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BONSHAW SOLAR (SSD-9438)
HERITAGE MANAGEMENT PLAN
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Gaia Australia Pty Ltd





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1. INTRODUCTION

1.1 PROJECT BACKGROUND

Tim Hill Heritage Management and Planning has been commissioned by Gaia Pty Ltd to provide a Heritage Management Plan (HMP) for the Bonshaw Solar Project (SSD-9438), located with Lot 2 DP1039185 and Lot 201 DP879480, Bonshaw NSW (the Study Area). The HMP has been developed to comply with conditions 23 and 24 of the Development Consent (Version 17 20 December 2019):

Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary.

The HMP is provided as an update of the Draft HMP issued by Everick Heritage (2022) to respond to a Request for information received from the Department of Planning and Environment on 25 July 2022.

1.2 ASSESSMENT HISTORY AND BACKGROUND INVESTIGATIONS

The below provides a summary of assessment and agreements relevant to the Bonshaw Solar Farm site:

1. The artefact site TD OS14 (#11-3-0083) was part of the Aboriginal Cultural Heritage Assessment ('ACHA') conducted by Ozark Heritage in 2011.

2. The Aboriginal Cultural Heritage Assessment Report was undertaken by ERM in 2018-2019 (ERM 2019) and provides the primary supportive document for the Environmental Impact Study ('EIS') and project approval. This study was undertaken with the Aboriginal stakeholders included within this plan.

3. An addendum advice from ERM (2020) to clarify points raised in the review by the Department of Planning.

4. A site inspection was conducted by Principal Archaeologist Tim Hill and Archaeologist Matt Finlayson of Everick Heritage Pty Ltd on 19 August 2020 to ground truth the Aboriginal sites previously recorded by ERM Consultants and identify any further sites not identified in previous assessments. The site inspection established the following:

- a. The nature and extent of the artefact site TD-OS14 (#11-3-0083) as mapped by Ozark Heritage (2011) and ERM Consultants (2019)
- b. The location of previously mapped scarred trees per the ERM (2019) report and verification of their authenticity, and
- c. The location and potential impacts from the development footprint of the Bonshaw Solar Project on Aboriginal objects and cultural heritage values.

5. A site inspection and consultation meeting was held with the following Aboriginal stakeholders and Everick Heritage on 16 September 2021

- a. Liza Talbot and Samantha Duncan
- b. Vicki Gomeroi Duncan, and
- c. Steve Binge and Wally Duroux.

The purpose of the inspection and consultation meeting was to cover the following:

- a. Background to the project and the Department of Planning approval conditions,
- b. Identification of the TD-OS14 scar tree and associated stone artefacts,
- c. Discussion of the mitigation and management strategy to collection and relocation of artefacts from the TD-OS14 site within the footprint of the solar farm, and
- d. Management of the BSF-36 scar tree.

The following describes the outcomes of the site inspection and consultation meeting:

- The TD-OS14 scar tree was identified, and it was agreed that the appropriate management response was to leave it in its current location within the exclusion area
- The management strategy for stone artefacts agreed for the remainder of the solar farm project should be extended to the TD-OS14 artefact scatter, being retention of artefacts along the creek line outside the approved development footprint and collection of any artefacts within the approved development footprint
- It was considered that the most appropriate place for relocation of the artefacts was to the north of TD-OS14 in an area which did not have artefacts present on the ground surface to the north of BSF 22, and
- The BSF36 scar tree was confirmed as a Aboriginal scar tree by the group, and it was agreed that this tree should be retained in-situ. This site is outside the approved development footprint.

6. A copy of the Draft HMP was issued to Aboriginal stakeholders via email on 8 October 2021 requesting comment on the HMP by close of business 5 November 2021.

7. An email was received from Nicole Davies from Heritage NSW on 22 October providing in principle support for the HMP.

8. An updated email was issued to Aboriginal stakeholders on 25 October to inform them that Heritage NSW had provided written support for the HMP.

9. An email was received from Samantha Duncan on 3 November indicating that she had no additional comment on the HMP.

10. An email was issued to Moombahlene LALC and Vicki Duncan requesting written support for the HMP.

1.3 PRINCIPALS OF THE MANAGEMENT PLAN

The principals of Management Plan are consistent with the requirements of consent condition 24, being:

Respect: A practice of respect, understanding and value for Aboriginal Traditions and Aboriginal Cultural Heritage should be conveyed to relevant employees, agents, consultants, Contractors and Sub-Contractors of the Proponent through Induction training and during future works.

Conservation and Protection: Aboriginal Traditions should be respected and Aboriginal Cultural Heritage of should be conserved and protected.

Minimise Impact: The Proponent accepts that Construction within the Development Area has the potential to damage Aboriginal Objects. Consequently, it is necessary to implement a series of actions and procedures to avoid or minimise the potential impact of Construction on Aboriginal Objects.

1.4 COMPLIANCE WITH CONSENT CONDITIONS

The HMP is provided as an update of the Draft HMP issued by Everick Heritage (2022) to respond to a Request for information received from the Department of Planning and Environment on 25 July 2022.

Compliance with the HMP is a requirement of the project approval and the Proponent is committed to implement the actions of the HMP in collaboration with RAPs.

The below table summarise the compliance of the HMP with the consent conditions (**Table 1**).

Table 1: Consent condition compliance table

Heritage	Document and Reference comment
HERITAGE	
Protection of Heritage Items	
<p>23. 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 4 or located outside the approved development footprint.</p> <p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 4, 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.</p> <p><i>Note: The location of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 4.</i></p>	Section 3.
Heritage Management Plan	
<p>24. Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p>	
(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;	Section 1.5
(b) be prepared in consultation with Heritage NSW and Registered Aboriginal Parties;	Section 2.1 Appendix 1
(c) include a description of the measures that would be implemented for:	
<ul style="list-style-type: none"> • AHIMS site # 11-3-0083 to: <ul style="list-style-type: none"> - assess the extent of AHIMS site # 11-3-0083 identified in the report prepared by Everick Heritage (dated 24 August 2020); - mitigation measures (including review of the exclusion zone as shown in Appendix 1) developed in consultation with Heritage NSW and RAPs for this site; 	Section 3.4.3 Section 3.4.4
<ul style="list-style-type: none"> • protecting the Aboriginal heritage items identified in Table 1 of Appendix 4 or items located outside the approved development footprint, including fencing off Aboriginal heritage items prior to commencing construction; 	Section 3.4.1 Section 3.4.3

Heritage	Document and Reference comment
<ul style="list-style-type: none"> • salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 4; 	Section 3.4.2 Section 3.6.6
<ul style="list-style-type: none"> • a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - previously unidentified heritage items are found; or - Aboriginal skeletal material is discovered; 	Section 3.3.3
<ul style="list-style-type: none"> • 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 	Section 3.2
<ul style="list-style-type: none"> • ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and 	Section 3.4.8 Section 4
(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.	Section 3.4.9 Section 4.2
Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.	Section 1.4
Schedule 4	
Condition 2	
Revision of Strategies, Plans and Programs 2. The Applicant must: (a) update the strategies, plans or programs required under this consent to the satisfaction of the Secretary prior to carrying out any upgrading or decommissioning activities on site; and (b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Secretary within 1 month of the: <ul style="list-style-type: none"> • submission of an incident report under condition 7 of Schedule 4; • submission of an audit report under condition 9 of Schedule 4; or • any modification to the conditions of this consent. 	Section 4.3
Updating and Staging of Strategies, Plans or Programs 3. With the approval of the Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis. To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval. With the agreement of the Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent. <i>Notes:</i> <ul style="list-style-type: none"> • While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times. • If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	Section 4.4
NOTIFICATIONS Notification of Department 4. Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Applicant must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase.	Section 4.5

Heritage	Document and Reference comment
If any of these phases of the development are to be staged, then the Applicant must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that would be carried out during the relevant stage.	
Final Layout Plans 5. Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department via the Major Projects website, including details on the siting of solar panels and ancillary infrastructure.	Section 4.6
Incident Notification 7. The Department must be notified in writing via the Major Projects website portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	Section 4.7
Non-Compliance Notification 8. The Department must be notified in writing via the Major Projects website portal within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	Section 4.8
INDEPENDENT ENVIRONMENTAL AUDIT 9. The Applicant must commission and pay the full cost of Independent Environmental Audits of the development. The audits must: (a) be prepared in accordance with the <i>Independent Audit Post Approval Requirements</i> (DPIE, 2020); (b) be led and conducted by a suitably qualified, experienced and independent expert(s) whose appointment has been endorsed by the Secretary; (c) be prepared, unless otherwise agreed with the Secretary: (i) within 3 months of commencing construction; (ii) within 3 months of commencement of operations; and (iii) as directed by the Secretary; (d) be carried out in consultation with the relevant agencies; (e) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and (f) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent unless the Secretary agrees otherwise. Within 3 months of commencing an Independent Environmental Audit, or unless otherwise agreed by the Secretary, a copy of the audit report must be submitted to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report, and a timetable for the implementation of the recommendations. The recommendations of the Independent Environmental Audit must be implemented to the satisfaction of the Secretary, confirmed in writing.	Section 4.9
ACCESS TO INFORMATION 10. The Applicant must: (a) make the following information publicly available on its website as relevant to the stage of the development: <ul style="list-style-type: none"> • the EIS; • the final layout plans for the development; • current statutory approvals for the development; • approved strategies, plans or programs required under the conditions of this consent; • the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged; • how complaints about the development can be made; 	Section 4.10

Heritage	Document and Reference comment
<ul style="list-style-type: none"> • a complaints register; • compliance reports; • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Secretary; and <p>(b) keep this information up to date.</p>	

1.5 ENDORSEMENT OF TIM HILL AS QUALIFIED EXPERT

This HMP was written by Tim Hill (BA Hons. Archaeology and Paleoanthropology, University of New England, Armidale, 1998). Tim completed the Draft HMP whilst employed with Everick Heritage (Everick Heritage 2021). Tim is currently employed as Principal at Tim Hill Heritage Management and Planning. Endorsement of Tim as a suitably qualified and experienced person was received from the Department of Planning, Industry and Environment on 1 December 2021.

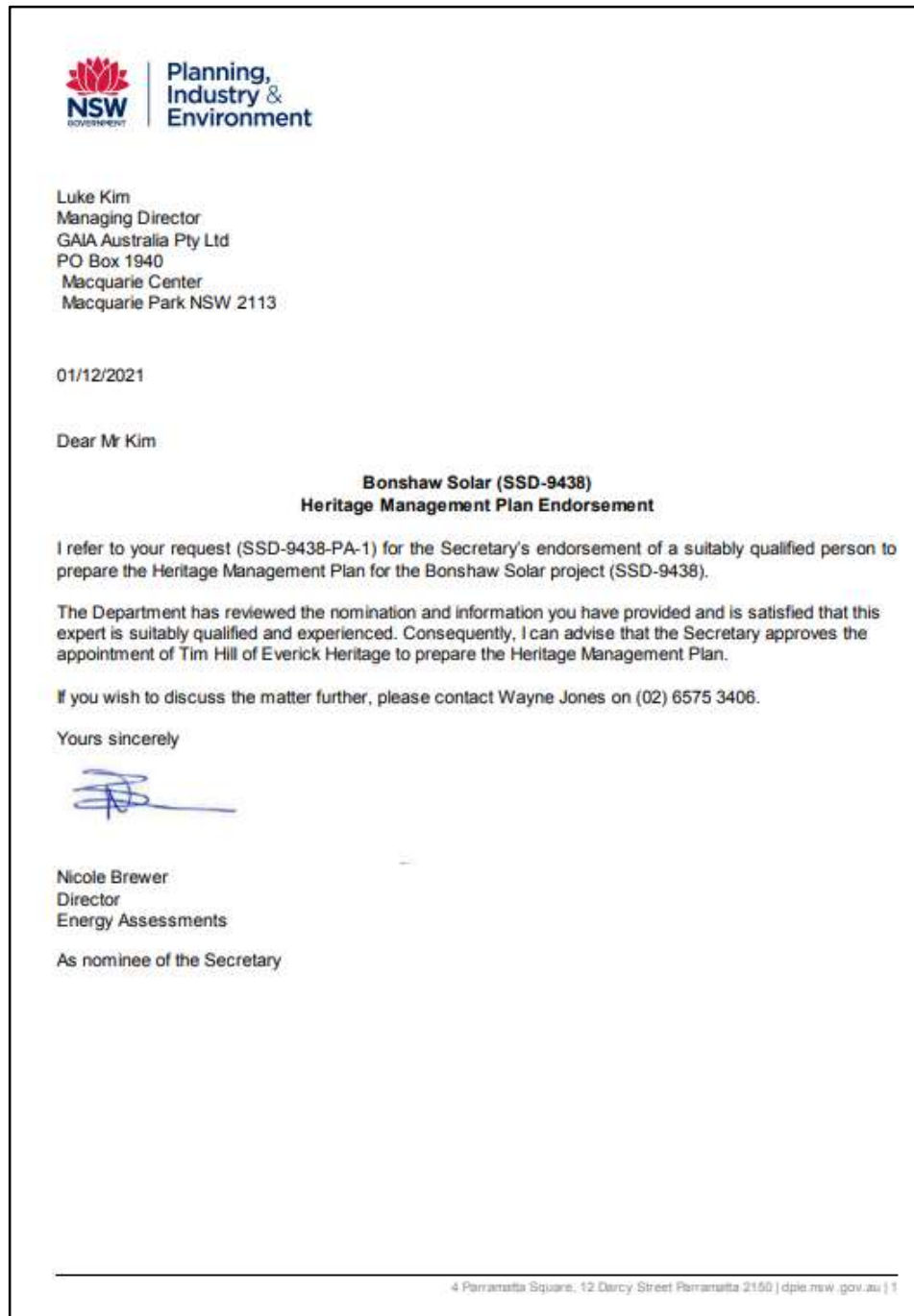


Figure 1: Endorsement of Tim Hill as a suitably qualified and experienced person.

2. UNDERSTANDING THE CULTURAL VALUES OF THE BONSHAW SOLAR PROJECT

2.1 ABORIGINAL COMMUNITY CONSULTATION

Consultation with the Aboriginal community was undertaken by ERM Pty Ltd in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DEECW 2010B) ('ACHRC').

Interim consultation with Aboriginal stakeholders was undertaken in September 2020 to provide an update on the project and to summarise outcomes from the Everick assessment. An additional email was provided in May 2021 following the Department of Planning Approval of the project. A Zoom meeting and site inspection was arranged in August / September 2021 to arrange a site visit and consultation meeting to develop the Heritage Management Plan.

The below provides a timeline of consultation with respect to the development of the Heritage Management Plan (**Table 2**).

Table 2: Summary of Aboriginal community consultation

Date	Community Contact	Outcome
28 September 2020	Vicky Duncan and Diane Marlow (Aboriginal Cultural Site Services)	Email response confirmed participation in the HMP.
	Samantha Duncan and Liza Talbot (Edgerton/ Kwiambal Aboriginal Corporation)	
	Moombahlene LALC	
10 May 2021	Vicky Duncan and Diane Marlow (Aboriginal Cultural Site Services)	Email update including Planning Approval documents.
	Samantha Duncan and Liza Talbot (Edgerton/ Kwiambal Aboriginal Corporation)	
	Moombahlene LALC	
19 August 2021	Vicky Duncan and Diane Marlow (Aboriginal Cultural Site Services)	
	Samantha Duncan and Liza Talbot (Edgerton/ Kwiambal Aboriginal Corporation)	
	Moombahlene LALC	
30 August 2021	Vicky Duncan and Diane Marlow (Aboriginal Cultural Site Services)	Zoom meeting to discuss planning approval and site inspection.
	Samantha Duncan and Liza Talbot (Edgerton/ Kwiambal Aboriginal Corporation)	
	Moombahlene LALC	
16 September 2021	Vicky Duncan and Diane Marlow (Aboriginal Cultural Site Services)	On-site meeting and site inspection.
	Samantha Duncan and Liza Talbot	

Date	Community Contact	Outcome
	(Edgerton/ Kwiambal Aboriginal Corporation)	
	Moombahlene LALC	
8 October 2021	Vicky Duncan and Diane Marlow (Aboriginal Cultural Site Services)	Provision of Draft HMP to RAPs via email, requesting comment on the HMP.
	Samantha Duncan and Liza Talbot (Edgerton/ Kwiambal Aboriginal Corporation)	
	Moombahlene LALC	
22 October 2021	Nicole Davies, Heritage NSW	Email confirming adequacy of the Draft HMP and indicating there were no additional requirements.
25 October 2021	Vicky Duncan and Diane Marlow (Aboriginal Cultural Site Services)	Email to RAPs providing advice from Heritage NSW and requesting a Zoom meeting if required.
	Samantha Duncan and Liza Talbot (Edgerton/ Kwiambal Aboriginal Corporation)	
	Moombahlene LALC	
3 November 2021	Samantha Duncan	Email confirming no additional comments.
2 December 2021	Moombahlene LALC	Email requesting written comment on the HMP
	Vicky Duncan and Diane Marlow (Aboriginal Cultural Site Services)	

2.2 ARCHAEOLOGICAL CONTEXT

The majority of archaeological studies in Northern NSW have been carried out in the coastal regions as opposed to the wider Northern Tablelands. The most notable of studies in the hinterland was carried out by Isabel McBryde in 1974. The McBryde (1974) study, supported by various subsequent studies for developments in the region suggest that the most common Aboriginal site type is an 'open site' (stone artefact scatter), however art sites, modified scarred trees, rockshelters grinding grooves and quarries have also been recorded (ERM 2019; Navin Officer 1990; OzArk EHM 2011). Predictive modelling based on these studies suggests that Aboriginal sites are more likely to be encountered on elevated ridgelines, spurs and slopes above flood levels rather than being located along creek lines (ERM 2019:17; Navin Officer 1990).

The most comprehensive 'regional' model for the region is provided by Godwin (1990) in a major review of the earlier archaeological research of Isabelle McBryde (1978). Godwin's model specifically

investigates patterns of movement between the coastal, sub-coastal, Tablelands and Western Slopes areas.

‘On the Tablelands small groups of people were on the move throughout the year. There are no indications that movement associated with subsistence activities took any particular direction. Abundant evidence exists to indicate that the Tablelands were not abandoned over the winter months. There were also references to travel in a north-south direction on the Tablelands for ceremonial activity. Tableland groups are recorded as travelling onto the western slopes in summer and early autumn months. It should be noted there was little or no social intercourse between sub-coastal and Tablelands people’ (Godwin 1990:122).

Between 2009 and 2011, Ozark EHM undertook Aboriginal and Historic cultural heritage assessments for a proposed transmission line between Dumaresq Switching Station (75 m from the Project Area’s western boundary) and the Lismore Substation to the east in the Northern Rivers Region of NSW (ERM 2019:17). In 2011, an assessment was carried out on the section of the proposed easement for the transmission line. The AHIMS data gathered from the assessment indicated that 49.2% of previously recorded sites in the area were open sites / artefact scatters with 15.2 % of sites being modified scarred trees. The assessment further identified 50 previously unrecorded Aboriginal sites (OzArk 2011). The assessment determined that most Aboriginal sites in this area were located near a water source, and that sites as per the AHIMS results were most likely to comprise artefact scatters or culturally modified scarred trees.

The below plans and drawings define the boundaries and extent of previously recorded Aboriginal objects and Sites within the Project Area ERM (2020, see **Figure 2** and **Figure 3**) and Everick Heritage (2020) (**Figure 4**).

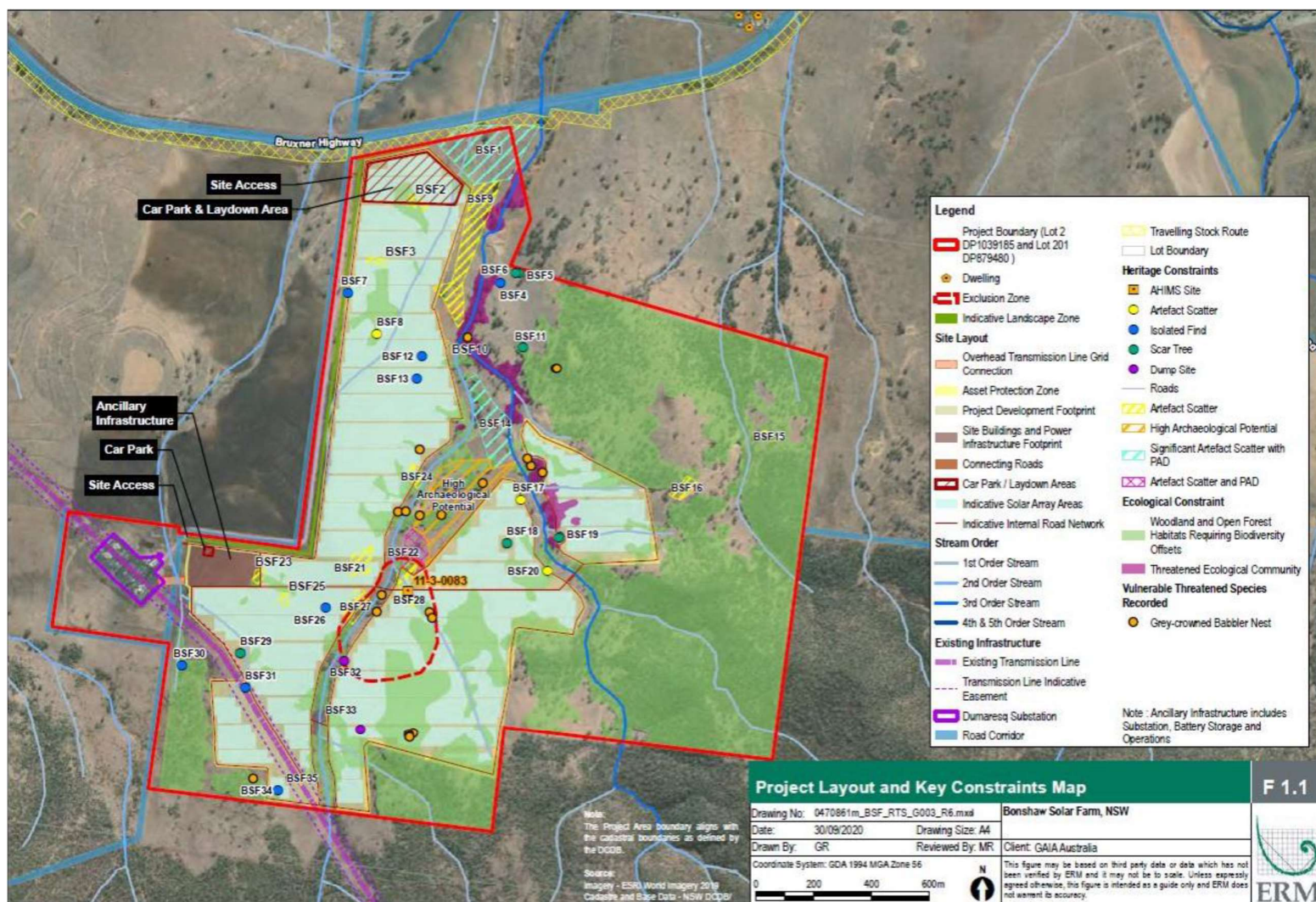


Figure 2: Cultural heritage mapping by ERM (2020) including TD-OS-14 extent.

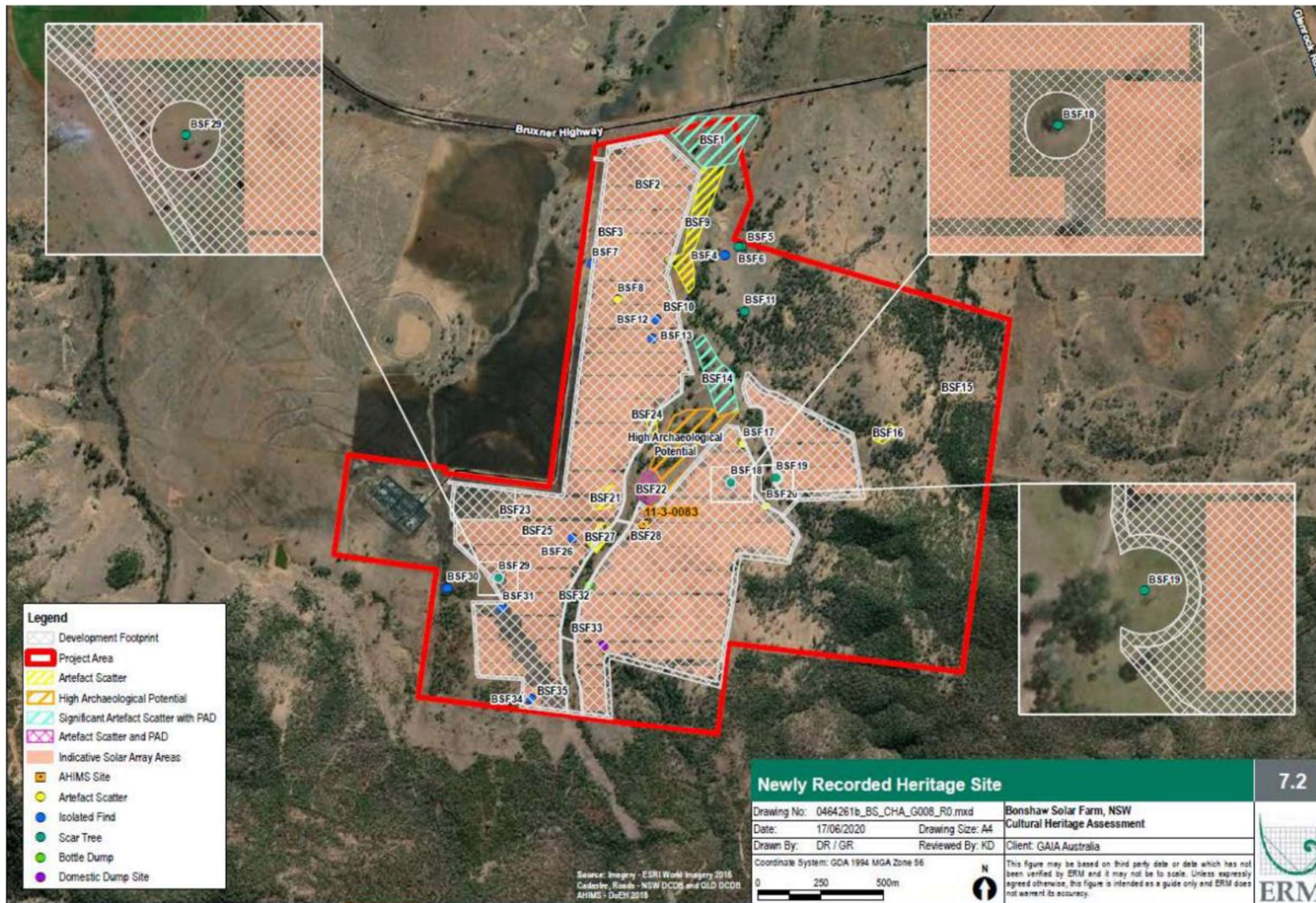


Figure 3: Bonshaw Solar Farm Development footprint and archaeological sites (ERM 2021)

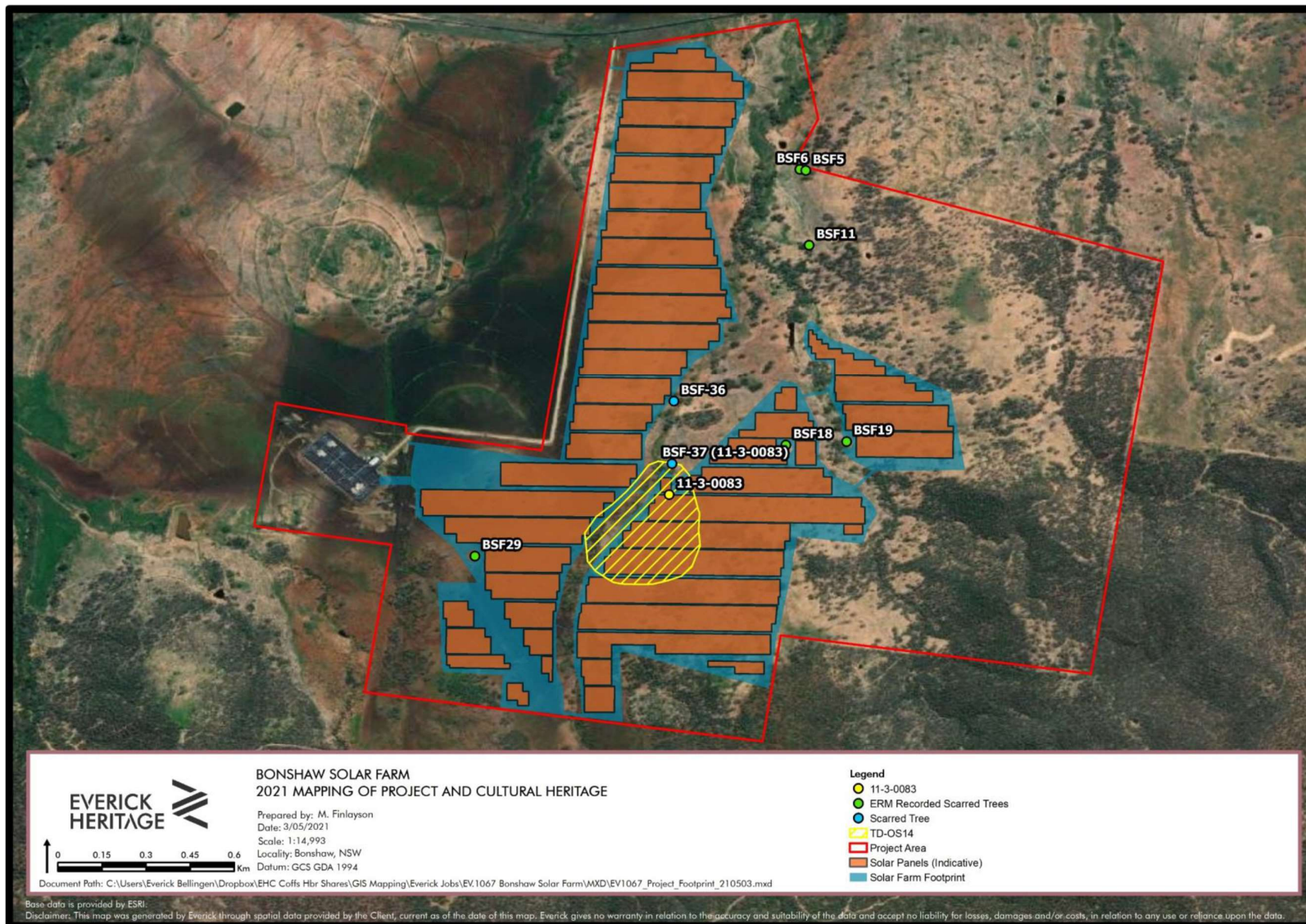


Figure 4: Project Footprint, TD-OS14 and Scarred trees (Everick 2020)

2.3. TD-OS14 (#11-3-0083)

The 'Tenterfield-Dumaresq OS-14' or TD-OS14 site was denoted in the ERM (2019:33) Aboriginal Cultural Heritage Assessment ('ACHA') as comprising a 'large site complex', however the nature and extent of the site were not fully described or investigated (ERM 2019). A site inspection conducted on 19 August 2020 by Everick Heritage of TD-OS14 determined that the site comprises a felled scarred tree (BSF37), several stone artefact scatters and isolated finds on elevated ground surrounding an ephemeral watercourse. These findings were consistent with the AHIMS site record form (see **Figure 5** and **Figure 6**). On the basis of the Everick investigation, specific requirements relating to the identification of the extent of TD-OS14 site with Aboriginal stakeholders were included as specific consent conditions (24c).

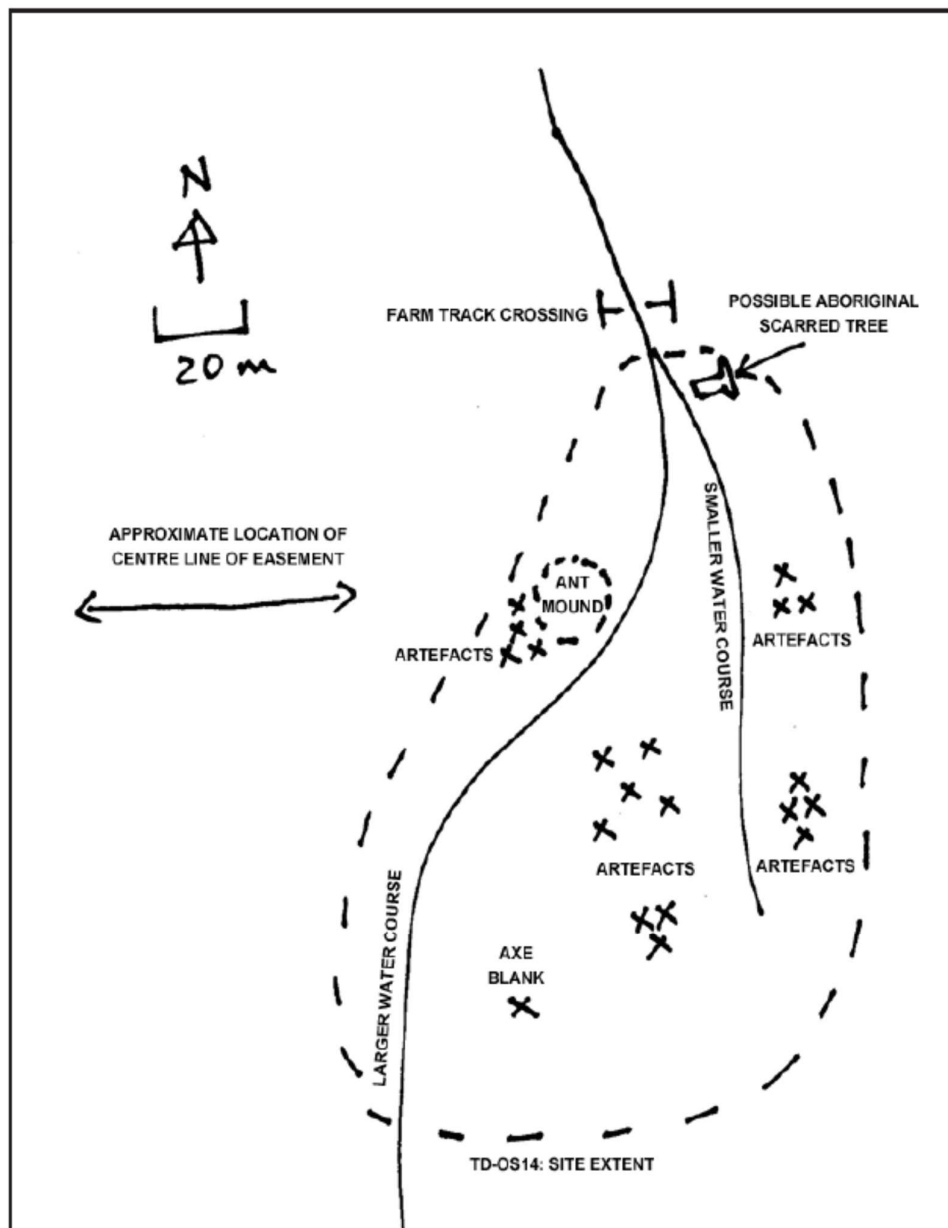


Figure 5: TD-OS14 'Site extent' (sources AHIMS Site Record Form / Ozark Heritage 2011)

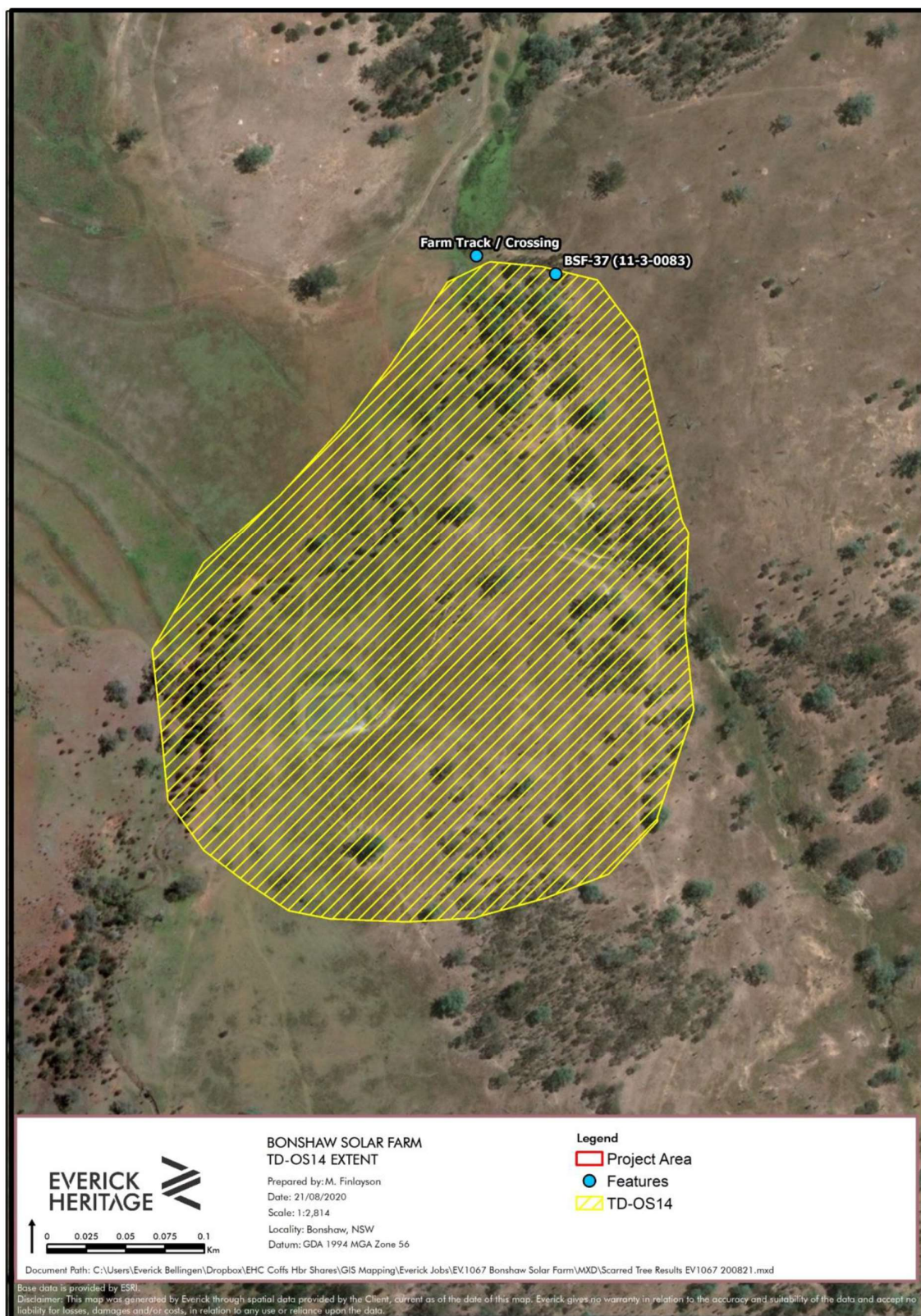


Figure 6: Corrected location of TD-OS14 scarred tree and inferred site boundaries (Everick Heritage 2020)

2.4. SCARRED TREES

The following culturally modified Scarred Trees are recorded to be within the Project Area as per the Everick Heritage (2020) and ERM (2019) reports (**Table 3**):

Table 3: Recored scarred trees (source ERM (2019) and Everick Heritage (2020))

ID	Easting	Northing
BSF5	338890	6769381
BSF6	338872	6769384
BSF11	338904	6769128
BSF18	338844	6768446
BSF19	339024	6768461
BSF29	337925	6768056
BSF36	338509	6768590
BSF37	338506	6768378

2.5. ARTEFACT SCATTERS AND ISOLATED FINDS

The following isolated artefacts and artefact scatters are recorded to be within the Project Area as per the ERM (2019) report (**Table 4**):

Table 4: Artefact Scatters and Isolated Finds (source ERM (2019) and Everick Heritage (2020))

ID		
BSF1	BSF2	BSF3
BSF4	BSF7	BSF8
BSF9	BSF10	BSF12
BSF13	BSF14	BSF15
BSF16	BSF17	BSF20
BSF21	BSF22	BSF23
BSF24	BSF25	BSF26
BSF27	BSF28	BSF30
BSF31	BSF32	BSF33

ID		
BSF34	BSF35	TD-OS14

2.6 SIGNIFICANCE ASSESSMENT (ERM 2019)

The NSW National Parks and Wildlife Act (1974) recognizes the principle of significance as a means of placing a type of importance/value upon an Aboriginal site. The significance of sites is defined in terms of their cultural/social value to the Aboriginal community, their scientific/archaeological value and their potential significance to the general public. The ultimate aim is to preserve a group of sites, which will permanently remain as a representative sample of all types of sites and environmental contexts in the region.

2.6.1 Archaeological/Scientific Significance

This type of significance is based upon a site's potential to elucidate past practices. The assessment is made mindful of present archaeological data retrieval methods but also mindful of developing and future techniques. The following are some of the factors at issue in the assessment of research potential: the intactness, stratigraphic integrity, disturbances, connectedness to other sites and the potential to yield a chronology extending into the past (NPWS 1997: 27).

The majority of Aboriginal sites within the Project Area have been determined to be of low archaeological and scientific significance in terms of the potential of the sites to contribute to regional archaeological research. The exceptions are noted to be the BSF1 open campsite and BSF14 artefact scatter which are rated as 'Moderate', the BSF22 low density scatter which is rated as 'Low – Moderate' and the TD-OS14 (11-3-0083) AHIMS site which is determined to be 'Moderate – Low'.

2.6.2 Cultural/Social Significance

The Aboriginal community may value a site primarily as evidence of their prior occupation and ownership, traditional control of land uses and custodianship of the land and the resources contained within it.

The significance of the cumulative Aboriginal sites to the local Aboriginal community within the Project Area has been determined to be 'High' as per the ERM (2019). It is noted additionally that the TD-OS14 site (11-3-0083) is rated as being of 'Moderate' to 'High' significance.

2.6.3 Aesthetic Significance

Aesthetic value refers to the sensory and perceptual experience of a place, including concepts of beauty and formal aesthetic ideals that are culturally influenced, in this case by the local Aboriginal community and stakeholders.

The isolated stone artefacts and artefact scatters have been determined not to reach the threshold of aesthetic significance. However, the scarred trees identified are deemed to make an aesthetic contribution to the landscape as visual representations of traditional cultural heritage practices of the local Aboriginal people.

2.6.4 Public Significance

Public significance is the potential of the site to be used as an educative tool to raise awareness among the public of the past and of the importance of protecting Aboriginal sites.

The previously recorded Aboriginal sites have high significance in terms of their potential as an education tool, for the Aboriginal community and the wider community as a whole. Particularly, the remains of the culturally modified trees could be used to demonstrative of typical regional scarred trees, depending on the outcomes of the Cultural Heritage Management Plan that is adopted for protection of the Site.

3. SITE SPECIFIC MANAGEMENT STRATEGIES

3.1 COMMUNICATION

The following contacts can support the implementation of the Long-term Management Plan:

- Luke Kim (Management Director Development Consulting and Execution- GAIA Australia), and
- Tim Hill (Principal Consultant- Tim Hill Heritage Management and Planning)

The Registered Aboriginal Stakeholders for the HMP are:

- Moombahlene Local Aboriginal Land Council,
- Aboriginal Cultural Site Services, and
- Edgerton/ Kwiambal Aboriginal Corporation.

Additional support can be sought from the Heritage NSW and the Department of Planning and Environment.

3.2 CULTURAL HERITAGE INDUCTIONS

The Proponent will ensure that all staff and contractors are aware of the responsibilities under this plan. The Proponent will allow sufficient time before works commences to coordinate a cultural induction. The induction will be run by a person agreed by the Proponent and the Aboriginal stakeholders. The purpose of the Induction will be to:

- a) instruct Staff on the basic principles of identifying Aboriginal Cultural Heritage,
- b) instruct Staff on areas which are considered to retain potential to contain Aboriginal Cultural Heritage,
- c) familiarise all persons with the Culture and Traditions of the Registered Aboriginal Stakeholders,
- d) promote an understanding and respect for the Culture and Traditions of the Registered Aboriginal Stakeholders,
- e) foster good relationships between the Registered Aboriginal Stakeholders and others, and
- f) instil an understanding of the principles embodied in this Aboriginal CHMP.

This induction may be extended to all contractors engage to undertake the Proposed Works.

The Proponent will retain a record of all staff and contractors who have participated within the cultural heritage inductions.

3.3 ABORIGINAL OBJECTS FIND PROCEDURE

3.3.1 Aboriginal Human Remains

Aboriginal human remains will be dealt with as according to the following Procedure, with special regard to the following considerations:

- a) in all cases suitable dignity is required in the handling of the issue,

b) the primary intention of this strategy is to avoid the unnecessary removal or disturbance of the human remains and to allow appropriate Aboriginal people the final decision-making powers, if the remains prove to be those of an Aboriginal person, and

c) where this is not the case the discovery Site will be deemed a crime scene and Contractor and its Sub-Contractors will be subject to police direction.

Where human remains are found, the Site must be cordoned off and the remains themselves must remain untouched.

Efforts must then be made to notify the New South Wales Police Service, Heritage NSW and Moombahlene Local Aboriginal Land Council. The Police Commissioner's Instruction 120.08 is intended to help police deal sensitively with the skeletal remains of Aboriginal people.

If any material is suspected of being of Aboriginal origin and there are no suspicious circumstances, then the Site must be secured and a Heritage NSW Officer contacted to identify the remains. Police are also asked to contact the nearest Aboriginal Community Liaison Officer.

The remains must be examined by a physical anthropologist or medical practitioner in order to establish their ancestry (as Aboriginal or European). The antiquity of the remains must also be determined by a physical anthropologist. This will be coordinated by the NSW Police.

The Find must then be reported to the Registered Aboriginal Stakeholders. Any report must use respectful language, treating them as the remains of Aboriginal people rather than as scientific specimens, and be written in plain English. In the event that the remains are of Aboriginal origin additional works will be based on advice from the NSW Department of Planning and Heritage NSW.

3.3.2 Aboriginal Objects

The project has the potential If suspected Aboriginal material has been uncovered during the Proposed Works.

- work in the surrounding area is to stop immediately
- a temporary fence is to be erected around the find
- an appropriately qualified archaeological consultant is to be engaged to identify the material, and
- if the works be deemed to have harmed the Aboriginal objects Heritage NSW must be notified immediately via the Department of Planning and AHIMS.

If the material is found to be of Aboriginal origin and the find cannot be avoided, the Aboriginal stakeholders are to be consulted to determine appropriate site-specific management measures (see below). Consistent with the ERM (2019) report this may include archaeological investigation and salvage.

3.3.3 Contingency plans and reporting

The Proponent shall put into place contingency plans and reporting procedures in the event that unexpected finds or skeletal remains are identified during works. This may include:

- Revision of the project design and layout to avoid impacts to previously unidentified Aboriginal objects that are consistent with objects identified in Section 3.4.1, such as scar trees,
- Engagement of Aboriginal stakeholders to salvage Aboriginal objects if the sites are determined to be consistent with sites identified in Section 3.4.2, such as disturbed stone artefact scatters or isolated finds, and
- Identification of larger areas of open space to retain top soils which contain Aboriginal archaeological deposits that cannot be reasonably salvaged by hand.

In the event that previously unidentified sites are discovered during construction the Proponent will be required to ensure that the sites are recorded on the AHIMS database and that all mitigation and management responses for the sites are approved by RAPs in accordance with this HMP (see Section 3.4 below).

3.4 SITE SPECIFIC MANAGEMENT MEASURES

3.4.1 Aboriginal Cultural Heritage Items to be avoided

The Proponent must ensure the Proposed Works do not cause any direct or indirect impacts on the Aboriginal heritage items identified Table 4 of Appendix 4 of the approval document (see **Table 5** below) which are outside of the approved development footprint. Based the ERM (2019) report, additional management strategies include provisions for “exclusion fencing and signage”. If the ancillary works occur within the same area as sites subject to avoidance additional archaeological investigation must take place to determine:

- whether the ancillary works will likely impact on sites, and
- whether or not site avoidance is required to mitigate impacts to the sites.

A summary of the management requirements for site identified for avoidance by the consent conditions is provided below (**Table 5**, see also ERM 2019 table 10.1).

Table 5: Sites to be avoided (source ERM 2019, Everick Heritage 2021)

SITE	AVOIDANCE	Exclusion fencing and signage for ancillary works in the same paddock	Additional archaeological investigation for ancillary work areas
BSF1	YES	YES	
BSF4	YES	YES	
BSF5	YES	YES	
BSF6	YES	YES	
BSF9	YES	YES	YES
BSF11	YES	YES	
BSF14	YES	YES	
BSF15	YES	YES	
BSF16	YES	YES	
BSF17	YES	YES	YES
BSF18	YES	YES	
BSF19	YES	YES	
BSF22	YES	YES	YES
BSF29	YES	YES	
BSF30	YES	YES	
BSF36	YES	YES	
BSF37 (11-3-0083)	Yes- Scar Tree Partial- artefacts outside the approved Development footprint	Yes- Scar Tree Partial- artefacts outside the approved Development footprint	

3.4.2 Aboriginal Heritage Items to be Salvaged and Salvage Methodology

Prior to carrying out any development that could directly or indirectly impact the heritage items identified in **Table 6**, the Proponent must salvage and relocate the item/s that will likely be impacted to a suitable alternative location, in accordance with the salvage methodology outlined in the *Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010a).

Table 6: Sites to be salvaged (ERM 2019, Everick Heritage 2021).

Site		
BSF2	BSF20	BSF28
BSF3	BSF21	BSF31
BSF7	BSF23	BSF32
BSF8	BSF24	BSF33
BSF10	BSF25	BSF34
BSF12	BSF26	BSF35
BSF13	BSF27	BSF 37 (Partial- stone artefacts within the approved development footprint)

The objective of the salvage methodology is to balance the regulatory requirements of the works, such as documenting the impacts to the sites on the AHIMS database against the needs of the Aboriginal community to ensure that the salvage is undertaken in a cultural appropriate way. The ERM (2019) report does not provide specific guidance on the salvage method, however the following is considered best practice and must be applied as the salvage methodology.

- Prior to the commencement of the site salvage all sites are to be recorded on the AHIMS.
- The salvage team must include 1 Aboriginal sites officer from each of the Aboriginal stakeholder groups and 1 qualified archaeologist. The allocated time for salvage works is three days.
- All sites subject to salvage are to be identified in a spatial database to assist with identification of the sites by the salvage team. This must be in the form of a electronic map on a tablet (Avenza or similar) or clearly printed plans.
- The extent of the site must be identified and marked using timber pegs or similar and agreed by the salvage team. Where artefacts are located outside the mapped salvage area the salvage team may agree to collect artefacts from outside the salvage area. In determining the boundaries of the site, the salvage team must have consideration for:
 - i. the consistency of the landform which might extend the site, and
 - ii. the history of soil disturbance which might restrict the extent of the site.
- The community collection must take place in a manner agreed by the salvage team but must be guided by the nature and extent of the site as described in the ERM report and as confirmed

by the salvage team. The agreed method must be documented by the archaeologist prior to commencement of salvage works.

- All artefacts will be salvaged in accordance with the site-specific salvage methodology. As a minimum this includes individual bagging and assignment of unique identification numbers for all artefacts. Artefacts from each site must be placed in a site-specific bag or box.
- On completion of the site salvage the salvage team must agree that the salvage works are completed and this must be documented on a database.
- The archaeologist responsible for the salvage is required to submit a Aboriginal Site Impact Recording Form ('ASIRF') for each site.
- The artefacts are to be retained at an agreed location within the exclusion area, with the default being the Moombahlene LALC office if a location cannot be agreed by the group.

At the completion of the salvage works the new relocation site will be managed in accordance with Section 3.4.1 of the Plan. No additional works will take place around the relocation sites.

3.4.3 TD-OS14 (#11-2-0083)/ BSF 37

Site TD-OS14 (#11-3-0083)/ BSF 37 is subject to specific condition of consent which requires that the site boundary is identified with Aboriginal stakeholders and agreed by Heritage NSW. The extent of the site was subject to the site inspection with RAPs on 16 September 2021, which included walking the inferred boundary of the site (see **Figure 6**).

The proposed management approach is based on the values assessment and consistency with the management recommendations of the ERM (2019) ACHAR which include avoidance of scar trees, avoidance of sites outside the solar farm footprint/ along the creek lines and salvage of artefacts within the solar farm footprint.

On this basis, the specific management strategy for the TD-OS14 site includes:

- Avoidance and installation of exclusion fencing/signage around the scar tree.
- Avoidance and installation of exclusion fencing/ signage along the creek line which defines the approved development footprint within the mapped extent of the TD-OS14 site (see Figure 3).
- Salvage of stone artefacts within the approved development footprint and mapped extent of TD-OS14 and relocation to an area north of BSF 22 stone artefact scatter.

Mitigation measures relating to the mitigation of impacts to the TD-OS14 site during the early works phase will include the engagement of RAPs to ensure that the exclusion fencing is installed in accordance with the HMP and that salvage of artefacts is undertaken in accordance with established salvage procedures (see section 3.4.2), or procedures agreed with the Proponent.

It is not likely that ancillary work areas will be required within the TD-OS14 / BSF37 site boundary.

3.4.4 Archaeological Investigation and community consultation

The ERM (2019) ACHAR provides for archaeological investigation of the following sites in the event that impacts to the sites cannot be avoided:

- BSF 9,
- BSF 17, and

- BSF 22.

In the event that ancillary works extend beyond the approved development footprint into the mapped boundaries of these sites the consulting archaeologist will provide the Aboriginal stakeholders with a archaeological investigation methodology, which shall be agreed prior to commencement of works. As a general rule the target area for investigation will be 5% of the area of the recorded site which is subject to ancillary works.

In determining the appropriate level and method of excavation the archaeologist will have consideration for the following:

- The significance, nature and extent of the site as described in the ERM 2019 ACHAR and any subsequent site inspections,
- The potential harm to the site from the revised works program
- The use of machinery, such as mechanical sieves and small excavators, to assist with the archaeological investigation, and
- The advice and recommendation of Aboriginal stakeholders.

3.4.5 BSF 36

BSF 36 comprises a scar tree which was not identified within the ERM (2019). The tree is located outside the development footprint and all works will avoid the site. The standard requirements for exclusion fencing and signage will apply for this tree.

3.4.6 Site reburial areas

During the salvage site reburial areas will be identified by the salvage team as permanent reburial areas for salvaged artefacts. The reburial method must be broadly consistent with Requirement 26 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DEECW 2010). Site reburial areas shall be recorded on the AHIMS database and the location of each reburial will be recorded on the ASIRF for each site. Preliminary advice from Aboriginal stakeholders is that the artefacts must be relocated on the ground surface however a final decision will be made at the time of relocation, depending on the nature of the artefacts which have been salvaged.

3.4.7 Monitoring and registration on AHIMS

Prior to the commencement of construction, the salvage team will be provided one day as an opportunity to do an additional salvage survey to identify and collect any artefacts that may have been missed during the initial site survey and have become visible after rain or wind erosion. Any additional salvage must be recorded on AHIMS.

At the completion of the site construction works the nature of the impacts on Aboriginal sites must be additionally recorded on the AHIMS database as a site impact.

4. GENERAL MANAGEMENT AND REPORTING

4.1. ONGOING CONSULTATION WITH RAPS

Ongoing consultation with RAPS is required to ensure that the HMP is implemented in accordance with the consent conditions. Ongoing consultation with RAPS will primarily be via email and in-person meetings. This will include:

- Provision of any updates to the HMP in response to any requests for information from DPE
- The approval and commencement of stages of work
- The completion of project milestones, and
- The commencement of site restoration and rehabilitation works that may impact on Aboriginal sites.

A record of consultation will be retained as part of the HMP procedures, including all emails, meeting notices, AHIMS site forms, induction records and incident reports. Subject to confidentiality requirements and intellectual property restrictions, these may be made available to RAPS.

The RAPS may wish to form a committee to assist with the coordination of responses or increase the efficiency of responding to requests for information. This may include delegation of consultation through the RAPS or provision of information to other Aboriginal stakeholders via RAPS.

4.2 MONITORING AND REPORTING

Reporting and monitoring will be undertaken in accordance with procedures set out in the construction and operational management documents.

Ancillary impacts to sites, such as movement resulting from any increases in surface water erosion, will be subject to monitoring by the Proponent. A record of any potential breaches shall be retained by the Proponent and provided via email to RAPS and seek advice on the ongoing management of the sites. This may include management in accordance with this HMP.

The Proponent will provide opportunities for the RAPS to inspect sites and document any changes to Aboriginal objects during the construction and establishment period. At least one monitoring opportunity must be provided each calendar years.

During the operational phases, RAPS will be provided an opportunity to monitor sites and document any changes every 2 years. This will include monitoring the health of scar trees and the condition of sites using digital imagery.

The proponent will report any changes to Aboriginal sites which are not consistent with this HMP, or are of concern to RAPS, shall be reporting in accordance with regulatory reporting procedures in place at the time of the incident and include notification of the Department of Planning and Environment via the Major Projects portal.

In the event that RAPS consider that a breach of the HMP has taken place during the construction or operation of the Project, and they consider that the Proponent has not acted in accordance with the HMP or the approval conditions, they may report the incident direct to the appropriate regulatory body or via the NSW Enviro Hotline or directly to Heritage NSW.

4.3. REVISION OF STRATEGIES, PLANS AND PROGRAMS

The Proponent must update the HMP prior to any upgrades or decommissioning activities. In accordance with the consent conditions any revisions must be undertaken in consultation with RAPs and Heritage NSW.

The Proponent must update the HMP in response to the following:

- The submission of an incident report relating to the HMP
- The submission of an audit relating to the HMP, and
- Modification to consent conditions relevant to the HMP.

4.4 UPDATING AND STAGING OF STRATEGIES, PLANS OR PROGRAMS

This HMP may be revised, updated or restructured to provide for project staging with the approval of the Secretary.

Unless previously agreed in writing from the Secretary, any revisions, updates or restructures to provide for project staging must be undertaken in consultation with RAPs and Heritage NSW.

While any strategy, plan or program may be submitted on a progressive basis, the Proponent must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.

If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.

4.5 NOTIFICATION OF THE DEPARTMENT

Prior to commencing the construction, operations, upgrading or decommissioning of the development or the cessation of operations, the Proponent must notify the Department in writing via the Major Projects website portal of the date of commencement, or cessation, of the relevant phase.

If any of these phases of the development are to be staged, then the Proponent must notify the Department in writing prior to commencing the relevant stage, and clearly identify the development that will likely be carried out during the relevant stage.

4.6. FINAL LAYOUT PLANS

Prior to commencing construction, the Applicant must submit detailed plans of the final layout of the development to the Department of Planning and Environment via the Major Projects website, including details on the siting of solar panels and ancillary infrastructure. The HMP must be updated to include the final layout and the updated plan must be submitted to RAPs.

4.7. INCIDENT NOTIFICATION

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

4.8. NON-COMPLIANCE NOTIFICATION

The Proponent must notify the Department of Planning and Environment in writing via the Major Projects website portal within 7 days after it becomes aware of any non-compliance with the conditions of the HMP. The notification must:

- identify the development and the application number for it
- set out the condition of consent that the development is non-compliant with,
- the way in which it does not comply, and
- the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.

4.9. INDEPENDENT ENVIRONMENTAL AUDIT

Audits relating to the HMP may be required within the lifespan of the project. The Proponent must commission and pay the full cost of Independent Environmental Audits of the development. The audits must:

- (a) be prepared in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020)
- (b) be led and conducted by a suitably qualified, experienced and independent expert(s) whose appointment has been endorsed by the Secretary
- (c) be prepared, unless otherwise agreed with the Secretary:
 - (i) within 3 months of commencing construction
 - (ii) within 3 months of commencement of operations, and
 - (iii) as directed by the Secretary.
- (d) be carried out in consultation with the relevant agencies
- (e) assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent, and
- (f) recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

4.10 Access To Information

No confidential or restricted information has been made available within the ACHAR (ERM 2019) or the HMP. However, subject to cultural restrictions and protocols that may be placed by RAPs on future information provided to manage and mitigate impacts to sites, the Proponent must:

- (a) make the following information publicly available on its website as relevant to the stage of the development:
 - the EIS
 - the final layout plans for the development
 - current statutory approvals for the development
 - approved strategies, plans or programs required under the conditions of this consent

- the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged
- how complaints about the development can be made
- a register of complaints
- compliance reports
- any independent environmental audit, and the Applicant's response to the recommendations in any audit, and
- any other matter required by the Secretary.

(b) keep this information up to date.

5. REFERENCES

DECCW

2010a Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. Heritage Office:

DECCW

2010b Aboriginal Cultural Heritage Consultation Requirements for Proponents.

ERM

2019 Bonshaw Solar Farm: Cultural Heritage Assessment. Unpublished report prepared for GAIA Australia.

Everick Heritage

2020 Response to Request for Information: Bonshaw Solar Farm, Bonshaw NSW. Unpublished ACHA Letter of Advice prepared for GAIA Australia Pty Ltd.

2021 Bonshaw Solar Farm: Heritage Management Plan. Everick Heritage Pty Ltd unpublished report prepared for GAIA Australia Pty Ltd

McBryde, I.

1974 Aboriginal Prehistory in New England – An Archaeological Survey of Northeastern New South Wales. Sydney University Press.



APPENDIX 1: COMMUNICATION WITH ABORIGINAL STAKEHOLDERS (EVERICK HERITAGE 2021, 2020)

28 September 2020- Email/ Letter to Aboriginal Stakeholders

From: Tim Hill Sent: Monday, 28 September 2020 9:58 AM

To: 'moombahlenelalc1@bigpond.com' <moombahlenelalc1@bigpond.com>;
'duncans528@gmail.com' <duncans528@gmail.com>; 'acsworknsw@gmail.com'
<acsworknsw@gmail.com> Cc: 'luke.kim@gaiaau.com' <luke.kim@gaiaau.com>; Roger Mehr
<Roger.Mehr@environment.nsw.gov.au>

Subject: FW: Bonshaw Solar Farm

Vicky, Diane, Samantha, Liza and Helen.

BONSHAW SOLAR FARM ABORIGINAL CULTURAL HERITAGE ASSESSMENT

The Aboriginal cultural heritage assessment undertaken by ERM Pty Ltd for the Bonshaw Solar Farm project has been subject to review by the Department of Planning, Infrastructure and Environment ('DPIE') and Heritage NSW. As part of the review process, in response to the COVID-19 travel restrictions, Gaia Australia engaged Everick Heritage Pty Ltd to undertake an additional inspection of the original TD-OS14 (#11-3-0083) Aboriginal site to provide additional information to Heritage NSW on the following;

- determine the presence of the scar tree identified on the original site record but not in the ERM survey results. The Everick investigation confirmed that the scar tree is still present on the creek bank, please see attached a photo of the tree in its current condition.
- Provide a general comment on the nature and extent of Aboriginal archaeological sites within the Bonshaw Solar Farm Project. This investigation generally supported the conclusions of the ERM report, however made additional comment on the identification of scar trees, including the recording of a new scar tree near the old stockyards.

As a result of the additional information provided to the DPIE and Heritage NSW, Gaia Australia is of the understanding that Conditional Approval will be received from DPIE soon and that specific conditions relating to Aboriginal cultural heritage will include the following;

- Completion of a site inspection with RAPs to confirm the outcomes of the Everick site inspection and the ERM site mapping. This meeting will be arranged by Everick Heritage when we get the final consent conditions.
- Negotiation of a Aboriginal Cultural Heritage Management Plan in consultation with RAPs and Heritage NSW. This work will commence following the site inspection/ meeting with RAPs.

Gaia Australia acknowledges that there has been a gap in consultation with RAPs while we have been working to satisfy the requests of Heritage NSW and the Department of Planning. This was made harder by policies and commitments to safety around COVID-19. However, we now wish to recommence the consultation and investigation process as we work towards additional design and



construction plans. We would appreciate it greatly if you could provide a written response confirming that you still wish to be part of the project.

Should you wish to discuss the project with Everick Heritage directly, please contact Tim Hill on 0422 309 822.

Please note we will send a letter of the above in the mail for your records.

ta

Tim Hill

10 May 2021-Email to Aboriginal Stakeholders

From: Tim Hill

Sent: Monday, 10 May 2021 10:24 AM

To: moombahlenelalc1@bigpond.com; duncans528@gmail.com; acsworknsw@gmail.com; vduncan@live.com.au

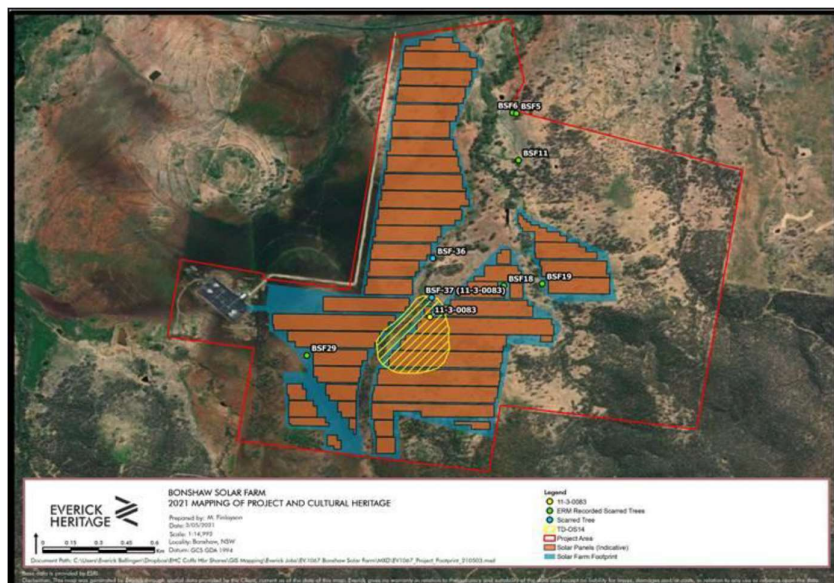
Cc: luke.kim@gaiaau.com; Roger Mehr <Roger.Mehr@environment.nsw.gov.au>

Subject: FW: Correspondence from Aboriginal stakeholders/ RAPs

All

Further to our email from last year, please be advised that the Department of Planning has issues consent conditions for the Bonshaw Solar Farm project. I have attached the documents for your records.

We will develop a draft Heritage Management Plan on the basis of the consent conditions. Please note the specific requirements around the TD-OS14 site, where there is a requirement to consider and agree on the extent of the site boundaries (see yellow hatched area on map below). The blue point named BSF-37 (11-3-0083) is the location of the scar tree as confirmed by Everick last year. The tree is within the lands along the creek.



We will be in touch with additional information over the next few weeks.

Ta



Tim Hill

19 August 2021- Email to Aboriginal Stakeholders

From: Tim Hill

Sent: Thursday, 19 August 2021 8:39 AM

To: moombahlenelalc1@bigpond.com; duncans528@gmail.com; acsworknsw@gmail.com;
vduncan@live.com.au Cc: luke.kim@gaiaau.com; Roger Mehr
<Roger.Mehr@environment.nsw.gov.au>

Subject: FW: Correspondence from Aboriginal stakeholders/ RAPs

Good morning

Further to my email from May, I am writing to give a quick update on the Bonshaw Solar project. I have recently received a phone call that has confirmed there is now a finance package in place for the project. As such, we can now get on with the consultation and Heritage Management Plan.

However, I understand the complexities of working right now and the need to have COVID plans in place. I think it is easier if we can all have a phone call first just so I can get an idea of where everyone is at in terms of being comfortable to visit the sites. Everick is working on the basis that archaeological work is permissible/ exempt from the stay-at-home requirements as it is work that cannot be undertaken from home.

If you could please give me a ring when it suits you we can talk through everyone's individual situation and take it from there. Alternatively, if everyone uses Zoom, I can arrange a teleconference.

Hope to hear from you soon.

Ta

Tim Hill

8 October 2021- Provision of Draft HMP to Aboriginal Stakeholders

From: Tim Hill

Sent: Friday, 8 October 2021 10:34 AM

To: moombahlenelalc1@bigpond.com; duncans528@gmail.com; vduncan@live.com.au

Cc: Roger Mehr <Roger.Mehr@environment.nsw.gov.au>; luke.kim@gaiaau.com

Subject: Bonshaw Solar Farm Heritage Management Plan

Samantha, Vicki and Helen

Thanks for your time out at Bonshaw last month- sorry I just had to sort out a communication protocol type issue with Roger from Heritage NSW.

Please see attached the Draft Heritage Management Plan for the Bonshaw Solar Farm project for your records and for your comments. If you wish to comment or make a revision, please do so by COB 5 November 2021.



The main change from the previous plan/ conditions relates to the TD-OS14 site where it was agreed that the artefacts within the approved development footprint would be subject to community collection/ salvage and the scar tree and artefacts outside the approved development footprint would be left behind exclusion fencing. The proposed relocation point is on the gully to the north- above BSF 22 site- which is east of the old stockyards.

The additional scar tree near the stockyards (BSF 36) will be retained outside the development footprint.

If you want, we can do another Zoom meeting at 11am on Monday 24th October.

Tim Hill

22 October 2021- Email from Heritage NSW

From: Nicole Davis <Nicole.Davis@environment.nsw.gov.au> Sent: Friday, 22 October 2021 1:25 PM
To: luke.kim@gaiaau.com Subject: HNSW ACH - Request Advice on Post Approval - Proponent - Draft Heritage Management Plan Review

Attention : Luke Kim,

Please be advised that I have uploaded our advice re the above request to the MPP today.

Heritage NSW has reviewed the *Draft Heritage Management Plan, Everck Heritage Consulting, prepared for - GAIA Au for Bonshaw Solar Farm, dated 7 October 2021*, with respect to Aboriginal cultural heritage. Heritage NSW is satisfied that it proposed management measures are appropriate in relation to the ACH values and sites within the mining footprint. Heritage HNSW has no additional comments or recommendations. Please don't hesitate to contact me if you require any additional information.

Regards Nicole Davis

Nicole Davis | A/Senior Team Leader, Aboriginal Cultural Heritage Regulation - North

Heritage NSW, Community Engagement, Department of Premier and Cabinet

Level 6, 10 Valentine Ave, Parramatta | Locked Bag 5020 Parramatta 2124

T: 02 4927 3156 M: 0409 394 343 | nicole.davis@environment.nsw.gov.au

25 October 2021- Update email to Aboriginal stakeholders

From: Tim Hill

Sent: Monday, 25 October 2021 8:51 AM

To: moombahlenelalc1@bigpond.com; duncans528@gmail.com; vduncan@live.com.au

Cc: Roger Mehr <Roger.Mehr@environment.nsw.gov.au>; luke.kim@gaiaau.com

Subject: FW: Bonshaw Solar Farm Heritage Management Plan

Good Morning



Further to the below email, we have received in-principle support from Heritage NSW on the heritage management plan. If you wish to comment, please do so by 5th November.

I can set up another Zoom meeting next Monday at 10am if its easier for everyone to talk.

Ta

Tim Hill

3 November 2021- Email from Samantha Duncan

From: Samantha Duncan <duncans528@gmail.com>

Sent: Wednesday, 3 November 2021 9:33 AM To: Tim Hill <t.hill@everick.net.au>

Subject: Re: FW: Bonshaw Solar Farm Heritage Management Plan

Yaama Tim

Thankyou for your email.

I've read through the attached documents and have no comment in relation to the proposed plans for the project.

I apologise for the delay in my response.

Looking forward to hearing from you again.

Kind regards

Samantha Duncan

2 December 2021- Email requesting written support for HMP

From: Tim Hill <t.hill@everick.net.au>

Sent: Thursday, December 2, 2021 7:52 AM

To: moombahlenelalc1@bigpond.com; duncans528@gmail.com

Cc: Vicky Gomerioi Duncan <vduncan@live.com.au>; luke.kim@gaiaau.com; Roger Mehr <Roger.Mehr@environment.nsw.gov.au>

Subject: FW: Bonshaw Solar Farm Heritage Management Plan

Good morning Helen and Sam.

We have just had a note back from the Department of Planning that they would like written advice re: support for the ACHMP for the Bonshaw Solar Project. We lodged the attached based on the written comment from Vicki- if you wouldn't mind sending an email by COB 16 December that would be appreciated.

As always, give me a ring if its easier....

Ta

Tim Hill