinate the environmental training in conjunction with other training and development activities (e.g. safety). A record of this training will be maintained by the HSEQ Personnel.

In particular, all employees, contractors and utility staff working on site will receive Aboriginal Cultural Heritage Awareness Training. It will be provided to all personnel in the form of an induction before they begin work on site. This training will address obligations under the Project CoC, the *National Parks and Wildlife Act 1974* and project specific site identification, heritage conservation and management measures. Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in heritage management. Further details regarding staff induction and training will be outlined in the CEMP.

7.3 INSPECTIONS AND MONITORING

Periodic inspection of the site Wellington Solar Farm ST 1 (AHIMS #36-4-0154), Aboriginal heritage sites located outside the approved development footprint and the Narrawa Homestead (should it not be utilised for the OAM building) will occur for the duration of construction and operation of the solar farm.

The site Wellington Solar Farm ST 1 (AHIMS #36-4-0154) and other Aboriginal heritage sites located outside the approved development footprint will be identified by the project archaeologist and/or the Site Environmental Officer (SEO) and demarked by fencing prior to constructions works commencing to ensure there are no inadvertent impacts during the construction and operation of the solar farm. Inspection of the site will occur fortnightly during construction and monthly thereafter by the SEO.

Any stone artefacts collected during the salvage program and/or recovered during the subsurface testing program will be reburied at a safe location outside the development footprint within the Project area. The reburial location/s of the salvaged stone artefacts will also be subject to monitoring and inspection.

Any compliance Issues will be recorded and raised with the relevant authorities. Inspections will be undertaken following a reporting checklist.

7.4 AUDITING

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

Cultural heritage should be included within any environmental audit of impacts undertaken during the construction phase.

Audit requirements are detailed in the EMS.

7.5 REPORTING

Reporting requirements and responsibilities are documented in the EMS

8 REVIEW AND IMPROVEMENT

8.1 CONTINUOUS IMPROVEMENT

Continuous improvement of this Plan will be achieved by the ongoing evaluation of heritage management performance against heritage policies, objectives and targets to identify opportunities for improvement.

The continuous improvement process will be designed to:

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

8.2 CHMP UPDATE AND AMENDMENT

The processes and plans described in the EMS may result in the need to update or revise this Plan. This will occur as needed.

Only the SEO, or delegate, has the authority to change any of the CHMP documentation.

A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure – refer to the EMS.

9 REFERENCES

NGH (2019). Modification Application: Wellington Solar Farm substation expansion. Final V1.1 Prepared 2 October 2019 for Lightsource BP.

NGH Environmental, 2017, Wellington Solar Farm Environmental Impact Statement.

NGH Heritage, 2017, Wellington Solar Farm Aboriginal Cultural Heritage Assessment.

OEH, 2010a, Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales.

OEH, 2010b, Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.

OEH, 2011, Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW.

APPENDIX A HERITAGE CONSTRAINTS MAP

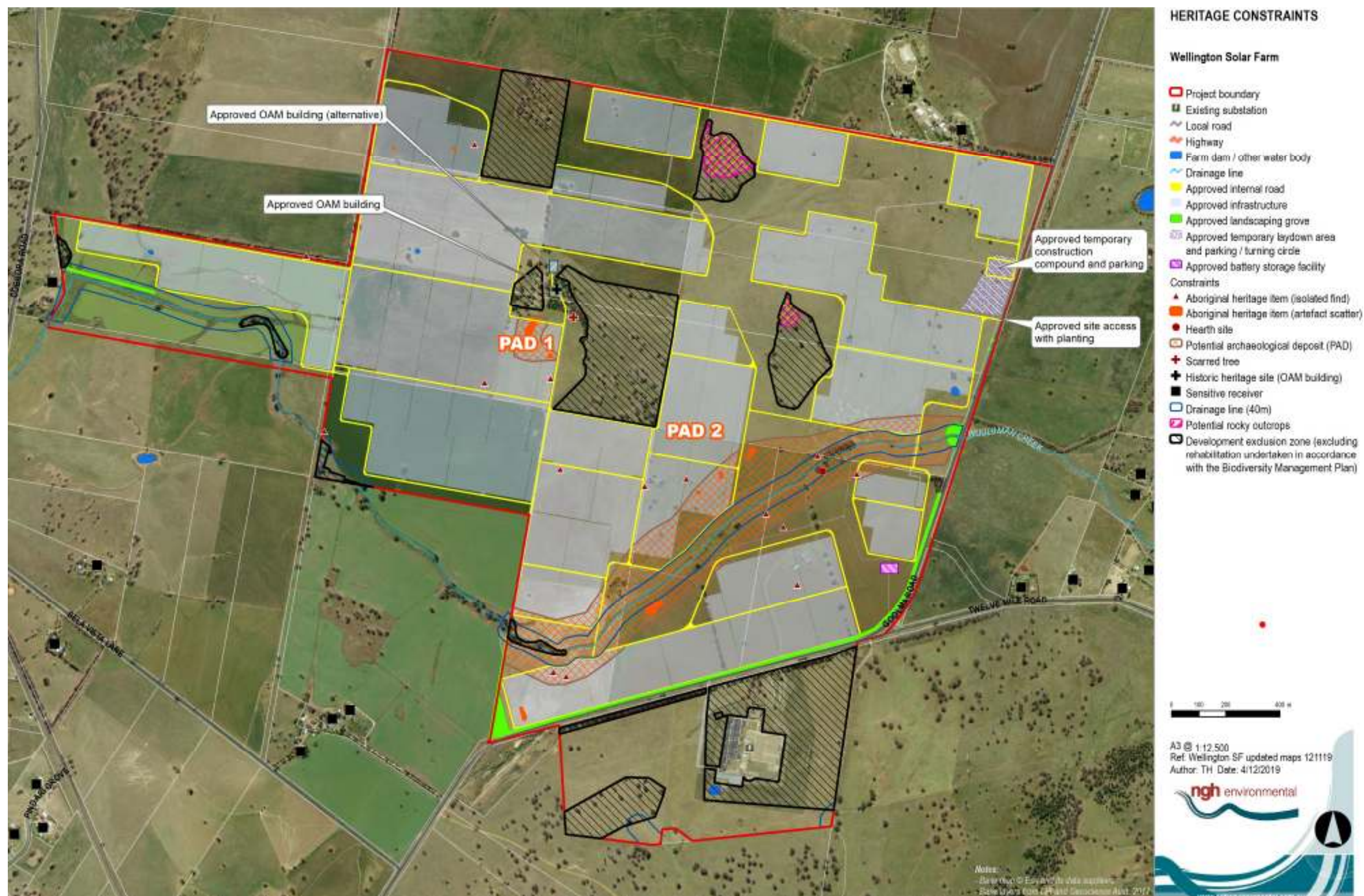


Figure 1 Overview of recorded Aboriginal heritage sites in Project.



Figure 2 Close up of recorded Aboriginal heritage sites in Project (Figure 1 of 2).



Figure 3 Close up of recorded Aboriginal heritage sites in Project (Figure 2 of 2).

APPENDIX B GENERAL LAYOUT OF DEVELOPMENT



Figure 4 Figure from CoC Appendix 1 General layout of development.

APPENDIX C UNEXPECTED FINDS PROTOCOL

C.1 INTRODUCTION

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

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

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

C.2 WHAT IS A HERITAGE UNEXPECTED FIND?

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

Unexpected heritage finds may include:

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

C.3 ABORIGINAL HERITAGE PLACES OR OBJECTS

All Aboriginal objects are protected under the NSW *National Parks and Wildlife Act 1974* (NPW Act).

An Aboriginal object is defined as:

Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons on non-Aboriginal extraction and includes Aboriginal remains.

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

C.4 HISTORIC HERITAGE

The *Heritage Act 1977* protects relics which are defined as:

Any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance.

C.5 UNEXPECTED FIND MANAGEMENT PROCEDURE

In the event that any unexpected Aboriginal heritage places or objects or any substantial intact historic archaeological relics that may be of State or local significance are unexpectedly discovered during the Project, the following management protocols will be implemented. **Note: this process does not apply to human or suspected human remains. Follow Section C6 Human Skeletal Remains below if remains or suspected remains are encountered.**

1. Works within the immediate identified heritage location will cease. Personnel should notify their supervisor of the find, who will notify the project manager.
2. Establish whether the unexpected find is located within an area covered by approved Conditions of Consent or whether it is outside based on Appendix A and B.
3. **If the find it is determined to be covered under approved CoC undertake the following steps**
 - a. Establish an appropriate buffer zone of at least 20 metres to allow for the assessment and management of the find. All site personnel will be informed about the buffer zone with no further works to occur within the buffer zone.
 - b. A heritage specialist or the project archaeologist will be engaged to assess the Aboriginal place or object encountered and undertake appropriate salvage of the site in line with the mitigation methods and approval requirements of the CoC.
 - c. Following appropriate salvage of the unexpected find works may continue at this location
4. **If the unexpected find is not covered under the existing approved CoC undertake the following steps.**
 - a. All works at this location must cease.
 - b. An appropriate buffer zone of at least 20 metres to allow for the assessment and management of the find must be established. All site personnel will be informed about the buffer zone with no further works to occur.
 - c. A heritage specialist or the project archaeologist will be engaged to assess the Aboriginal place or object encountered. Registered Aboriginal Party (RAP) representatives may also be engaged to assess the cultural significance of the place or object.
 - d. The discovery of an Aboriginal object will be reported to the local office of the Office of Environment and Heritage (OEH) and works will not recommence at the heritage place or object until advised to do so by OEH.
 - e. If the unexpected find can be managed *in situ*, works at the location will not recommence until appropriate heritage management controls have been implemented, such as protective fencing.
 - f. If the unexpected find cannot be managed *in situ*, works at the heritage location will not recommence until further assessment is undertaken and appropriate permits to impact Aboriginal cultural heritage are approved and issued by OEH.
5. For historic relics, work must cease in the affected area and the Heritage Council must be notified in writing. This is in accordance with section 146 of the *Heritage Act 1977*.

6. Depending on the nature of the discovery, additional assessment may be required prior to the recommencement of work in the area. At a minimum, any find should be recorded by an archaeologist.

C.6 HUMAN SKELETAL REMAINS

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

Discovery:

- If any human remains or suspected human remains are found during any activity, works in the vicinity **must** cease and the Project Manager must be contacted immediately.
- The remains must be left in place and protected from harm or damage.
- All personnel should then leave the area immediately

Notification:

- The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant authorities.
- If there are reasonable grounds to believe that the remains are Aboriginal, the following must also occur;
 - a. The Office of Environment and Heritage must be contacted as soon as practicable and provide any available details of the remains and their location. The OEH's Environment Line can be contacted on 131 555;
 - b. The relevant Aboriginal community groups must be notified immediately
 - c. The relevant project archaeologist may be contacted to facilitate communication between the police, OEH and Aboriginal community groups.

Process:

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

APPENDIX D SALVAGE METHODOLOGY AND POTENTIAL TEST EXCAVATION

SURFACE COLLECTION

Each Aboriginal site with surface artefacts that will be impacted within the approved development footprint will need to be collected prior to construction. We would also take the opportunity to examine the immediate surrounds of the recorded sites to identify any other artefacts that may be present within the approved development footprint. The salvage collection fieldwork would be carried out with representatives of the Aboriginal community.

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

- Walk across the site area (within the construction footprint), use 'pin' flags to identify and mark artefacts.
- Photograph site area to provide visual summary of the artefact distribution.
- If considered necessary, construct a collection grid of 2 m x 2 m or 5 m x 5 m or similar as appropriate to the size of the site, only larger sites or site with higher densities of artefacts will have this strategy.
- As an alternative GPS plot artefacts if required, this is suitable for smaller sites (~<10).
- Collect artefacts. At each collection site the artefacts will be recorded, bagged and labelled in accordance with their collection position, that is either individual number and/or their collection grid. If suitable and agreed with the RAPs, artefacts may be retained temporarily by NGH and taken to the NGH Environmental office in Canberra for detailed recording if required.
- Recording of stone artefacts will be conducted in line with standard archaeological practice to include raw material, type, dimensions and any other characteristics considered relevant. Photos of particularly interesting items only would be taken.

The reburial location would need to be agreed with by the landowner, the NGH archaeologists and the Aboriginal parties and be outside the proposed development footprint. The location of the reburied artefacts would be noted with AHIMS site cards as legally required. An Aboriginal Site Impact Recording Form must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage and/or construction works. A representative from each of the Registered Aboriginal Parties would be provided with the opportunity to assist the archaeologist with the reburial of the salvaged objects. A smoking ceremony will take place to cleanse the artefacts and reburial site during the salvage program of works as requested by the Aboriginal community.

The recording and reburial of artefacts will be compliant with the *Code of Practice for Archaeological Investigations* <http://www.environment.nsw.gov.au/resources/cultureheritage/10783FinalArchCoP.pdf>

The reburial location/s will also be provided to LightsourceBP to ensure that these sites are fenced and protected during the construction and operation of the solar farm.

SUBSURFACE TESTING

If the complete avoidance of PAD1 and PAD2 is not possible, further archaeological investigation in the form of test excavations is required as per the Conditions of Consent to be undertaken at the potential archaeological deposits located within the development footprint. Test excavations would be conducted prior to any development and would be undertaken in consultation with the Registered Aboriginal Parties in compliance with the OEH Code of Practice. The test excavation program would be conducted by a qualified archaeologist and members of the registered Aboriginal parties.

The following outlines the process for test excavation to be conducted at the potential archaeological deposits located within the approved development footprint for the Wellington Solar Farm.

- Establish a nominal grid for each testing area to provide a framework to position each test pit. We propose to use a 20 m pit spacing along the transects within each Potential Archaeological Deposit (PAD) within area that will be impacted by the development footprint.
- Set up a sieve station, we intend to carry out dry sieving.
- Undertake excavations in line with the OEH *Code of Practice*:
 - Hand excavation using shovels and trowels, pits to be a minimum of 50cm x 50cm in area.
 - Removal of initial deposit in 5cm levels or 'spits' with subsequent spits at 10cm unless features found requiring a different strategy.
 - Placement of excavated deposit in buckets labelled by spit and test square.
 - Transfer of buckets to sieve station.
 - Sieving of deposits (dry sieving will be undertaken).
 - Removal of residue from sieves, bag and label for analysis.
 - Excavated material will be analysed in NGH offices in Canberra. Once analysed, material recovered from the testing program will be reburied onsite, preferably at the same location as the surface collected artefacts.
 - Proceed with excavation until completed.
 - Continual photography of excavated sections and the excavation work in progress.
 - At completion of excavation, backfill test pits (with sieved material if possible or clean fill if required).

Some flexibility for the placement of test pits is required to ensure adequate assessment of the PAD areas within the development footprint and the identification of archaeological features.

In the event that human bone is located, an *Unexpected Finds Procedure* would be followed. This includes stopping work at that location and making the area secure for further assessment. The police and OEH would be notified. If the remains were determined to be Aboriginal, further discussion and assessment of options would be considered by all parties.

At the conclusion of the testing program a report to the standard required by OEH would be completed detailing the testing methodology, results, Aboriginal involvement, conclusions and mitigation impact measures employed, if applicable. Artefacts recovered would be reburied at an agreed location by the RAPs and Lightsource BP in accordance with the Code of Practice.

APPENDIX E ABORIGINAL COMMUNITY CONSULTATION

The following consultation has occurred in the preparation of this CHMP.

Table 5 Consultation with RAPs as part of this CHMP

Registered Party	Contact	Date	Contact Method	Notes
Wellington LALC	Mike Nolan	25/2/2019 27/2/2019	Phone call with M Barber	Left message Returned call, indicated the tree should be protected, wanted to ensure continued LALC involvement in all salvage works
Wellington Valley Wiradjuri Aboriginal Corporation	Bradley R. Bliss	25/2/2019	Phone call with M Barber	Wanted to make sure scarred tree was protected or if the dead tree falls that First Solar would protect or help salvage Wanted to ensure the PADs were tested if impacted Storage of artefacts should be on country - reburial preferred.
Gallangabang Aboriginal Corporation	Bradley Bliss	25/2/2019	Phone call with M Barber	
Binjang Wellington Wiradjuri heritage Survey	Jamie Gray	25/2/2019	Phone call with M Barber	Wanted artefacts salvaged to be reburied on country in area of non-disturbance.
Wiradjuri Central West Republic	Jamie Gray	25/2/2019	Phone call with M Barber	
OEH	Phil Purcell	25/2/2019	Phone call with M Barber	Made comments about what the CHMP should include. Noted the below <ul style="list-style-type: none"> ▪ Ensure the Unexpected Finds Procedure is an easy to follow plan with actions for people to follow. ▪ Ensure the CHMP includes clear strategies and clear statements for managing heritage and the potential for finds to occur. ▪ Recommends RAPs should be involved in collections of known sites and any further finds. ▪ Ensure that if skeletal material was found, contact should be made to police but to also include joint contact with OEH.

Registered Party	Contact	Date	Contact Method	Notes
				<ul style="list-style-type: none"> Ensure the salvage description includes some detail regarding the methods to be utilised. Include potential alternative strategies to accommodate different scenarios in response to progression of works.
Draft of CHMP sent to RAPs				
Wellington LALC	Mike Nolan	15/04/2019	Via email	
Wellington Valley Wiradjuri Aboriginal Corporation	Bradley R. Bliss	15/04/2019	Via email	Response provided via email dated 22/04/2019. Noted that all artefacts collected are to be fully recorded and assessed by NGH Environmental in a laboratory prior to return to site for reburial. Dry Sieving was requested. Training: Any Cultural Heritage Training to staff at inductions should be jointly conducted by WVVAC/GAC and Binjang Wellington Wiradjuri heritage Survey as Traditional Owner representatives.
Gallangabang Aboriginal Corporation	Bradley Bliss	15/04/2019	Via email	Response provided via email dated 22/04/2019. Noted that all artefacts collected are to be fully recorded and assessed by NGH Environmental in a laboratory prior to return to site for reburial. Dry Sieving was requested. Training: Any Cultural Heritage Training to staff at inductions should be jointly conducted by WVVAC/GAC and Binjang Wellington Wiradjuri heritage Survey as Traditional Owner representatives.
Binjang Wellington Wiradjuri heritage Survey	Jamie Gray	15/04/2019	Via email	
Wiradjuri Central West Republic	Jamie Gray	15/04/2019	Via email	

APPENDIX F CONSULTATION LETTER



DOC19/314291

Leesa Johnston
Post Approvals, Resource and Energy Assessments
Department of Planning & Environment
leesa.johnston@planning.nsw.gov.au

Dear Leesa

Wellington Solar Farm - Biodiversity Management Plan and Cultural Heritage Management Plan

I refer to your email dated 28 March 2019 requesting comments from the Office of Environment and Heritage (OEH) on the draft Biodiversity Management Plan (BMP) and the Cultural Heritage Management Plan (CHMP) for the Wellington Solar Farm.

OEH notes that this BMP only addresses the management of biodiversity impacts during construction of the project. A separate management plan will be prepared to manage biodiversity through the operation period. OEH recommend that should the Department of Planning and Environment approve this staged approach, the BMP for the operational period should be prepared in consultation with OEH and approved prior to the commencement of operation.

This BMP adequately addresses the conditions as they relate to the construction phase of the project; however, OEH recommends that a final proof read is conducted to rectify some minor errors including the following:

- The section *Pesticide application record* is duplicated in Section 5.5.2
- A number of references are missing, e.g. Sections 5.5.1, 5.5.2, 5.6.1 and Table 6-1.
- References to the breeding season of Superb Parrots should be removed as this species is not known to breed at the project site.

OEH have no issues regarding the draft CHMP and the associated Chance Finds Protocols. The CHMP adequately explains the avoidance and mitigation strategies for Aboriginal objects. The consultation with Registered Aboriginal Parties (RAPs) is also adequate. OEH note that there have been no issues raised by the RAPs with regards to the proposed management of ACH as detailed in the CHMP.

Should you require additional information please contact David Geering on (02) 6883 5335 or david.geering@environment.nsw.gov.au.

Yours sincerely

PO Box 2111 Dubbo NSW 2830
Level 1, 48-52 Wingewarra Street Dubbo NSW 2830
Tel: (02) 6883 5330 Fax: (02) 6884 8875
ABN 30 841 387 271
www.environment.nsw.gov.au



PETER CHRISTIE
Director North West
Conservation and Regional Delivery

11 April 2019

Contact officer: DAVID GEERING
6883 5335



Planning,
Industry &
Environment

Planning and Assessment
Energy and Resources
Contact: Leesa Johnston
Tel: 0282696861
Email: Leesa.Johnston@planning.nsw.gov.au

Ms Sarah Hillis
Senior Environmental Consultant
NGH Environmental
PO BOX 5464
Wagga Wagga NSW 2650

Via email to: sarah.h@nghenvironmental.com.au

Dear Ms Hillis

**Wellington Solar Project (SSD 8573)
Traffic Management Plan and Cultural Heritage Management Plan**

I refer to your emails dated 31 July 2019 and 1 August 2019 on behalf of Lightsource BP, asking the Secretary for approval of the:

- Wellington Solar Farm Traffic Management Plan (Version 2, dated 30 July 2019); and
- Wellington Solar Farm Cultural Heritage Management Plan (Version 1.3, dated 1 August 2019).

The Department has carefully reviewed the plans and notes that you have consulted with RMS and the Department's Biodiversity Conservation Division (formerly OEH).

The Department is satisfied that the plans address the applicable requirements of condition 6 and 19 of Schedule 3 of the Wellington Solar Project development consent (SSD 8573).

Accordingly, the Secretary has approved the:

- Wellington Solar Farm Traffic Management Plan (Version 2, dated 30 July 2019); and
- Wellington Solar Farm Cultural Heritage Management Plan (Version 1.3, dated 1 August 2019).

Please ensure that the approved documents are placed on your website as soon as possible.

If you require further information, please contact Leesa Johnston on 8289 6861 or by email at Leesa.Johnston@planning.nsw.gov.au.

Yours sincerely

13/8/19

Nicole Brewer
A/Director
Energy Assessments
as nominee of the Secretary

APPENDIX G ENDORSEMENT OF HERITAGE EXPERT



Planning,
Industry &
Environment

Planning & Assessment
Energy & Resources
Contact: Leesa Johnston
Tel: 82896861
Email: leesa.johnston@planning.nsw.gov.au

Ms Diana Mitchell
Principal Environmental Planner
Lightsource BP
CBW Level 19
181 William Street
Melbourne Vic 3000

Via email: diana.mitchell@lightsourcebp.com

Dear Diana

SSD 8573 - Wellington Solar Project Endorsement of Heritage Expert

I refer to your letter dated 19 June 2019 seeking the Secretary's endorsement of a heritage expert for the Wellington Solar Project (SSD 8573).

The Department has reviewed the information you provided. The Department is satisfied that Mr Matthew Barber is suitably qualified, independent and experienced. In accordance with Condition 19 of Schedule 3 of SSD 8573, the Secretary has endorsed Mr Matthew Barber of NGH Environmental.

If you wish to discuss the matter further, please contact Leesa Johnston on 02 82896861.

Yours sincerely

A handwritten signature in blue ink, appearing to read "fjz", followed by the date "12/7/19".

Steve O'Donoghue
Director – Resource Assessments
as nominee of the Secretary