



CENTRAL-WEST ORANA RENEWABLE ENERGY ZONE

HERITAGE MANAGEMENT PLAN

CWO-PRO-050-ENV-PLN-000006 REV 04



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Document Control

This Heritage Management Plan is a controlled document, approved by the ACJV D&C Project Director. The Project Wide Lead is responsible for ensuring this plan is kept up to date for the Project, Project risks, activities and legislative requirements.

PROJECT AUTHORISATION

Authorisation				
Document Title	CENTRAL-WEST ORANA RENEWABLE ENERGY ZONE TRANSMISSION PROJECT – HERITAGE MANAGEMENT PLAN			
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Rev 00	12/03/2025	All	Erran Woodward Matthew Kelleher	Update following consultation and further comments from Heritage NSW
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Rev 04	10/12/2025	Multiple	Lauren Tompkins	Update for Modification 2 and 3 determination

CONTROL AND RECORDS

The approved CWO-PRO-050-ENV-PLN-000006 Heritage Management Plan will be signed, and a pdf version will be uploaded and stored on the Project's document management system in accordance with CWO-PRO-050-DOC-PLN-000001 the CWO Document and Records Management Plan.

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Any uncontrolled hard copy documents are up to date at issue and are only issued to outside organisations, customers, etc., upon request and approval by a Workplace Manager. Such uncontrolled documents will be clearly marked "Uncontrolled Copy When Printed or Downloaded" and will not be subject to an update.

DISTRIBUTION

The Integrated Management System – Systems Representative on the Project is responsible for the controlled internal distribution of this document and changes. Personnel have access to the latest revision of the Plan through RIBCX.

Terms and Definitions

Abbreviation / Term	Expanded text
ACEREZ Network Operator	ACEREZ Network Operator has been selected by EnergyCo as the Network Operator for the Central-West Orana REZ.
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHAR-A	Aboriginal Cultural Heritage Assessment Report Addendum
ACJV D&C	Acciona and Cobra Joint Venture - Design and Construct – the Joint Venture of ACCIONA Construction Australia Pty Ltd and Cobra Pty Ltd, engaged by ACEREZ Network Operator to design and construct the project
AHIMS	Aboriginal Heritage Information Management System
AR	Amendment Report
CEP	Communication and Engagement Plan
CHL	Commonwealth Heritage List
CoA (Commonwealth)	Commonwealth Conditions of Approval
CSSI	The Critical State Significant Infrastructure, as described in Schedule 1, the carrying out of which is approved under the terms of the SSI-48323210 approval
DPHI	NSW Department of Planning, Housing and Infrastructure
EIS	The Environmental Impact Statement titled <i>Environmental Impact Statement – CentralWest Orana REZ Transmission Project</i>, prepared by WSP, dated February 2023, including the Proponent's: • Amendment Report, dated March 2024 • Submissions Report, dated March 2024 • Biodiversity Development Assessment Report, dated March 2024 • Central-West Orana REZ Transmission Project Modification 1 – Request for minor modifications to the condition of approvals, dated September 2024 and additional information dated 11 October 2024 • Central-West Orana REZ Transmission Project Modification 2 – Request for modification to allow establishment of an additional operations facility, dated 22 October 2025 • Central-West Orana REZ Transmission Project Modification 3 – Request for minor administrative changes to reflect Strategic Offset delivery Agreement, dated 15 August 2025
EMS	Environmental Management Strategy
EnergyCo	The Energy Corporation of New South Wales, constituted by Section 6 of the <i>Energy and Utilities Administration Act 1987</i> as the NSW Government statutory authority responsible for the delivery of NSW's Renewable Energy Zones
Environmental Representative (ER)	A suitably qualified and experienced person independent of project design and construction personnel employed for the duration of construction. The principal point of advice in relation to environmental performance of the project and have the responsibility listed in condition A12 of the NSW Minister for Planning and Public Spaces' Conditions of Approval
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>

Abbreviation / Term	Expanded text
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Commonwealth)
Exclusion Buffer	An area of suitable minimum width to be implemented to protect heritage items from indirect impacts. Also known as 'exclusion zone' (REMM AH10).
GPR	Ground Penetrating Radar
Heritage-UFP	Unexpected Heritage Finds and Human Remains Procedure
HMP	Heritage Management Plan
ICOMOS	International Council on Monuments and Sites
LEP	Local Environment Plan
MCoA (NSW)	NSW Minister for Planning and Public Spaces' Conditions of Approval
Minister, the	Minister for Planning and Public Spaces
NHA	Non-Aboriginal Heritage Assessment
NHL	National Heritage List
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPWS	NSW National Parks and Wildlife Service
NSW	New South Wales
NVMP	Noise and Vibration Management Plan
OEH	NSW Office of Environment and Heritage
PAD	Potential archaeological deposit
Participating Elders and key knowledge holders	Individuals identified by the Aboriginal community that may or may not also be members of a RAP.
Project, the	The construction and operation of new electricity transmission infrastructure, new energy hubs and switching stations and ancillary works required to connect new renewable energy generation and storage projects within the Central-West Orana REZ to the NSW transmission network (referred to herein as 'the project' or 'Central-West Orana Renewable Energy Zone Transmission project')
RAPs	Registered Aboriginal Parties as identified in the EIS
Reasonable and feasible	Available and capable of being implemented after consideration of cost, existing technology, logistics in light of the overall Project purpose, environmental impact, and ability to obtain all necessary approvals for implementation
REMM	Revised Environmental Mitigation Measure, also known as Updated mitigation measure. For clarity, this refers to those measure listed in Appendix E of the Amendment Report
Restriction Zone	An area of suitable minimum width to be implemented to protect heritage items from direct impacts
REZ	Renewable Energy Zone
RIBCX	RIBCX is the name of the software platform used by ACJV to facilitate document hosting and distribution.
RNE	The Register of the National Estate



Abbreviation / Term	Expanded text
RtS	Response to Submissions Report
SAP	Sensitive Area Plan
Secretary	Secretary of the NSW Department of Planning, Housing and Infrastructure or nominee, whether nominated before or after the date on which this approval was granted
SHR	State Heritage Register
SSI	State Significant Infrastructure
WHL	World Heritage List



1 Introduction

1.1 CONTEXT

This Heritage Management Plan (HMP or plan) is for the Central-West Orana Renewable Energy Zone (REZ) Transmission project (the Project).

This HMP has been prepared to address the requirements of the:

- NSW Minister for Planning's Conditions of Approval (MCoA (NSW)) for the Project (SSI-48323210)
- The Project Environmental Impact Statement (dated September 2023) (EIS)
- The Project Response to Submission report (dated March 2024) (RtS)
- The Project Amendment Report (dated March 2024) (AR), including revised environmental mitigation measures (REMMs)

In totality, the MCoA (NSW) and REMMs are referred to as the 'Project requirements'.

This plan describes how ACJV Design and Construct (ACJV D&C) proposes to manage potential impacts on heritage (Aboriginal and Historical) during pre-construction and construction of the Project.

1.2 AUTHOR OF THIS PLAN

As required by Condition B28(a) this plan has been prepared by a suitably qualified and experienced Aboriginal cultural heritage specialist, Dr Matthew Kelleher of Kelleher Nightingale Consulting Pty Ltd, whose appointment has been endorsed by the Planning Secretary.

Matthew has 30 years of experience in all aspects of archaeological fieldwork and heritage management, including survey, test and salvage excavation, impact assessment, management plans and Aboriginal community consultation. Matthew's areas of archaeological expertise include large scale spatial and statistical analysis and rock art and a PhD in Archaeology (Australian Prehistory) from the University of Sydney.

1.3 BACKGROUND AND PROJECT DESCRIPTION

The Project comprises the construction and operation of new electricity transmission infrastructure, new energy hubs and switching stations and ancillary works required to connect new renewable energy generation and storage projects within the Central-West Orana REZ to the NSW transmission network.



The Environmental Impact Statement (EIS) was prepared to assess the impacts of construction and operation of the Project. As part of the EIS development, an Aboriginal Cultural Heritage Assessment Report (ACHAR) (Technical Paper 5 – Aboriginal Cultural Heritage Assessment Report) was prepared to assess and address matters concerning Aboriginal heritage. A Non-Aboriginal Heritage Assessment (NHA) (Technical Paper 6 - Non-Aboriginal Heritage) was also prepared to assess and address matters concerning non-Aboriginal heritage. The findings of the heritage assessments were summarised in Chapter 11 (Aboriginal Heritage) and Chapter 12 (Non-Aboriginal Heritage), respectively, of the EIS.

A Response to Submissions (RtS) was prepared in response to submissions received on the EIS. The RtS includes clarifications as well as further detail relating to Aboriginal and non-Aboriginal (hereafter historical) heritage management issues of the Project.

An Amendment Report (AR) and an Aboriginal Cultural Heritage Assessment Report Addendum (ACHAR-A) were subsequently prepared to address Project changes resulting from the submissions and design progress. The AR was accepted on 11 March 2024.

The Project was declared Critical State Significant Infrastructure (CSSI) by the NSW Minister for Planning and Public Spaces (the Minister) on 23 November 2020 (amended in February 2023) in accordance with Section 5.13 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Section 23 in Schedule 5 of the *State Environmental Planning Policy (Planning Systems) 2021*.

The Project is also deemed a Controlled Action and requires a separate approval from the Commonwealth Minister (or its delegate) for the Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The Project was approved by the Minister on 26 June 2024. This approval was updated to accommodate Modification 1 (MOD 1) on 14 October 2024, Modification 2 (MOD 2) on 22 October 2025 and Modification 3 (MOD 3) on 15 August 2025. Approval for the Project under the EPBC Act was granted by the Branch Head of Environmental Assessments NSW and ACT of the DCCEEW on 8 August 2024 (EPBC 2022/09353).

The documents listed in the planning approval concluded that while efforts have been made to avoid impacts to Aboriginal and historical heritage, some impacts could not be avoided due to competing environmental and technical constraints. These impacts will be managed through the implementation of mitigation and management measures as described in this HMP.

1.4 SCOPE

The scope of this plan is to describe how ACJV D&C will manage potential impacts to heritage during construction of the Project.

This HMP applies to the Construction Area, defined in the EIS as *the area that would be directly impacted by the construction of the project, including (but not limited to) transmission towers and*

lines, brake and winch sites, access roads to the switching stations and energy hubs, access tracks, energy hubs, switching stations, communications infrastructure, workforce accommodation camps, construction compounds, laydown and staging areas, and including future refinements permitted as part of the existing or a modified approval.

All ACJV D&C staff and subcontractors are required to comply with the requirements of this plan and related plans, over the full duration of the construction program.

This plan addresses the construction stage of works. A separate HMP was prepared as part of the Environmental Management Strategy (required under MCoA (NSW) C1) for the impact to the low density artefact scatter SNI BS1. Following approval of this HMP, this plan will supersede the HMP as included with the EMS. Remaining stages, including operation, upgrading and decommissioning, will be addressed in a separate document, in accordance with MCoA (NSW) C3.

1.5 INTERFACE WITH OTHER PLANNING DOCUMENTS

The key documents that interface with the HMP are outlined in Table 1-1.

Table 1-1 Key interfaces with this plan

Plan	Interface
Unexpected Heritage Finds and Human Remains Procedure (MCoA (NSW) B28(d)(vi), REMM AH4 and REMM HH8)	Describes the procedure that must be followed, in the event that unexpected heritage finds are discovered, including direction on when to stop work, where to seek technical advice and how to notify the regulator, as required
Environmental Management Strategy (MCoA (NSW) C1)	- Provides the strategic framework for environmental management of the development - Identifies all statutory approvals that apply to the development - Describes key roles, responsibilities authority and accountability - Sets out procedures to inform the community, local agencies of the environmental performance of the development, manage complaints, resolve disputes, response to any non-compliances or emergencies - Details the links to any strategies, plans and programmes - Details monitoring and reporting requirements under the approval
Aboriginal Heritage Interpretation Strategy and Plan (REMM AH7)	Identifies the interpretive values of the area and to provide direction for potential interpretive opportunities for the Project
Noise and Vibration Management Plan (MCoA (NSW) B13)	- Details how potential noise and vibration impacts will be managed and monitored during construction of the Project - Details requirements for construction vibration testing during vibration generating activities that have the potential to impact heritage items and mitigation for potentially affected heritage items

1.6 PURPOSE

The purpose of this HMP is to describe how ACJV D&C will manage potential impacts to heritage during the construction phase of the Project. ACJV D&C is responsible for the implementation of the HMP including appointing a suitably qualified heritage specialist. The HMP outlines Registered Aboriginal Party (RAP) and other key stakeholder involvement in the required management activities. The requirements of the MCoA (NSW) specifically relevant to the preparation of the HMP are provided in Table 1-2. No CoA (Commonwealth) are directly applicable to the preparation of this plan.

This HMP has been prepared to address applicable statutory requirements and aims to ensure that the commitments in the planning approval are met with regard to construction impacts to heritage item or sites.

The MCoA (NSW) and REMMs relevant to heritage management are listed in Appendix A and Appendix B, respectively.

Table 1-2: MCoA (NSW)

MCoA (NSW)	Requirement	Document reference	How addressed
B28	Prior to carrying out any development that could harm heritage values, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	HMP	This document, in its entirety, meets the requirement of this condition.
a)	Be prepared by a suitably qualified experience Aboriginal cultural heritage specialist whose appointment has been endorsed by the Planning Secretary	-	The HMP has been prepared by a suitably qualified heritage professional whose appointment has been appropriately endorsed.
b)	Be prepared in consultation with Aboriginal Stakeholders, NPWS and reviewed by Heritage NSW	Section 3	Section 3 details the consultation undertaken with Aboriginal stakeholders and NPWS in preparation of this plan. It also evidences the review of this HMP by Heritage NSW.
c)	Undertake an assessment of the unsurveyed areas of the construction areas, in accordance with Code of Due Diligence	Section 6.1.3	This Section details the methods for assessment of unsurveyed areas.
d)	Include a description of the measures that would be implemented for:	-	-
i)	Protecting heritage items in accordance with conditions B27(a)	Section 6.3.1	This Section details the measures for protecting heritage items in accordance with MCoA (NSW)B27(a) for Aboriginal and historical heritage, as required.

MCoA (NSW)	Requirement	Document reference	How addressed
	ii) Undertaking the management activities specified in Table 3-2 of Appendix 3, including a detailed methodology for each of the approved management activities	Section 6.2	This Section details the methods of undertaking the required management activities as specified in Table 3-2 of Appendix 3 of the MCoA (NSW).
	iii) Avoiding harm to Laheys Creek Cemetery (CWO-22-HH06), Tallawang Creek Archaeological Site 02 (CWO-22-HH11) and the suspected graves and buried architecture within Tallawang Union Church (CWO-22-HH09b) and Tallawang Catholic Church (CWO-22-HH-09c)	Sections 6.3.1.12 and 6.3.2.1	These Sections detail the process to avoid harm to the specified archaeological site and heritage items.
	iv) Undertaking detailed reporting on the outcomes of management activities including (but not limited to) archival recording and analysis of stone artefact assemblages and other information relevant to addressing research questions	Sections 6.2.7 and 7.5	These Sections detail the reporting requirements for the relevant heritage management activities.
	v) A strategy for the management of any salvaged Aboriginal objects	Sections 3.3.6 and 6.2.9	These Sections detail the consultation requirements and identified strategies for the management of salvaged Aboriginal objects.
	vi) A contingency plan and reporting procedure if: - Heritage items outside the approved construction area are harmed - Previously unidentified heritage items are found - Skeletal material is discovered	Sections 6.1.2 and 7.12 Appendix C	Section 6.1.2 details unexpected heritage finds procedure and Section 7.12 provides an overview of incidents and non-compliances for heritage items outside the approved construction area that are harmed. An Unexpected Finds Protocol is provided in Appendix C for any previously unidentified heritage items or skeletal material that may be discovered.
	vii) Ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions	Section 6.1.1	This Section details the training and heritage induction process to be undertaken, including details of record-keeping.
	viii) Ongoing consultation with Aboriginal Stakeholders during the implementation of the plan	Section 3.2	This Section describes the methods and processes for ongoing consultation.
e)	Include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project	Section 7.3	Section 7.3 details the monitoring and reporting program.

2 Environmental Requirements

2.1 LEGISLATION AND REGULATORY REQUIREMENTS

Legislative and regulatory requirements pertinent to heritage management for the Project include:

- Aboriginal and Torres Strait Island Heritage Protection Act 1984 (Commonwealth)
- Aboriginal Land Rights Act 1983 (NSW)
- Heritage Act 1977 (NSW)
- National Parks and Wildlife Act 1974 (NSW)
- Native Title Act 1993 (Commonwealth)
- Native Title Act 1994 (NSW)
- Relevant local environmental plans, including:
 - Dubbo Regional Local Environmental Plan 2022
 - Mid-Western Regional Local Environmental Plan 2012
 - Upper Hunter Local Environmental Plan 2013
 - Warrumbungle Local Environmental Plan 2013
- Aboriginal Cultural Heritage Consultation Requirements for Proponents (Department of Climate Change, Environment and Water (DECCW), 2010a)
- Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010b)
- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (ICOMOS, 2011)
- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (Office of Environment and Heritage (OEH), 2011)
- NSW Heritage Manual (NSW Heritage Branch, 2009) (including the Statement of Heritage Impact Guidelines)
- *The Burra Charter: The Australia International Council on Monuments and Sites (ICOMOS)* charter for places of cultural significance (Australia ICOMOS, 2013) (The Burra Charter)

2.2 GUIDELINES AND STANDARDS

The main guidelines, standards and policy documents relevant to this HMP include:

- Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW, 2010a)
- *Aboriginal Scarred Trees in NSW: A Field Manual* (Department of Environment and Conservation NSW (DEC), 2005)



- Assessing heritage significance: Guidelines for assessing places and objects against the Heritage Council of NSW criteria (DPE (NSW Heritage Office), 2023a)
- Assessing Significance for Historical Archaeological Sites and 'Relics' (Heritage Branch, Department of Planning, 2009)
- Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010b)
- Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010c)
- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011)
- Guidelines for preparing a statement of heritage impact (DPE (NSW Heritage Office), 2023b)
- *NSW Heritage Manual* (NSW Heritage Office and Department of Urban Affairs and Planning, 1994)
- Skeletal Remains: Guidelines for Management of Human Remains (NSW Heritage Office, 1998)
- The Burra Charter Practice Note - Understanding and Assessing Cultural Significance (Australia International Council on Monuments and Sites (ICOMOS), 2013b).
- The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance (Australia ICOMOS, 2013a)

The above guidelines were used in preparation of the EIS, AR and this HMP, and should be used as reference points for further information.

2.3 MINISTER'S CONDITIONS OF APPROVAL (NSW)

The MCoA (NSW) relevant to this plan are listed in Appendix A. A cross reference is also included to indicate where the MCoA (NSW) are addressed in this plan or other project management documents.

2.4 CONDITIONS OF APPROVAL (COMMONWEALTH)

No CoA (Commonwealth) are applicable to heritage management.

2.5 REVISED ENVIRONMENTAL MITIGATION MEASURES

Relevant revised environmental mitigation measures (REMMs) are listed in Appendix B. A cross reference is also included to indicate where the REMM is addressed in this plan or other project management documents.



2.6 OTHER HERITAGE MANAGEMENT PLANS

It is noted that the Project passes through the Peabody Energy Wilpinjong Coal, Yancoal Moolarben Coal and Glencore Ulan Coal mining operations. Each of these mining areas is currently subject to an individual heritage management plan in accordance with their respective terms of approval. Aboriginal heritage within these mining areas was considered during preparation of the ACHAR and ACHAR Addendum and appropriate management strategies identified in the project REMMs. Mitigation and management of Aboriginal heritage within the mining areas will be completed in accordance with the requirements of the Project's MCoA (NSW).

3 Consultation

3.1 CONSULTATION FOR HMP PREPARATION

In accordance with MCoA (NSW) B28(b), this HMP has been:

- Reviewed by Heritage NSW
- Prepared in consultation with:
 - Aboriginal Stakeholders (defined as 'Registered Aboriginal Parties (RAPs) from the EIS' under the Project Approval)
 - NPWS

A copy of the draft HMP was provided to all RAPs on 29 November 2024 for a review and comment period. RAPs were invited to provide feedback on the proposed management and mitigation measures contained within the draft HMP, the process for continued Aboriginal community consultation, and the strategies for long-term management of salvaged Aboriginal objects. RAPs were provided with an eight-week (56 day) review period, extended to account for the Christmas/New Year holiday (closure of formal comment period on 24 January 2025). During consultation of the HMP RAPs were also invited to attend a follow-up meeting in early 2025 to further discuss the document and proposed management strategies. Written responses were received from four RAPs during the review period for the HMP. The meeting with the RAPs has been unable to be facilitated at the time of preparing this revision of the HMP and is currently scheduled for May 2025. Should the meeting identify any required amendments to the HMP these amendments will be discussed with DPHI and HNSW and the need to re-submit the HMP for approval will be determined at that time.

Consultation and correspondence with each stakeholder, including responses received and how any issues raised were addressed in the development of this plan has been provided to the Planning Secretary/Heritage NSW along with the relevant documents for submission. A Consultation Log is provided in Appendix E.

3.2 CONDITIONS RELATING TO ONGOING STAKEHOLDER CONSULTATION

The following stakeholders will be included in ongoing consultation during the implementation of this plan:

- RAPs, where Aboriginal cultural heritage requires management, in accordance with REMM AH8
- Aboriginal Stakeholders, in accordance with MCoA (NSW) B28(d)(viii)
- Participating Elders and key knowledge-holders via On-Country meetings undertaken, in accordance with REMM AH3
- Heritage NSW (if historical archaeological test excavation or salvage will be undertaken), in accordance with REMM HH6 and REMM HH7

3.3 ABORIGINAL COMMUNITY CONSULTATION

Table 3-1: Aboriginal community consultation

Consultee	Timing	Source of requirement	Output
RAPs	Pre-construction Construction	MCoA (NSW) B28(b), B28(d)(viii), REMM AH4 and REMM AH8	Consultation records
Elders and key knowledge-holders	Pre-construction Construction	REMM AH3	Consultation records

The Registered Aboriginal Parties (RAPs) that were identified during the consultation process undertaken for the Aboriginal cultural heritage assessments completed the EIS are detailed in Table 3-2 below, as presented in the Addendum ACHAR.

Table 3-2: RAP Details

Organisation/Individual	Contact Person
Dubbo Local Aboriginal Land Council	Charlie Trindall, Will Robinson
Wellington Local Aboriginal Land Council	Chairperson
Woka Aboriginal Corporation	Steve Johnson
Ngumbaay Indigenous Corporation/Summit Employment	Tatum Moore
Three Rivers Regional Assembly (TRRA)	Paul Carr
Gallangabang Aboriginal Corporation	Melissa Chown
Murong Gialinga Aboriginal & Torres Strait Islander Corporation	Debbie Foley
Warrabinga Native Title Claimants Aboriginal Corporation	Jack Pennell
Wurrumay Consultants	Vicki Slater
Mudgee Local Aboriginal Land Council	Aleshia and Tony Lonsdale
Wellington Valley Wiradjuri Aboriginal Corporation	Brad Bliss
Natasha Rodgers	Natasha Rodgers
Corroboree Aboriginal Corporation	Marilyn Carroll-Johnson
Gomeri Native Title Applicant c/o NTS Corp	Conor Wakefield, Mishka Holt, Maeve Parker
The Gomeri People	Steve Talbott
AT Gomilaroi Cultural Consultancy	Aaron Talbott
Michael Long	
Binjang Wellington Wiradjuri Heritage Survey	Jamie Gray
Mingaan Aboriginal Corporation	Aunty Helen Riley
Timothy Stubbs	Timothy Stubbs



Organisation/Individual	Contact Person
Kamilaroi Yankuntjatjara Working Group	Phil Khan
Edgerton Kwiembul Aboriginal Corporation	Vicky Hannah Gomeroi Duncan
Jeremy Duncan	Jeremy Duncan
Yurwang Gundana	Merekai Bell
Wiradjuri Elders Council/Wiradjuri Council of Elders	David Acheson
North- Eastern Wiradjuri	Virginia Doig, Emma Shannon
Didge Ngunawal Aboriginal Corporation	Paul Boyd
Konanggo Aboriginal Cultural Heritage Services	Robert Young
Red Earth Gallery/Warrabinya Cultural Services	Lewis Burns
Thomas Dahlstrom	Thomas Dahlstrom
Ibbai Waggan Wiradjuri People P/L	Stephen Parkes
Ungooroo Aboriginal Corporation	Allen Paget
Jarban and Mugreba	Les Atkinson
Hunters and Collectors	Tania Matthews
AGA Services, Bawurra and Cactua	Donna Sampson
A1 Indigenous Services Pty Ltd	Carolyn Hickey
Murra Bigee Mullangari	Ryan Johnson
Girragirra Muran Aboriginal Corporation	Diane Astin

Ongoing consultation and engagement will be undertaken in accordance with the Planning Approval and the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010a), which will provide an opportunity to continue to minimise impacts relating to Aboriginal cultural heritage. The aims of ongoing consultation are to:

- Inform and provide opportunity for feedback regarding matters relating to the mitigation and management of Aboriginal cultural heritage values across the Project footprint
- Provide a forum for organising future RAP participation in ongoing assessment, mitigation and management activities
- Provide opportunities to comment on policy and documentation in regard to the mitigation and management of Aboriginal cultural values, including the HMP
- Provide an opportunity for RAPs to participate in field actions involving the mitigation and management of Aboriginal cultural values

Additional specific consultation pathways identified include:

- The Aboriginal Heritage Interpretation Strategy and Plan, to be developed by an Aboriginal heritage specialist, in liaison with RAPs and in accordance with REMM AH7

- Community feedback and complaints relating to Aboriginal heritage to be managed in accordance with the Community Communications Strategy, and the Complaints Management System

3.3.1 Cultural Sites and Areas

Table 3-3: Further consultation on visual impact on cultural sites and areas

Consultee	Timing	Relevant sites / areas	Source of requirement	Output
Participating Elders and key knowledge-holders	Pre-construction Construction	SNI-CS4; SNI-CS5; SNI-CS6; travelling routes #1 and #5 where they intersect the construction area	REMM AH3 MCoA (NSW) Appendix 3, Table 3-2	Consultation records Updates to HMP (where required)

Elders and key knowledge holders (who may or may not also be RAPs) previously participated in the cultural values assessment and further consultation is required under REMM AH3. In accordance with REMM AH3 and MCoA (NSW) Appendix 3, Table 3-2, On-Country meetings will be undertaken with participating Elders and key knowledge-holders of the Project to discuss efforts to conserve and communicate appropriate and important information about places of Aboriginal cultural value that may be intersected by the Project.

If identified, reasonable and feasible measures to mitigate indirect harm would be developed in consultation with the Elders and key knowledge-holders and integrated into this HMP. This may include inclusion of specific cultural knowledge into the Aboriginal Heritage Interpretation Strategy and Plan to be developed under REMM AH7, educational outcomes, or identification of any specific management measures relevant to the Project for the identified Aboriginal cultural heritage sites and places.

On-Country meetings may occur in the following instances:

- Assessment of a potential Unexpected Find(s)
- To aid further understanding of cultural values
- Further consultation in relation to managing or avoiding impacts to Aboriginal heritage items or sites
- Following an incident involving an Aboriginal heritage item or site

3.3.2 Aboriginal Heritage Interpretation Strategy

An Aboriginal Heritage Interpretation Strategy and Plan will be developed by a heritage specialist, in consultation with RAPs, which will identify the interpretive Aboriginal cultural heritage values of the construction area and provide direction for interpretive installations and devices. The contents and guiding principles for the management of the strategy and plan are described further in Section 6.2.10. It is recognised that the strategy and plan need to incorporate RAPs' views on traditional and contemporary values, local ethnographic and post-Contact information, and archaeological data developed for the Project.



The Aboriginal Heritage Interpretation Strategy and Plan will be developed prior to 31 December 2025 to allow for timely implementation of interpretation measures throughout the lifecycle of the Project.

3.3.3 Provision of Reports

In accordance with REMM AH9, a copy of the ACHAR and ACHAR-A and all relevant Aboriginal Heritage Information Management System (AHIMS) site recording forms and information for the Project will be provided to each of the RAPs, this information will also be provided to Heritage NSW as standard practice. This applies for all Aboriginal objects, sites and places described in Chapter 5 of the ACHAR-A (see Section 7.5).

3.3.4 Consultation on Unexpected Finds

In the event of a discovery or any unexpected finds concerning Aboriginal objects (inconsistent with approved heritage impacts) or suspected human remains are identified, consultation with the RAPs and Heritage NSW will be undertaken as required, as outlined in the Unexpected heritage Finds Procedure (Appendix C).

3.3.5 RAPs Participation in Archaeological Fieldwork

Opportunity will be provided to the RAPs to assist with the following activities in accordance with the methodologies specified in this HMP:

- Additional Aboriginal heritage surveys, where required
- Salvage collection/movement of surface artefacts
- Aboriginal archaeological test and/or salvage excavation

The selection of RAPs to participate in (paid) fieldwork will be managed by ACJV D&C.

3.3.6 Salvaged Archaeological Material

RAPs are to be consulted on the appropriate short and long-term management strategies for salvaged archaeological materials. The proposed short and long-term management strategies are included in Section 6.2.9. Feedback on the proposed strategies will be sought as part of the HMP review process, and incorporated into this document, where appropriate. Long-term management strategies and storage locations will need to be identified following salvage and confirmation of the characteristics of the assemblages.

3.4 RAPs CONSULTATION ON PROPOSED CHANGES TO ABORIGINAL CULTURAL HERITAGE IMPACTS

Design alterations or other changes to the approved Project may be required during construction of the Project. Where a change is proposed, a review of existing heritage assessments and/or



additional heritage assessments will be undertaken by the Project's Senior Manager Environment and Sustainability (or delegate) and the appointed Heritage Specialist to determine if there would be a change to approved impacts to known Aboriginal cultural heritage items, and whether this represents a modification to the approved Project.

If a proposed change to the approved Project is considered to have a net neutral impact to an item of Aboriginal cultural heritage, as identified in the EIS/AR, typically, no further consultation would be required.

However, if a proposed change to the approved Project is considered to have an adverse impact to an item of Aboriginal cultural heritage value, or potentially impacts Aboriginal cultural heritage not included in the current approval, then, further consultation with RAPs will be undertaken, subject to the degree of change to impact and whether the area was assessed as part of the EIS/AR. Consultation requirements pertaining to changes to Aboriginal cultural heritage impact are categorised below:

a) Neutral:

If, as a result of a proposed change, a previously identified impact to an Aboriginal heritage item is neutral, then no further consultation is required.

b) Reduced impact:

If, as a result of a proposed change, an impact to an Aboriginal heritage item is proposed that results in a reduced impact (i.e. the cumulative impact is reduced), then further consultation with RAPs will be undertaken. This consultation will be undertaken via an email notification, and may be followed by a phone call and log of additional comments received or the provision of a report for comment (10 working days).

c) Increased impact:

If, as a result of a proposed change, an impact on Aboriginal heritage item is considered to be greater than identified by the Approved Project, then further consultation will be undertaken. This consultation will either entail an email with a follow up phone call and log of comments received or the provision of a report for comment (10 working days).

d) Unknown impacts:

Where a proposed change is in an area located outside of the Project area assessed as part of the EIS/AR, the impact on Aboriginal cultural heritage is considered to be unknown. This area would require preliminary assessment to determine any impacts upon any known Aboriginal heritage items. Should no impacts be identified, then no additional consultation with RAPs is required. Conversely, should potential impacts be identified, additional consultation with RAPs will be undertaken. This consultation will entail the provision of a report for stakeholder comment (10 working days) detailing the impacts and mitigation strategies proposed.

4 Existing Environment

4.1 ABORIGINAL CULTURAL HERITAGE

The Aboriginal heritage values of the Project were identified in the EIS and the AR and have been summarised below and are shown in Figure 4-1 to Figure 4-18.

An ACHAR was prepared for the EIS (Technical Paper 5) and is summarised in Chapter 11 of the EIS. Additional assessment was subsequently undertaken to identify changes to potential Aboriginal heritage impacts associated with the amended Project. The relevant assessment completed to support the AR also comprised an ACHAR-A.

4.1.1 Cultural, Historical and Archaeological Context

The EIS (Section 11.3.1), informed by the detailed Aboriginal cultural values mapping and report (ACHAR Appendix C), identified that the study area is primarily located on land traditionally occupied by people known collectively as the Wiradjuri, who all spoke a related language and shared cultural attributes. The northern extent of the study area also extends into Gamilaroi Country (also known as Kamilaroi, Gomeroi and Gamilaraay). The main mythologies of both Wiradjuri and Gamilaroi people involved supreme beings, such as Baiame, Daramulan and Muni Burrebean, with totemic ancestors being of lesser importance. Numerous creation stories and spiritual sites are documented within the region. Burial activities of the Wiradjuri people were observed by early explorers and exhibited complex and highly visibly landscape modifications, including carved trees. Wiradjuri people lived in small family groups of up to 50 individuals and primarily occupied open camp sites. Groups travelled around country throughout the year, moving to a new area when resources were diminished, seasons changed or for ceremonies and trade with other groups.

Extensive research has been conducted over the south-east of the study area for over 30 years as noted in the EIS (Section 11.3.2), with broader and more recent assessments encompassing the remainder of the study area. While not all data is publicly available, these prior studies provide a record of cultural materials that may be expected across the construction area. Based on the information available across the region, cultural materials are dominated by various stone artefact densities, typically as isolated finds or clusters of more than 20 artefacts, indicative of ongoing but transient use of much of the study area.

Section 11.3.2 of the EIS details that there are several notable areas of cultural materials, including along the banks of Laheys Creek, the interface between Barneys Reef and the surrounding lowlands near Tallawang, a suite of grinding grooves on discrete sandstone dominated hills in the northwest of Merotherie Energy Hub, and an abundance of diverse sites along Wilpinjong Creek.

4.1.2 AHIMS Search Results

A review of Heritage NSW's AHIMS database was undertaken in 2022 during the preparation of the ACHAR for the EIS, which identified 2,809 previously documented sites within the broad search area,

centred on the construction area (EIS Section 11.3.3). Updated searches were undertaken in late 2023 during preparation of the ACHAR-A for the AR. The updated search results identified 3,050 previously documented sites within the search area, which represents an increase by 241 since the ACHAR. The most common site features registered in the AHIMS search area included:

- Artefactual sites (82%)
- Areas of potential archaeological deposit (PAD) (13%)
- Culturally modified trees (5%)
- Rockshelter (5%)
- Grinding grooves (2%)

96 of the previously documented sites identified in the AHIMS searches were found to be within the construction area (as amended), which represents an increase by 12 since the ACHAR, and comprises the following:

- Various stone artefact sites (86%)
- Culturally modified trees (6%)
- Areas of PAD (5%)
- Rockshelter (5%)
- Grinding grooves with stone arrangements and water hole (1%)
- Art site (1%)

The AHIMS search results identified two significant patterns reflective of the past use of the landscape, including:

- Rockshelter and art sites are generally found in the eastern and south-eastern portion of the study area, where steep relief and sandstone outcropping – a necessity for such sites – is prevalent
- Clear clusters of sites along moderate (second to fourth order) creek-lines within the study area, most notably Laheys, Sandy and Wilpinjong Creeks, and which suggests these corridors were a focus of past use

Updated searches of the AHIMS database were undertaken during preparation and finalisation of the HMP (February-March 2025) to confirm the existing findings of the ACHAR and ACHAR Addendum. The updated searches correlated with the AHIMS data and mapping as presented in the ACHAR Addendum, with the additional inclusion of archaeological sites registered for the project, changes in site status for sites that have since been destroyed by approved mining activities within the mining areas, and the addition of two new isolated finds and two low density surface scatters within the mining areas. Following micro-siting of the Project infrastructure and the completion of detailed design, any impacts to these sites will be managed in accordance with the strategies outlined in this HMP.

4.1.3 Cultural Mapping

The EIS (Section 11.3.5) describes six places of cultural value and two key travelling routes that were identified in the study area through cultural values mapping. The places of cultural value include bora and corroboree grounds, specific rockshelters of high value, birthing trees and a burial ground. The travelling routes encompass portions of Barney's Reef and Cockabutta Creek and reflect main movement corridors of people in the past. None of the identified places of cultural value are within the AR construction area. However, the travelling routes intersect the construction area at five points near the Elong Elong Energy Hub, Switching Station M9 and Merotherie Energy Hub and two points between Merotherie Energy Hub and the New Wollar Switching Station. Figure 4-1 to Figure 4-18 show mapping of the cultural sites and travelling route locations. The identified sites are summarised in Table 4-2.

4.1.4 Aboriginal Sites and Places in the Construction Area

Preparation of the ACHAR and ACHAR-A included extensive Aboriginal community consultation and field programs of archaeological survey and test excavation undertaken with RAPs. Results were used to ratify and combine existing and new site recordings, resulting in the identification of 47 discrete identified sites and places within the construction corridor for the EIS. Additional work undertaken in the ACHAR-A identified a total of 50 sites and places within the amended Project footprint.

Through the early design refinement described in the AR (Section 5.6.3), up to 23 Aboriginal sites of moderate to high significance would be avoided, representing a 46 per cent reduction, including two sites of high significance and 21 sites of moderate significance. This is an improvement over the EIS, which predicted only nine sites as being avoidable.

The AR (Section 5.6.2) identified 50 Aboriginal sites within the construction area, including:

- Nine rock shelters
- Five (potential) culturally modified trees
- 15 grinding grooves sites
- Four high density artefact scatters (defined as having a density of more than 100 artefacts per square metre)
- Six moderate density artefact scatters (defined as having a density of between about 20 to 50 artefacts per square metre)
- 10 centres of past activity, characterised by high densities of sub surface near major watercourses, including Laheys Creek, Tallawang Creek and Sandy Creek
- A background artefact scatter, consisting of and consolidating 160 previously documented isolated and low-density stone artefact sites

This background artefact scatter, described as consolidated site 'SNI-BS1', was predicted to occur across the construction area and comprise a variable but generally low to very low density distribution of stone artefacts. Slightly higher densities within SNI-BS1 were associated with specific creek-side landforms investigated during testing (~2.1--16 artefacts/m²) with the rest of the consolidated site

comprising a very low density and sporadic distribution of artefacts away from these areas. Previously recorded sites consolidated within SNI-BS1 were described as typically of low significance and reflective of the long-term, transient use of the entire landscape by Aboriginal people in the past.

The EIS (Section 11.3.7) identified zones of higher archaeological potential within the construction area within 150 metres of 13 watercourses. However, field investigations (AR Section 5.6.2) confirmed that only three of the nine creek lines investigated exceeded background scatter levels and thus retain high archaeological potential, being Laheys Creek, Sandy Creek and Tallawang Creek. Smaller watercourses show less activity and are subsequently considered of low significance.

In considering the significance of the identified sites, the EIS (Section 11.3.8) and AR (Section 5.6.2) concluded that:

- Nine sites were considered to have high scientific significance
- 37 were considered to be of moderate scientific significance
- Four sites were considered to have low scientific significance
- No specific sites or places have been identified that meet the criterion of historical significance.
- The majority of the Aboriginal sites identified were considered to have moderate social significance.
- Four sites were considered to have a high social significance including a rockshelter, grinding groove and three artefact scatters
- The majority of the Aboriginal sites identified have no inherent aesthetic value as they consist of artefact scatters in disturbed rural areas

The identified sites and their assessed significance are summarised in Table 4-1. Chapters 8 and 9 and Appendix E of the ACHAR, and Chapter 4 and Appendix D of the ACHAR-A, provide further detail on site types, environmental context/locations, artefact numbers/densities and site extents.

Table 4-1: Aboriginal objects and/or sites within the amended construction area (Source: adapted from AR Table 5-12)

Site	AHIMS #	Site type	Cultural significance (Low (L), Moderate (M), High (H))				
			Scientific	Aesthetic	Historical	Social	Overall
S1MC487	#36-3-3794	Rockshelter	L	-	-	M	M
UWF SU51/L3	#36-3-0449	Rockshelter	M	-	-	M	M
WCP137	#36-3-0570	Rockshelter	H	-	-	H	H
S1MC488	#36-3-3790	Rockshelter	M	-	-	M	M
SNI-RS01	#36-3-4029	Rockshelter	M	-	-	M	M
SNI-RS02	#36-3-4028	Rockshelter	M	-	-	M	M
SNI-RS03	#36-2-0675	Rockshelter	M	-	-	M	M
SNI-RS04	#36-2-0674	Rockshelter	M	-	-	M	M
SNI-RS06	#36-3-4113	Rockshelter	M	-	-	M	M
Birriwa Bus Route South ST-1	#36-3-3918	Culturally modified tree (potential - requires validation)	M	-	-	M	M
SNI-CMT02	#36-3-4034	Culturally modified tree (potential - requires validation)	M	-	-	M	M
SNI-CMT04	#36-2-0747	Culturally modified tree (potential - requires validation)	M	-	-	M	M
SNI-CMT16	#36-3-4058	Culturally modified tree (potential - requires validation)	M	-	-	M	M
SNI-CMT19	#36-3-4059	Culturally modified tree (potential - requires validation)	M	-	-	M	M

Site	AHIMS #	Site type	Cultural significance (Low (L), Moderate (M), High (H))				
			Scientific	Aesthetic	Historical	Social	Overall
Argyll No.3 (SNI-GG14 / SNI-SA01)	#36-3-0111	Grinding groove with stone arrangement and water hole	H	L	-	M	M
SNI-GG01	#36-3-4048	Grinding groove	M	L	-	M	M
SNI-GG02	#36-3-4031	Grinding groove	M	L	-	M	M
SNI-GG03	#36-3-3968 / #36-3-4038 (duplicate)	Grinding groove	M	L	-	M	M
SNI-GG04	#36-3-4044	Grinding groove	M	L	-	M	M
SNI-GG05	#36-3-4043	Grinding groove	M	L	-	M	M
SNI-GG06	#36-3-4042	Grinding groove	M	L	-	M	M
SNI-GG07	#36-3-4045	Grinding groove	M	L	-	M	M
SNI-GG08	#36-3-4046	Grinding groove	M	L	-	M	M
SNI-GG09	#36-3-4052	Grinding groove	M	L	-	M	M
SNI-GG15	#36-3-4047	Grinding groove	M	L	-	M	M
SNI-GG16	#36-3-4060	Grinding groove	M	L	-	M	M
SNI-GG17	#36-3-4110	Grinding groove	M	L	-	M	M
SNI-AS65	#36-3-4027	Grinding groove, low density artefact scatter and PAD	M	L	-	M	M
SNI-IF104	#36-3-4115	Grinding groove, artefact (isolated find)	M		-	M	M

Site	AHIMS #	Site type	Cultural significance (Low (L), Moderate (M), High (H))				
			Scientific	Aesthetic	Historical	Social	Overall
SNI-AS41	#36-2-0678	High density artefact scatter	H	L	-	M	H
SNI-AS43	#36-3-4030	High density artefact scatter	H	L	-	M	H
SNI-AS57	#36-2-0677	High density artefact scatter	H	L	-	M	H
SNI-AS101	#36-3-1140 / #36-3-1141	High density artefact scatter	H	L	-	M	H
WCP220	#36-3-0496	Moderate density artefact scatter	L	-	-	L	L
WCP227	#36-3-0503	Moderate density artefact scatter	L	-	-	L	L
WC OS 17 with PAD	#36-3-0658	Moderate density artefact scatter	M	-	-	M	M
WCP260	#36-3-0793	Moderate density artefact scatter	M	-	-	M	M
SNI-AS71	#36-2-0688	Moderate density artefact scatter	M	-	-	M	M
SNI-AS02	#36-2-0676	Moderate density artefact scatter	M	-	-	M	M
SNI-FA02	#36-2-0680	High density artefact scatter, and deposit	H	-	-	M	M
SNI-FA04	#36-3-4040	Moderate density artefact scatter, and deposit	M	-	-	M	M

Site	AHIMS #	Site type	Cultural significance (Low (L), Moderate (M), High (H))				
			Scientific	Aesthetic	Historical	Social	Overall
SNI-FA05	#36-2-0682	High density artefact scatter, and deposit	H	L	-	H	H
SNI-FA06	#36-2-0683	Moderate density artefact scatter, and deposit	M	-	-	M	M
SNI-FA07	#36-3-4041	High density artefact scatter, and deposit	M	L	-	M	M
SNI-FA08	#36-3-4112	Moderate density artefact scatter, and deposit	M	-	-	M	M
SNI-FA09	#36-3-4111	Moderate density artefact scatter, and deposit	M	-	-	M	M
SNI-FA10	#36-2-0746	Moderate density artefact scatter, and deposit	M	-	-	M	M
SNI-FA11 / SNI-AS91	#36-3-4114	High density artefact scatter, and deposit	M	-	-	M	M
SNI-FA12	#36-2-0748	High density artefact scatter, and deposit	H	L	-	H	H
SNI-BS1 ¹		Low density artefact scatter	L	-	-	L	L

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SNI-BS1 incorporates #36-3-0353, #36-3-0497, #36-3-0634, #36-3-0691, #36-3-0815, #36-3-0816, #36-3-0817, #36-3-0818, #36-3-0819, #36-3-0820, #36-3-0821, #36-3-1047, #36-3-1048, #36-3-1049, #36-3-1050, #36-3-1051, #36-3-1053, #36-3-1054, #36-3-1055, #36-3-1058, #36-3-1062, #36-3-1063, #36-3-1064, #36-3-1065, #36-3-1066, #36-3-1067, #36-3-1068, #36-3-1090, #36-3-1402, #36-3-1404, #36-3-1428, #36-3-3406, #36-3-1052, #36-3-1056, #36-3-1057, #36-3-1401, #26-3-2514, #36-3-3291, #36-3-3523, #36-2-0627, #36-3-3917, SNI-IF01-15 inclusive, SNI-IF17, SNI-IF20, SNI-IF28, SNI-IF33, SNI-IF39, SNI-IF41, SNI-IF43, SNI-IF47, SNI-IF48, SNI-IF51, SNI-IF56, SNI-IF58, SNI-IF62, SNI-IF65, SNI-IF66-68, SNI-IF70-76, SNI-IF78-80, SNI-IF83-86, SNI-IF88-90, SNI-IF93-96, SNI-IF99-103, #36-3-0336, #36-3-0470, #36-3-0498, #36-3-0569, #36-3-0660, #36-3-0139, #36-3-1403, #36-3-2833, #36-3-3182, #36-3-3227, #36-3-3233, #36-3-3432, #36-3-3805,

Table 4-2. Cultural sites identified by cultural values mapping (Source: ACHAR Appendix C Table 1 and Section 2.1)

Cultural site/place	Site ID	Description	Site category
Merotherie Road area	SNI_CS1	Flat area near Cockabutta Creek, reported to contain Aboriginal ancestral burials, 'Corroborree Ground' for 'dance meeting', and ritual areas for initiation and hunting.	Cultural
Barneys Reef	SNI_CS2	Major sandstone uplands, with creek alongside. Artefacts, a water well and grinding grooves, and the location of documented Aboriginal ancestral burials. Node on the 'travelling route' from Wiradjuri Country to Kamilaroi Country.	Cultural
Ulan coal mine	SNI_CS3	Existing mine lease near Goulbourn River National Park, within which a range of high value and/or significant archaeological features are known, including a Bora Ground, rockshelters, rock art, grinding grooves, artefact scatters, stone arrangements and occupation sites.	Cultural
Castle Rock	SNI_CS4	An impressive rockshelter located immediately south of the existing Wilpinjong mine area.	Cultural
Wilpinjong coal mine	SNI_CS5	Bora Ground located on the Wilpinjong Creek, and north of the existing mining operations. This was initially recorded by R.H. Mathews (1894). The site is reported to extend north of its location (near the construction area), but significant impacts and destruction of parts of the site have occurred through Wollar Road and associated mining infrastructure. Nearby are rock shelters, rock art, grinding grooves and artefact scatters.	Cultural, historical
Wollar Creek	SNI_CS6	Wollar Creek between Wollar and south of the Wollar Solar Farm. Increased evidence of past occupation along this river corridor, including occupation sites, grinding grooves and other archaeological material. Site includes rockshelters, grinding grooves, artefact scatters and a women's area 'birthing tree'.	Cultural
Travelling route #1	Travelling route #1	Part of a mosaic of tracks by which Aboriginal people moved around. May be associated with Songlines as tracks that follow the paths where the Creation ancestors of the Stories had travelled.	Cultural
Travelling route #5	Travelling route #5	Part of a mosaic of tracks by which Aboriginal people moved around. May be associated with Songlines as tracks that follow the paths where the Creation ancestors of the Stories had travelled.	Cultural

#36-3-3828, #36-3-3832, #36-3-3833, #36-3-3835, #36-2-0533, #36-2-0580, #36-3-1396, SNI-S01, SNI-AS03-07 inclusive, SNI-AS09, SNI-AS012-13 inclusive, SNI-AS15, SNI-AS17, SNI-AS29, SNI-AS31, SNI-AS37, SNI-AS40, SNI-AS51-52 inclusive, SNI-AS61, SNI-AS66, SNI-AS68-70 inclusive, SNI-AS72-73 inclusive, SNI-AS76-77 inclusive, SNI-Q01, SNI-FA01, SNI-AS79, SNI-AS83, SNI-AS87-90, SNI-AS92, SNI-AS95, SNI-AS97, SNI-AS99, #36-3-0685/SNI-FA03, #36-3-0720/SNI-AS100, #36-2-0613, #36-3-3884.



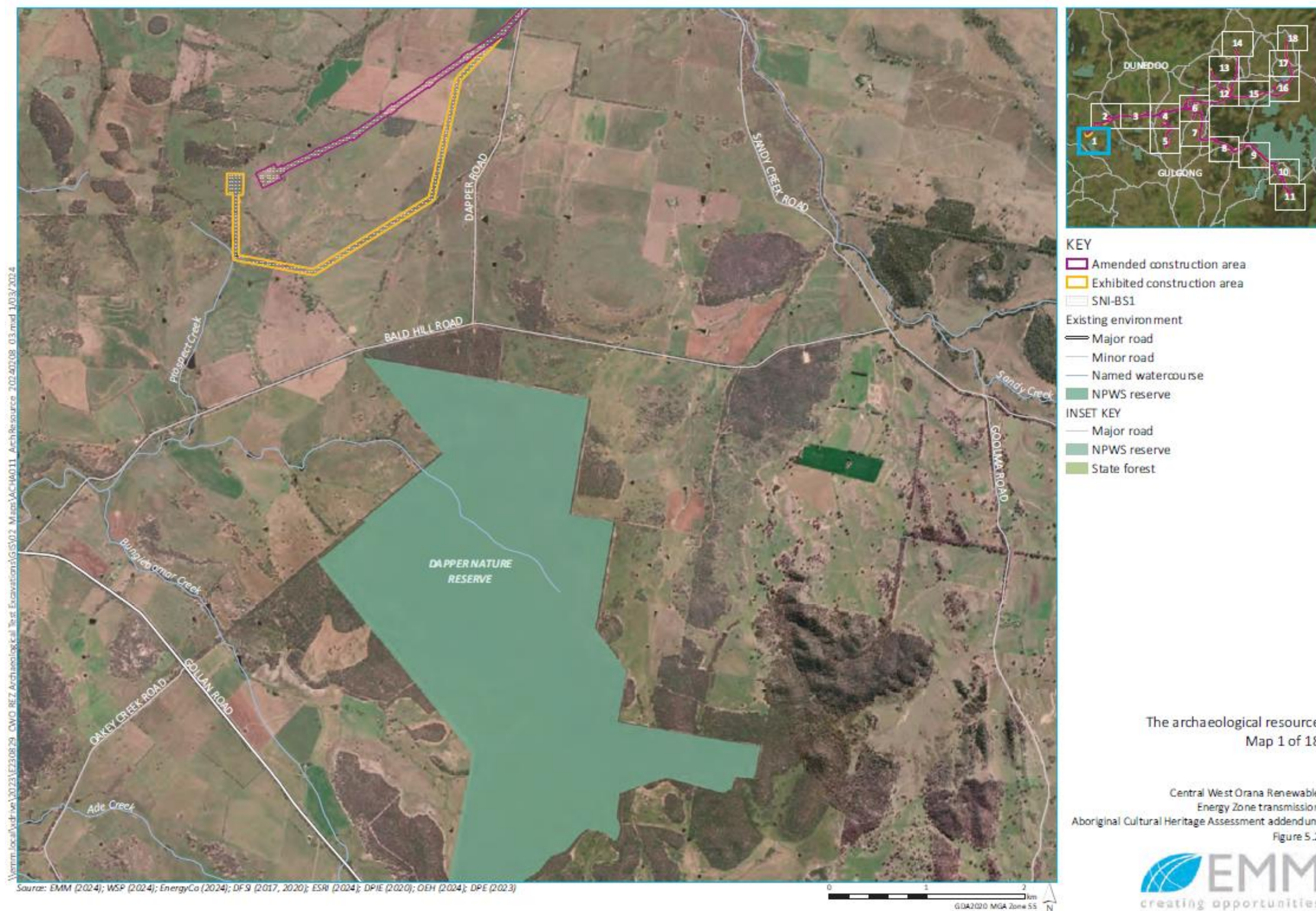


Figure 4-1: Aboriginal sites map 1 of 18 (Source ACHAR-A, Figure 5-2)

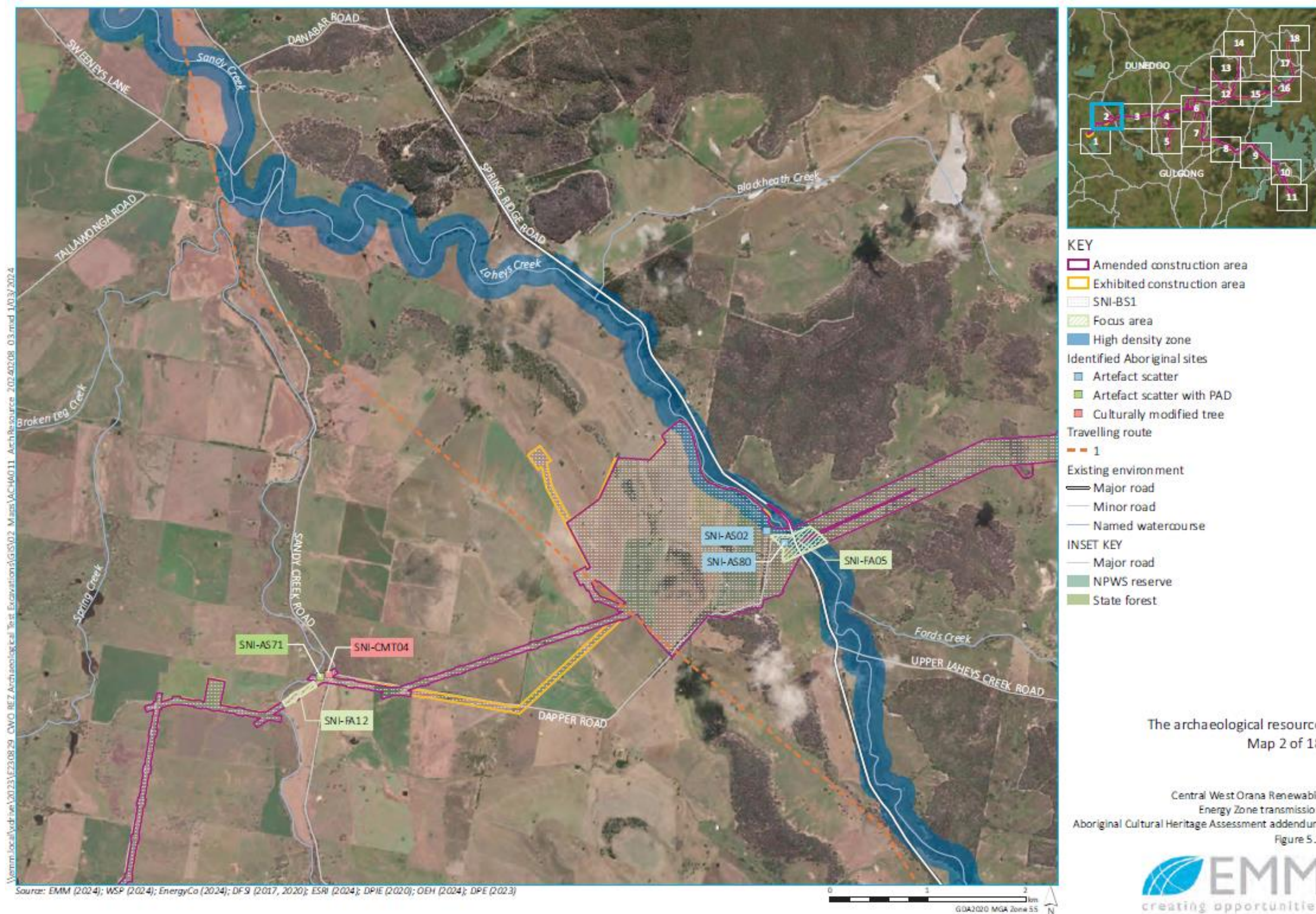


Figure 4-2: Aboriginal sites map 2 of 18 (Source ACHAR-A, Figure 5-2)

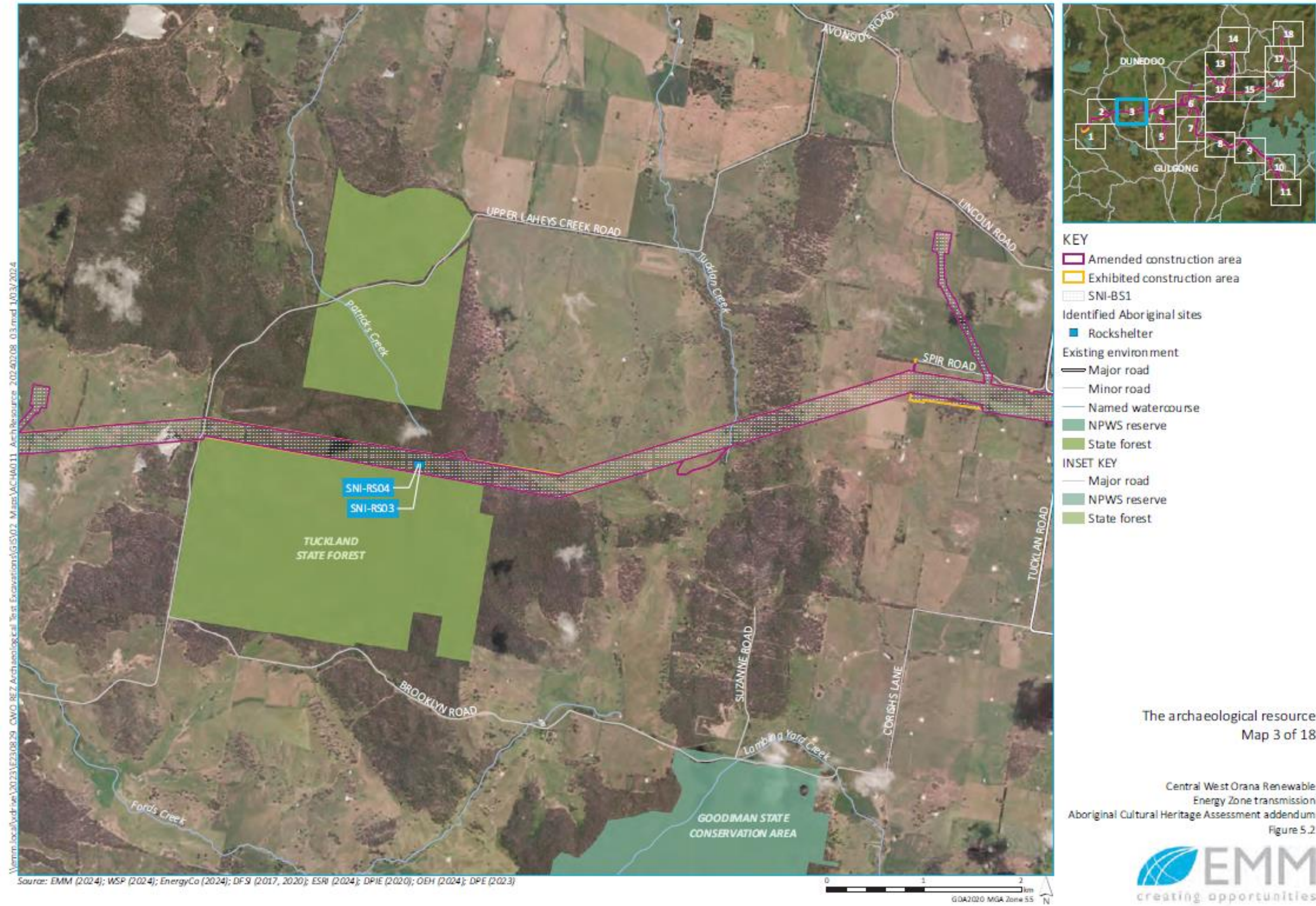


Figure 4-3: Aboriginal sites map 3 of 18 (Source ACHAR-A, Figure 5-2)

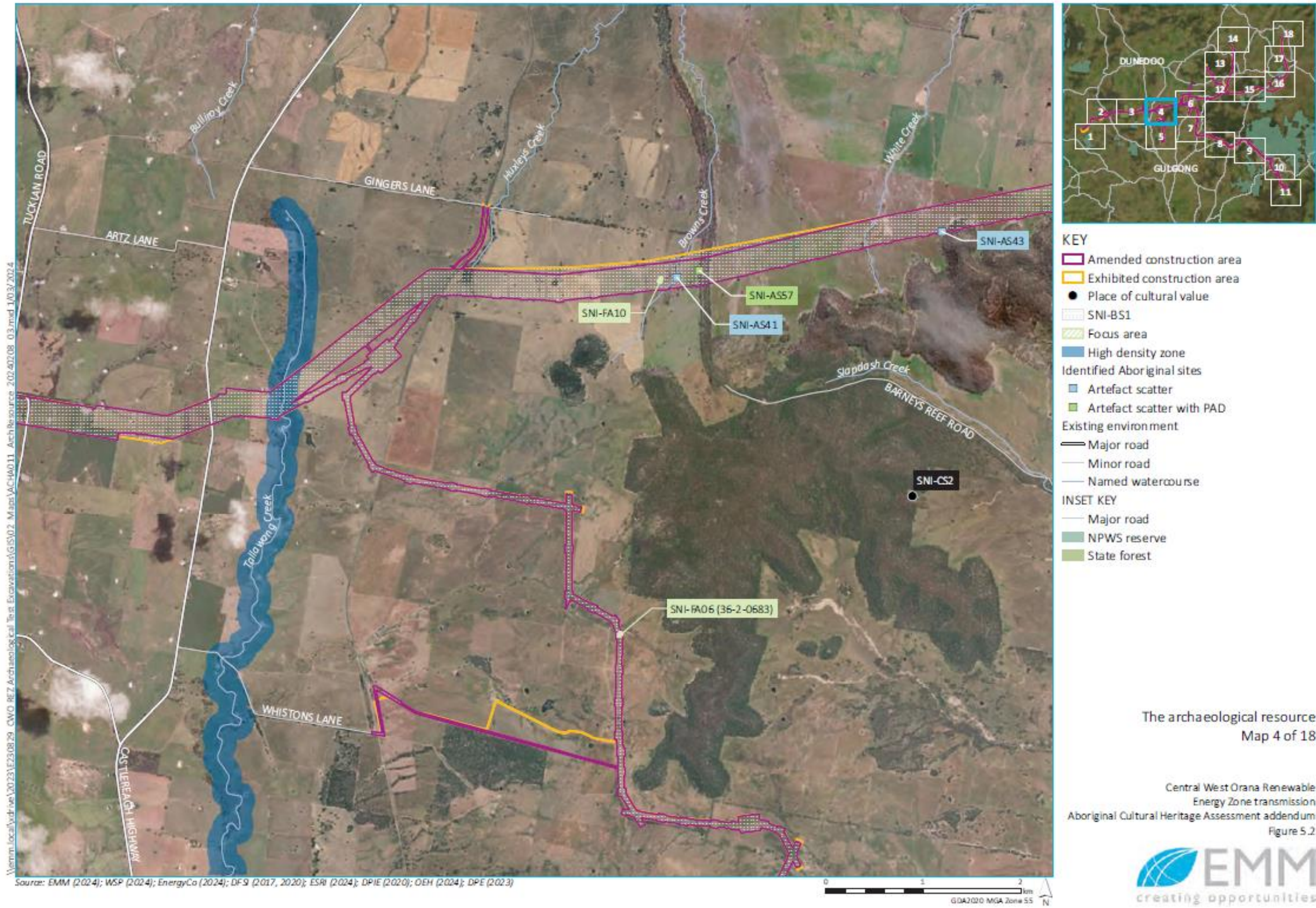


Figure 4-4: Aboriginal sites map 4 of 18 (Source ACHAR-A, Figure 5-2)

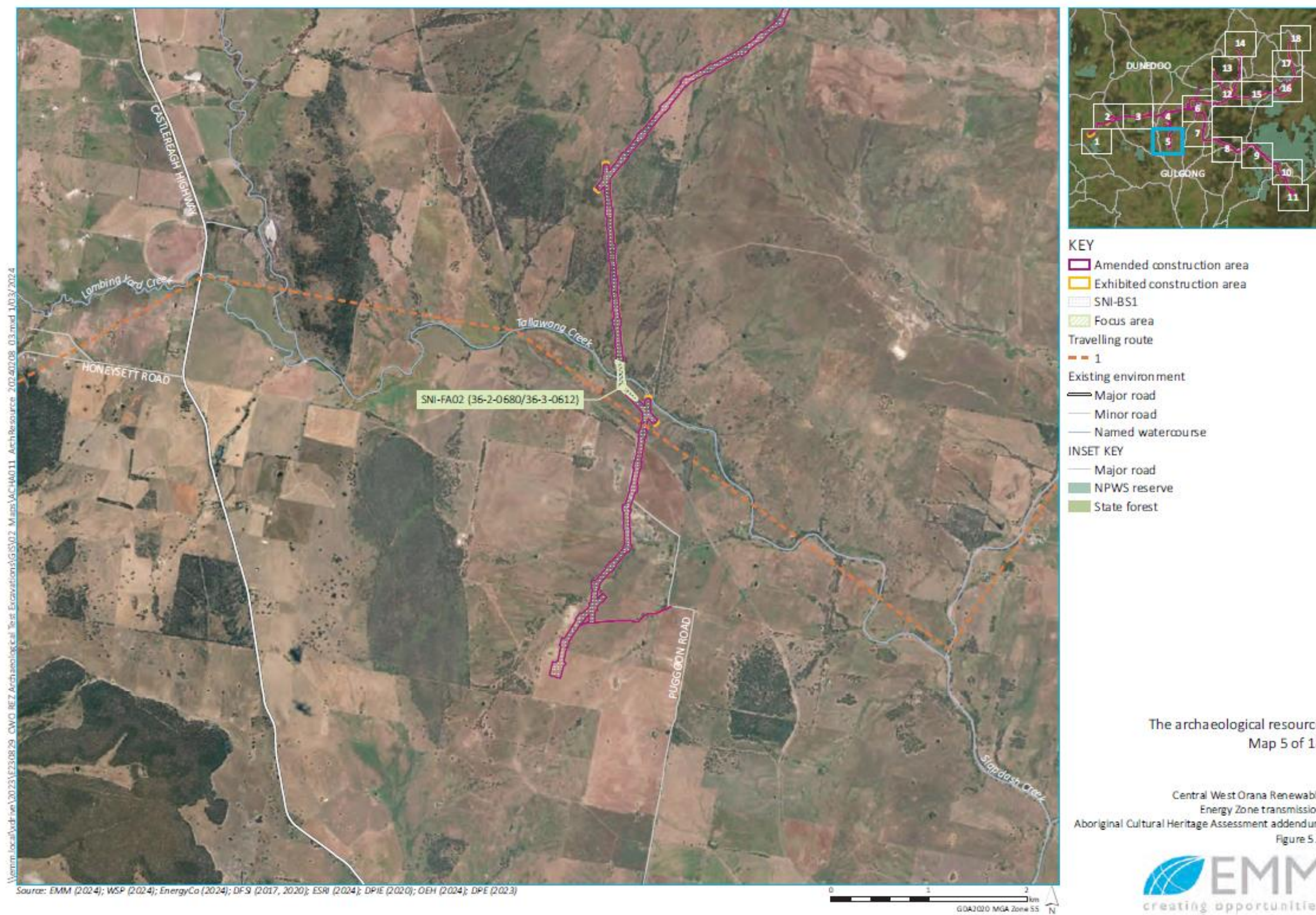


Figure 4-5: Aboriginal sites map 5 of 18 (Source ACHAR-A, Figure 5-2)

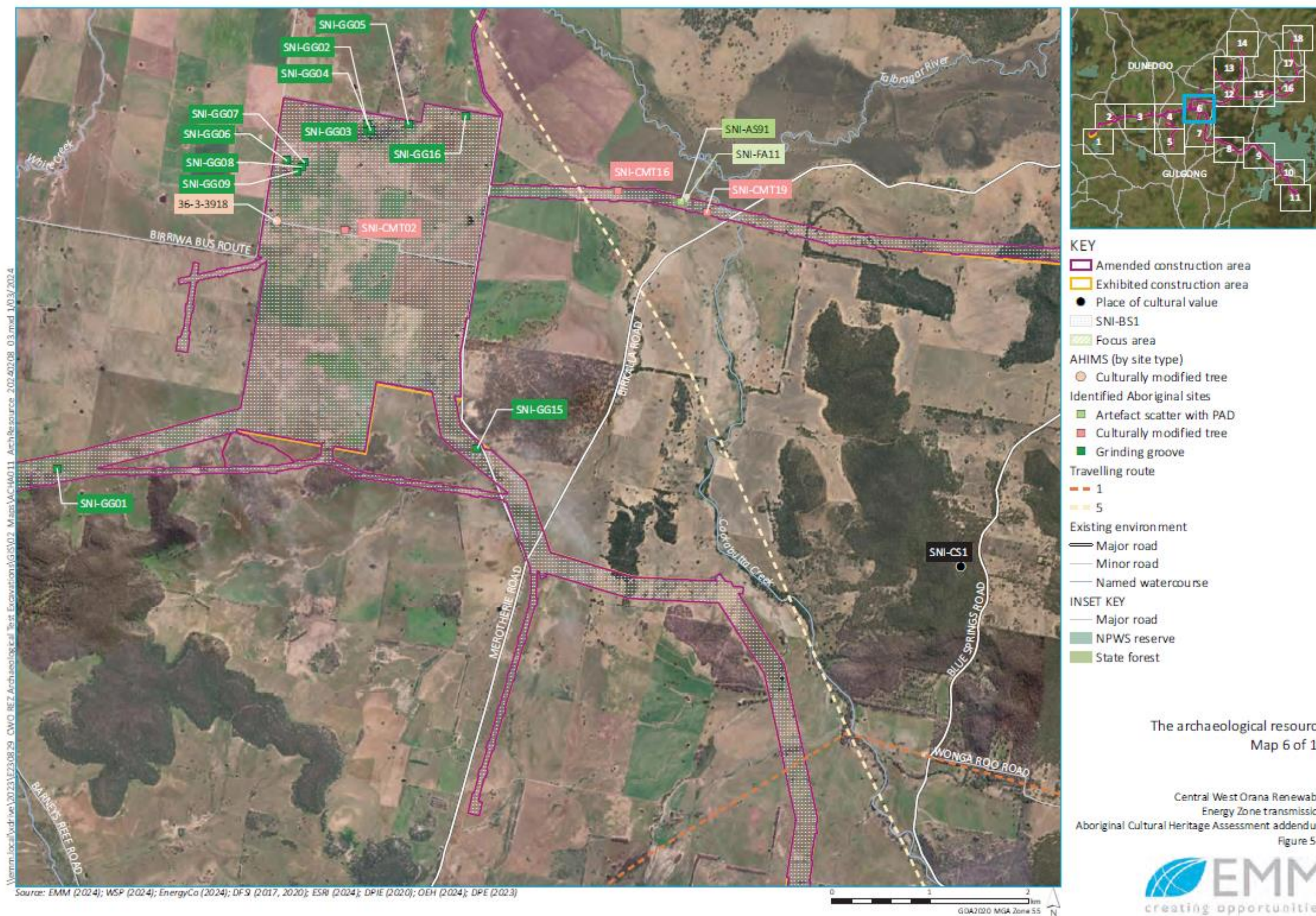


Figure 4-6: Aboriginal sites map 6 of 18 (Source ACHAR-A, Figure 5-2)

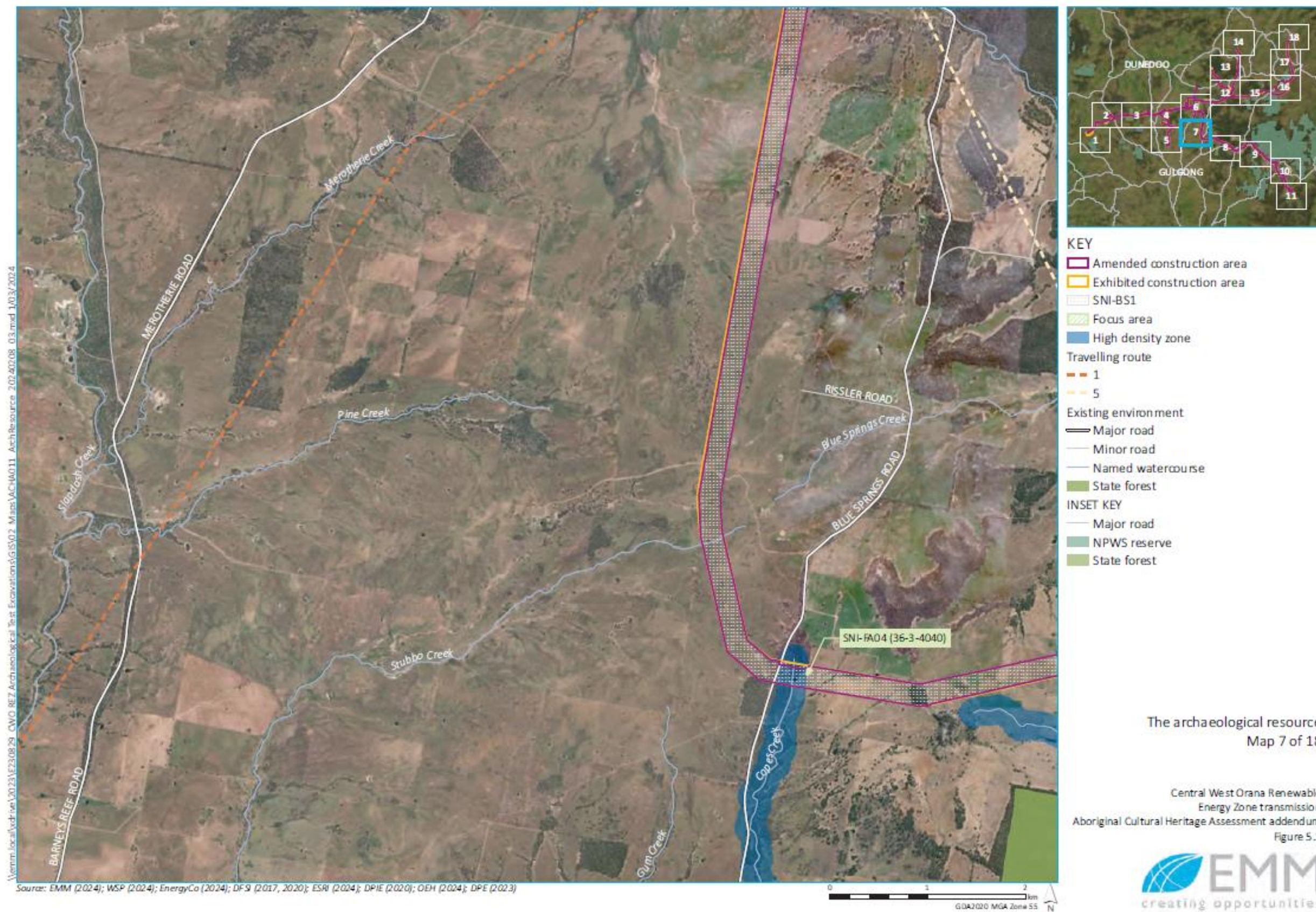


Figure 4-7: Aboriginal sites map 7 of 18 (Source ACHAR-A, Figure 5-2)

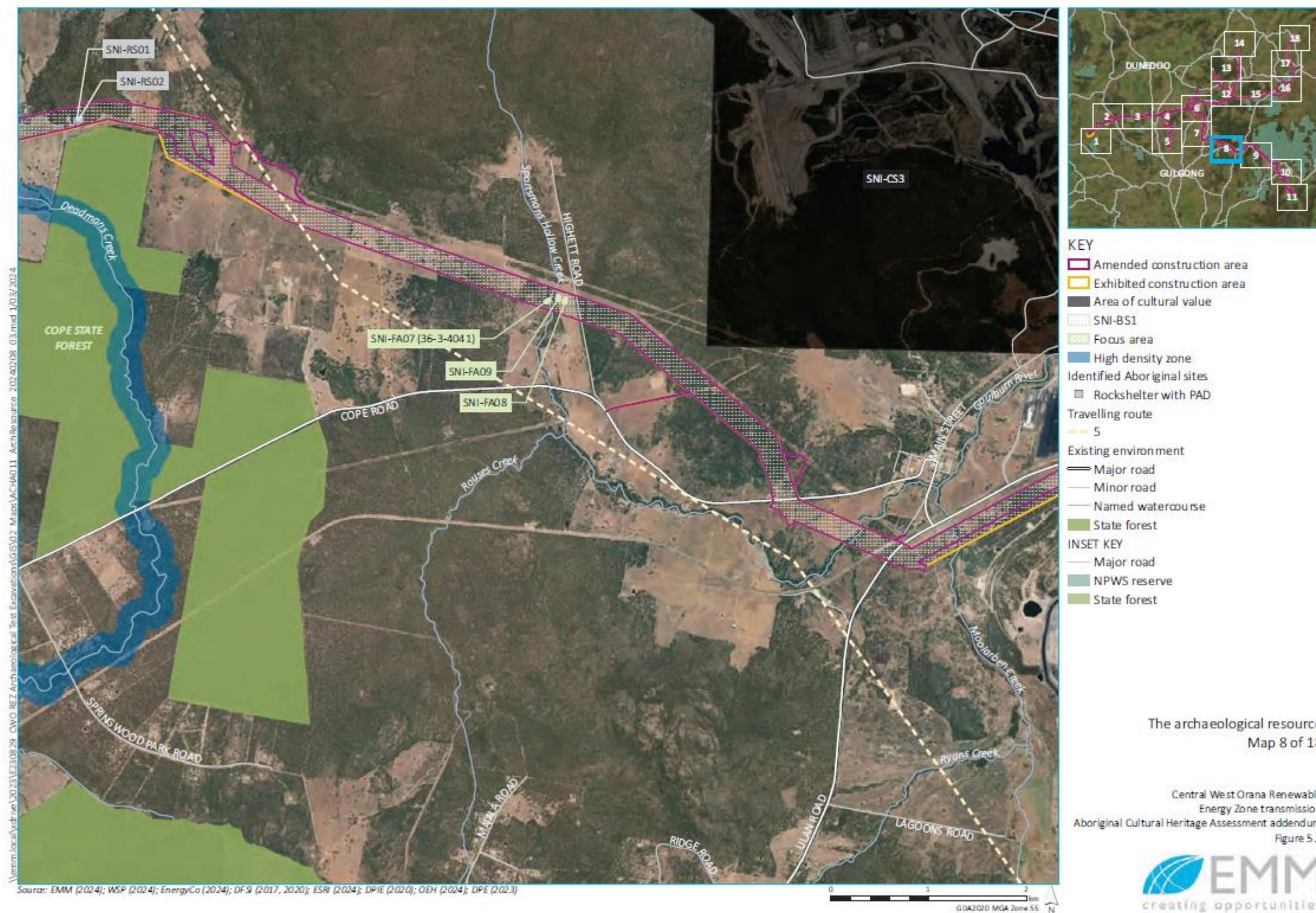


Figure 4-8: Aboriginal sites map 8 of 18 (Source ACHAR-A, Figure 5-2)

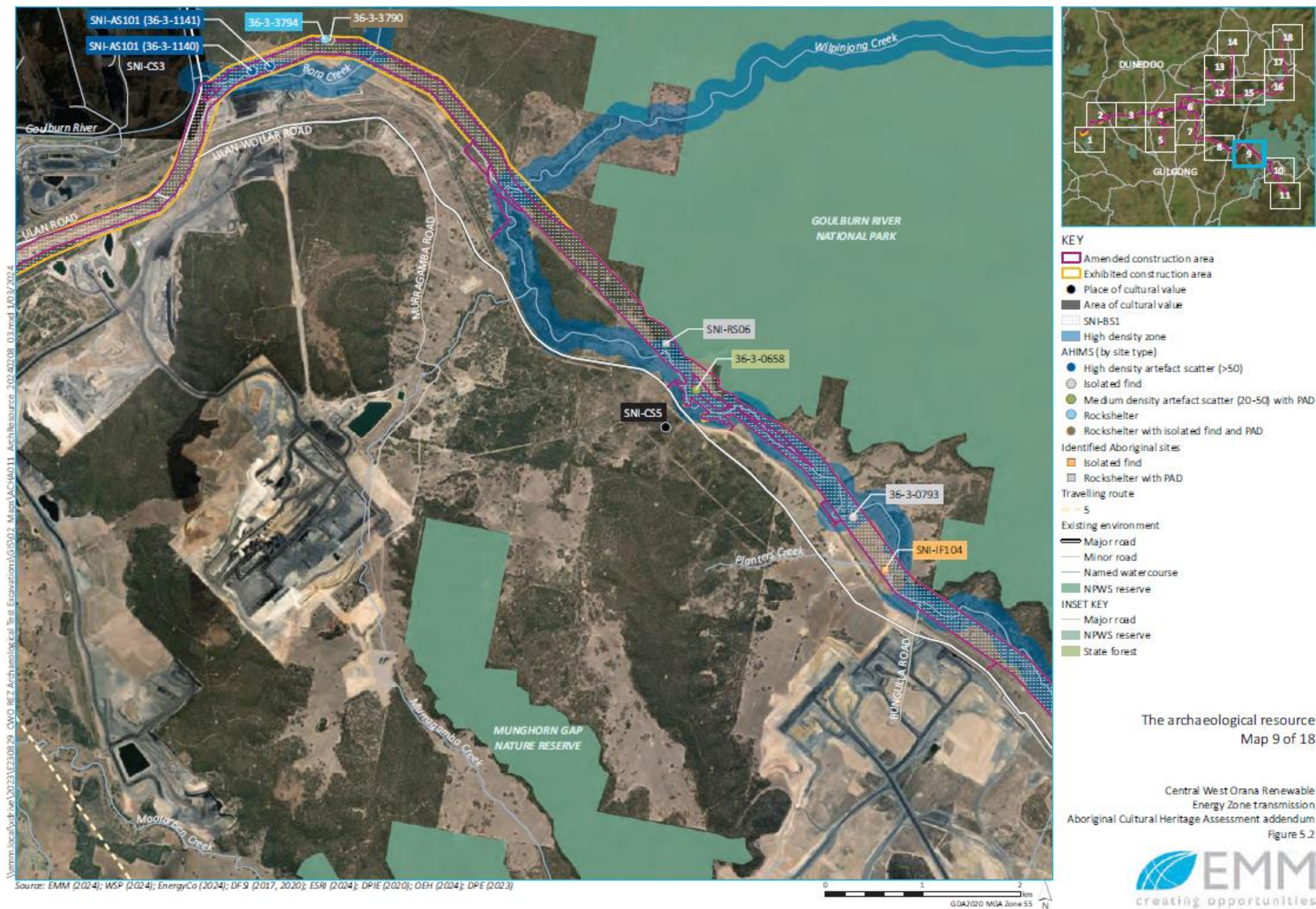


Figure 4-9: Aboriginal sites map 9 of 18 (Source ACHAR-A, Figure 5-2)

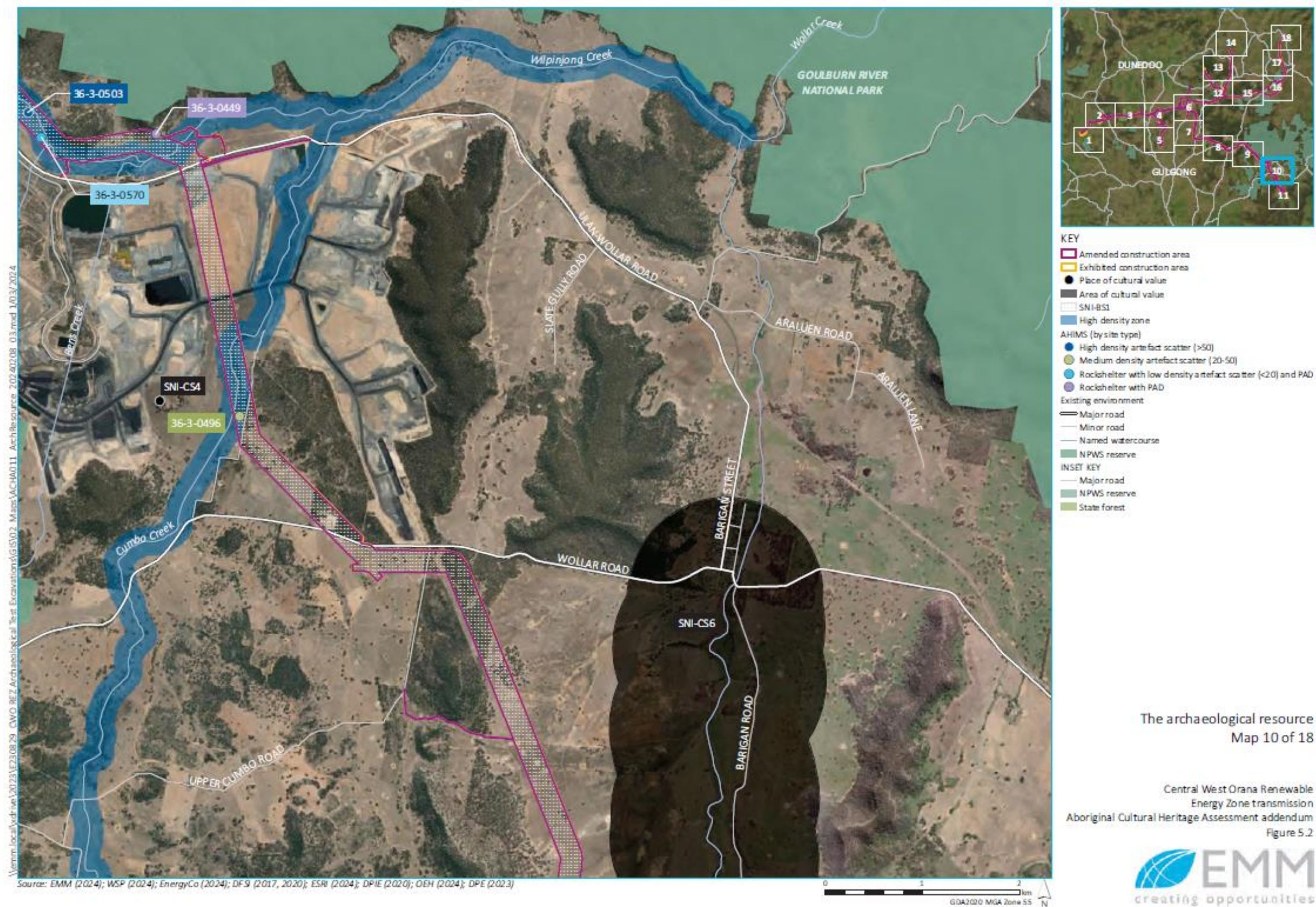


Figure 4-10: Aboriginal sites map 10 of 18 (Source ACHAR-A, Figure 5-2)

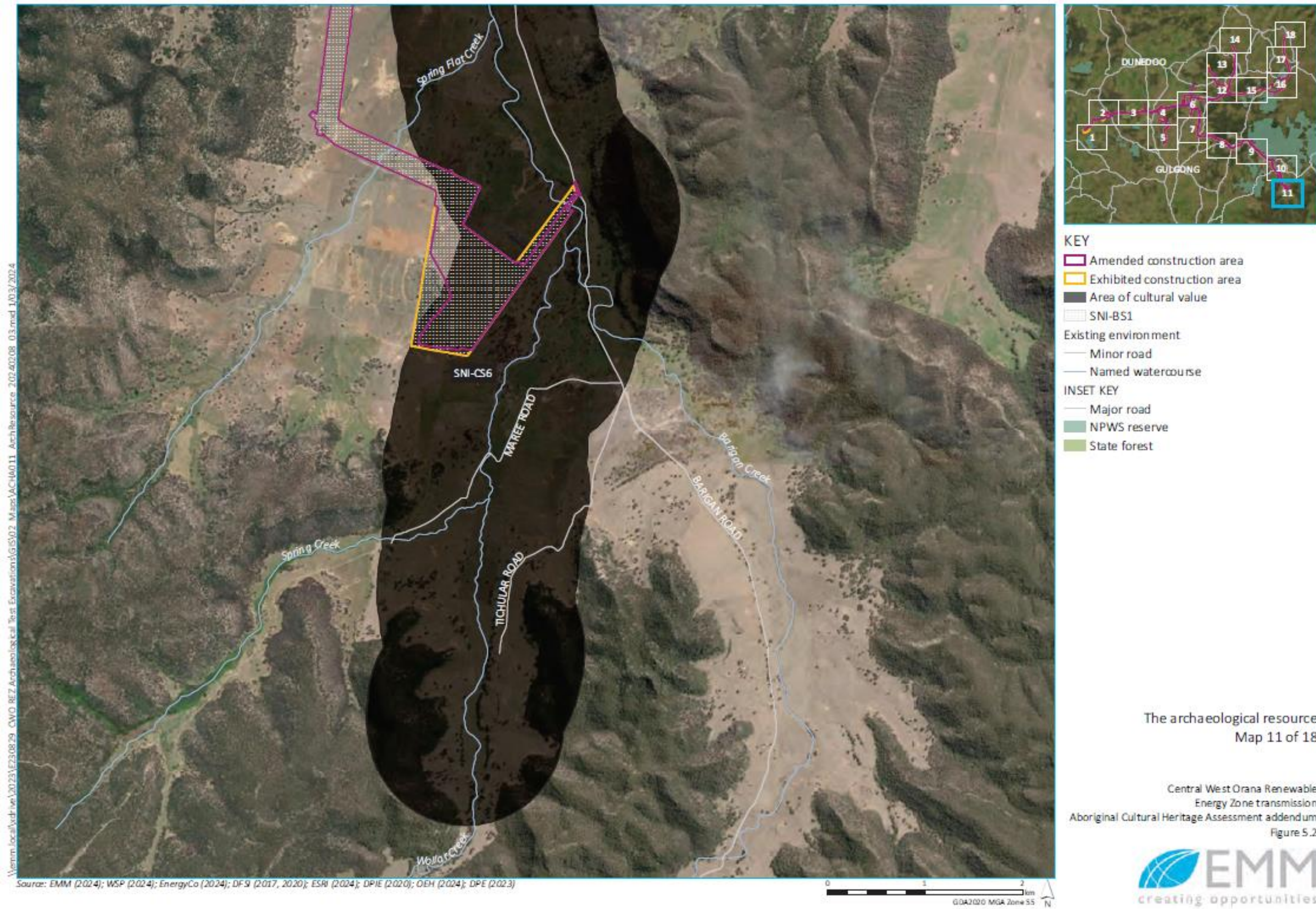


Figure 4-11: Aboriginal sites map 11 of 18 (Source ACHAR-A, Figure 5-2)

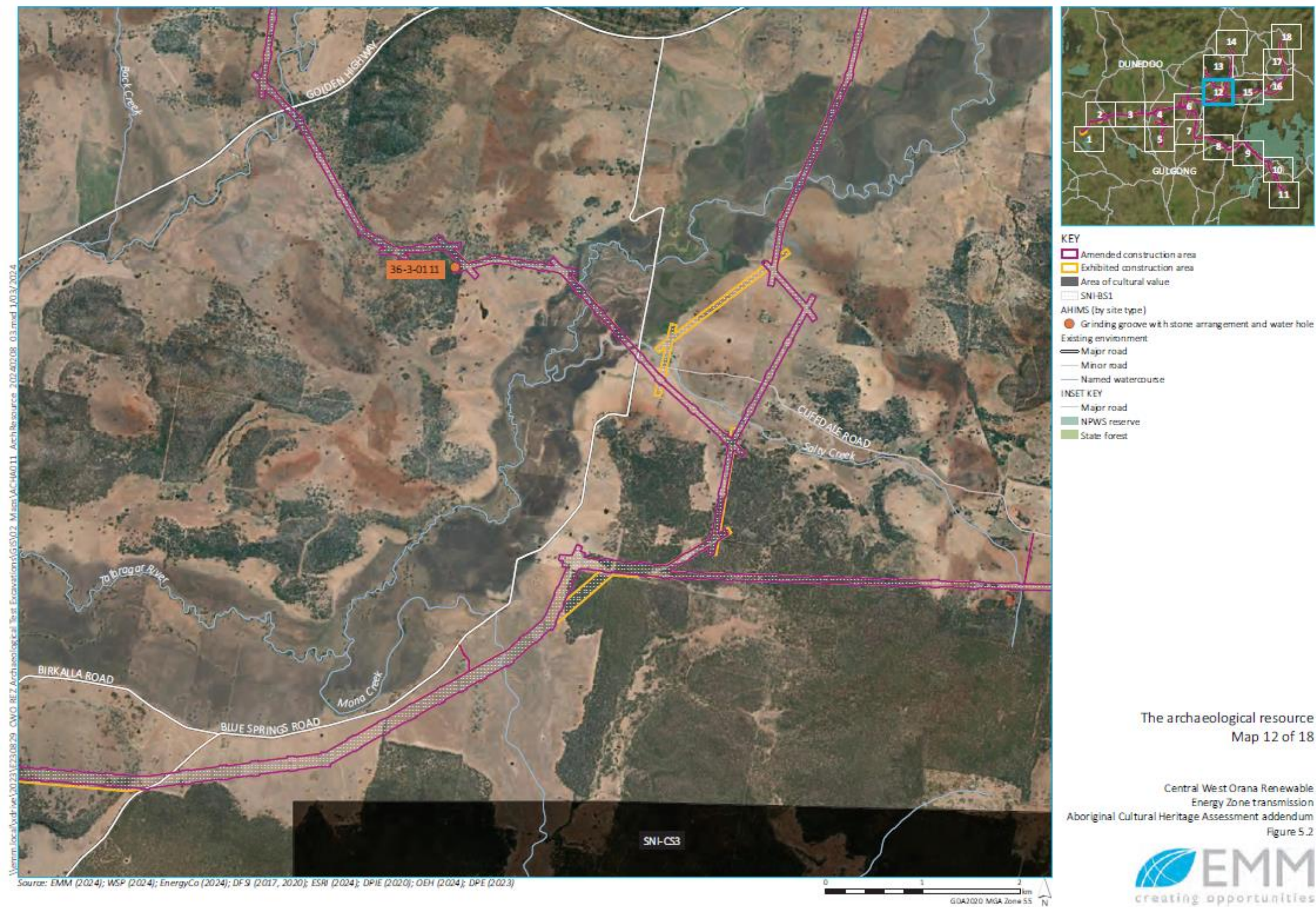


Figure 4-12: Aboriginal sites map 12 of 18 (Source ACHAR-A, Figure 5-2)

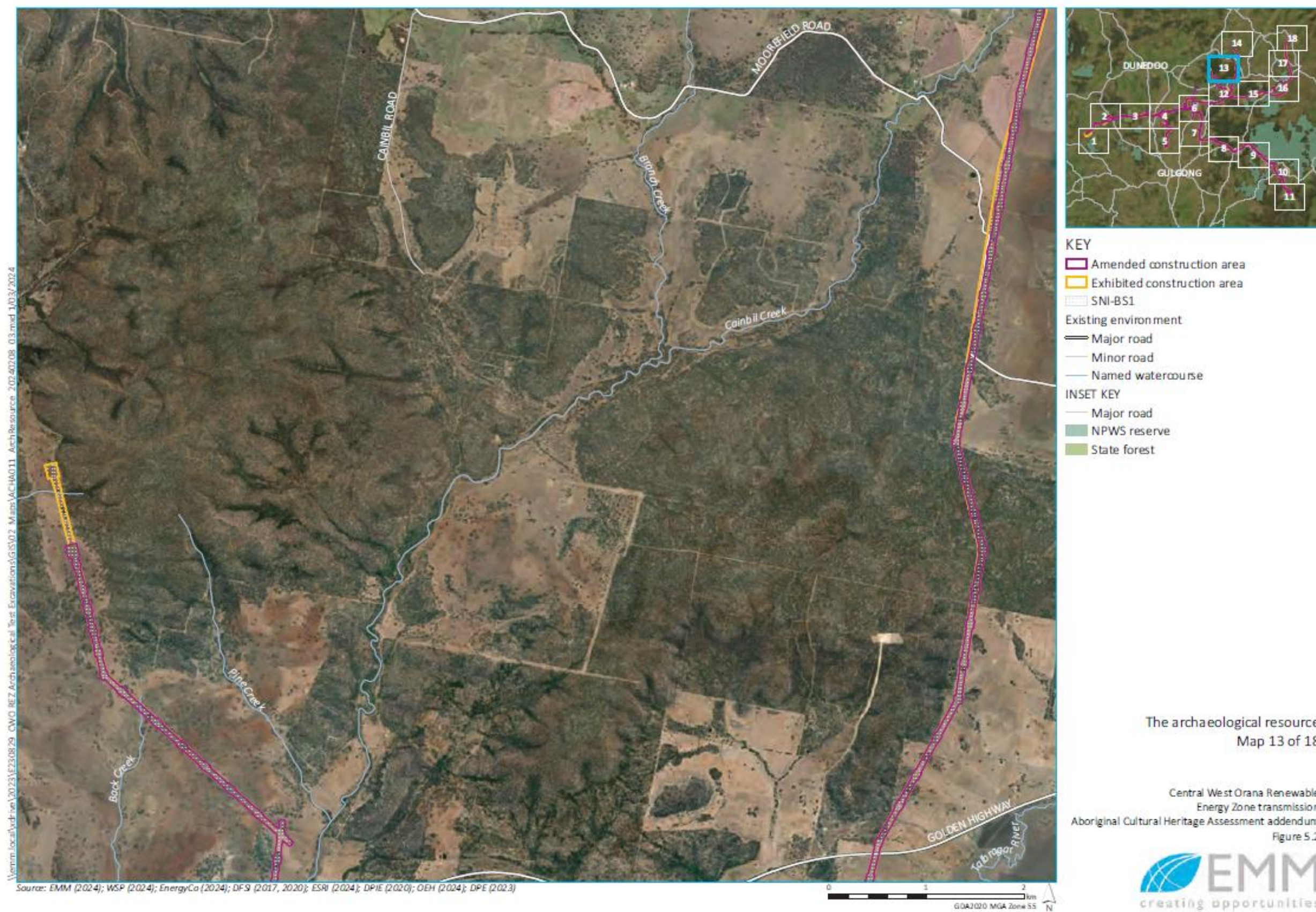


Figure 4-13: Aboriginal sites map 13 of 18 (Source ACHAR-A, Figure 5-2)

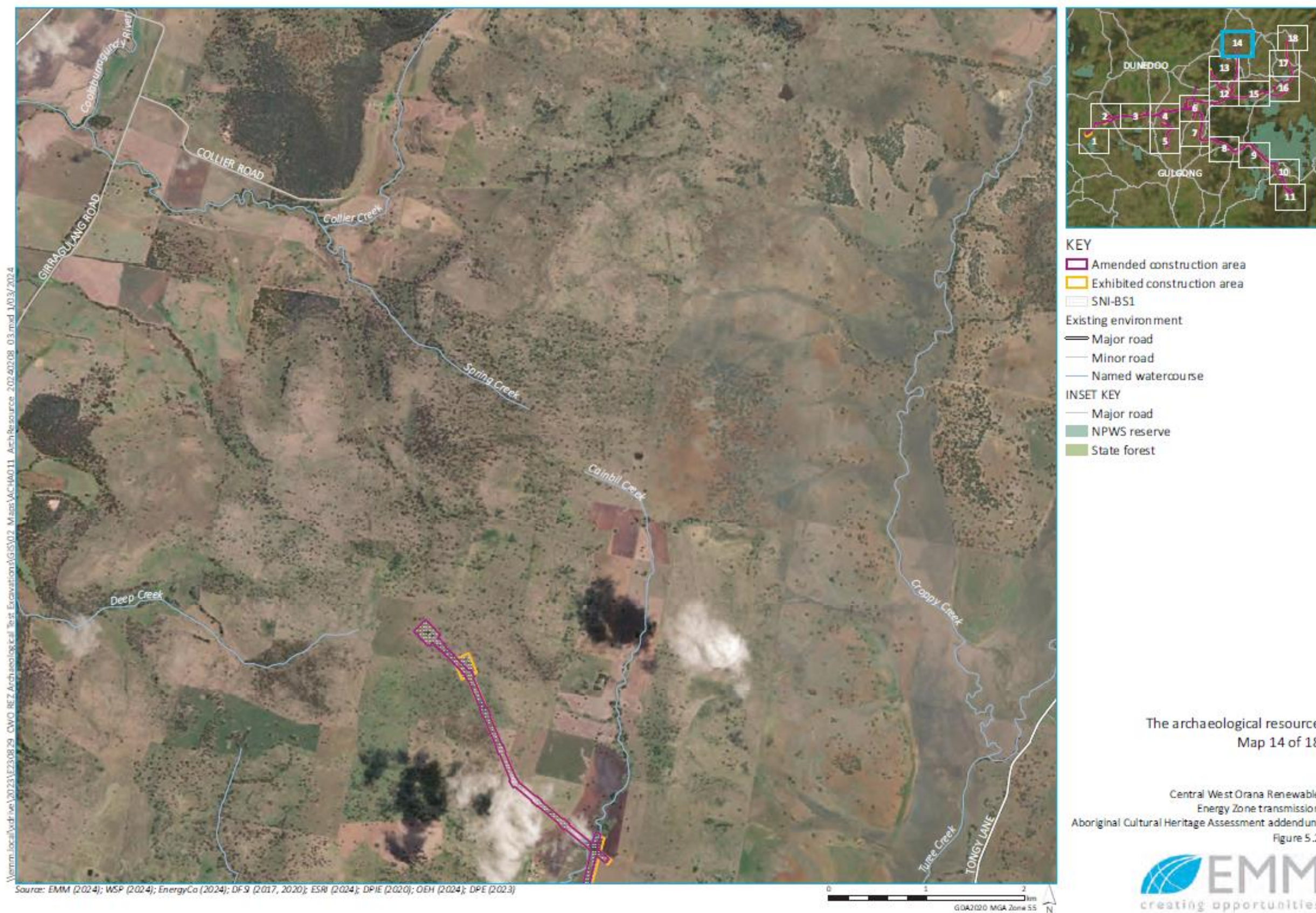


Figure 4-14: Aboriginal sites map 14 of 18 (Source ACHAR-A, Figure 5-2)

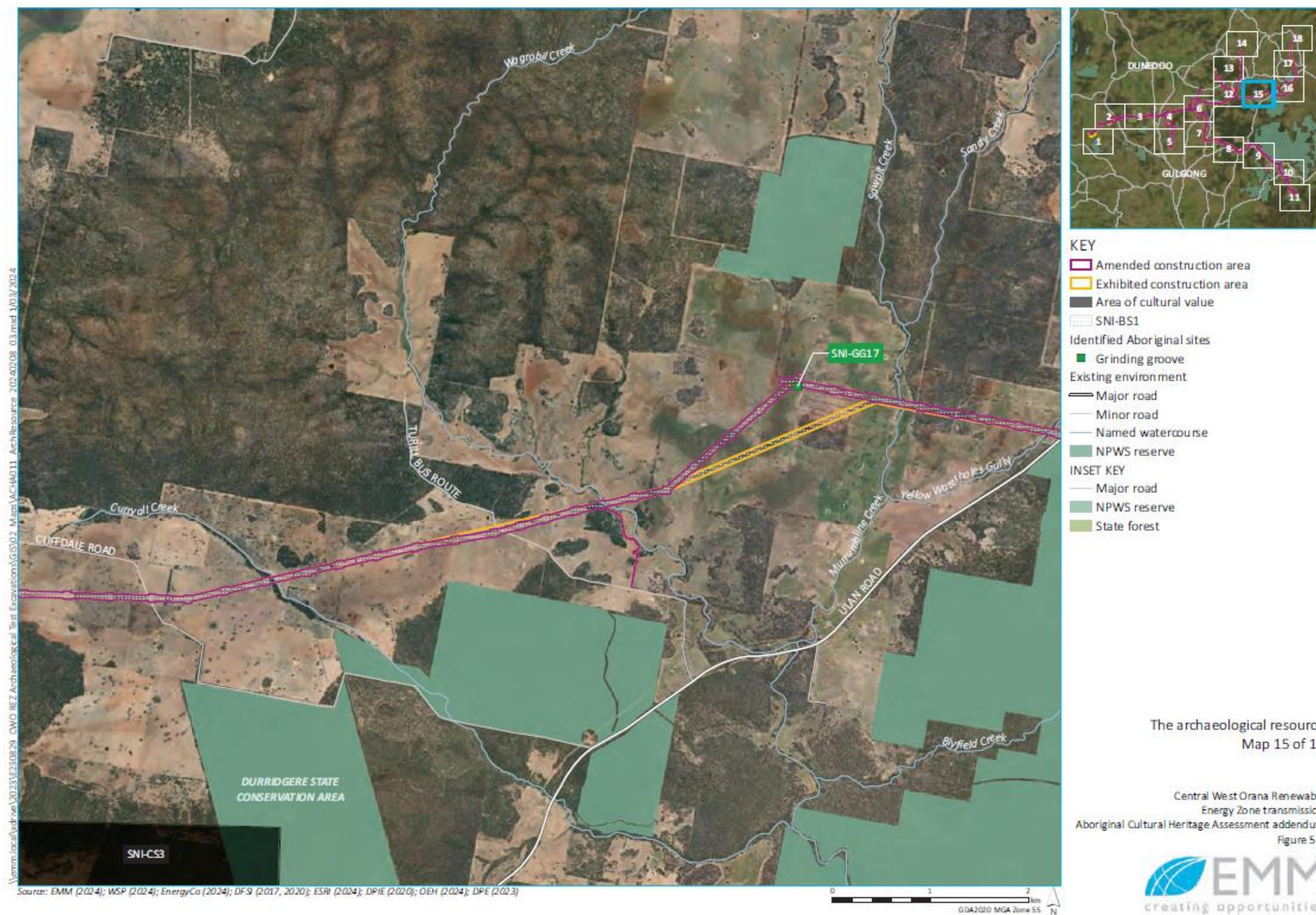


Figure 4-15: Aboriginal sites map 15 of 18 (Source ACHAR-A, Figure 5-2)

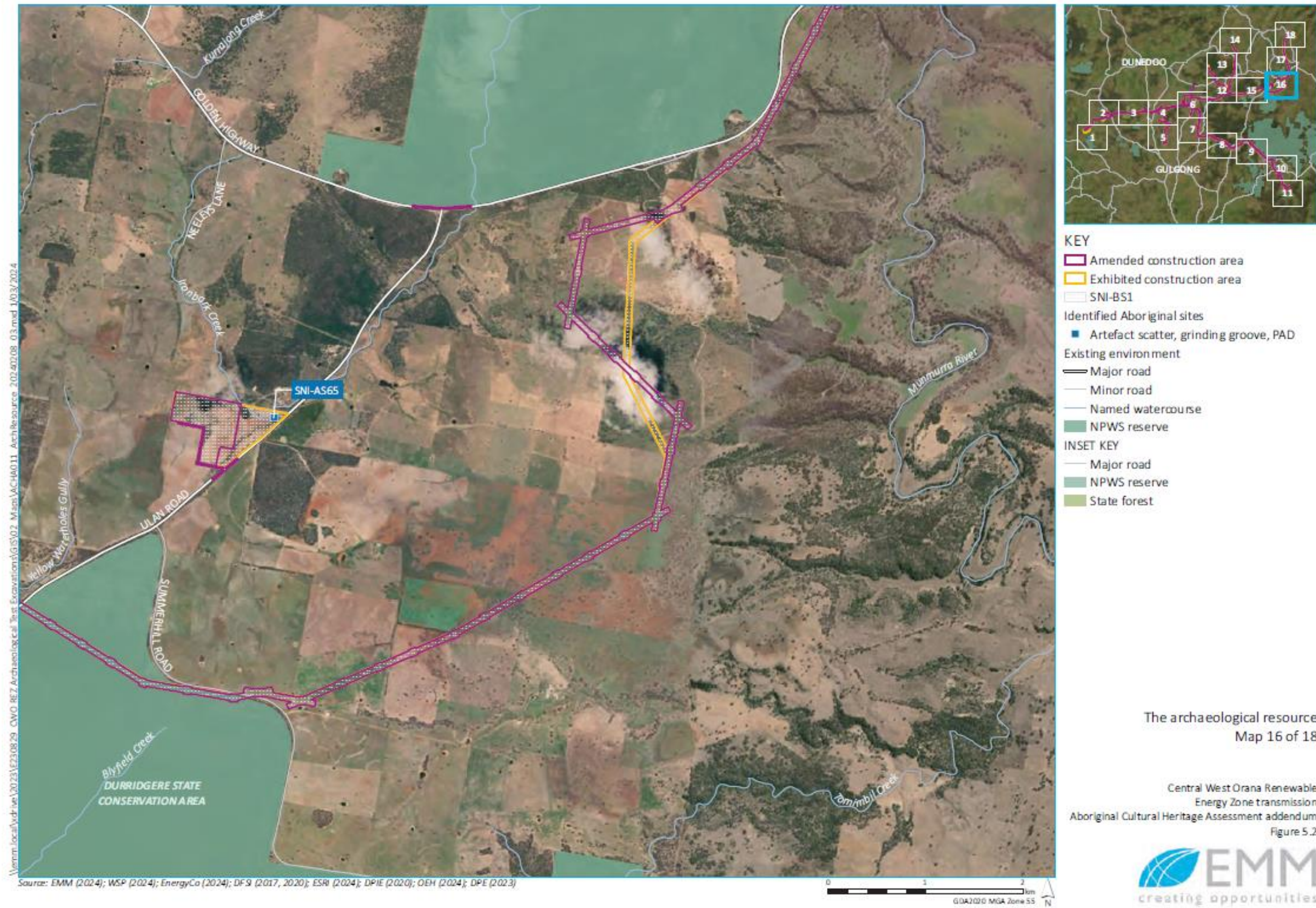


Figure 4-16: Aboriginal sites map 16 of 18 (Source ACHAR-A, Figure 5-2)

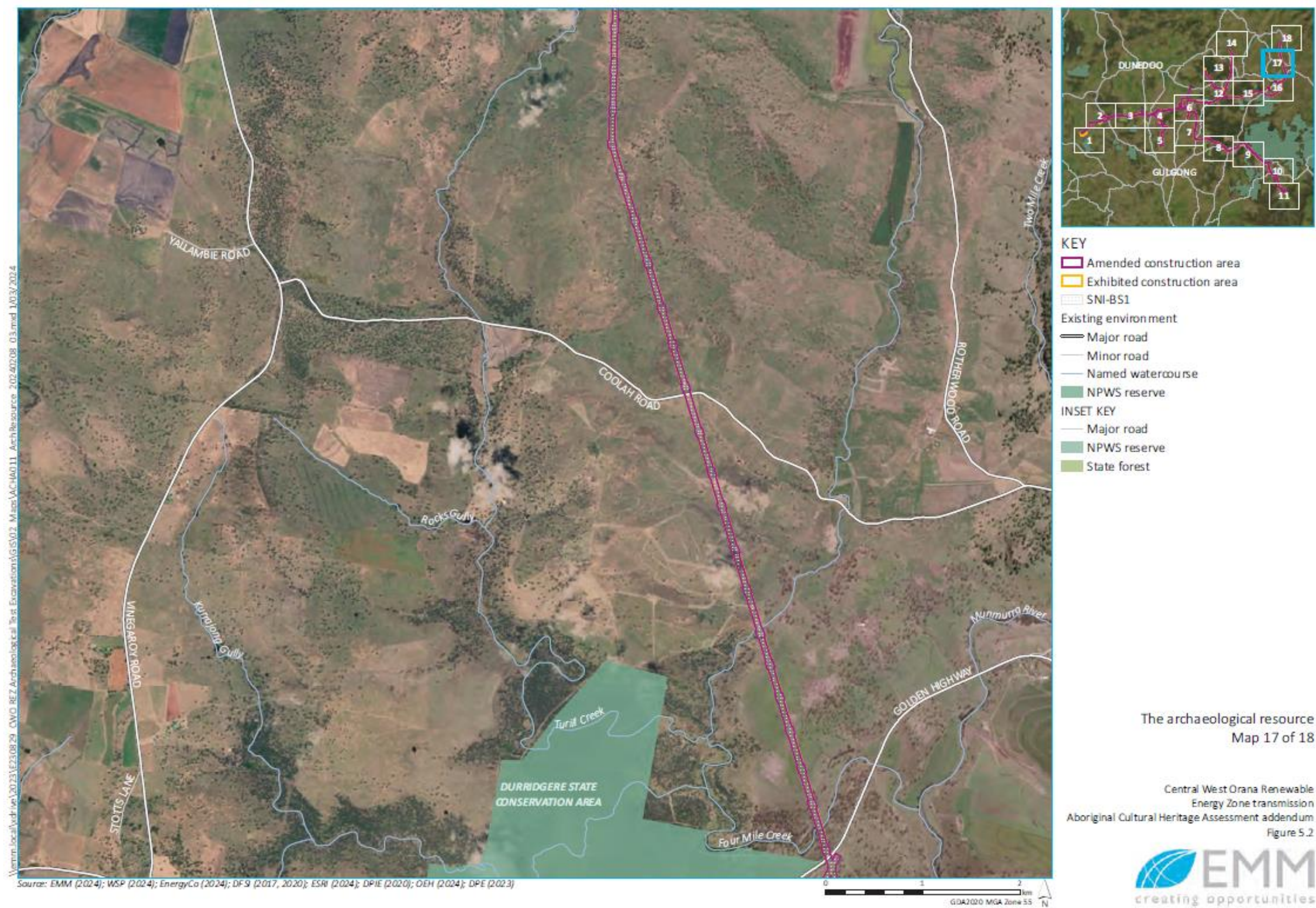


Figure 4-17: Aboriginal sites map 17 of 18 (Source ACHAR-A, Figure 5-2)

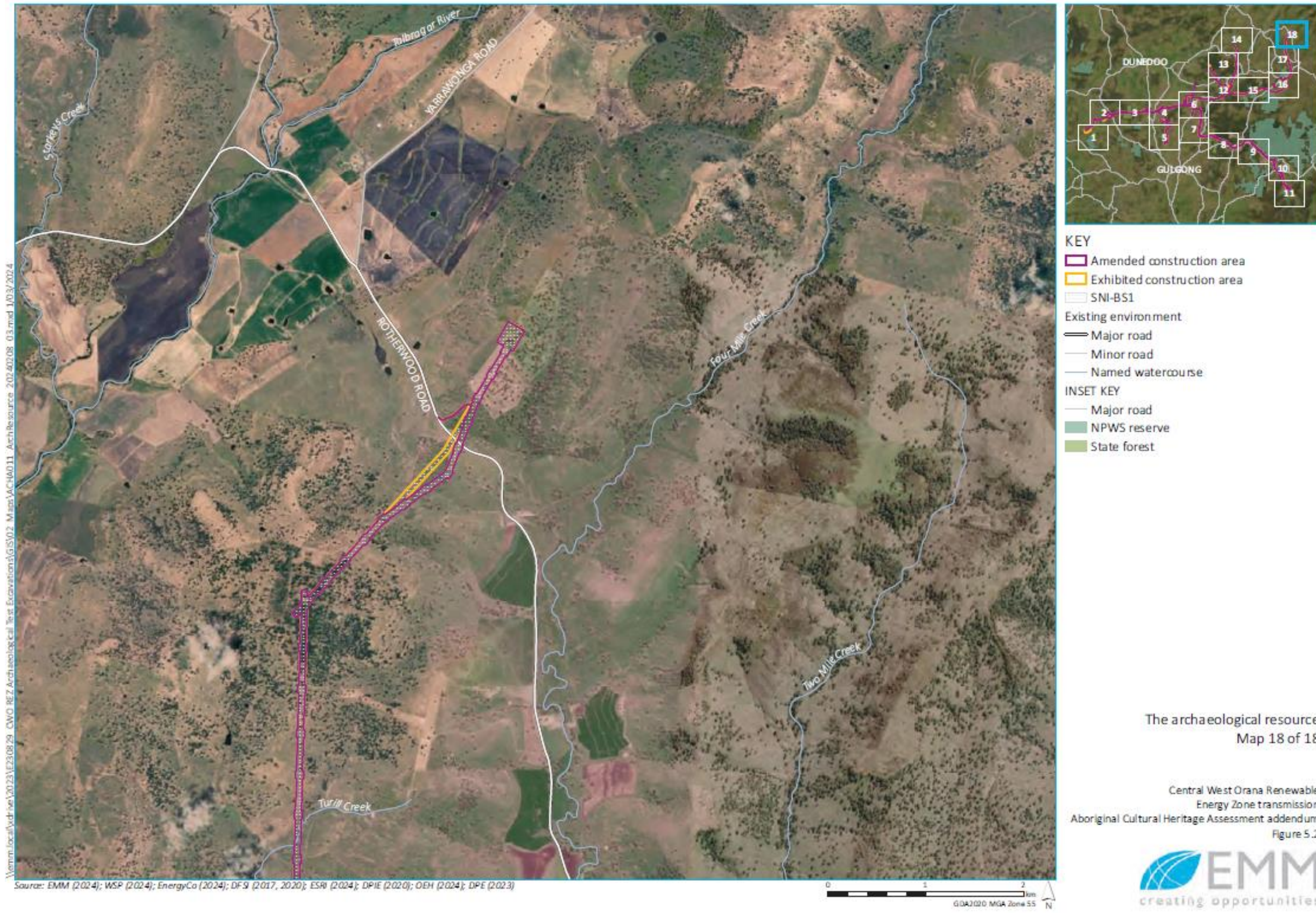


Figure 4-18: Aboriginal sites map 18 of 18 (Source ACHAR-A, Figure 5-2)

4.2 HISTORICAL HERITAGE

The historical heritage values of the Project were identified in the EIS and the AR and have been summarised below and are shown in Figure 4-19 to Figure 4-24.

A non-Aboriginal Heritage Assessment (NHA) was prepared for the EIS (Technical Paper 6) and is summarised in Chapter 12 of the EIS. Additional assessment was also undertaken to identify changes to potential historical heritage impacts associated with the amended project, as documented in Section 5.7 of the AR. The ‘study area’ for both the EIS and AR comprised the respective construction areas with a one-kilometre buffer.

4.2.1 Listed Heritage Items

The EIS identified two listed historical heritage items within the study area, as detailed in Table 4-3, being “Wandoona Homestead” (Item No. 1996) and “The Goulburn River National Park” (Item No. 1994), both listed on Schedule 5 of the Mid-Western Regional Local Environmental Plan 2012 (LEP). The “Wandoona Homestead” item is partially located within the EIS construction area, while the “Goulburn River National Park” is located adjacent to (but not within) the construction area.

The AR did not identify any additional listed non-Aboriginal heritage items within the amended study area or construction area.

4.2.2 Unlisted Heritage Items and Archaeological Potential

In addition to the above, the EIS highlighted 24 unlisted heritage items (within and adjacent to the construction area) that were assessed as having local heritage significance, as listed in Table 4-4. Two of the 24 potential heritage items (Laheys Creek Archaeological Site and Tallawang Public School and Churches) are comprised of sub-areas either by lot or area of activity. Additional field surveys of the amended construction area identified two new unlisted potential archaeological sites within the amended construction area (described in Table 4-5), giving a total of 26 items within the overall study area.

The archaeological potential of the amended construction area was assessed from the available historical documentation. In most cases, the documentation did not identify any areas that would indicate high potential for earlier structures, and therefore archaeological sites. However, given that the region was initially historically taken up by squatters and then converted to pastoral runs, there was considered to be potential for unmapped structures to exist in the amended construction area. These structures may have been in the form of shepherds’ huts, sheep folds, and wool/shearing sheds. Other structures or features related to squatting or early pastoral activities may also exist.

The EIS identified potential cemetery areas associated with heritage items along the Tallawang west connection, including Spir Road Cottage (CWO-22-HH08), Tallawang Union Church (CWO-22-HH09b) and Tallawang Catholic Church (CWO-22-HH09c). As part of the AR, a review was conducted using Ground Penetrating Radar (GPR) data as part of the ongoing assessment of potential heritage impacts.



GPR technology provides a non-destructive approach widely employed in archaeological investigations for locating unmarked graves while minimising disturbance.

One location with a high confidence for a potential grave and five sites with a moderate confidence for potential graves were identified in the Tallawang Union Church site. Five locations with a moderate confidence for potential graves were identified in the Tallawang Catholic Church site. One location with a low confidence for a potential grave was identified at Spir Road Cottage. The GPR data also identified three potential locations of surviving architectural fabric in the form of foundations/footings in the Tallawang Catholic Church site, and five potential locations of surviving architectural fabric in the Tallawang Union Church site.

Based on this finding, heritage mitigation measures were updated for the AR with the inclusion of REMM HH11, which prescribes the establishment of restricted zones within specific areas of the church lots in order to avoid harm to any relics or potential graves present.

Table 4-3: Listed historical heritage items in the study area (Source: EIS Table 12-4)

ID	Description	Within construction area	Historical heritage register/ place of listing	Description	Assessed heritage significance	Cultural heritage sensitivity
CWO-22-HH22	Wandoona Homestead	Yes (partial)	Mid-Western Regional Local Environmental Plan 2012 (1996)	A local heritage item listed under the Mid-Western Regional Local Environmental Plan 2012. It is located to the north of the proposed New Wollar Switching Station and the curtilage of this item is partially located within the construction area. The property is associated with Richard Fitzgerald, who was the earliest settler to the area. The homestead group of buildings are situated at the eastern end of the property (about 1.9 kilometres east of the construction area) and faces Wollar Creek. The majority of the lot is cleared farmland except for the western end, which is heavily vegetated, with steep topography and an existing power line oriented to the north-west.	Local	Moderate
CWO-22-HH23	Goulburn River National Park	No (adjacent)	Mid-Western Regional Local Environmental Plan 2012 (1994)	A local heritage item that is listed under the Mid-Western Regional Local Environmental Plan 2012. It is located adjacent to the construction area in the southeastern section of the study area near Ulan. The National Park was established in 1983 following proposals to construct the Kerrabee Dam. It has primarily natural, historic heritage values.	National (potentially)*	Moderate

Note: *The Mid-Western Regional Local Environmental Plan 2012 identifies this item as having local significance. As parts of the Goulburn River National Park are being considered for inclusion on the National Heritage List, this assessment has assigned this item as having national heritage significance.

Table 4-4: Unlisted historical heritage items within the study area (Source: EIS Table 12-5)

ID	Description	Within construction area	Description	Assessed heritage significance	Cultural heritage sensitivity
CWO-22-HH01	Dapper homestead group	No	Originally part of the Woolloowoolonly Run, the Dapper Homestead Group has been continuously occupied for close to 150 years and is one of the earliest established properties of the region.	Local	Low
CWO-22-HH02	Dapper hut and shed	No	Hut identified on Crown Plan (about 1876) predates the current Dapper Homestead Group. Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH03	Avondale House archaeological site	Yes (partial)	Site of the former Avondale house (last recorded in 1878). Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH04	Avondale Homestead (current)	No	A 100-year-old homestead, likely built in early 20 th century.	Local	Low
CWO-22-HH05a	Laheys Creek archaeological site (house and hut)	Yes	Site of a former house and hut (last recorded in 1866) and associated with the settlement of the district and one of the earliest European families in the area (Falconer). Field survey found two surface heaps of rubble of dressed and rough stones and metal items including machinery.	Local	Low
CWO-22-HH05b	Laheys Creek Archaeological Site (Stockyards)	Yes	Site of stockyards (last recorded in 1866) and associated with CWO-22-HH05a. Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH06	Laheys Creek Cemetery	Yes	A cemetery for about 40 people from the area, most being members and relations of the Falconer family. An easily recognisable link to the settlement of the district.	Local	Low

ID	Description	Within construction area	Description	Assessed heritage significance	Cultural heritage sensitivity
CWO-22-HH07	Brampton Park Homestead	No	An approximately 100-year-old homestead comprising a house, sheep stockyards, water tank and corrugated tin sheds for the Brampton Park property.	Local	Low
CWO-22-HH08	Spir Road Cottage	Yes (partial)	A single storey, multi-room vertical slab and asbestos building. Oral evidence identified that the vertical slab section was relocated from nearby Tucklan in the mid-20 th century.	Local	Low
CWO-22-HH09a	Tallawang (Upper) Public School	Yes	Site of a school residence dating from the late 19 th century, which was relocated to Tucklan. Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH09b	Tallawang Union Church	Yes (partial)	Site of an early 20 th century church since removed. Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH09c	Tallawang Catholic Churches	Yes (partial)	Site of a church since removed. Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH010	Tallawang Creek Archaeological Site 01	Yes (partial)	An iron water tank and standing concrete meat safe half filled with complete bottles indicate the site dates from the early 1900s and was probably abandoned in the early 1950s. Potential archaeological site.	Local	Low
CWO-22-HH011	Tallawang Creek Archaeological Site 02	No	Mid 1960s historic aerial map shows three structures on the southern bank of Tallawang Creek. Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH012	Puggoon Rail Siding	No	Demolished railway siding identified from parish maps (1916) and historical aerals (1964). Originally named Stubbo Railway Station, it was renamed to Puggoon Railway Station by the mid-20 th century. The site has been destroyed. This site appears to have been destroyed and is not considered to meet any of the criteria for local heritage significance.	None	Negligible

ID	Description	Within construction area	Description	Assessed heritage significance	Cultural heritage sensitivity
CWO-22-HH013	Merotherie Archaeological Site	Yes	Archaeological site with scattered bottles estimated to be from the 1930s at the earliest.	Local	Low
CWO-22-HH014	Cope Road archaeological site	No	A large house since removed fringed by mature vegetation (identified from aerial imagery from mid-1960s). Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH015	Moolarben Archaeological Site	No	A large house since removed fringed by mature vegetation (identified from aerial imagery from mid-1960s). Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH016	Moolarben Coal Project (MCP) Site 10	Yes (partial)	Original residence described as a gunyah on 1884 Crown Plan. Remaining structures comprise a few posts and exotic trees. Potential archaeological site.	Local	Low
CWO-22-HH017	Mittaville Archaeological site	Yes (partial)	Site of one structure thought to have been built in the early 20 th century. Demolished prior to construction of current electrical transmission line easement. Potential archaeological site with no structures remaining.	Local	Low
CWO-22-HH018	Road Embankment (Site 4)	Yes	A stone embankment supports the unsealed Wilpinjong Road. It was built in the drystone technique using sandstone blocks and plausible that it dates from the late 1920s when a shale seam was discovered at Wollar and a syndicate was put together to mine the product.	Local	Low
CWO-22-HH019	Pine Park Woolshed	Yes (partial)	A simple slab shed believed to date to the 1930s. It has a corrugated galvanised iron roof and end-walls on a round-post frame. The slabs are said to have come from the old house on the property.	Local	Low
CWO-22-HH020	Tallawang Creek Archaeological Site 03	Yes	Site of a house (recorded in 1884) since removed. The property is associated with Edward Milton, the original pioneers of the Birriwa area. Potential archaeological site with no structures remaining.	Local	Low

ID	Description	Within construction area	Description	Assessed heritage significance	Cultural heritage sensitivity
CWO-22-HH021	MCP Site 12	Yes (partial)	A house likely dated to 1912 with associated outbuildings and sheds.	Local	Low

Table 4-5 Newly Identified Archaeological Sites (Source Amendment Report: Section 5.7.1)

ID	Heritage item name	Site description
CWO-23-HH01	Coolah metallurgical processing and mining sites	Potential former gold and mineral mining/processing site. Identified near the relocated switching station M2 and the associated realigned transmission line
CWO-23-HH02	Sportsmans Hollow Creek archaeological site	Potential nineteenth-century occupation site. Northern bank of Sportsmans Hollow Creek, Ulan near the Merotherie Energy Hub—Elong Elong Energy Hub connection. Evidence of three areas of previous occupation: • A small outbuilding structure • A main structure. A lower terrace extending towards the north edge of the creek suggests that this flat terrace could have been a small vegetable garden, although this could not be confirmed • Separate kitchen or similar structure

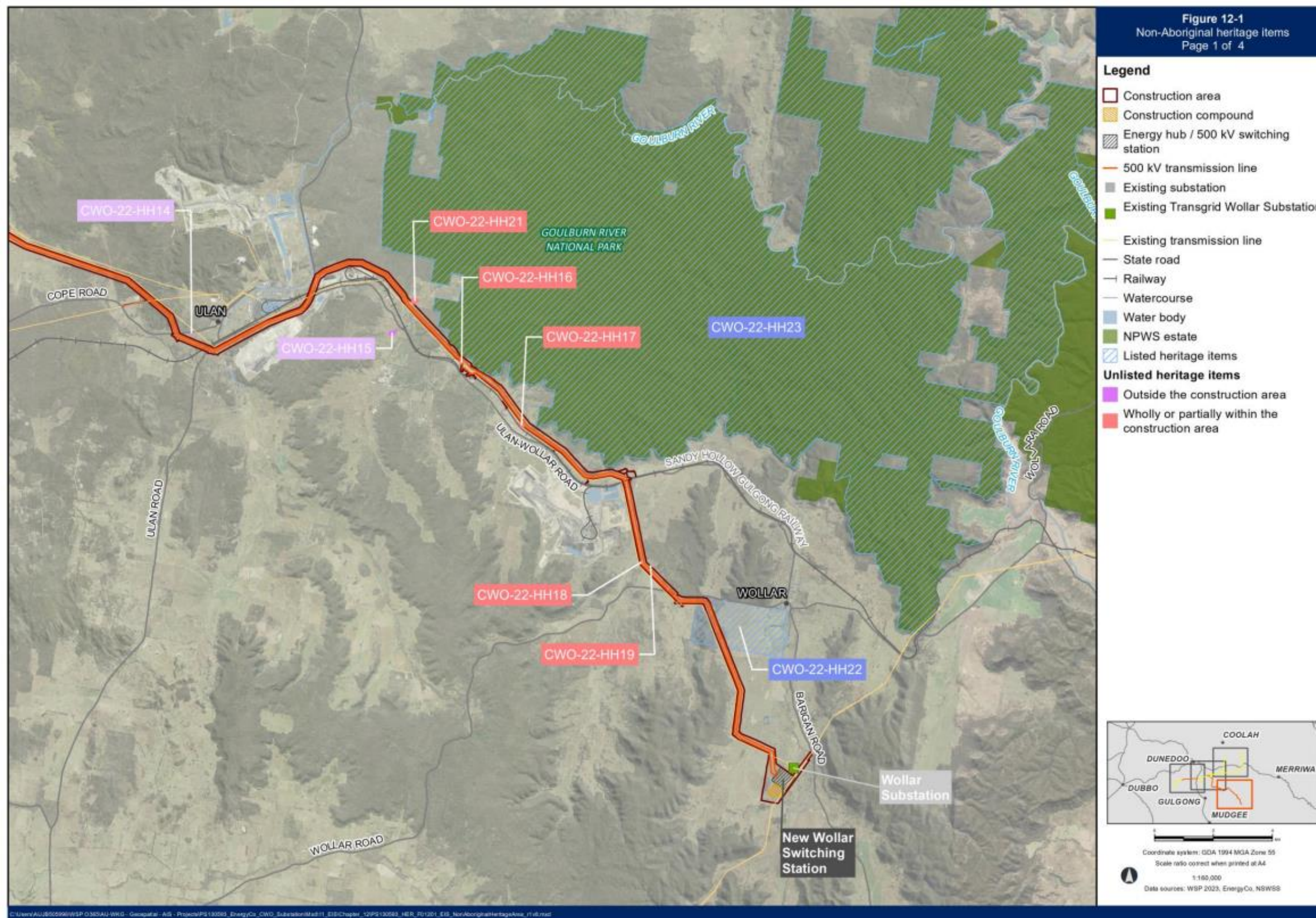


Figure 4-19: Historical heritage sites map 1 of 6 (Source EIS Figure 12-1 pages 1-4). NB 'construction area' as shown is the EIS (exhibited) area.

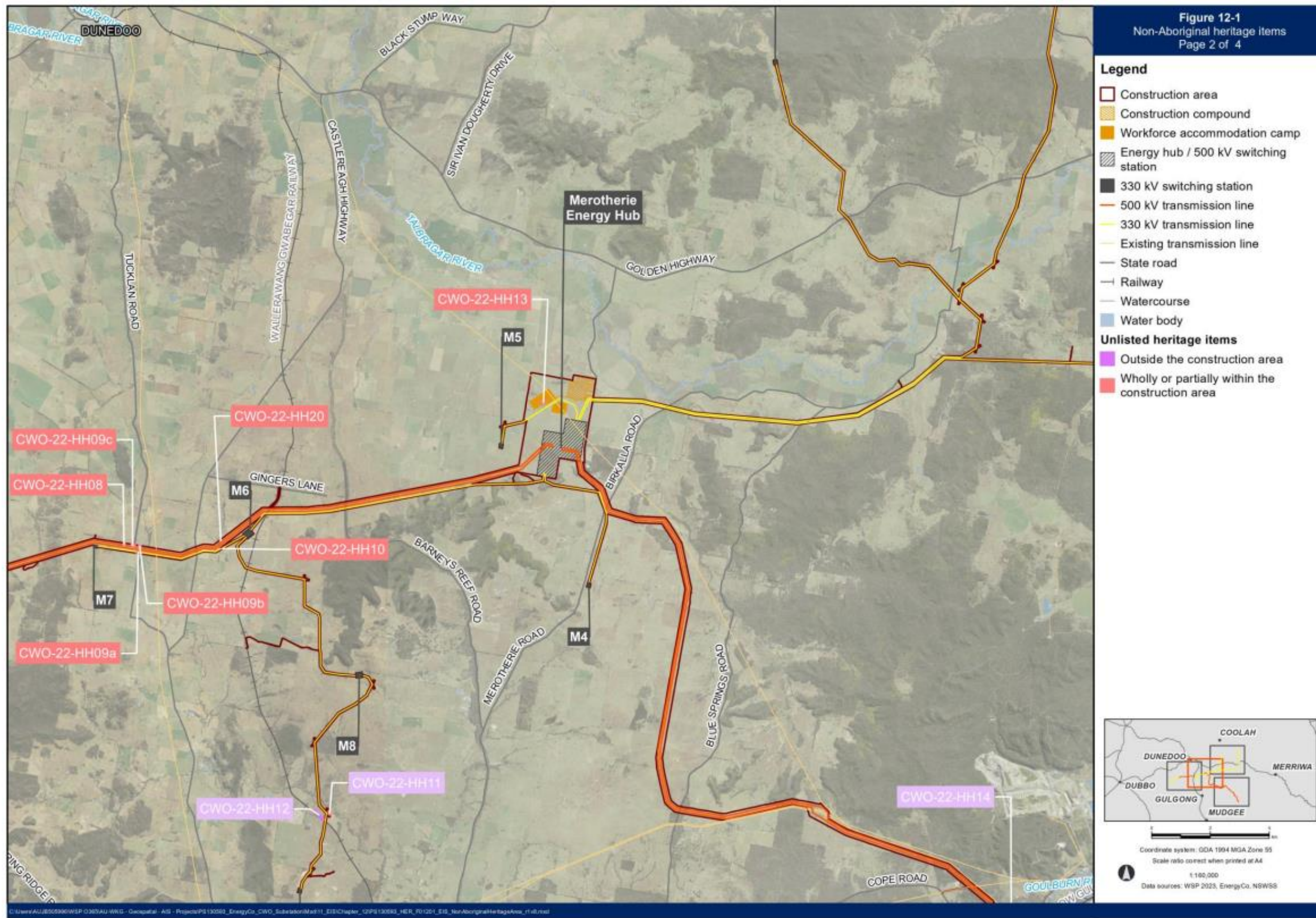
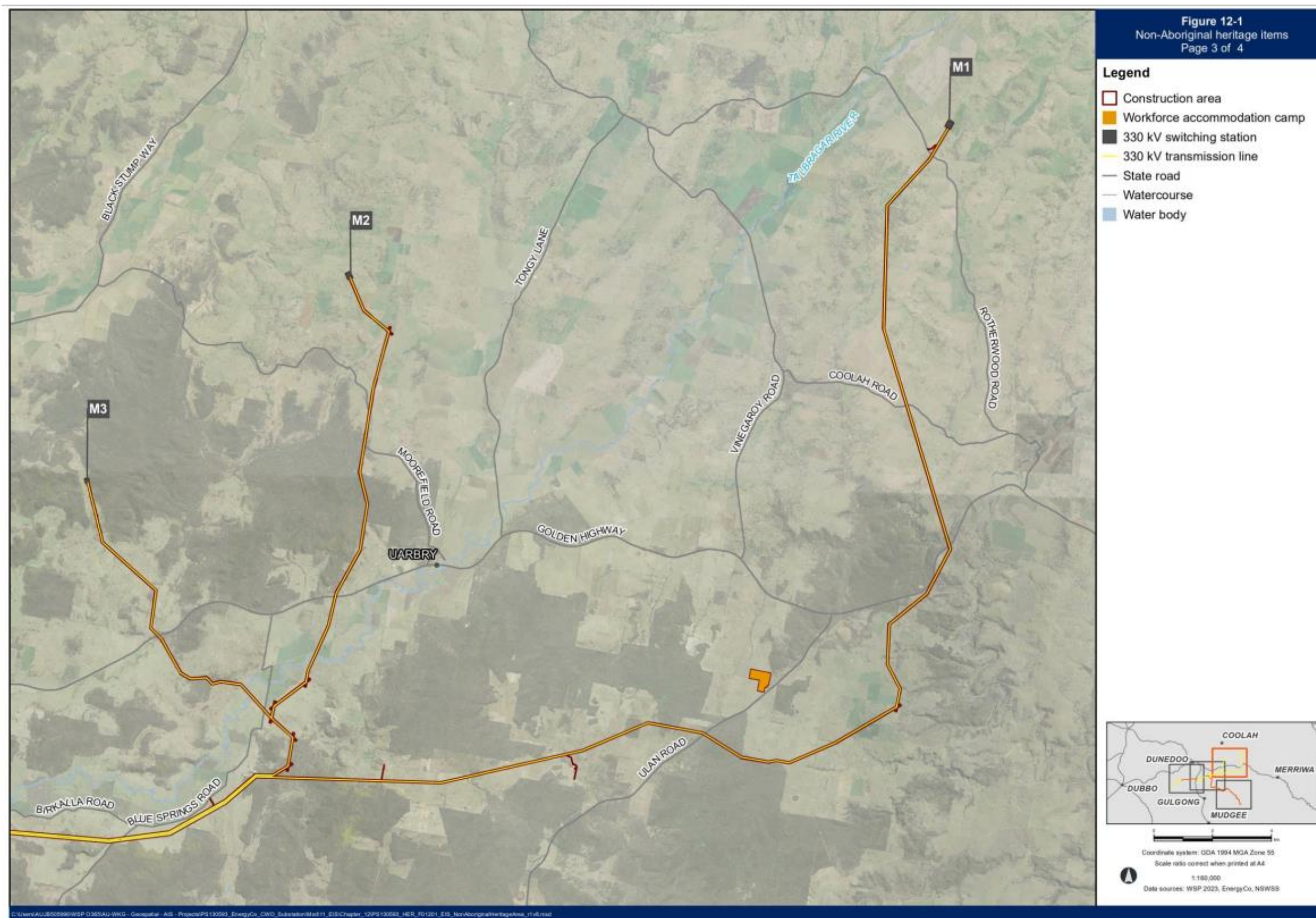
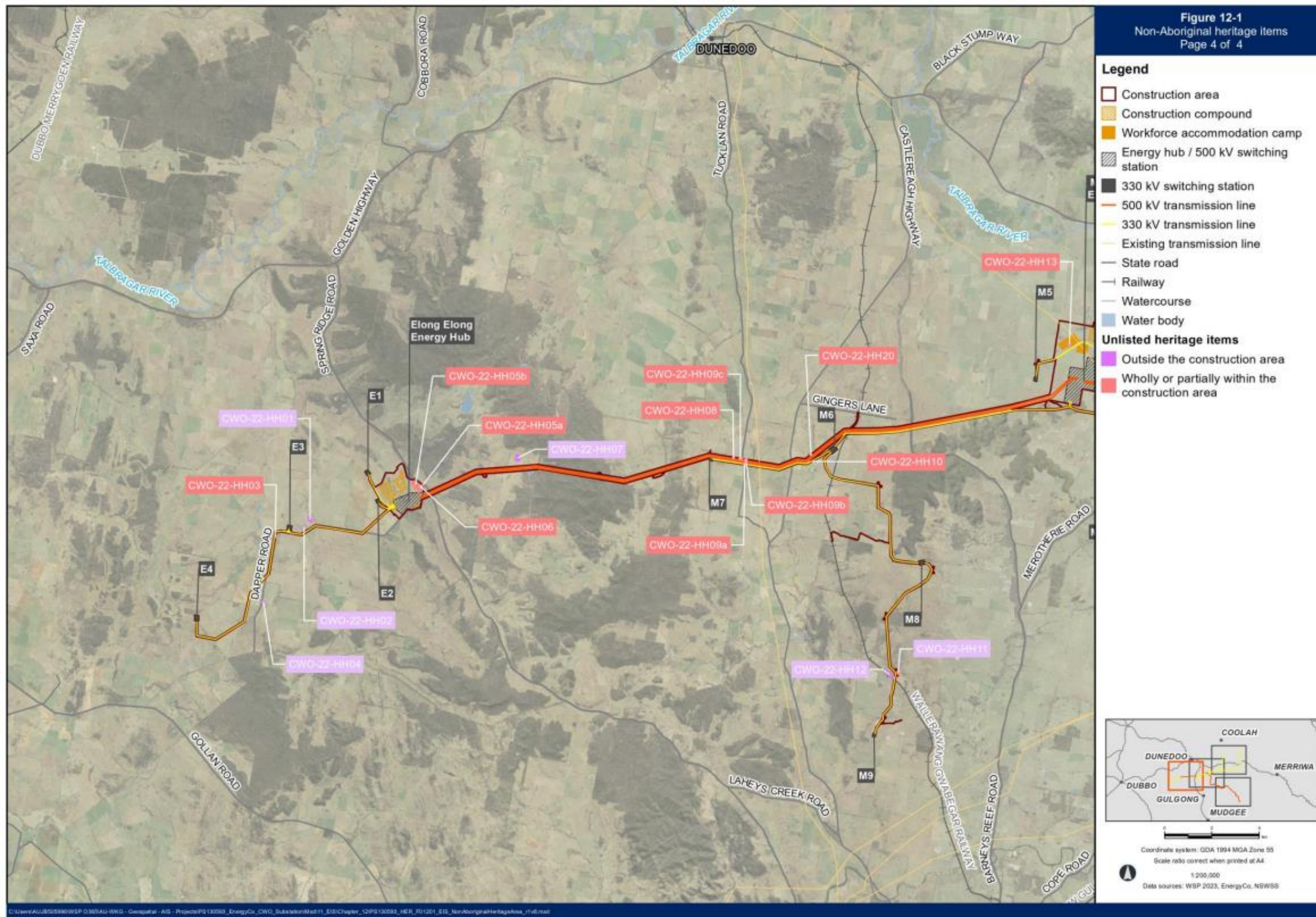


Figure 4-20: Historical heritage sites map 2 of 6 (Source EIS Report, 12-1). NB 'construction area' as shown is the EIS (exhibited) area.







Central-West Orana REZ

CWO-23-HH01

Legend

CONSTRUCTION

Construction Boundary 22/05/2024



ENVIRONMENT

Heritage

Historical Heritage

HH Area Of Interest



HH Area Of Interest 20m Buffer



Notes



This map is shown for reference purposes only. Acciona provides this information "as is" with the understanding that it is not guaranteed to be accurate, correct or complete and conclusions drawn from such information are the responsibility of the user. While every effort is made to ensure the information displayed is as accurate and current as possible, Acciona will not be held responsible for any loss, damage or inconvenience caused as a result of reliance on such information or data.

Figure 4-23 Historical heritage sites map 5 of 6 – CWO-23-HH01.



Central-West Orana REZ

CWO-23-HH02

Legend

CONSTRUCTION

Construction Boundary 22/05/2024



ENVIRONMENT

Heritage

Historical Heritage

HH Area Of Interest



HH Area Of Interest 20m Buffer



Notes



This map is shown for reference purposes only. Acciona provides this information "as is" with the understanding that it is not guaranteed to be accurate, correct or complete and conclusions drawn from such information are the responsibility of the user. While every effort is made to ensure the information displayed is as accurate and current as possible, Acciona will not be held responsible for any loss, damage or inconvenience caused as a result of reliance on such information or data.

Figure 4-24 Historical heritage sites map 6 of 6 – CWO-23-HH02 and CWO-22-HH14.

5 Environmental aspects and impacts

5.1 ABORIGINAL HERITAGE

All archaeological sites identified in the EIS and AR (refer to Table 4-1 above) were assessed to be directly impacted by the Project, with the exception of those items described in REMM AH1 and/or MCoA (NSW) B27(a) and/or MCoA (NSW) Appendix 3 Table 3-1 and as summarised in Table 5-1 below:

Table 5-1 Sites where impact is to be avoided

AHIMS #	Corresponding project site ID
36-3-4031	SNI GG02
36-3-3968 / 36-3-4038	SNI-GG03
36-3-4042	SNI-GG06
36-3-4043	SNI-GG05
36-3-4044	SNI-GG04
36-3-4045	SNI-GG07
36-3-4046	SNI-GG08
36-3-4027	SNI-AS65
36-3-4052	SNI-GG09
36-3-0111	Argyll No.3 (SNI-GG14 / SNI-AS01)
Within 150 m of Laheys Creek ((excluding the unavoidable impacts associated with the crossing of Lahey's Creek by the transmission corridor, which will be minimised), and ground disturbance associated with upgrades and maintenance along Spring Ridge Road and Dapper Road)	

The remaining archaeological items or locations were considered by the assessment reports to be subject to possible direct impact, with the level of harm subject to confirmation pending design finalisation. In accordance with REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW), the Project will investigate the micro-siting of project infrastructure and construction activities in order to avoid or minimise impact to specific sites and identified areas of sensitivity (as listed in Table 5-2 below).

None of the identified places of cultural value are within the construction area. However, the travelling routes intersect the construction area at five points near the Elong Elong Energy Hub, Switching Station M9 and Merotherie Energy Hub and two points between Merotherie Energy Hub and the New Wollar Switching Station. Potential (indirect) visual impacts were identified for three places of cultural value and two travelling routes (as listed in Table 5-2 below).



MCoA (NSW) B27(b) and the REMMs require management and mitigation measures for Aboriginal archaeological and cultural sites within the construction area that will be impacted. These are detailed in Section 6.1 and Section 6.2.

A summary of sites and their potential for direct and indirect impacts is provided in Table 5-2.

Table 5-2: Potential and direct impacts on Aboriginal objects / sites and cultural areas (adapted from ACHAR Table 6.1, AR Table 5-12, REMMs and MCoA)

Site	AHIMS #	Site type	Impact type	Mitigation/management required if impact cannot be avoided?
S1MC487	36-3-3794	Rockshelter	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
UWF SU51/L3	36-3-0449	Rockshelter	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
WCP137	36-3-0570	Rockshelter	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
S1MC488	36-3-3790	Rockshelter	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-RS01	36-3-4029	Rockshelter	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-RS02	36-3-4028	Rockshelter	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-RS03	36-2-0675	Rockshelter	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-RS04	36-2-0674	Rockshelter	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes

Site	AHIMS #	Site type	Impact type	Mitigation/management required if impact cannot be avoided?
SNI-RS06	36-3-4113	Rockshelter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
Birriwa Bus Route South ST-1	36-3-3918	Culturally modified tree – to be confirmed as per REMM AH5	Direct - however if confirmed as a culturally modified tree, micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes, if confirmed to be a culturally-modified tree under REMM AH5
SNI-CMT02	36-3-4034	Culturally modified tree – to be confirmed as per REMM AH5	Direct - however if confirmed as a culturally modified tree, micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes, if confirmed to be a culturally-modified tree under REMM AH5
SNI-CMT04	36-2-0747	Culturally modified tree – to be confirmed as per REMM AH5	Direct - however if confirmed as a culturally modified tree, micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes, if confirmed to be a culturally-modified tree under REMM AH5
SNI-CMT16	36-3-4058	Culturally modified tree – to be confirmed as per REMM AH5	Direct - however if confirmed as a culturally modified tree, micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes, if confirmed to be a culturally-modified tree under REMM AH5
SNI-CMT19	36-3-4059	Culturally modified tree – to be confirmed as per REMM AH5	Direct - however if confirmed as a culturally modified tree, micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes, if confirmed to be a culturally-modified tree under REMM AH5
Argyll No.3 (SNI-GG14 / SNI-SA01)	36-3-0111	Grinding groove with stone arrangement and water hole	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A
SNI-GG01	36-3-4048	Grinding groove	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-GG02	36-3-4031	Grinding groove	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A

Site	AHIMS #	Site type	Impact type	Mitigation/management required if impact cannot be avoided?
SNI-GG03	36-3-3968 / 36-3-4038	Grinding groove	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A
SNI-GG04	36-3-4044	Grinding groove	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A
SNI-GG05	36-3-4043	Grinding groove	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A
SNI-GG06	36-3-4042	Grinding groove	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A
SNI-GG07	36-3-4045	Grinding groove	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A
SNI-GG08	36-3-4046	Grinding groove	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A
SNI-GG09	36-3-4052	Grinding groove	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A
SNI-GG15	36-3-4047	Grinding groove	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-GG16	36-3-4060	Grinding groove	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-GG17	36-3-4110	Grinding groove	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-AS65	36-3-4027	Grinding groove, low density artefact scatter and PAD	None – as per REMM AH1 and Table 3-1 of Appendix 3 of the MCoA (NSW)	N/A

Site	AHIMS #	Site type	Impact type	Mitigation/management required if impact cannot be avoided?
SNI-IF104	36-3-4115	Grinding groove, artefact (isolated find)	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-AS41	36-2-0678	High density artefact scatter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-AS43	36-3-4030	High density artefact scatter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-AS57	36-2-0677	High density artefact scatter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-AS101	36-3-1140 / 36-3-1141	High density artefact scatter	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
WCP220	36-3-0496	Moderate density artefact scatter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
WCP227	36-3-0503	Moderate density artefact scatter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
WC OS 17 with PAD	36-3-0658	Moderate density artefact scatter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
WCP260	36-3-0793	Moderate density artefact scatter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-AS71	36-2-0688	Moderate density artefact scatter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-AS02	36-2-0676	Moderate density artefact scatter	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes

Site	AHIMS #	Site type	Impact type	Mitigation/management required if impact cannot be avoided?
SNI-FA02	36-2-0680	High density artefact scatter, and deposit	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-FA04	36-3-4040	Moderate density artefact scatter, and deposit	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-FA05	36-2-0682	High density artefact scatter, and deposit	Direct, however micro siting to be investigated under REMM AH2 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-FA06	36-2-0683	Moderate density artefact scatter, and deposit	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-FA07	36-3-4041	High density artefact scatter, and deposit	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-FA08	36-3-4112	Moderate density artefact scatter, and deposit	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-FA09	36-3-4111	Moderate density artefact scatter, and deposit	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-FA10	36-2-0746	Moderate density artefact scatter, and deposit	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-FA11 / SNI-AS91	36-3-4114	High density artefact scatter, and deposit	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes
SNI-FA12	36-2-0748	High density artefact scatter, and deposit	Direct, however micro siting to be investigated under Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes

Site	AHIMS #	Site type	Impact type	Mitigation/management required if impact cannot be avoided?
SNI-BS1 ²		Low density artefact scatter – previously identified in the EIS as a stone artefact background scatter predicted to occur across the construction area, typically of low significance.	Direct impact	No
Zone within 150m from Laheys Creek	NA	Area of archaeological sensitivity	Partial direct harm within the transmission line corridor and road corridors however micro siting within approved impact area to be investigated under REMM AH2 Partial no harm area (heritage protection zone) outside of the approved impact area as per REMM AH1 and Table 3-2 of Appendix 3 of the MCoA (NSW)	Yes, within approved impact area under REMM AH10
Zones within 150m from Deadmans, Bora, Cumbo, Wilpinjong, Tallawang and Copes Creeks	NA	Zones of Archaeological potential: Within 150 m of Deadmans Creek, Bora Creek, Cumbo Creek, Wilpinjong Creek, Tallawang Creek (north crossing), Copes Creek and Laheys Creek.	Direct, however micro siting to be investigated under REMM AH2	Yes

² SNI-BS1 incorporates #36-3-0353, #36-3-0497, #36-3-0634, #36-3-0691, #36-3-0815, #36-3-0816, #36-3-0817, #36-3-0818, #36-3-0819, #36-3-0820, #36-3-0821, #36-3-1047, #36-3-1048, #36-3-1049, #36-3-1050, #36-3-1051, #36-3-1053, #36-3-1054, #36-3-1055, #36-3-1058, #36-3-1062, #36-3-1063, #36-3-1064, #36-3-1065, #36-3-1066, #36-3-1067, #36-3-1068, #36-3-1090, #36-3-1402, #36-3-1404, #36-3-1428, #36-3-3406, #36-3-1052, #36-3-1056, #36-3-1057, #36-3-1401, #26-3-2514, #36-3-3291, #36-3-3523, #36-2-0627, #36-3-3917, SNI-IF01-15 inclusive, SNI-IF17, SNI-IF20, SNI-IF28, SNI-IF33, SNI-IF39, SNI-IF41, SNI-IF43, SNI-IF47, SNI-IF48, SNI-IF51, SNI-IF56, SNI-IF58, SNI-IF62, SNI-IF65, SNI-IF66-68, SNI-IF70-76, SNI-IF78-80, SNI-IF83-86, SNI-IF88-90, SNI-IF93-96, SNI-IF99-103, #36-3-0336, #36-3-0470, #36-3-0498, #36-3-0569, #36-3-0660, #36-3-0139, #36-3-1403, #36-3-2833, #36-3-3182, #36-3-3227, #36-3-3233, #36-3-3432, #36-3-3805, #36-3-3828, #36-3-3832, #36-3-3833, #36-3-3835, #36-2-0533, #36-2-0580, #36-3-1396, SNI-S01, SNI-AS03-07 inclusive, SNI-AS09, SNI-AS012-13 inclusive, SNI-AS15, SNI-AS17, SNI-AS29, SNI-AS31, SNI-AS37, SNI-AS40, SNI-AS51-52 inclusive, SNI-AS61, SNI-AS66, SNI-AS68-70 inclusive, SNI-AS72-73 inclusive, SNI-AS76-77 inclusive, SNI-Q01, SNI-FA01, SNI-AS79, SNI-AS83, SNI-AS87-90, SNI-AS92, SNI-AS95, SNI-AS97, SNI-AS99, #36-3-0685/SNI-FA03, #36-3-0720/SNI-AS100, #36-2-0613, #36-3-3884.



Site	AHIMS #	Site type	Impact type	Mitigation/management required if impact cannot be avoided?
SNI-CS4 (Castle Rock (6))	NA	Cultural area	Potential indirect (visual)	Yes, where identified under REMM AH3
SNI-CS5 Wilpinjong coal mine (7))	NA	Cultural area	Potential indirect (visual)	Yes, where identified under REMM AH3
SNI-CS-6 (Wollar Creek (8))	NA	Cultural area	Potential indirect (visual)	Yes, where identified under REMM AH3
Travelling route # 1	NA	Cultural area	Potential indirect (visual)	Yes, where identified under REMM AH3
Travelling route # 5	NA	Cultural area	Potential indirect (visual)	Yes, where identified under REMM AH3

5.2 HISTORICAL HERITAGE

Potential direct and indirect impacts to historical heritage are in association with construction of the project which are discussed in EIS Chapter 12 and AR Chapter 5.7 (Non-Aboriginal Heritage). It is noted that no cumulative impacts to historical heritage were identified in these assessments.

5.2.1 Direct Impacts

Historical heritage items with potential for direct impacts through the Project's construction were explored within the EIS, these are presented in Table 5-3. In accordance with REMM HH2 and MCoA (NSW) B27(c), construction methodologies will be refined to avoid and/or minimise direct impacts to historic heritage items within the approved construction area where reasonable and feasible.

Of the items listed in Table 5-3 below, impact must be avoided to items CWO-22-HH06 and CWO-22-HH11 as required by MCoA (NSW) B27(a).

Table 5-3 Potential direct impacts to items of historical heritage within the study area (Source: EIS Technical Paper 6-Table 7.1)

ID	Heritage item name	Potential unmitigated impact	Likely magnitude of change (unmitigated)
CWO-22-HH03	Avondale House	Heritage item is located partially within the construction area and has the potential to be directly impacted	Medium
CWO-22-HH05a	Laheys Creek Archaeological Site (House and Hut)	Site complex is located on the eastern edge of the proposed Elong Elong energy hub, adjacent to Laheys Creek and has potential to be directly impacted by the proposed Project through: • Traversal of area by construction plant and vehicles • Potential construction activities in the south and east of the heritage complex in areas identified as being stockyards (CWO22-HH05b) It is noted that the heritage item has been previously impacted by cropping activities by way of machinery movements.	Major
CWO-22-HH05b	Laheys Creek Archaeological Site (Stockyards)	Heritage item is located on the eastern edge of the proposed Elong Elong energy hub, adjacent	Major

ID	Heritage item name	Potential unmitigated impact	Likely magnitude of change (unmitigated)
		to Laheys Creek and has the potential be directly impacted by: • Traversal of area by construction plant and vehicles • Potential construction activities in the south and east of the heritage complex in areas identified as being stockyards It is noted that the heritage item has been previously impacted by cropping activities by way of machinery movements.	
CWO-22-HH06*	Laheys Creek Cemetery	Heritage item is located on the eastern edge of the proposed Elong Elong energy hub, adjacent to Laheys Creek and has the potential be directly impacted by construction activity prior to application of mitigation. Visual amenity impacts from transmission line easement and Elong Elong Energy Hub would also occur.	Major
CWO-22-HH08	Spir Road Cottage	Heritage item is located within the construction area and may be directly impacted by construction activities such as vegetation clearance and tower placement.	Major
CWO-22-HH09a	Tallawang (Upper) Public School	Heritage item is located within the construction area and has the potential to be directly impacted through construction activities such as vegetation clearance and tower placement	Major
CWO-22-HH09b	Tallawang Union Church	Heritage item is located within the construction area and has the potential to be directly impacted through construction activities such as vegetation clearance and tower placement	Major
CWO-22-HH09c	Tallawang Catholic Church	Heritage item is located within the construction area and has the potential to be directly impacted through construction activities	Major



ID	Heritage item name	Potential unmitigated impact	Likely magnitude of change (unmitigated)
		such as vegetation clearance and tower placement.	
CWO-22-HH10	Tallawang Creek Archaeological Site 01	Heritage item is located within the construction corridor and would be directly impacted. Surface features including water tank, meat safe, vegetation may be removed	Major
CWO-22-HH11*	Tallawang Creek Archaeological Site 02	Direct construction impacts to CWO-22-HH11 are possible, however there are no known heritage items (including potential relics) in the immediate area of impact.	No Change
CWO-22-HH13	Merotherie Archaeological Site	Heritage item is located within the construction area and would be directly impacted by the proposed project	Major
CWO-22-HH16	MCP Site 10	Heritage item is located within the construction area and would be directly impacted by the proposed project.	Major
CWO-22-HH17	Mittaville Archaeological Site	Potential partial disturbance of heritage item. The likely area of this heritage item is located partially within the construction area. However, this heritage item has likely been already significantly impacted through past demolition and construction of the current electrical transmission line easement.	Major
CWO-22-HH18	Road Embankment (Site 4)	Heritage item is located within the construction area and would be directly impacted by the proposed project.	Major
CWO-22-HH19	Pine Park Woolshed	Heritage item is located within the construction area and would be directly impacted by the proposed project both physically and visually	Major
CWO-22-HH20	Tallawang Creek Archaeological Site 03	Heritage item is located within the construction corridor and would be directly impacted by the project.	Major

ID	Heritage item name	Potential unmitigated impact	Likely magnitude of change (unmitigated)
CWO-22-HH21	MCP Site 12	Only a very small portion of the Heritage item intersects with the construction footprint, therefore significant direct impacts to MCP Site 12 are not anticipated.	Negligible

** Although Lahey's Creek Cemetery (CWO-22-HH06) and Tallawang Creek Archaeological Site 02 (CWO-22-HH11) are located (wholly or partially) within the construction area, these items will be avoided in accordance with REMM HH1 and MCoA (NSW) B27 (a).*

The AR assessed the potential direct impacts to additional archaeological sites as a result of amendments and refinements to the project boundary. Potential direct disturbance following demolition was identified at the following sites:

- Coolah metallurgical processing and mining sites (CWO-23-HH01), located near switching station M2 and its associated transmission line
- Sportsman's Hollow Creek archaeological site (CWO-23-HH02), located near the Merotherie Energy Hub—Elong Elong Energy Hub connection
- Potential graves and surviving architectural fabric at sites previously identified in the EIS along the Tallawang west connection, including Spir Road Cottage (CWO-22-HH08), Tallawang Union Church (CWO-22-HH09b) and Tallawang Catholic Church (CWO-22-HH09c)

Direct impacts to the newly identified archaeological sites would be avoided where practicable in accordance with REMM HH2 and MCoA (NSW) B27 (c). If direct impacts cannot be avoided, further archaeological assessment would be required under REMM HH4 (as described in Section 6.3.6).

For other sites where direct impacts cannot be avoided, the REMMs require additional management and mitigation measures. These are detailed in Sections 6.3.6 to 0.

5.2.2 Indirect Impacts

Indirect impacts may occur during any phase of the Project when construction, site decommissioning, or other activities result in excessive dust, noise, or vibration which damages historical heritage structures, or where the Project would have a detrimental effect on the setting of a place resulting from visual impacts. Historical heritage items with potential indirect impacts from the project are listed in Table 5-4, along with the potential nature of the impact and magnitude of change.

Table 5-4 Potential indirect impacts to items of historical heritage within the study area (Source: EIS Technical Paper 6-Table 7.2)

ID	Heritage item name	Potential unmitigated impact	Likely magnitude of change (unmitigated)
CWO-22-	Brampton	Heritage item is located outside the construction area and	Low

ID	Heritage item name	Potential unmitigated impact	Likely magnitude of change (unmitigated)
HH07	Park Homestead	will no longer be directly impacted. Although the homestead is surrounded by mature native and introduced vegetation species, visual impacts as a result of the transmission line may be possible.	
CWO-22-HH22	Wandoona Homestead (LEP #1996)	Although the project would be partially located in the westernmost portion of the curtilage of this heritage item, direct impacts to the structures that form the homestead group are not anticipated. As the proposed transmission line is approximately 2.3 km from the homestead (e.g. beyond the visual impact assessment study area of 2 km), visual impacts as a result of the transmission line would be negligible.	Negligible
CWO-22-HH23	Goulburn River National Park (LEP #1994)	As there are no significant views from the Goulburn River National Park in the direction of the proposed transmission line, and already an existing transmission line running along the southern boundary of the Goulburn River National Park, visual impacts as a result of the transmission line is considered negligible.	Negligible

In accordance with REMM HH3 and MCoA (NSW) B27 (c), construction methodologies will be refined to avoid and/or minimise indirect impacts to listed and potential historic heritage items where reasonable and feasible.

6 Environmental Mitigation and Management Measures

Heritage management and mitigation measures relevant to the project are outlined in the following Sections. These will be implemented to minimise heritage impacts and ensure all project requirements and relevant applicable legislation are met.

General heritage management procedures are detailed in Section 6.1.

Aboriginal heritage management procedures and mitigation methods are detailed in Section 6.2.

Historical heritage management procedures and mitigation methods are detailed in Section 6.3.

Specific required management and mitigation measures for identified heritage sites under the REMMs, and where these are addressed in the following sections, are listed in Appendix B. Specific required management and mitigation measures for identified heritage sites under MCoA (NSW) Appendix 3 Table 3-2, and where these are addressed in the following sections, are listed in Appendix D.

6.1 GENERAL HERITAGE MANAGEMENT PROCEDURES

The general management procedures below have been designed to protect, monitor and manage all heritage matters within the project footprint. They are consistent with the recommendations and commitments made in the EIS and AR and comply with the REMMs and MCoA (NSW) and have been developed with consideration of the guiding principles documented in Appendix E of the ACHAR-A.

6.1.1 Heritage inductions and training

Various levels of inductions and training will be implemented for the Project dependent on the target audience and their role on the Project. The following sections describe each of the types of induction and training that will be implemented.

6.1.1.1 Aboriginal Cultural Awareness Training

A Cultural Awareness Training module will be developed and delivered (likely electronically) by a third-party training provider. This Cultural Awareness Training will be targeted at ACJV D&C and subcontractor personnel in leadership positions, site supervisors and any personnel who liaise with the public in carrying out their roles.

The Aboriginal Cultural Awareness Training will be specific to the local region and relevant to the works. Project RAPs will be consulted on both the content and delivery of the Aboriginal Cultural Awareness Training.

The Project's Training Needs Analysis (TNA) will be utilised to identify the personnel/roles that are required to complete the Aboriginal Cultural Awareness Training.

6.1.1.2 Project Site Induction

Input	Timing	Source of requirement	Output
All personnel working on site	Pre-construction; construction	MCoA (NSW) B28 (d) (vii); REMM AH4	Induction records

All personnel working on site will undertake the Project Site Induction which will include topics on:

- Heritage significance in the construction footprint
- Protocols that must be complied with to avoid, minimise and manage potential impacts
- Identification and protection of sites, cultural deposits, curtilages, and obligations for their protection
- Aboriginal and historical heritage management issues prior to construction commencement
- Roles and responsibilities for heritage management
- Location of identified heritage sites and no-go areas (restricted areas/exclusion zones)
- Proposed heritage management and protection measures
- Procedure to follow in the event of an unexpected heritage item find or discovery of human remains (Appendix C)

The Project site induction will be delivered in electronic format and will be completed by all relevant project personnel that are required to work onsite, prior to the relevant person commencing work onsite. The induction content will be subject to continual review to reflect the construction stage, significant risks and learnings from incidents or non-conformances. The Project's Training Needs Analysis (TNA) will be utilised to identify the personnel / roles that are required to complete the Project Site Induction.

6.1.1.3 Targeted training

Input	Timing	Source of requirement	Output
Construction personnel working on site	Pre-construction; construction	MCoA (NSW) B28 (d) (vii); REMM AH4	Toolbox records, Training records

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

- Establishment of heritage exclusion zones
- Details of specific features of heritage significance within or adjacent to the proposed work area
- Discovery of any unexpected finds

6.1.1.4 Roles and responsibilities

The specific roles and responsibilities relating to the development and delivery of the cultural awareness training are detailed in Table 6-1 below.

Table 6-1. Cultural awareness training roles and responsibilities

Role	Responsibility
ACJV D&C Environment and Sustainability Manager	Review and approve heritage related content in project site induction.
ACJV D&C Indigenous Engagement Manager	Review and approve heritage related content in project site induction. Facilitate establishment of Aboriginal Cultural Awareness Training.
ACJV D&C Environmental Manager (or delegate)	Prepare heritage related content for project site induction.
ACJV D&C Environmental Advisors	Prepare content for toolbox talks or other targeted training relating to heritage management.
Qualified Heritage Professional	Provide input for heritage related content as required for project site induction.
RAPs	Provide feedback on heritage related content for project site induction and Cultural Awareness Training.
Training Provider	Prepare and deliver Cultural Awareness Training.

6.1.2 Unexpected heritage finds procedure

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction	MCoA (NSW) B28(d)(vi)	Unexpected Heritage Finds Procedure (Appendix C)
	Construction	REMM AH4	
		REMM HH8	

There is potential to come across unexpected heritage finds and human remains within and adjacent to the construction footprint during works associated with the project. As such, an Unexpected heritage Finds Procedure (Heritage-UFPP) (Appendix C) has been prepared and will be implemented throughout works to:

- Manage the unexpected discovery of Aboriginal objects, sites and/or human remains during the project (REMM AH4)
- Manage the unexpected discovery of historical objects, sites and/or human remains during the project (REMM HH8)
- Provide a contingency plan and reporting procedure if unexpected heritage items are found or skeletal material is discovered during the project (MCoA (NSW) B28(d)(vi))



Note: Human remains that are found unexpectedly during the carrying out of work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.

6.1.2.1 Harm to Aboriginal items outside the Construction Area

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction	MCoA (NSW) B28(d)(vi)	Assessment report
	Construction		Incident notification Incident investigation report

Figure 6-1 below outlines the procedure and reporting requirements should un-authorised impact (harm) occur to Aboriginal heritage items outside the approved construction area as required by MCoA (NSW) B28(d)(vi).

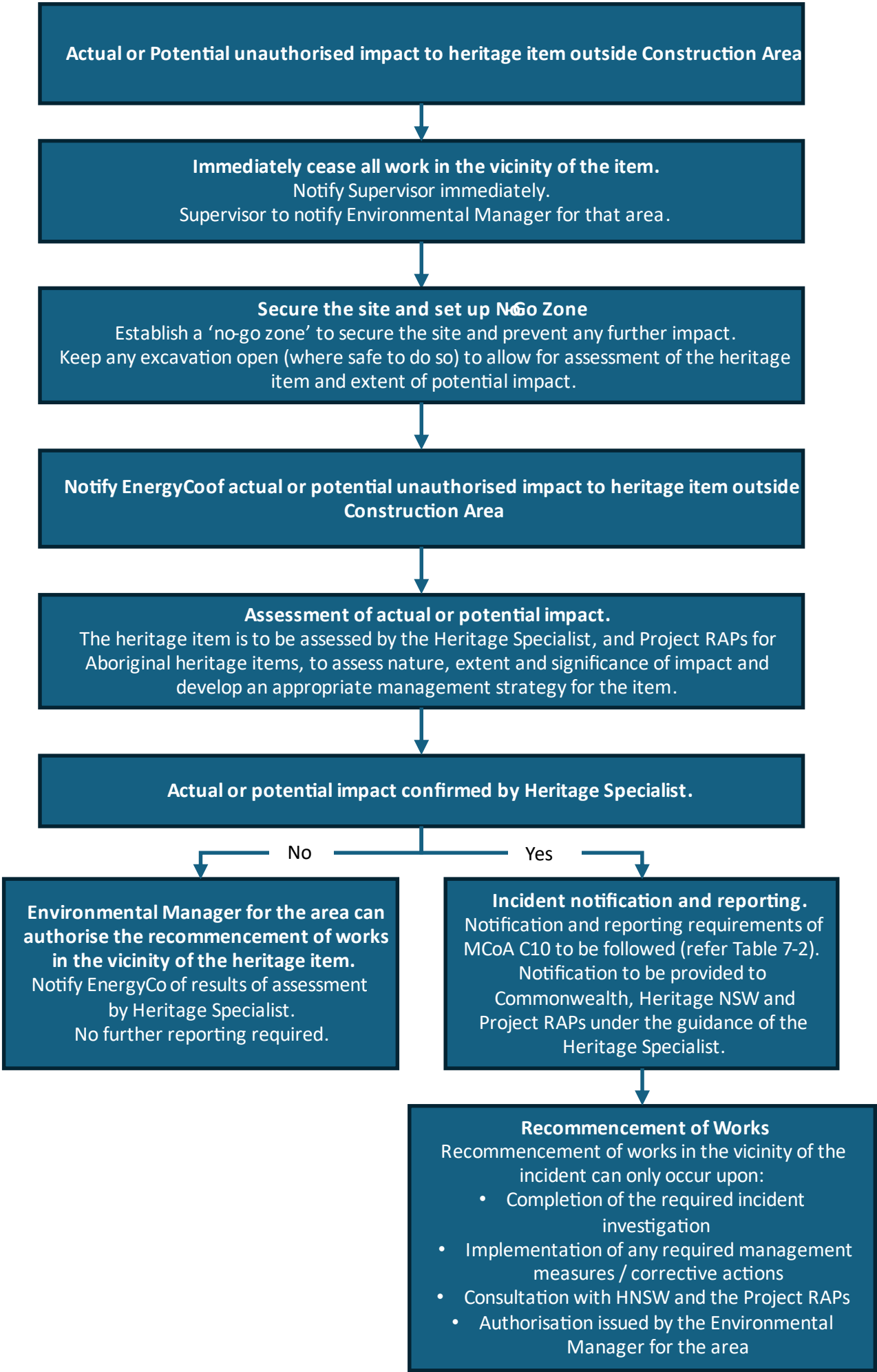


Figure 6-1: Contingency plan and reporting requirements for unauthorised impact to heritage items outside the Construction Area

6.1.3 Unassessed Areas

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction	MCoA (NSW) B28 (c)	Survey records
	Construction		

Any unsurveyed areas within the construction area as identified in ACHAR Addendum map series Figure 4.3 will be assessed in accordance with the Code of Due Diligence as required by MCoA (NSW) B28(c).

For clarity, the Code of Due Diligence as referenced in MCoA (NSW) B28(c) refers to the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*.

Assessment of unsurveyed areas will be undertaken as follows, in accordance with the steps outlined in the Code of Due Diligence and (where required) the field investigation requirements described in the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW*.

- Determine if construction activity will disturb the ground surface or trees (Step 1)
- Database search: AHIMS search and review of known information sources (Step 2a)
- Landscape assessment (Step 2b)
- Impact avoidance assessment (Step 3)
- Field survey (Step 4)

The following methodology has been prepared to provide a consistent approach for additional field survey activities.

Where required, survey will be undertaken in accordance with Requirements 5 – 10 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. The field methodology is consistent with the previous methodology employed during Aboriginal heritage investigations for the project including the surveys undertaken during preparation of the EIS and AR, which was consulted on with RAPs and is detailed in the ACHAR and ACHAR-A. All field survey will be undertaken with RAPs. The survey methodology has been designed to achieve the following aims, consistent with previous investigations for the Project:

- To identify and map any new Aboriginal sites and PADs
- To verify the location and extent of existing Aboriginal sites and PADs, where required
- To conduct consultation with the nominated Aboriginal site officers with regard to the mitigation of impact to Aboriginal archaeological values
- To consider ways that potential impacts to significant places can be avoided
- To establish if further archaeological investigations (test and/or salvage excavation and/or surface artefact collection) will be required in order to mitigate the impacts of the Project



- To target areas of higher visibility and exposures of the ground surface for the presence of Aboriginal objects
- To inspect mature trees in the project footprint for cultural modification and scarring
- To inspect rocky outcrops, close to waterways for grinding grooves, waterholes or wells
- To inspect suitable sandstone overhangs or boulders for rockshelters
- To record the following details for each surveyed area:
 - Landform
 - Ground surface exposure and nature of exposure, ground surface visibility
 - Degree of disturbance
 - Nature of current and historical land use

The outcomes of the archaeological survey will be used to determine whether additional management and mitigation measures are required, where this is not already identified in the mitigation measures. Any required mitigation activities would be undertaken in accordance with the archaeological methodologies included in the HMP. The project archaeologist, taking into account the survey findings and the outcome of consultation with RAPs, will determine which mitigation and management activities are required:

Where additional survey is required for previously unassessed areas, survey effort will be concentrated within the locations of potential impact within the project footprint, with the intention to accomplish a full coverage pedestrian survey of the potential impact areas. Each survey location may be assessed as an independent survey unit, with consideration made for the use of multiple survey units where assessment areas are larger in size or where clear landform or other divisions are present within the same survey area instance. In accordance with Requirement 5b of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, the survey will meet the following methodological requirements:

- Survey an area, on foot, for the purposes of discovering Aboriginal objects
- Be conducted in accordance with the sampling strategy
- Be carried out using accurately defined and named survey units
- Include representative photographs of survey units and landforms where informative
- Record landform and general soil information for each survey unit
- Record the land surface and vegetation conditions encountered during the survey (accounting as appropriate for things like vegetation, rock outcrops, coarse fragments, etc.) and how these impact on the visibility of objects
- Record any Aboriginal objects (including those already registered on AHIMS or otherwise known) observed during the survey
- Record survey coverage



- Be used to calculate survey effectiveness
- Be accurately mapped and presented visually at an appropriate scale as part of any subsequent archaeological reporting

Survey locations will be accessed by vehicle and survey inspection will be undertaken on foot (pedestrian survey). Based on the archaeological background and landscape context of the project area, the survey team will closely inspect any areas of surface exposure for artefacts, evidence of intact soils and any mature trees for evidence of Aboriginal bark removal. The area will also be inspected for any suitable sandstone outcrops in the form of benches utilised for grinding groove sites or overhangs/boulders with potential rockshelters where suitable geological formations occur. Assessments of soil integrity and land use disturbance will also be made, as this can assist with decision-making regarding requirements for subsequent test excavation.

The survey team will be equipped with high resolution aerial photography and topographic maps showing the project boundary, the survey area, and the location of previously recorded Aboriginal archaeological sites and areas of sensitivity. A non-differential GPS receiver will be used for spatial recordings. All GPS recordings will be made using the Geocentric Datum of Australia (GDA) coordinate system. All geospatial information will be recorded in line with Requirement 8 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. Detailed notes on the condition of the survey area will be compiled by the survey team including an assessment of surface visibility, vegetation coverage, and disturbance.

The definition and recording of archaeological sites will be undertaken in accordance with Requirements 6 and 7 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. Site boundaries will be defined in accordance with a) the spatial extent of visible objects, or evidence of their location; b) obvious physical boundaries where present, including landform and/or c) identification by the Aboriginal community on the basis of cultural information.

Site recording will provide the information required to complete an AHIMS site recording form (for new and previously identified sites), identify the site boundary and include an appropriate site plan and spatial recording. All photography will be undertaken using a suitable metric scale (mm or cm graded scale for artefact photography and cm or metre graded scale such as a range pole for wider angle or context photography). AHIMS site recording forms will be completed for previously unidentified sites and submitted to the AHIMS registrar for inclusion on the database.

If heritage items or sites (Aboriginal or non-Aboriginal) are identified within these areas, impacts would be avoided in the first instance in accordance with REMMs AH2, HH2 and HH3. If impact avoidance is possible, this should be ensured by using the most appropriate protection procedures outlined in Section 6.2.1 or Section 6.3.1, as applicable.

For heritage items or sites where it is identified that impact from the project is unavoidable, consistency assessment and/or suitable mitigation measures would be determined in accordance with the MCoA and REMMs and in consultation with RAPs (for Aboriginal heritage). These may include the requirement for further mitigation actions including test and/or salvage excavation,

surface collection, or detailed/archival recording. Any additional mitigation activities would be undertaken in accordance with the methodologies approved as part of the HMP.

6.1.4 Vibration generating activities

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction	MCoA (NSW) Appendix 3 Table 3-2	Construction Planning
Noise and Vibration Specialist	Construction	REMM NV5	Inspection records Monitoring records (as required)

Aboriginal and non-Aboriginal heritage items which have potential to be impacted by the project works (including blasting and vibration) will be confirmed prior to the commencement of vibration generating works in proximity to relevant structures.

6.1.4.1 Vibration Monitoring

Suitable, item specific vibration monitoring criteria will be developed for heritage items and vibration impacts at these locations will be managed before commencement of construction. This may include the use of alternative construction and blasting methods which generate lower levels of ground vibration and the installation of vibration monitors while vibration intensive activities are conducted.

If direct impact is to be avoided for Aboriginal sites specified in MCoA (NSW) Appendix 3 Table 3-2, a Blast Management Strategy will be developed to evaluate potential for indirect impacts from blasting. Where moderate or high risk of indirect impact is identified for Aboriginal sites specified in MCoA (NSW) Appendix 3 Table 3-2, undertake monitoring at the following:

- Rockshelters
 - 36-3-3794 (S1MC487)
 - 36-3-0449 (UWF SU51/L3)
 - 36-3-0570 (WCP137)
 - 36-3-3790 (S1MC488)
 - 36-3-4029 (SNI-RS01)
 - 36-3-4028 (SNI-RS02)
 - 36-2-0674 (SNI-RS04)
 - 36-2-0675 (SNI-RS03)
 - 36-3-4113 (SNI-RS06)
- Grinding groove sites
 - 36-3-4048 (SNI-GG01)
 - 36-3-4047 (SNI-GG15)

- 36-3-4060 (SNI-GG16)
- 36-3-4110 (SNI-GG17)

Any site-specific management measures developed to address this commitment would be documented in Environmental Work Method Statements (EWMS) as required.

6.1.4.2 Risk Assessment for Indirect Impacts

Environmental Work Method Statements (EWMS) will be prepared for vibration generating activities. The EWMS will identify known rock shelters and grinding grooves that are outside, but within 50m, of the approved construction area.

A risk assessment to assess potential indirect impacts to these sites will be undertaken as a component of the preparation of the EWMS and any associated management measures will also be identified and included in the EWMS.

The known rock shelters and grinding grooves that are outside, but within 50m, of the approved construction area are detailed in Table 6-2 below.

Table 6-2. Known Rock Shelters and Grinding Grooves Outside the Approved Construction Area

Site ID	Type of site	Easting	Northing
SNI-GG16	Grinding groove	742888	6443163
SNI-RS06	Rock shelter with potential archaeological deposit	766281	6424153
SNI-GG02	Grinding groove	741886.5938	6443079.213
SNI-GG03	Grinding groove	741883.6284	6443005.861
SNI-GG04	Grinding groove	741920.3262	6443013.122
SNI-GG05	Grinding groove	742307.1713	6443076.677
SNI-GG06	Grinding groove	741066.7187	6442706.651
SNI-GG07	Grinding groove	741244.662	6442683.426
SNI-GG08	Grinding groove	741215.0961	6442638.595
SNI-GG09	Grinding groove	741174.5819	6442597.687
SNI-GG15	Grinding groove	742999.4908	6439776.957
SNI-RS01	Rock shelter with potential archaeological deposit	749560.9689	6428679.09
SNI-RS02	Rock shelter with potential archaeological deposit	749583.0942	6428690.208
SNI-GG13	Grinding groove	749714.6344	6428634.91
SNI-GG01	Grinding groove	738728.4478	6439565.718
SNI-RS03	Rock shelter	721146.8972	6436748.219
SNI-RS04	Rock shelter	721121.9962	6436749.027
SNI-GG17	Grinding groove	767566	6445765
SNI-RS05	Rock shelter with potential archaeological deposit	766274	6444800
SNI-GG14	Grinding groove	753433.1144	6446957.103

6.1.5 Periodic AHIMS Searches

Due to the linear nature of the Project, ACJV D&C endeavours to undertake updated AHIMS searches every 3 - 6 months, however at a minimum, updated AHIMS searches will be conducted on an annual basis throughout the construction phase of the Project, in line with the annual review period for the HMP. If the updated searches uncover sites within the Construction Area that are unable to be avoided and that were not present in previous searches, a consistency assessment would be completed and managed in consultation with the Project RAPs.

6.2 ABORIGINAL HERITAGE MITIGATION AND MANAGEMENT MEASURES

6.2.1 Avoiding impacts

6.2.1.1 Site protection

MCoA (NSW) B27(a) and associated Table 3-1 of MCoA (NSW) Appendix 3 specify Aboriginal heritage items where impact must be avoided, as listed in Table 6-3 below. In accordance with MCoA (NSW) B28 (d)(i), this section contains a description of the measures that would be implemented to protect the specified heritage items. The procedures described below may also be employed to protect heritage items which have been avoided by micro-siting of the project infrastructure to avoid or minimise impacts (see Section 6.2.1.3).

Table 6-3. Aboriginal heritage items where impact must be avoided (Source: adapted from MCoA (NSW) Appendix 3 Tables 3-1 and 3-2)

AHIMS ID / area	Site name / description
36-3-0111	Argyll No.3 (SNI-GG14 / SNI-AS01)
36-3-4031	SNI GG02
36-3-3968 / 36-3-4038	SNI-GG03
36-3-4042	SNI-GG06
36-3-4043	SNI-GG05
36-3-4044	SNI-GG04
36-3-4045	SNI-GG07
36-3-4046	SNI-GG08
36-3-4027	SNI-AS65
36-3-4052	SNI-GG09
Zone within 150m from Laheys Creek	Zone within 150 m of Laheys Creek (excluding the unavoidable impacts associated with the crossing of Laheys Creek by the transmission corridor, which will be minimised, and ground disturbance associated with upgrades and maintenance along Spring Ridge Road and Dapper Road)

A series of figures showing the above items and the associated buffer zone is included as Appendix F.

6.2.1.2 Heritage protection zones

Input	Timing	Source of requirement	Output
SAPs	Pre-construction	MCoA (NSW) B27 (a)	SAPs
Fencing materials		REMM AH1	Heritage protection zones
Project archaeologist	Construction		

Heritage protection zones will be established through the construction of physical barriers or delineation to avoid and not cause harm to the sites/areas identified in Table 6-3 and any sites identified in previously unassessed areas.

Impacts will be avoided through the delineation of the site/ area in the vicinity of the ground disturbance works. This will take the form of protective fencing (e.g. star pickets and flagging tape, stake and wire fencing, temporary chain link fencing or similar materials that form a clear visual and physical barrier between the site and construction area) or through the establishment of other equivalent controls to restrict access (e.g. geofencing) installed. Fencing will be installed along the site/area boundary for sites within the project footprint, or along the relevant section of the project boundary for relevant sites outside the project footprint. The fenced areas will be clearly marked/signposted as environmentally-sensitive 'no-go' zones. Access restrictions will be included/noted in the project SAPs.

Protective fencing will be implemented prior to any activities which may harm Aboriginal objects in the vicinity of these locations. The location of the fencing will be based on the site boundaries as identified in the project's GIS systems and SAPs (with an appropriate spatial buffer, if required) and confirmed by the project archaeologist.

Additional sites for delineation or protection may be identified following completion of detailed design and successful micro-siting of the project infrastructure and construction activities (Section 6.2.1.3). This may include newly avoided sites inside the construction footprint or the remaining portion of partially-impacted sites, or sites where salvage mitigation activities are required but have not yet been undertaken. These will be identified on SAPs as no-go zones and protective fencing will be considered as outlined above, if required.

Where additional measures, specific to the cultural materials in question and the construction activities occurring nearby, are identified for avoided sites these will be documented in Environmental Work Method Statements and SAPs as required.

6.2.1.3 Micro-siting of project infrastructure and construction activities

Input	Timing	Source of requirement	Output
GIS	Design	REMM AH2	Design reports
EIS		MCoA (NSW) B27 (b)	
AR			
Project archaeologist			



During detailed design, the locations of recorded Aboriginal sites and zones of heritage sensitivity will be used to inform the final location of transmission line structures, construction compounds and project facilities, with an aim to:

- Protect, conserve and/or manage the heritage significance of Aboriginal objects and places to ensure the project does not diminish the cultural understanding of Aboriginal people in New South Wales
- Avoid or minimise impacts on areas of moderate or high archaeological potential and scientific significance, where feasible and reasonable

Aspects of the project that may be subject to further refinement include:

- The final transmission line structure locations, location of new or upgraded access tracks
- Final locations and layouts of the construction compounds and project facilities
- Construction methods and staging

Refinements to optimise the design outcomes and construction method will be carried out to further avoid or minimise environmental impacts as far as practical. This includes approaches to avoid or minimise impacts to Aboriginal heritage.

Specifically in accordance with REMM AH2 and MCoA (NSW) Appendix 3 Table 3-2 (refer Appendix D of this HMP), the project will investigate the micro-siting of project infrastructure and construction activities in consultation with an Aboriginal heritage specialist to avoid or minimise impacts to:

- Rockshelters
 - 36-3-3794 (S1MC487)
 - 36-3-0449 (UWF SU51/L3)
 - 36-3-0570 (WCP137)
 - 36-3-3790 (S1MC488)
 - 36-3-4029 (SNI-RS01)
 - 36-3-4028 (SNI-RS02)
 - 36-2-0674 (SNI-RS04)
 - 36-2-0675 (SNI-RS03)
 - 36-3-4113 (SNI-RS06)
- Grinding groove sites
 - 36-3-4048 (SNI-GG01)
 - 36-3-4047 (SNI-GG15)
 - 36-3-4060 (SNI-GG16)

- 36-3-4110 (SNI-GG17)
- Potential culturally modified trees (if validated as Aboriginal sites, see Section 6.2.6.1)
 - 36-3-3918 (Birriwa Bus Route South ST 1)
 - 36-3-4034 (SNI-CMT02)
 - 36-2-0747 (SNI-CMT04)
 - 36-3-4058 (SNI-CMT16)
 - 36-3-4059 (SNI-CMT19)
- High-density and/or significant stone artefact sites
 - 36-3-1140/36-3-1141 (SNI-AS101)
 - 36-2-0680 (SNI-FA02)
 - 36 2 0682 (SNI-FA05/SNI-AS80)
 - 36-2-0748 (SNI-FA12)
 - 36-3-4115 (SNI-IF104)
- Zones within 150 m of Lahey's Creek, Deadmans Creek, Bora Creek, Cumbo Creek, Wilpinjong Creek, Tallawang Creek (north crossing) and Copes Creek.
- High or moderate density artefact scatters, including areas of subsurface deposit
 - 36-2-0678 (SNI-AS41)
 - 36-3-4030 (SNI-AS43)
 - 36-2-0677 (SNI-AS57)
 - 36-3-0496 (WCP220)
 - 36-3-0503 (WCP227)
 - 36-3-0658 (WC OS 17 with PAD)
 - 36-3-0793 (WCP260)
 - 36-2-0688 (SNI-AS71)
 - 36-2-0676 (SNI-AS02)
 - 36-3-4040 (SNI-FA04)
 - 36-2-0683 (SNI-FA06)
 - 36-3-4041 (SNI-FA07)
 - 36-3-4112 (SNI-FA08)
 - 36-3-4111 (SNI-FA09)
 - 36-2-0746 (SNI-FA10)
 - 36-3-4114 (SNI-FA11 / SNI-AS91)

The sites listed above and zones within 150m of the specified creeks are shown on Figure 4-1 to Figure 4-18. Where detailed design avoids identified heritage sites (cultural and archaeological), ongoing management may be undertaken in the form of heritage protection zones (Section 0) on the advice of the project archaeologist depending on the nature of the site and its proximity to the direct disturbance areas within the project footprint.

Where direct impacts to sites cannot be avoided during design refinement, the identified mitigation measures in MCoA (NSW) Appendix 3 Table 3-2 and REMMs AH4, AH6 and AH10 would be implemented to minimise the impacts on Aboriginal heritage.

The outcomes of the micro-siting investigation will be communicated to the RAPs as detailed design progresses.

6.2.1.4 Ground disturbance permits/approvals (or similar)

Input	Timing	Source of requirement	Output
SAPs	Construction	ACHAR-A Appendix E	Permits
Permits			Induction records
Site Specific inductions			

Where required, obligations to avoid Aboriginal heritage sites will be included in relevant ground disturbance permit/approvals and site-specific inductions. The ground disturbance permit will be followed.

6.2.1.5 Sensitive Area Plans

Input	Timing	Source of requirement	Output
GIS	Pre-construction	REMM AH4	SAPs
EIS	Construction		
AR			

Sensitive Area Plan's (SAPs) will clearly identify as 'No-go' areas all Aboriginal sites in proximity to the construction footprint that are to be salvaged and avoided. The information within SAPs will be included in relevant site inductions.

6.2.2 No mitigation required

No archaeological mitigation is required under the REMMs or MCoA (NSW) for Aboriginal heritage sites that form part of low density artefact scatter SNI-BS1. Sites may only be impacted after project approval is obtained. An Aboriginal Site Impact Recording Form (ASIRF) will be completed for each impacted AHIMS site and submitted to the AHIMS registrar to update site status following impacts.

Note, SNI-BS1 incorporates #36-3-0353, #36-3-0497, #36-3-0634, #36-3-0691, #36-3-0815, #36-3-0816, #36-3-0817, #36-3-0818, #36-3-0819, #36-3-0820, #36-3-0821, #36-3-1047, #36-3-1048, #36-3-1049, #36-3-1050,

#36-3-1051, #36-3-1053, #36-3-1054, #36-3-1055, #36-3-1058, #36-3-1062, #36-3-1063, #36-3-1064, #36-3-1065, #36-3-1066, #36-3-1067, #36-3-1068, #36-3-1090, #36-3-1402, #36-3-1404, #36-3-1428, #36-3-3406, #36-3-1052, #36-3-1056, #36-3-1057, #36-3-1401, #26-3-2514, #36-3-3291, #36-3-3523, #36-2-0627, #36-3-3917, SNI-IF01-15 inclusive, SNI-IF17, SNI-IF20, SNI-IF28, SNI-IF33, SNI-IF39, SNI-IF41, SNI-IF43, SNI-IF47, SNI-IF48, SNI-IF51, SNI-IF56, SNI-IF58, SNI-IF62, SNI-IF65, SNI-IF66-68, SNI-IF70-76, SNI-IF78-80, SNI-IF83-86, SNI-IF88-90, SNI-IF93-96, SNI-IF99-103, #36-3-0336, #36-3-0470, #36-3-0498, #36-3-0569, #36-3-0660, #36-3-0139, #36-3-1403, #36-3-2833, #36-3-3182, #36-3-3227, #36-3-3233, #36-3-3432, #36-3-3805, #36-3-3828, #36-3-3832, #36-3-3833, #36-3-3835, #36-2-0533, #36-2-0580, #36-3-1396, SNI-AS01, SNI-AS03-07 inclusive, SNI-AS09, SNI-AS012- 13 inclusive, SNI-AS15, SNI-AS17, SNI-AS29, SNI-AS31, SNI-AS37, SNI-AS40, SNI-AS51-52 inclusive, SNI-AS61, SNI-AS66, SNI-AS68-70 inclusive, SNI-AS72-73 inclusive, SNI-AS76-77 inclusive, SNI-Q01, SNI-FA01, SNI-AS79, SNI-AS83, SNI-AS87-90, SNI-AS92, SNI-AS95, SNI-AS97, SNI-AS99, #36-3-0685/SNI-FA03, #36-3-0720/SNI-AS100, #36-2-0613, #36-3-3884.

6.2.3 Archival recording

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction	REMM AH6	Archival records
RAPs		MCoA (NSW) Appendix 3 Table 3-2	AHIMS records

Where direct impacts cannot be avoided or the project may adversely affect the following sites, archival recording will be undertaken:

- Rockshelters
 - 36-3-3794 (S1MC487)
 - 36-3-0449 (UWF SU51/L3)
 - 36-3-0570 (WCP137)
 - 36-3-3790 (S1MC488)
 - 36-3-4029 (SNI-RS01)
 - 36-3-4028 (SNI-RS02)
 - 36-2-0674 (SNI-RS04)
 - 36-2-0675 (SNI-RS03)
 - 36-3-4113 (SNI-RS06)
- Grinding groove sites
 - 36-3-4048 (SNI-GG01)
 - 36-3-4047 (SNI-GG15)
 - 36-3-4060 (SNI-GG16)
 - 36-3-4110 (SNI-GG17)
- Potential culturally modified trees (if validated as Aboriginal sites, see Section 6.2.6.1)

- 36-3-3918 (Birriwa Bus Route South ST 1)
- 36-3-4034 (SNI-CMT02)
- 36-2-0747 (SNI-CMT04)
- 36-3-4058 (SNI-CMT16)
- 36-3-4059 (SNI-CMT19)

Archival recordings of all site types will comply with field recording requirements outlined in the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* and will include (at minimum):

- Detailed photography of site context/landscape/features as required
- Preparation of a site plan including estimation or detailed measurement of site extent/site features, as required
- Description of site contents, context and condition
- Preparation and lodgement of updated AHIMS Site Cards

Rockshelters

Archival recording of the site both in its landscape context and the specific features of the modifications prior to disturbance, including a focus on any rock art that may be present.

Grinding groove sites

Suitable field survey to ensure all individual grooves are identified. This may include additional surveys at dawn or dusk to ensure appropriate lighting to further identify such features. This should be followed by detailed spatial documentation and archival recording of each individual groove.

Culturally modified trees

Archival recording of the tree both in its landscape context and the specific features of the modifications prior to disturbance. Consideration of the recording guidelines described in *Aboriginal Scarred Trees in NSW: A Field Manual* (DEC 2005).

6.2.4 Archaeological excavation

Input	Timing	Source of requirement	Output
Project archaeologist RAPs	Pre-construction	REMM AH10 MCoA (NSW) Appendix 3 Table 3-2	Archaeological excavation records

Where impacts cannot be avoided, the Project archaeologist will determine whether archaeological excavation is required at the following sites in accordance with the MCoA (NSW) and the REMMs:

- Rockshelters
 - 36-3-3794 (S1MC487)
 - 36-3-0449 (UWF SU51/L3)
 - 36-3-0570 (WCP137)
 - 36-3-3790 (S1MC488)
 - 36-3-4029 (SNI-RS01)
 - 36-3-4028 (SNI-RS02)
 - 36-2-0674 (SNI-RS04)
 - 36-2-0675 (SNI-RS03)
 - 36-3-4113 (SNI-RS06)
- High-density and/or significant stone artefact sites
 - 36-3-1140/36-3-1141 (SNI-AS101)
 - 36-2-0680 (SNI-FA02)
 - 36 2 0682 (SNI-FA05/SNI-AS80)
 - 36-2-0748 (SNI-FA12)
 - 36-3-4115 (SNI-IF104)
- Zones within 150 m of Laheys Creek, where impacts cannot be avoided within the footprint of the transmission line corridor and road corridor
- Zones within 150 m of Deadmans Creek, Bora Creek, Cumbo Creek, Wilpinjong Creek, Tallawang Creek (north crossing) and Copes Creek.
- High or moderate density artefact scatters, including areas of subsurface deposit:
 - 36-2-0678 (SNI-AS41)
 - 36-3-4030 (SNI-AS43)
 - 36-2-0677 (SNI-AS57)
 - 36-3-0496 (WCP220)
 - 36-3-0503 (WCP227)
 - 36-3-0658 (WC OS 17 with PAD)
 - 36-3-0793 (WCP260)
 - 36-2-0688 (SNI-AS71)
 - 36-2-0676 (SNI-AS02)
 - 36-3-4040 (SNI-FA04)
 - 36-2-0683 (SNI-FA06)



- 36-3-4041 (SNI-FA07)
- 36-3-4112 (SNI-FA08)
- 36-3-4111 (SNI-FA09)
- 36-2-0746 (SNI-FA10)
- 36-3-4114 (SNI-FA11 / SNI-AS91)

The sites listed above and zones within 150m of the specified creeks are shown on Figure 4-1 to Figure 4-18.

Archaeological excavation may be split into an investigative (test) phase, followed by staged salvage excavation if required. Archaeological methodologies for these activities for open context sites are outlined below. Excavation methodology for rockshelters is discussed separately in Section 6.2.4.3.

6.2.4.1 Test excavation

Aims

The aim of the test excavation is to obtain further information in regard to the nature, extent and significance of the Aboriginal cultural heritage resource at these locations and how it may be affected by the project. The purpose of the test excavation program is to collect information about the nature and extent of subsurface archaeological deposit, based on a sample derived from sub-surface investigations.

Test excavation will build on the information already obtained through previous archaeological investigations for the project. Test excavation results will be used to inform appropriate management and mitigation measures (i.e. avoidance of Aboriginal objects where possible and salvage mitigation where required) where these are not already identified in the project mitigation measures and MCoA. The first priority during the archaeological test program will be to minimise, as far as is practicable, the risk of harm to objects under investigation.

Test excavation will be undertaken using a standard methodology based on Requirements 14 – 17 of the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW*. The field methodology is generally consistent with the previous methodology employed during Aboriginal heritage investigations for the project including test excavations undertaken during preparation of the EIS and AR, which was consulted on with RAPs and is detailed in the ACHAR and ACHAR-A. The methodology is designed to provide a consistent and standardised approach across all additional testing required for the project but allows flexibility in responding to the particular topographic, archaeological, cultural and logistical constraints present at the investigation areas.

All test excavation will be undertaken with RAP representatives present. The test excavation methodology has been designed to achieve the following aims, consistent with previous investigations for the project:

- Investigate the portions of identified sites/PADs within the direct impact area that have no archaeological exposure
- Assess the presence of subsurface archaeological deposit at the nominated site/PAD areas
- Determine the nature, extent and significance of archaeological deposit within the direct impact area
- Determine in consultation with RAPs whether further archaeological salvage mitigation of the site will be required prior to any construction impact

Within each archaeological site/PAD to be subject to test excavation, the test sample would be restricted to the proposed impact area. The number, arrangement and extent of test excavation units (test squares) would be determined by the project archaeologist based on the individual conditions at each site/PAD, the degree of proposed impact, and consultation with RAPs, and would generally be consistent with the Requirements of the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* and the existing test excavation methodology for the project used during preparation of the EIS and AR.

Field methods

Standardised field methods for the test excavation program at each investigation area would be as follows:

1. Test transects will be placed on a systematic grid at regular intervals, with spacing to be determined by observed disturbance, topographical or archaeological features, and the size of the area under investigation. The selected interval should be justifiable and regularly spaced.
2. Test excavation units will be placed at systematic and regular intervals consistent with previous investigations ranging from 10-20 metres along these transects.
3. Test excavation points must be separated by at least five metres. Generally, closer spacing is required to detect predicted lower artefact densities while wider spacing is adequate to detect predicted higher artefact densities.
4. Test squares may be 'staggered' or offset along parallel transects to maximise the sample area.
5. Individual test units may also be placed 'off-transect' to sample areas or features of particular interest, in consultation with the RAPs, where excavation of a full transect is not practical or considered necessary.
6. All excavation will be undertaken manually using hand tools. No machine excavation is to be undertaken.
7. Test excavation squares will be excavated in standard 50cm x 50cm units.
8. Test excavation units may be combined and excavated as necessary to understand the characteristics of any site identified. In general, the maximum continuous surface area of a combination of test excavation units at a single excavation point will be no greater than three square metres. This may, however, be exceeded in cases where deep deposits require benching for safety reasons.



9. For the archaeological investigation of deep soil profiles or in areas that have been identified to contain deep artefact bearing deposits, combined excavation units (generally 1 m x 1 m) will be used.
10. The maximum surface area of all test excavation units will be no greater than 0.5% of the total area of the identified site/PAD.
11. Test excavation units will be smaller in size than the maximum allowed testable area (0.5% of the site/PAD).
12. The first excavation unit in each area will be excavated and documented in 5cm spits. Based on the evidence of the first excavation unit, 10cm spits or sediment profile/stratigraphic excavation will then be implemented.
13. All material excavated will be sieved using a maximum 3mm mesh. Dry sieving should be employed where possible however wet sieving may also be employed as required, based on the clay content of the excavated soils and individual site conditions.
14. Recovered artefacts will be bagged with duplicated contextual information regarding test square location, spit, depth or association with archaeological features. Where artefacts are identified during excavation, detailed locational information would be collected and in situ recording undertaken.
15. All test excavation units will be excavated to culturally sterile soils at the base of the artefact-bearing units (generally the B horizon).
16. Photographic and/or scale drawn records of the soil profile, features and informative Aboriginal objects will be made for each single excavation point. This includes recording of the stratigraphy/soil profile of each distinct landform sampled and of each test excavation unit in which an archaeological feature or Aboriginal object was identified. All squares will be photographed.
17. Soil types and stratification will be recorded to increase understanding of the sub-surface conditions and how they may relate to site formation processes influencing the presence and condition of sub-surface archaeological deposits. This may include, but is not limited to, soil pH testing, use of a Munsell colour chart, and soil texture recording.
18. Samples of organic material suitable for radiometric dating (charcoal, bone, shell, wood etc.) may be collected for the dating of archaeological deposits. The number of samples sent for dating would be determined based on the suitability of the sample, especially archaeological context and integrity, and the significance of the site.
19. Test excavation units will be backfilled as soon as practicable, using spoil from the dry-sieving process where possible.
20. The location of each excavated test square would be recorded with GPS coordinates on a site plan showing the relationship to topographical and landform features, landscape disturbance, and other archaeological features such as surface artefacts within the site.
21. Aboriginal Site Impact Recording forms will be completed and submitted to the AHIMS Registrar as soon as practicable, for each AHIMS site that has been the subject of test excavation.

22. The test excavation will be sufficiently comprehensive to allow characterisation of the Aboriginal objects present without having a significant impact on the archaeological value of the subject area.

Cessation of test excavation and post-excavation activities

The test excavation will cease when enough information has been recovered to adequately characterise any archaeological deposits or Aboriginal objects present with regard to their nature and significance.

Following the excavation, any artefacts recovered will be analysed by qualified archaeologists. During analysis, artefacts will be placed in secure temporary storage. Lithic analysis and recording would follow the same methodology as that employed for artefacts recovered from salvage excavations (see Section 6.2.4.2). This ensures the maximum information is collected from each investigated site and is consistent with the lithic recording methods employed during analysis undertaken for the EIS and AR. The long-term management of Aboriginal objects recovered from testing would be determined in consultation with the RAPs and in accordance with the HMP (see Section 6.2.9).

The test excavation is intended as an exploratory exercise only. The requirement for further salvage mitigation activities would be dependent on the test results on a site-by-site basis. Factors to be considered in triggering further salvage excavation include:

- The integrity/intactness of the archaeological deposits
- The location and extent of identified deposits in relation to the proposed impact area and project boundary
- The identification of spatial variation in past Aboriginal land use practices across or within a site
- The identification of a locally or regionally high density of Aboriginal objects
- The presence of rare or representative artefacts
- The assessed significance of the deposit (moderate or higher)
- The degree of proposed impact from the project
- Cultural considerations based on detailed consultation with RAPs

In cases where test excavation of a site indicates the absence of or a low to very low density of subsurface archaeological material, or low archaeological significance, it may be determined to be part of SNI-BS1 and that no further investigation or mitigation is warranted to mitigate proposed impacts (Section 6.2.2).

In cases where test excavation of a site with additional identified surface artefacts indicates the absence of or a low to very low density of subsurface archaeological material, or low archaeological significance, it may be determined that further salvage activities take the form of a surface collection (Section 6.2.5), with no further archaeological mitigation (salvage excavation) required for the subsurface deposit.



If test excavation determines the presence of an Aboriginal archaeological site, impacts would be avoided, as far as practicable. If impact avoidance is possible, this should be ensured using the site protection procedures outlined in this HMP (see Section 6.2.1).

For sites with at least moderate archaeological significance where it is identified that impact from the project is unavoidable, suitable mitigation measures would be completed in accordance with the MCoA and REMMs. These may include the requirement for mitigation activities including salvage excavation, surface collection, or archival recording. Any mitigation activities would be undertaken in accordance with the archaeological methodologies approved as part of this HMP.

6.2.4.2 *Salvage excavation*

Where required, archaeological salvage excavation would be undertaken as a harm mitigation measure prior to construction impact.

The scope of the salvage requirement would be determined by the project archaeologist in consultation with RAPs and based on the principles of Ecologically Sustainable Development, archaeological significance, environmental context and condition, and the project's MCoA and REMMs. All salvage excavation will be undertaken with RAPs.

In general, salvage excavation would be required where:

- It has been determined through test excavation that an archaeological site displays at least moderate archaeological significance based on its scientific value and potential to inform on Aboriginal landscape use of the project area
- The significance of proposed harm to the site is moderate, given the site's overall at least moderate archaeological significance
- Test excavation has demonstrated archaeological triggers described in Section 6.2.4.1
- The archaeological value of the site is linked to the information that it contains, and recovery of this information through archaeological salvage excavation offers an opportunity to better understand the activities which were undertaken at this and similar sites, and the effect of land use disturbance and natural processes on subsurface archaeological deposits in the vicinity
- It is noted that the loss of intrinsic Aboriginal cultural value of impacted sites cannot be offset or mitigated; however, information recovered from mitigation activities can be equally as valuable to the contemporary Aboriginal community as it is to archaeologists as it expresses the overall cultural story of the area

It is also noted that RAPs place cultural value on the material objects (artefacts) identified through the archaeological investigations for this project. Salvage excavation of these objects and analysis and understanding of the archaeological information they offer may contribute to educational or interpretive outcomes for Aboriginal cultural values.

Aims

The main aims of the salvage excavation program would be:

- To salvage a representative sample of the identified archaeological sites prior to impact
- To analyse the salvaged archaeological material to gain and conserve knowledge and understanding of the scientific and cultural information exhibited by the activities associated with the varied landscape contexts along the project corridor
- To use the excavation results to gain insight into the subsurface archaeology of the region and, more specifically, of adjacent areas not being impacted by the proposal. This would increase future educational opportunities and allow more informed management of Aboriginal heritage

The further scientific aim of the salvage excavation program would be to determine the subsurface integrity, extent, spatial distribution and nature of the cultural deposit and the specific types of associated archaeological/cultural activities.

- Determining the integrity of the deposit involves assessing the degree of disturbance which is present
- Determining the statistical extent of the site and/or activity areas involves identifying the boundaries associated with the identified archaeological deposit
- Assessing the spatial distribution involves identifying the presence/absence of archaeological material across the identified archaeological site
- The nature of the site refers to the type of activities indicated by the artefactual material (e.g. primary production, domestic knapping, hunting camps, satellite or support camps). The goal would be to retrieve entire assemblages from specific activities if such activities were present
- Retrieved assemblages would be compared with the results from other salvaged sites within the program and relevant archaeological projects in the region

Research questions

The results of the proposed salvage excavation would increase our understanding of subsurface archaeology of the project area. In particular, research would focus on the archaeologically-identifiable cultural activities that took place within the varied environments and across the major catchment divides transected by the project corridor. There is significant variation in landscape context between the existing sites identified along the project: the sites are not spatially connected by landform, but they offer an opportunity to explore larger landscape connections through the central-western inland regions of NSW.

These connections offer insights into past cultural continuums depicting the movements and actions of past Aboriginal people, enabling an understanding of how past people spatially organised their culture and by extension insights into how they perceived the world around them.



Integration of archaeological data with contemporary cultural knowledge is an opportunity to explore these connections. Recent research of such landscape continuums has found a strong association between contemporary use/perceptions of landscape and past Aboriginal landscapes as evidenced by the archaeology.

In order to characterise the physical archaeological manifestations of this cultural landscape, research will aim to address questions about past activity events and survivability of the deposit. In addition, assessment techniques will address how natural processes and modern land use practices impact on archaeological sites within the local area. This information is of critical importance for determining empirical scientific value.

Specific research questions may be developed to guide the salvage excavation at particular sites, once the characteristics of individual site locations requiring salvage excavation have been confirmed. A suggested basis for the development of specific research questions (when the scope of the archaeological salvage program is confirmed during detailed design) is provided below:

- Source information: What raw material resources were used; where did they come from; and what does this tell us about Aboriginal use of the region in the past?
- Stone reduction technology: How was the stone worked and used? Does this change over time? Can the function of the site be inferred from the artefact assemblage? What does this tell us about Aboriginal occupation, use, settlement and activities undertaken through time in this region?
- Post-depositional influences: What post-depositional influences have impacted the assemblages, and what does this tell us about the integrity and significance of the sites?
- Site chronology: When was the site occupied? Was the assemblage the product of repeated occupations or a single event? Is there spatial patterning in the assemblage, and what does this tell us about repeated use, activities and/or occupation of the region through time?

It is anticipated that differences in stone tool assemblages may be related to different cultural activities (e.g. primary reduction vs maintenance flaking). The science of archaeology is paramount to any research question and it is important to stress that the goal for the salvage program for all excavated sites is straight forward: to retrieve a viable sample for comparative analysis using established techniques (see 'Field Methods' below).

In this regard interpretation would not precede data collection. The proposed archaeological program would systematically sample the relevant areas using standard techniques with the outcome being a viable, robust and comparable sample. Analysis of the sample would follow and interpretations would be made distinctly separate from the results.

Archaeological salvage areas

At sites where it has been established that salvage excavation is required, the archaeological investigations and excavations would be undertaken on the portion of the identified archaeological



site within the proposed impact area and project boundary. Salvage excavation would focus on the extraction of collections of artefacts related to activity areas.

Conservation is a primary goal of all Aboriginal heritage management. All archaeological excavation undertaken during the salvage program would be restricted to the actual construction corridor and approved impact area within the project boundary and within the identified extent of the archaeological site. No works would be undertaken outside the approved project boundary or direct impact areas.

Field methods

The goal of the field excavation program is to recover significant assemblages of artefacts. In order to achieve the most robust and comparable result, the methodology proposes the use of open area salvage excavation. The first phase in open area salvage is to establish the statistical boundaries of the archaeological deposit. In other words, recording the spread of activities across the site/landscape. This approach is designed to salvage the spatial properties of the site as shown in the lithic continuum.

Phase 1

A series of 1 m² squares are excavated on a transect grid at regular intervals overlain on the site to mark the spread of lithics and related geomorphic activity.

GDA 94 coordinates would be recorded for each square to enable three dimensional modelling. Statistical salvage following this method is highly beneficial because it creates a robust inter-site sample, sufficiently random, critical for regional comparative analysis. No other method is as efficient or effective. A minimum of 5m² would be excavated within each site during Phase 1 if required to complement existing test excavation results where possible.

Individual excavation squares measuring 1m² would be hand excavated in stratigraphic units (Unit A, Unit B, etc.). Squares would be excavated until the basal layer or culturally sterile deposit is reached. Where results indicate no archaeological stratigraphy within units, i.e. the A1 and A2 soil layers are culturally one layer (suffering from cyclical soil transfer resulting in a mixed cultural profile within the soil), these can be salvaged as one unit where possible. All excavated deposit would be sieved using minimum 3mm mesh sieves. Where potential micro-debitage is recovered 1.0mm sieves will be utilised.

The location of each excavated square would be identified on a surveyed plan of the site. Stratigraphic sections detailing the stratigraphy and features within the excavated deposit would be drawn and all squares would be photographed. Soil samples as well as thin section profiles (where feasible) would also be collected. The stratigraphy of all excavated areas would be fully documented, and appropriate records archived.

Phase 2

Open area salvage of significant deposit follows the test excavation and/or Phase 1 assessment.



Additional contiguous 1m² squares, constituting an open area, will be excavated around information bearing deposits along the excavation grid.

Information bearing deposits are identified by triggers such as: significant quantities of artefacts, variations in raw material, unusual artefacts, chronological material and/or taphonomic indicators. In this context chronologic material is anything that can be used to date artefacts or deposit: charcoal or charcoal bearing deposit (e.g. hearth ash), sandy deposit, gravels (e.g. aluminium feldspar). Taphonomic indicators are generalised to include biospherical process such as bioturbation and geomorphic features such as soil lenses and soil laminates as indicators of post-depositional factors affecting site formation.

Phase 2 open area investigation would expand to encompass entire activity areas. The location of open areas would be based on analysis of the test excavation and Phase 1 results. A minimum of 20m² of Phase 2 open area salvage would be excavated within each site where Phase 2 excavation is triggered. This may be split across one or more individual contiguous open area excavations depending on test/Phase 1 findings and the extent of proposed impacts. The total salvage area would therefore be a minimum of 25m² for each location where both Phase 1 and Phase 2 salvage is undertaken.

Where possible, carbon samples will be collected and analysed for material relating to both the archaeology and geomorphology. Where appropriate, cosmogenic and radiometric dating of soils and rock surfaces will be applied. Chronologic dating where possible is an important part of the salvage program as this information will assist in interpreting use of the wider landscape.

Analysis

Artefacts would be analysed on a comparable level with previous excavated assemblages. Information derived from this analysis; in particular, the identification of specific artefact types and their distributions and associations; would be used to put together interpretations about how sites were used, where sites were located across the landscape, the age of sites and to assess cultural heritage values. By comparing different areas it would be possible to determine whether there were differences in the kinds of activities carried out and if different activities were related to different landforms, catchments, or other factors.

A range of stone artefacts may be present across the salvage areas and the analysis would expand accordingly to account for artefact variability. All information would be recorded in database form (MS Excel, Access or similar). Various types of evidence would be used to determine the kinds of activities that were carried out. A short description of the proposed analysis is outlined below.

Field analysis would record basic data, such as material type, number and any significant technological characteristics, such as backing or bipolar techniques; added to this would be any provenance data such as pit ID and spit number. The purpose of the field recording is twofold: 1) establish a basic recording of artefacts retrieved and 2) to allow on-going assessment of the excavation regime (e.g. whether higher stratigraphic resolution is required while digging).

Detailed (laboratory) analysis would entail recording a larger number of characteristics for each individual artefact. These details would be recorded in data matrices suitable for comparative analysis (e.g. multivariate and univariate) of the excavated assemblage on a local and regional basis. The matrix should be formulated with each row corresponding to an individual artefact entry and each column representing an attribute, with cells at the row/column intersections recording the data point value.

Lithic characteristics to be recorded cover a range of basic information but are not limited to these categories (see example below). For transparency, terms and category types would in large part be derived from Holdaway and Stern (2004). Basic attributes for each artefact would include raw material, location information, size and weight, cortex, artefact reduction type. Following Holdaway and Stern, lithic analysis would then expand to include additional attributes depending on the assigned artefact 'type' (flake, core, tool etc). Suggested attributes for recording on each 'type' are included in the examples below.

All artefacts should include entries for the following attributes:

Site Name	Open area (if applicable)	Square type (Test, Phase 1/2)
Artefact ID (unique identifier)	Spit number	Reduction type
Square location Easting	Spit depth	Cortex %
Square location Northing	Raw material type	Weight
Heat affected	Colour/quality (if applicable)	Size range (mm)

Additional attributes may be recorded for particular artefact types, as follows:

- Flakes: additional recordings for platform type, termination type, percussion length, width and thickness (mm), flake shape
- Proximal and distal flake fragments: Platform type or termination type, as applicable
- Cores: Core type (bifacial, bipolar, fragment, multidirectional, unifacial, unifacial-rotated, core-tool), number of scars, length of longest scar, core body
- Tools: Modification type (backed, retouched, usewear, hammerstone, ground stone, anvil, axe etc.) length, width and thickness (mm)
- Additional data points for backed types (backed blade, Bondi point, elouera, geometric microlith, non-diagnostic) and retouched types (convex scraper, notched scraper, serrated/denticulate scraper, thumbnail scraper, burin, non-diagnostic)
- A comment field may also be used to capture any additional non-standard data

A detailed explanation and glossary would be provided with the final excavation report.

Minimum Number of Flake (MNF) calculations would be undertaken where applicable (although past experience indicates MNF calculations would not be required for this excavation program).



The analysis of artefacts recovered during the excavation program would be undertaken in a transparent and replicable fashion so as to permit the comparison of the entire excavated assemblage with data from other areas. This would also allow for further interpretation of the project area's archaeological significance. The long-term management of Aboriginal objects recovered from salvage excavations would be determined in consultation with the RAPs and in accordance with the HMP (see Section 6.2.9).

Reporting requirements are discussed further in Section 6.2.7.

6.2.4.3 Excavation of rockshelter sites

Where required, staged salvage excavation of rockshelter sites would be carried out in accordance with the methodology described below.

Excavation will be undertaken in line with conventional best practice methodology for rockshelter sites in south eastern Australia. The nature and extent of the archaeological deposit will be determined during the earliest (investigative) phase of the salvage program. This information will determine the subsequent salvage requirements for the site (including extent of excavation, spit resolution, and recording requirements). Salvage of the site would encompass the entirety of any defined intact deposit. The shelter formation will be systematically documented prior to excavation, including recording of dimensions, aspect and outlook and a digital photographic catalogue. A horizontal and vertical site datum will be established to assist spatial recording. Where intact archaeological deposit is identified, excavation will apply the following method.

The excavation area will be divided into a grid referencing the site datum(s). Excavation units within the rockshelter will comprise 1 m² squares divided into four quadrants, each to be excavated separately. The initial excavation square and quadrants would be excavated in 2cm spits in order to determine the stratigraphy of the deposit. Excavation should continue until bedrock is reached. Each spit would be described on standardised recording forms, including sediment description, layer morphology, stratigraphy, identifiable disturbance, artefacts identified in situ and notes on any features.

A base plan for each spit would be recorded showing the location of in situ artefacts, features or samples collected. At the completion of excavation, the stratigraphy of each square would be fully recorded in section and on standardised recording sheets (including pH and Munsell colour observations).

A combination of stratigraphic and arbitrary spit excavation would be undertaken depending on the nature of identified stratigraphy within the shelter.

Features would be excavated independently of surrounding deposit and where possible in section, in order to fully document the shape and extent. Prior to excavation of features, additional recording would be undertaken including photographs, elevations and scale drawn plans where required. A separate feature log would be maintained for the site and would contain details of any feature samples retained for further analysis.

All excavated deposit would be sieved through maximum 3 mm sieves. Where potential micro-debitage is recovered 1.0mm micromesh sieves will be utilised. Appropriate samples from each excavation unit would be subject to flotation to isolate buoyant materials such as plant material, charcoal and other macro ecofact remains.

Flotation would involve the use of standard plastic buckets, filled with one quarter of sediment and three quarters of water. After waiting a short amount of time (approximately 10 minutes) for the heavier residue to settle in the bottom, the content of buckets with floating material would be passed through a fine 0.05 millimetre chiffon mesh. The light residue retained in the mesh would be dried and sorted, allowing for the separation between charred plant remains and other buoyant materials. The remaining heavier sediment would then be sorted, allowing for the recovery of less buoyant macro plant remains.

Where possible, additional sediment samples for phytoliths and pollen would be collected and retained for appropriate analysis. Faunal and floral remains would also be retained for further analysis.

The earliest phase of the salvage program should also determine whether any roof fall within the shelter is likely to have capped underlying archaeological deposit, and if removal of the roof fall would be required to complete the program. If required, the roof fall would be removed in order to sample the underlying deposit. Removal of the roof fall debris should be undertaken at the direction of the supervising archaeologist in order to minimise potential impact to the archaeology.

6.2.5 Surface collection

Input	Timing	Source of requirement	Output
Project archaeologist RAPs	Pre-construction	REMM AH4 MCoA (NSW) Appendix 3 Table 3-2	Archaeological surface collection records

Where impacts cannot be avoided, surface collection is required at the following sites:

- High-density and/or significant stone artefact sites
 - 36-3-1140/36-3-1141 (SNI-AS101)
 - 36-2-0680 (SNI-FA02)
 - 36 2 0682 (SNI-FA05/SNI-AS80)
 - 36-2-0748 (SNI-FA12)
 - 36-3-4115 (SNI-IF104)
- Zones within 150 m of Deadmans Creek, Bora Creek, Cumbo Creek, Wilpinjong Creek, Tallawang Creek (north crossing) and Copes Creek.
- High or moderate density artefact scatters, including areas of subsurface deposit

- 36-2-0678 (SNI-AS41)
- 36-3-4030 (SNI-AS43)
- 36-2-0677 (SNI-AS57)
- 36-3-0496 (WCP220)
- 36-3-0503 (WCP227)
- 36-3-0658 (WC OS 17 with PAD)
- 36-3-0793 (WCP260)
- 36-2-0688 (SNI-AS71)
- 36-2-0676 (SNI-AS02)
- 36-3-4040 (SNI-FA04)
- 36-2-0683 (SNI-FA06)
- 36-3-4041 (SNI-FA07)
- 36-3-4112 (SNI-FA08)
- 36-3-4111 (SNI-FA09)
- 36-2-0746 (SNI-FA10)
- 36-3-4114 (SNI-FA11 / SNI-AS91)

The sites listed above and zones within 150m of the specified creeks are shown on Figure 4-1 to Figure 4-18. Surface collection must be completed prior to any activities which may harm Aboriginal objects at the identified site locations. Surface collection may be undertaken concurrent with salvage excavation, or with survey or test excavation if it is considered that archaeological investigations will not proceed further at the site.

Surface collection would be undertaken in accordance with the methodology outlined below:

- Surface artefact collection at each location would be restricted to the identified site area and approved impact area and undertaken by pedestrian transect across the collection area
- The collection of surface artefacts would be undertaken with Aboriginal site officers from the RAPs
- Surface collection would record the location information and context for collected objects and be documented photographically. Updated GPS coordinates would be taken for each site and for relevant individual site features (e.g. high density areas or key landscape features). The entirety of the collected site would be recorded as a single unit. If collected sites contain >100 surface artefacts a 1m x 1m grid system overlaid on the impacted site extent would be employed for more detailed spatial recording
- Collected objects would be documented as part of salvage reporting being undertaken for the broader project (Aboriginal Cultural Heritage Excavation Report, see Section 6.2.7)
- Artefacts located outside the proposal site would not be salvaged and would remain in situ

- If surface collection is attempted but no surface artefacts are identified, then in consultation with RAPs it may be determined that construction works can proceed at the site location
- The long-term management of Aboriginal objects recovered from surface collections would be determined in consultation with the RAPs (see Section 6.2.9)

6.2.6 Culturally-modified trees

Five potential culturally modified trees require further assessment in order to determine appropriate management/mitigation measures:

- 36-3-3918 (Birriwa Bus Route South ST 1)
- 36-3-4034 (SNI-CMT02)
- 36-2-0747 (SNI-CMT04)
- 36-3-4058 (SNI-CMT16)
- 36-3-4059 (SNI-CMT19)

Procedures for required actions under the REMMs and MCoA are outlined below.

6.2.6.1 Validation as Aboriginal heritage sites

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction	REMM AH5	Arboricultural report
Qualified arboriculturist		MCoA (NSW) Appendix 3 Table 3-2	Inspection records

An inspection will be undertaken by a qualified arboriculturist of all tentatively identified culturally modified trees to confirm whether they have formed through anthropogenic or natural processes. The findings of the arboriculturist assessment of the tentatively identified culturally modified trees will be appended to the HMP, including any subsequent management. The updated HMP will be approved by the Heritage Specialist and Environmental Representative.

6.2.6.2 Mitigation and management

Trees confirmed as being culturally modified will be managed in accordance with the requirements of MCoA (NSW) Appendix 3 Table 3-2 and REMM AH6. If the trees are confirmed as culturally-modified, RAPs would be notified. Updates will be made to the AHIMS site cards for the modified tree recordings with the results of the additional assessment.

6.2.6.3 Avoidance

If the trees are confirmed to be Aboriginal heritage sites, micro-siting of the project infrastructure and construction activities should be investigated to avoid or minimise impacts (Section 6.2.1.3) In the first instance. If impacts are unavoidable, required management is outlined below.

6.2.6.4 Archival recording

If impacts cannot be avoided, the sites will be subject to archival recording (Section 6.2.3).

6.2.6.5 Salvage

If impacts cannot be avoided, salvage may be undertaken in accordance with MCoA (NSW) Appendix 3 Table 3-2.

Prior to any impacts to modified or scarred trees, consultation will be undertaken with the RAPs on salvaging the scarred tree trunk. Options for the salvage (removal and retention) of modified trees under a Care Agreement may be explored as part of the management of salvaged/collected Aboriginal objects for the project (see Section 6.2.9) and should be determined in consultation with RAPs.

A detailed methodology for the salvage process will be prepared in consultation with relevant stakeholders once the determination of avoidance has been completed. The methodology will be developed in accordance with the following guiding principles:

- Methods for suitable relocation of the tree, either in its entirety and/or via the removal of the 'scar' portion of the tree. It should be dictated that these approaches should be overseen by a qualified arboriculturist.
- Where relocated, methods for the long-term curation and conservation of the removed tree or tree fragment, including suitable conditions and preservation agents as required.

6.2.7 Analysis and reporting

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction Construction	MCoA 28 (d)(iv) REMM AH4	Aboriginal Archaeological report

Post-excavation analysis and reporting will be required where archaeological mitigation has been carried out for Aboriginal heritage sites. This includes archival recording, archaeological excavations and surface collection, analysis of stone artefact assemblages and other information relevant to addressing research questions.

An Aboriginal Cultural Heritage Excavation Report will be prepared to document the archaeological results of the mitigation program being undertaken for the project. The report will be prepared in accordance with the MCoA, the REMMs and the requirements of Heritage NSW including the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* and the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*.

The report will be prepared following completion of the artefact analysis which will be completed in accordance with the salvage methodology (Section 6.2.4.2) and Heritage NSW guidelines. The report will:



- Include an executive summary
- Describe the methods and results of the excavation program
- Describe any ongoing consultation with and involvement of RAPs
- Be completed with input and consultation with RAPs
- Detail the results of the analysis of recovered Aboriginal objects
- Include analysis of the geomorphological context and site formation processes in relation to the results of the salvage excavation and analysis of the Aboriginal objects
- Include analysis of the local and regional archaeological context in relation to the results of the salvage excavation and analysis of the Aboriginal objects
- Include analysis of the results of the excavations in relation to the research questions
- Provide comment on how the results relate to the predictive model and indicate avenues for future research and desirable regional conservation outcomes
- Provide comment on the effectiveness of any mitigation measures that were implemented
- Provide comment on the effectiveness of the HMP
- Detail the long-term management of Aboriginal objects
- Include a statement of compliance with approval conditions and management and mitigation measures, and
- Confirm that Aboriginal Site Impact Recording Forms have been completed and submitted to the Heritage NSW AHIMS Registrar

The RAPs will be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report will be provided to the Planning Secretary, Heritage NSW, relevant LALCs and the RAPs within 24 months of the completion of the archaeological excavation and analysis. Detailed analysis and reporting of cultural material collected, including detailed mapping, would be provided to DPHI as required.

6.2.8 Salvage of obtrusive site features

Where project impacts cannot be avoided, additional salvage mitigation measures may be required for particular obtrusive archaeological features including grinding grooves and rock art panels in rockshelter sites. If required, a detailed methodology for these salvage actions will be prepared in consultation with relevant stakeholders once the determination of avoidance has been completed. The methodology will be developed in accordance with the following guiding principles:

- Where required, residue analysis should be undertaken of grinding grooves by a specialist to determine whether any past dietary information can be obtained from the feature. Other specialist techniques that explore geological make up, formation history of the feature, age, and other relevant information may also be considered

- Where required, methods for protection in situ and/or relocation of the grooves (and associated sandstone outcrop) should be included
- Where relevant and feasible, methods for protection in situ and/or relocation of any rock art panels (and associated sandstone outcrop) would also be included

6.2.9 Strategy for management of salvaged Aboriginal objects

The long-term management of Aboriginal objects recovered from mitigation activities would be determined in consultation with the RAPs and in accordance with the HMP. Salvaged archaeological materials will be stored in appropriate facilities confirmed in consultation with the RAPs. Management of salvaged/collected Aboriginal objects would also be undertaken in accordance with any relevant cultural protocols identified by RAPs.

6.2.9.1 Short-term management

The identification of suitable locations for temporary storage of salvaged material (during investigations, salvage and/or construction) would be completed in consultation with the RAPs as per the *Aboriginal Cultural Heritage Consultation Requirements for Proponents*. In general:

Any Aboriginal objects that are removed from the land by actions authorised by the MCoA (NSW), should be moved as soon as practicable to a temporary storage location (see below) pending any agreement reached about the long term management of the Aboriginal objects.

The temporary storage location will be determined in consultation with RAPs. The recommendation that temporary storage be with the project archaeologist, who is also the appointed Heritage Specialist for the Project, in the first instance, to enable the completion of detailed artefact recording for the assemblages has been endorsed by RAPs during consultation of the HMP. Subsequent temporary storage arrangements on Country may be confirmed following the analysis, if required.

Any Aboriginal objects stored at the temporary storage location must not be further harmed. The following steps will be taken to ensure that items placed in temporary storage are not harmed:

- Stored inside at secure storage location (locked cabinet or storage room)
- Objects to be stored with detailed provenance and identification data for each assemblage
- Objects to be stored in clean polyethylene Ziploc bags inside storage container with secure lids
- Fragile items will be individually protected with bubble wrap or cushioning material
- Considered storage of large/heavy items to avoid damage to smaller or more fragile objects
- Return of objects to secure storage immediately following analysis

Requirement 26 of the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* should be complied with for appropriate cataloguing and storage.



The HMP may be updated should any changes to short term storage arrangements be required based on ongoing consultation with the RAPs, updating and resubmission of the HMP will be discussed with DPHI and Heritage NSW if the need arises.

6.2.9.2 Long-term management

Long term management strategies and storage locations will need to be identified following salvage and confirmation of the characteristics of the assemblages. Long-term management of the artefacts must comply with the MCoA (NSW) and be determined in consultation with the Aboriginal community, project RAPs and NPWS (as appropriate), with NSW DPHI and Heritage NSW to be notified of the final management outcomes.

There are several possibilities for long-term management of the project assemblages, including reburial on Country and/or handing the artefacts to the Aboriginal community through a Care Agreement with the appropriate Local Aboriginal Land Council (LALC) or other community organisation. It may be decided to split the project assemblage, with some objects undergoing reburial, and the retention under a Care Agreement of specific collections of artefacts for the Aboriginal community to assist with cultural story-telling, interpretation, training and education or display purposes. Long-term management will be undertaken in accordance with any relevant cultural protocols identified by RAPs. The determination of long-term management outcomes will require consultation and agreement between RAPs.

Reburial on Country

Multiple artefact reburials may be undertaken for the project. The location selected for any artefact reburial should be outside of any direct impact areas associated with the Project. It may be located within an environmental conservation or management area or within an offset site. If Aboriginal objects are salvaged from land managed by NPWS, the long-term management of these objects (including options for reburial within the managed land) will include consultation with NPWS as required. NPWS have indicated that if reburials are proposed within land reserved or acquired under the *National Parks and Wildlife Act 1974* (NPW Act), NPWS will help to facilitate the reburial in accordance with its conservation policy, protocols, and repatriation reburial process inclusive of its environmental assessment requirements under the EP&A Act.

The location of all reburials will be consulted on and decided with RAPs.

Artefacts from surface collection, test excavation, and salvage excavation may be reburied together. The salvage assemblage may be split into multiple reburials (e.g. one for each major catchment, one for each respective LALC area, by individual sites or groups of sites, by proximity to where they were found etc), or for other cultural reasons determined by the RAPs. In the instance where reburial is to be undertaken on land outside the CSSI Approval Area, any relevant approvals or consents under the NPW Act or EP&A Act must be sought and granted prior to proceeding. Specific cultural requirements and protocols to be followed for the reburial process may be identified by the RAPs.

The general process for reburial is as follows:



1. Confirmation of the reburial location.
2. The artefact assemblage would be prepared for reburial in accordance with Requirement 26 of the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW*, which specifies how artefacts should be organised, packaged and labelled for reburial, unless RAPs agree to an alternative deposition method. Noting that reburial using non- natural materials may not be supported on some land tenures; ensure reburial processes are approved prior to progressing.
3. A date and time is set for the reburial and project RAPs are invited to attend.
4. Welcome to Country, smoking ceremony or other appropriate cultural acknowledgements may be undertaken.
5. A hole large enough for the packaged assemblage is excavated at the nominated location and the assemblage is placed in the ground. A small metal plate or pole may be placed with the assemblage, to allow future relocation by a metal detector if necessary.
6. The hole is backfilled carefully, compacted and made level with the surrounding area. If small plantings or a top-cover of bark chips or similar is required to blend the area in with the landscape this can also be undertaken.
7. The reburial process is photographed and documented for posterity, including taking a GPS position of the reburial location and preparation of a site sketch plan.

Following confirmation of reburial of the objects, the reburial location is registered on the AHIMS database as an Artefact Reburial archaeological site. This helps ensure the location is avoided by future projects in the area. AHIMS site cards for the artefact origin sites may also be updated at this time to include information about the reburial.

Care Agreement

Section 85A(1)(c) of the NPW Act allows for the transfer of Aboriginal objects to an Aboriginal person or an organisation representing Aboriginal people under a Care Agreement. While the provisions of the NPW Act do not apply for the current project (being CSSI and under a Project Approval), a Care Agreement would be consistent with the CoA. The possibility for Care Agreement arrangements will require consultation and agreement between RAPs, and may be prepared for stone artefacts and/or salvaged culturally-modified (scarred) trees.

The custodian may be a LALC, recognised Traditional Owner or Native Title claimant group or another Aboriginal community organisation or individual representing Aboriginal people. It is also possible to split the assemblage between the relevant LALCs or Traditional Owner groups (with objects salvaged within each area transferred to the relevant group) or between a LALC or Traditional Owner and one or more other Aboriginal organisations.

A Care Agreement enables Aboriginal communities to care for Aboriginal objects that have been excavated, disturbed or moved. It is an agreement between two parties –Heritage NSW and the



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person or organisation asking for Aboriginal objects to be transferred to them. The Care Agreement sets out the obligations of both parties.

The transferred Aboriginal object(s) are not owned, they are handed over for long-term safekeeping. A separate Care Agreement would be required for each organisation or individual seeking to become a custodian of the artefacts.

To arrange a Care Agreement, an 'Application for the transfer of Aboriginal objects for safekeeping' form must be completed and submitted to Heritage NSW. EnergyCo and/or the project archaeologist may seek to assist with this process, including completing the application form(s) and preparing supporting documents to submit with the application(s).

The general process is as follows:

1. Aboriginal community group/individual (the Applicant) to confirm they would like to make an application under the *National Parks and Wildlife Act 1974*
2. Preparation of the application form. This includes details about the project, the archaeological sites the objects came from, and information about the artefacts themselves.
3. Preparation of additional supporting information for the application, including records of Aboriginal community consultation, background archaeological reports, and CoA documents.
4. Applicant to complete the application form. This includes providing details for the custodian organisation, a contact person, and information on how and where the objects will be stored. The application form must be signed.
5. Once all the application materials are complete and prepared, the application package is submitted to Heritage NSW at heritagemailbox@environment.nsw.gov.au.
6. Heritage NSW considers the application. Heritage NSW may contact the Applicant for further discussion during this period.
7. If the application is granted, Heritage NSW will contact the Applicant directly to negotiate and prepare the Care Agreement.
8. The Care Agreement will include details about the location, storage, care, recording and notification requirements of the Aboriginal objects that are the subject of the application.
9. A copy of the Care Agreement will be sent to the Applicant. To execute the agreement, it will need to be signed and witnessed, and then returned to Heritage NSW.
10. When the Care Agreement is complete and officially executed, arrangements will be made to deliver the objects to the Applicant.
11. AHIMS site cards for the sites whose artefacts have been transferred will be updated to note that the artefacts are now in the care of the Applicant.
12. Ongoing care and management of the artefacts by the Applicant must follow the terms of the Care Agreement.

It may also be possible for the LALC, Traditional Owner group or other Aboriginal community group/individual to take custody of a smaller group or subset of artefacts from the project assemblage under a Care Agreement, with the rest to be reburied on Country.

If the LALC, Traditional Owner group or other Aboriginal community group/individual chooses to keep some objects, and rebury the rest, the processes outlined above would be used for each group. The Care Agreement(s) and supporting information should note if the retained objects form part of a larger assemblage, the remainder of which has undergone reburial on Country. The selection of objects to be retained under a Care Agreement may be determined by their association with a particular area or archaeological site, by the nature and types of the artefacts, or by the size of the assemblage. These are suggestions only, and will depend on the needs and goals of the Aboriginal community for the Aboriginal objects. The retained artefacts may be stored for safe-keeping, used for display, educational purposes, interpretation, site officer training, to assist cultural story-telling or other purposes allowed under the Care Agreement(s).

6.2.10 Aboriginal heritage interpretation strategy

Input	Timing	Source of requirement	Output
Heritage specialist RAPs	Pre-construction Construction	REMM AH7	Aboriginal heritage- interpretation strategy and plan

An Aboriginal heritage interpretation strategy and plan will be developed by a heritage specialist, in consultation with Registered Aboriginal Parties, which will identify the interpretive values of the construction area (and specifically Aboriginal heritage values) and provide direction for interpretive installations and devices. Guiding principles for consideration in the development of heritage interpretation of the project include:

- Initially an interpretation strategy should be developed to identify key and over-arching themes.
- Subsequently, a plan would refine the strategy with content (visual and textual) and design details in order to allow the implementation stage.
- The documents should be co-designed and closely developed with local Wiradjuri and Gomeroi traditional owners. This includes identification of initial aims and ideas, content and structure.
- Given the nature of the project, these documents may consider off-site public outreach opportunities at nearby townships such as Gulgong, Ulan, Mudgee, et cetera.
- The content should include, but not be limited to:
 - The ethnographic and historical record, which includes post-Contact and contemporary associations with the site and immediate environs
 - Consultation and input from the Wiradjuri and Gomeroi traditional owners

- Information obtained from the archaeological excavations and findings undertaken for the project on the cultural and environmental landscape within which past Aboriginal people interacted with in the past

Suitable Intellectual Property Protection (IPP) measures should be discussed and established as part of developing the interpretation strategy to ensure that cultural knowledge, stories, and interpretations shared are safeguarded appropriately.

6.3 HISTORICAL HERITAGE MITIGATION AND MANAGEMENT MEASURES

6.3.1 Avoiding impacts

In accordance with MCoA (NSW) B28 (d)(i) and B28 (d)(iii), this section contains a description of the measures that would be implemented to protect the specified heritage items, including avoiding harm to Laheys Creek Cemetery (CWO-22-HH06), Tallawang Creek Archaeological Site 02 (CWO-22-HH11) and the suspected graves and buried architecture within Tallawang Union Church (CWO-22-HH09b) and Tallawang Catholic Church (CWO-22-HH-09c).

Table 6-4. Historical heritage items where impact must be avoided (Source: adapted from MCoA (NSW) Appendix 3 Table 3-3)

Site ID	Site name
CWO-22-HH11	Tallawang Creek Archaeological Site 02
CWO-22-HH06	Lahey's Creek Cemetery

6.3.1.1 Tallawang Creek Archaeological Site 02

Input	Timing	Source of requirement	Output
Suitable fencing equipment (or alternative)	Pre-Construction Construction	MCoA (NSW) B27(a), B28 (d)(i) and B28 (d)(iii) REMM HH1	Construction Planning Monitoring Records

Prior to construction in this location, a Restriction Zone will be established to protect against direct impacts through the installation of a barrier (e.g. fencing or suitable alternative) to prevent construction activities or access into the portion of CWO-22-HH11 which extends into the construction area. The barrier would be maintained for the duration of construction.

6.3.1.2 Lahey's Creek Cemetery

Input	Timing	Source of requirement	Output
Suitable fencing equipment	Pre-Construction	MCoA (NSW) B27(a), B28 (d)(i) and B28 (d)(iii)	Inspection Records
Structural Assessment	Construction	REMM HH9 and	Monitoring Records
Vibration Assessment			

Monitoring equipment

REMM HH10

In accordance with REMM HH9, a structural assessment of the standing headstones will be undertaken at Laheys Creek Cemetery (CWO-22-HH06) (as shown in Figure 6-2) prior to any potentially impactful activities occurring, to determine if additional conservation works may be required to mitigate nearby construction works.

An initial Exclusion Buffer will be established to ensure indirect impacts to the cemetery are avoided in accordance with REMM HH10. This initial Exclusion Buffer will be determined as follows:

- A report from a structural engineer will assesses the stability of the headstones in the cemetery and identify vibration tolerance levels to avoid damage
- The report must certify that the proposed exclusion buffer is sufficient to avoid damage to the items, as informed by a vibration assessment

If a reduction of the initial Exclusion Buffer is required, the following will be implemented:

- A structural engineer must certify that the proposed revised exclusion buffer is sufficient to avoid damage to the items
- If vibration-generating works are unavoidable within the exclusion buffer, headstones identified as being at risk of collapse will be stabilised and conserved
- The report will provide and certify vibration criteria, vibration monitoring equipment is installed, and vibration criteria are not exceeded
- Any damage sustained to the cemetery during construction or in the succeeding 12-month period will be repaired and rectified

Prior to and during any activities with the potential to generate vibration levels that exceed tolerance levels identified by the above process, a vibration monitor will be installed within the cemetery at the closest point to construction works to confirm that vibration levels are compliant with applicable criteria.

The above measures will ensure that the development does not cause any harm to any historical heritage items in accordance with MCoA (NSW) B27(a).

6.3.2 Avoid or minimise impacts and/or salvage

6.3.2.1 Tallawang Church Lots

Input	Timing	Source of requirement	Output
Ground Penetrating Radar Interpretation Report	Pre-Construction Construction	MCoA (NSW) B28(d)(iii) and REMM HH11	Construction Planning Monitoring Records
Suitable fencing equipment (installed outside of restricted zone)			



Clearing procedure

Vehicle management plan

Specialist surveillance

To avoid direct impact to any relics present, Restriction Zones will be established around the suspected graves and buried architecture within specific areas of the Tallawang Church lots (CWO-22-HH09b, CWO-22-HH09c) in accordance with REMM HH11. Figure 6-3 shows the Restriction Zones.

To implement this mitigation measure:

- The detailed design and construction methodology will be developed to avoid excavation and ground disturbance within the Restricted Zones to the greatest extent practicable including:
 - Micro siting of construction activities to outside of the Restricted Zones
 - Limitation of disturbance area through fencing or
 - Limiting heavy vehicle access
 - Limiting vegetation clearing, and clearing as needed to ground level (e.g. leaving stumps in situ)
- If surface activities in the immediate vicinity of the subsurface anomaly confidence locations are unavoidable, implementing protective measures (for example using road plates or similar) to prevent ground disturbance and minimise potential compaction
- Heritage specialist/project archaeologist surveillance of any excavations required within the Restricted Zones

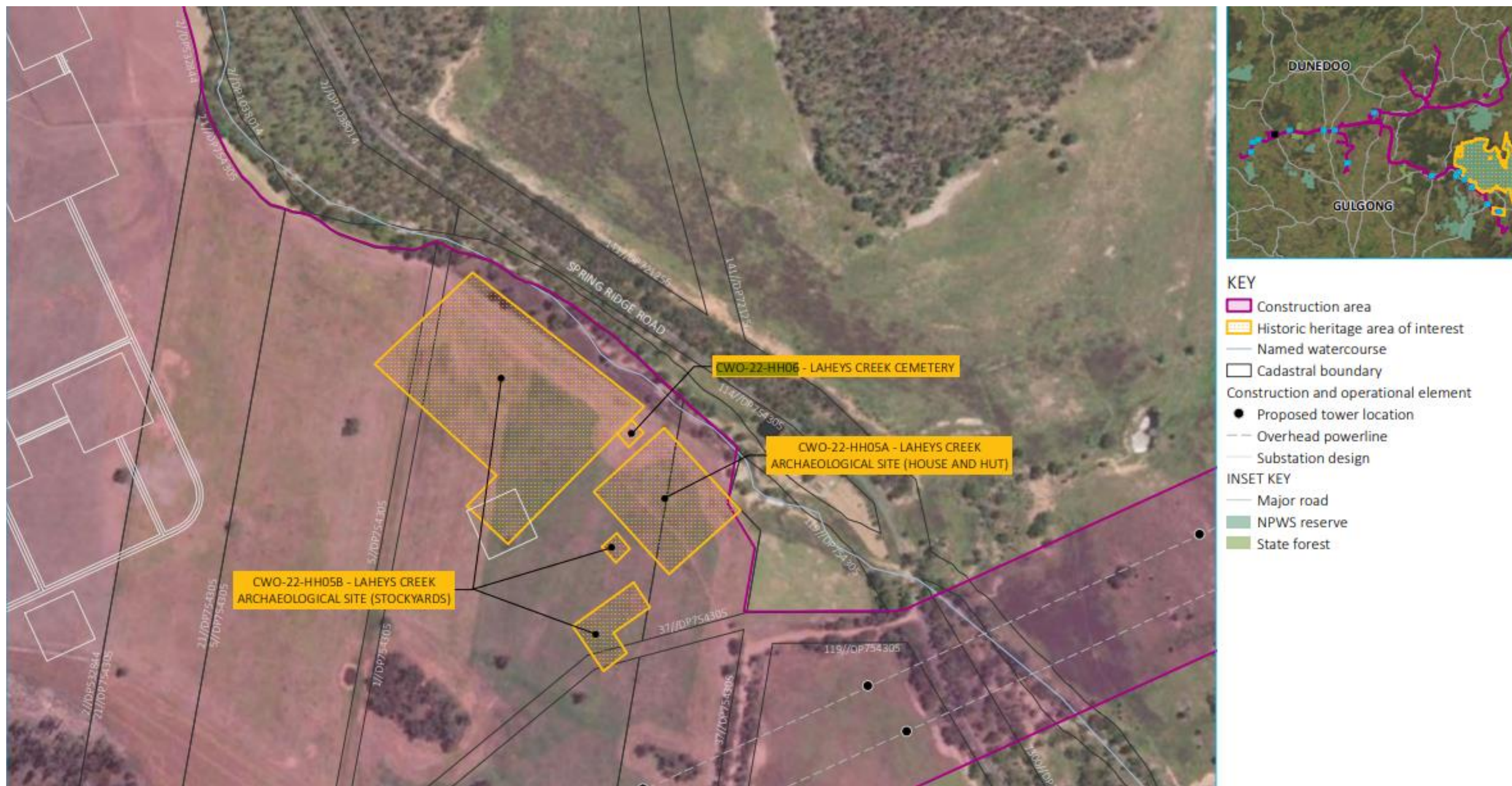


Figure 6-2- Lahey's Creek Cemetery (CWO-22-HH06) (Source: EIS Technical Paper 6 Appendix B)



Figure 6-3 Restriction Zones, Tallawang church lots (CWO-22-HH09b and CWO-22-HH09c) (Figure 5.2 of Amendment Report Appendix M)

6.3.3 Refinement of construction methodology

Input	Timing	Source of requirement	Output
GIS	Design	MCoA (NSW) B27(c)	Design Report
EIS	Pre-Construction	REMM HH2	Construction Planning
AR	Construction	REMM HH3	Updates to HMP (where required)
Project archaeologist (as required)			

During detailed design, the locations of listed and potential historical heritage items will be used to inform the final location of transmission line structures, construction compounds and project facilities, with an aim to:

- Protect, conserve and/or manage the heritage significance of historical heritage objects and places to ensure the project does not diminish the heritage significance or values of the identified items
- Avoid or minimise impacts on listed and potential historical heritage items, where feasible and reasonable

Aspects of the project that may be subject to further refinement include:

- The final transmission line structure locations, location of new or upgraded access tracks
- Final locations and layouts of the construction compounds and project facilities
- Construction methods and staging

Refinements to optimise the design outcomes and construction method will be carried out to further avoid or minimise environmental impacts as far as practical. This includes approaches to avoid or minimise impacts to historical heritage.

Specifically in accordance with REMMs HH2 and HH3 and MCoA (NSW) Appendix 3 Table 3-4, the project will investigate the micro-siting of project infrastructure and construction activities, and refinement of construction methodologies in consultation with a heritage specialist as follows:

- To avoid and/or minimise direct impacts to listed and potential historic heritage items (CWO-22-HH03, CWO-22-HH05a, CWO-22-HH05b, CWO-22-HH08, CWO-22-HH09a, CWO-22-HH09b, CWO-22-HH09c, CWO-22-HH10, CWO-22-HH13, CWO-22-HH16, CWO-22-HH18, CWO-22-HH19, CWO-22-HH20, CWO-22-HH21, CWO-22-HH22, CWO-22-HH23 CWO-22-HH14, CWO-23-HH01 and CWO-23-HH02) where reasonable and feasible
- To avoid and/or minimise indirect impacts to listed and potential historic heritage items (CWO-22-HH06, CWO-22-HH22 and CWO-22-HH23) where reasonable and feasible

Any site-specific management measures developed to address this commitment would be integrated into the EWMS and SAPs and appended to the HMP prior to implementing any of the identified management actions.

Where impacts to sites cannot be avoided during design and construction methodology refinement, the identified mitigation measures in REMMs HH4, HH5, HH6 and HH7 would be implemented to minimise the impacts on historical heritage.

6.3.4 Ground disturbance permits/approvals

Input	Timing	Source of requirement	Output
SAPs	Construction	MCoA (NSW) B27(c)	Permits
Permits			Induction records
Site Specific inductions			

Where required, obligations to avoid historical heritage sites will be included in relevant ground disturbance permit/approvals and site-specific inductions.

6.3.5 Sensitive Area Plans

Input	Timing	Source of requirement	Output
GIS	Pre-construction	MCoA (NSW) B27(c)	SAPs
EIS	Construction		
AR			

Inclusion of historical heritage items on Sensitive Area Plan's (SAPs) will be prepared identifying historical sites to be subject to mitigation and avoided "No-go" (for all sites in proximity to the construction footprint) and included in relevant site inductions (including those listed to be avoided in Table 6-4).

6.3.6 Cultural heritage sensitivity assessment

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction	REMM HH4	Inspection Records
			Heritage Specialist Report

If sites CWO-23-HH01 and CWO-23-HH02 cannot be avoided through detailed design, a site inspection assessment will be completed in accordance with NSW guidelines for items to determine their cultural heritage sensitivity and to establish if they meet the threshold for relics under the Heritage Act 1977 and require archaeological excavation. The requirement for archaeological excavation or archival recording would be dependent on the degree of impact to the confirmed heritage item's significance. If required, archaeological excavation would be undertaken in accordance with Section 6.3.8. If required, archival recording would be undertaken in accordance with Section 6.3.7.

6.3.7 Archival recording

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction	REMM HH5 MCoA Appendix 3 Table 3-4	Archival recordings

If avoidance of sensitive sites cannot be established during the detailed design stage, in accordance with REMM HH5 an archival recording will be completed for the following items, in accordance with NSW guidelines and be lodged with the Heritage NSW and local councils for access to researchers:

- CWO-22-HH08
- CWO-22-HH10
- CWO-22-HH18
- CWO-22-HH19
- CWO-22-HH14
- CWO-23-HH01 (if determined to have state or local significance in accordance with Section 6.3.6)
- CWO-23-HH02 (if determined to have state or local significance in accordance with Section 6.3.6)

Archival recording will also be considered for other heritage sites listed in MCoA Appendix 3 Table 3-4 where unavoidable impacts are identified and this would assist with mitigating/minimising impacts.

Archival recordings will be provided to Heritage NSW and the local council.

6.3.8 Archaeological test excavation

Input	Timing	Source of requirement	Output
Project archaeologist	Pre-construction	REMM HH6	Test excavation records

In accordance with REMM HH6, if direct impacts to heritage items listed in Table 6-5 cannot be reasonably and feasibly avoided during the detailed design stage, a program of archaeological test excavation will be undertaken (where the extent of the archaeological deposit is not known).

Test excavation activities will be completed prior to the commencement of construction activities near to these locations, and will include:

- A detailed archaeological research design prepared in accordance with the guidelines of *Archaeological Assessments* (NSW Heritage Office and Department of Urban Affairs and Planning 1996)
- Confirmation of a suitably qualified Excavation Director in accordance with the *Criteria for Assessing Excavation Directors* (NSW Heritage Council 2019)
- Consultation with Heritage NSW

- Systematic test excavation of historical archaeological sites that meet the 'relics' threshold identified for impact
- Where archaeological deposits are uncovered, sampled recovery of historic heritage relics will occur prior to disturbance. Once recorded and analysed, artefacts will be offered to local heritage society/museum

A detailed excavation method and research design for this process will be prepared and, once the determination of avoidance has been completed, will be endorsed by the ER and included in Environmental Work Method Statements as required. The detailed excavation method and research design, once endorsed by the ER, will be appended to the HMP.

Table 6-5 Sites potentially requiring archaeological test excavation (REMM HH6) and/or archaeological salvage excavation (REMM HH7)

ID	Name	Description	Test Excavation	Salvage Excavation
CWO-22-HH03	Avondale House archaeological site	Site of the former Avondale house (last recorded in 1878). Potential archaeological site with no structures remaining.	✓	✓
CWO-22-HH05a	Laheys Creek archaeological site (house and hut)	Site of a former house and hut (last recorded in 1866) and associated with the settlement of the district and one of the earliest European families in the area (Falconer). Field survey found two surface heaps of rubble of dressed and rough stones and metal items including machinery.	✓	✓
CWO-22-HH09a	Tallawang (Upper) Public School	Heritage item is located within the construction area and may be directly impacted by construction activities such as vegetation clearance and tower placement.		✓
CWO-22-HH09b	Tallawang Union Church	Heritage item is located within the construction area and has the potential to be directly impacted through construction activities such as vegetation clearance and tower placement		✓
CWO-22-HH09c	Tallawang Catholic Church	Heritage item is located within the construction area and has the potential to be directly impacted through construction activities such as vegetation clearance and tower placement.		✓
CWO-22-HH13	Merotherie Archaeological Site	Archaeological site with scattered bottles estimated to be from the 1930s at the earliest.	✓	✓
CWO-22-HH16	Moolarben Coal Project (MCP) Site 10	Original residence described as a gunyah on 1884 Crown Plan. Remaining structures comprise a few posts and exotic trees. Potential archaeological site.	✓	✓

6.3.9 Archaeological salvage excavation

Input	Timing	Source of requirement	Output
Heritage specialist / archaeologist	Pre-construction	MCoA B27(d) REMM HH7	Salvage excavation records

In accordance with MCoA 27(d) and REMM HH7, archaeological salvage excavation will be undertaken on archaeological sites listed in Table 6-5, where the extent of the archaeological deposit is known.

This process will include the development of:

- A detailed archaeological research design prepared in accordance with the guidelines of *Archaeological Assessments* (NSW Heritage Office and Department of Urban Affairs and Planning 1996)
- Confirmation of a suitably qualified Excavation Director in accordance with the *Criteria for Assessing Excavation Directors* (NSW Heritage Council 2019)
- Consultation with Heritage NSW
- Systematic salvage excavation of historical archaeological sites

Once recorded and analysed, salvaged artefacts will be offered to local heritage society/museum.

A detailed excavation method and research design and reporting requirements for this process will be prepared in consultation with relevant stakeholders once the determination of avoidance has been completed. The detailed excavation method and research design, once endorsed by the ER, will be appended to the HMP.

7 Governance and Implementation

7.1 IMPLEMENTATION

This HMP is supported by the Environmental Management Strategy (EMS) that has been developed, and approved by the Planning Secretary, for the Project. Responsibilities for the implementation of the HMP are as per the roles and responsibilities detailed in the EMS. Additional specialist support required for the implementation of the HMP is detailed in Table 7-1 below.

Table 7-1. Specialist Consultant roles and responsibilities – HMP implementation

Specialist	Responsibility
Project Archaeologist	Deliver any additional survey and/or test excavation, surface collection and salvage excavation as required. Prepare required archaeological reports. Participate in consultation activities throughout construction to facilitate implementation of this HMP.
RAPs	Participate in any additional survey and/or test excavation, surface collection and salvage excavation as required, Participate in consultation activities throughout construction to facilitate implementation of this HMP.

7.2 INCIDENTS AND NON-COMPLIANCE

As per the definition utilised in the MCoA (NSW), an Incident is “an occurrence or set of circumstances that causes or threatens to cause Material Harm and which may or may not be or cause a non-compliance”.

Material Harm is defined in the Project Approval (NSW), as harm that:

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

This definition excludes “harm” that is authorised under either the Project Approval or any other statutory approval.

Non-compliance is defined in the MCoA (NSW) as “an occurrence, set of circumstances or development that is a breach of this approval”.



In the event of activities being identified to be non-compliant, those activities may be recommended to be stopped, if deemed necessary, by the ER, or stopped, if deemed necessary, by the Project Superintendent and Supervisors, or ACJV D&C Environment and Sustainability Manager, or Construction Manager.

As environmental non-compliances are identified, the following will generally be undertaken, as required:

- The issue will be recorded within the compliance management database
- An environmental action list will be developed and issued to the relevant project team personnel for implementation and close out. Actions will be assigned a priority based on the environmental risk
- Timeframes will be stipulated for any corrective actions inclusive of preventative measures, if practicable, to be implemented
- Following corrective action, evidence of close out will be recorded and the ACJV D&C Environmental and Sustainability Manager, will close out the non-compliance

Notifications of incidents and non-compliances will be undertaken in accordance with the requirements from the MCoA (NSW), as detailed in Table 7-2 over page, and CoA (Commonwealth) where applicable, and in accordance with legislative requirements under the guidance of a Heritage Specialist.

Table 7-2. Incident and Non-Compliance Reporting Requirements MCoA (NSW)

Type	Communication Method	Timing	Information Required
Incident	via Major Projects website portal	Initial Notification – Immediately after the Proponent becomes aware of an incident.	- Identify the development (including the development application number and the name of the development if it has one) - Set out the location and nature of the incident
		Formal Notification – within 7 days after the proponent becoming aware of an incident.	- Identify the development and application number - Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident) - Identify how the incident was detected - Identify when the Proponent became aware of the incident - Identify any actual or potential non-compliance with conditions of approval - Describe what immediate steps were taken in relation to the incident - Identify further action(s) that will be taken in relation to the incident - Identify a project contact for further communication regarding the incident
		Incident Report – within 30 days of the date on which the incident occurred, unless the Planning Secretary agrees otherwise.	- A summary of the incident - Outcomes of an incident investigation, including identification of the cause of the incident - Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence - Details of any communication with other stakeholders regarding the incident
Non-compliance	via Major Projects website portal	Notification – within 7 days of the proponent becoming aware of any non-compliance.	- Identify the development and the application number for it, - Set out the condition of approval that the development is non-compliant with, - The way in which it does not comply. - The reasons for the non-compliance (if known). - What actions have been, or will be, undertaken to address the non-compliance

7.3 MONITORING, INSPECTIONS AND COMPLIANCE

The project approval has specific requirements for the inclusion of monitoring and reporting, including

- MCoA NSW (B28(e)): include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project
- REMM AH4: a monitoring regime for implementing the above measures

The project will regularly monitor and report on compliance of the project with the project approval during construction including: Visual inspection in areas of active or imminent construction will be undertaken (typically weekly) to confirm that measures identified in this document and on the applicable have been installed/implemented such as signposting, delineation/fencing/protection, and any site specific measures identified as described in this document, Environmental Controls Maps or identified in the EWMS, and identify where maintenance is required and improvement can be made. These records will be held internally, as described in the Environmental Management Strategy.

Vibration monitoring may be required in some locations where works may be adjacent to sensitive heritage structures. In such cases this will be undertaken in accordance with the Noise and Vibration Management Plan.

A summary of the heritage monitoring requirements is provided in Table 7-3 below.

Independent Audits will be undertaken in accordance with MCoA (NSW) C14. Outcomes of these audits will be submitted to the Planning Secretary and be made publicly available, in accordance with MCoA (NSW) C15 and C16.

Table 7-3 Heritage Monitoring Program

Monitoring / Program Item	Scope	Records / reporting	Timing	Approval Condition
Weekly Environmental Inspections	Weekly inspection of active work areas, inspection will include heritage aspects.	Environmental Inspection Checklist	Weekly in each active work area.	MCoA (NSW) B27
Vibration monitoring	As detailed in Section 6.1.4	Vibration monitoring records	During vibration generating activities where the risk of unauthorised impact warrants monitoring.	MCoA (NSW) B27 REMM AH4, HH9, HH10, NV5

Reporting requirements in addition to the above are described in Section 7.5.

7.3.1 Project heritage database

A project heritage database will be maintained for the duration of construction. This will contain:

- A list of all heritage sites (Aboriginal and non-Aboriginal) within the project boundary, including the site ID and site type
- The status of these sites (valid, partial, destroyed)
- Whether specific management actions are required for each of the identified sites, including, if required, what the specific management action is
- Status of the implementation of required management actions, including date of completion
- A record of AHIMS updates/ASIRFs for Aboriginal sites, including submission dates

The project heritage database will be accessible to the project design and construction teams to ensure currency of knowledge.

7.4 REVIEW

Table 7-4 below details the triggers and associated timings for review and update of the HMP as detailed throughout this plan and in line with the requirements of the approved EMS.

Table 7-4. Triggers for HMP Review and Update

Trigger	Responsibility	Timing	Consultation	Distribution*
Annual management review	Environment and Sustainability Manger Environmental Approvals Manager	Every 12 months.	Project Archaeologist RAPs (as required and directed by the Project Archaeologist)	DPHI Heritage NSW RAPs NPWS
Incident	Environment and Sustainability Manger Environmental Approvals Manager	Within 3 months of the submission of an incident report.	Project Archaeologist RAPs (as required and directed by the Project Archaeologist)	DPHI Heritage NSW RAPs NPWS
Non-compliance	Environment and Sustainability Manger Environmental Approvals Manager	Within 3 months of the notification of a non-compliance.	Project Archaeologist RAPs (as required and directed by the Project Archaeologist)	DPHI Heritage NSW RAPs NPWS
Independent Environmental Audit	Environment and Sustainability Manger Environmental Approvals Manager	Within 3 months of the submission of an Independent Audit.	Project Archaeologist RAPs (as required and directed by the Project Archaeologist)	DPHI Heritage NSW RAPs NPWS

*the HMP will only be re-distributed if updates occur as a result of the triggered review.

7.5 REPORTING

Table 7-5 details the reports that will be produced throughout the Project as required by the applicable MCoA (NSW) or REMM.

Table 7-5. Heritage reporting requirements

Report	Report trigger	Included content	To whom	Reference
Archival recording (Aboriginal sites)	Archival recording will be undertaken of all rockshelters, grinding grooves, and culturally modified trees that may be adversely impacted by the project.	#36-3-3794, #36-3-0449, #36-3-0570, #36-3-3790, SNI-RS01 – RS04 inclusive, SNI-RS-06, SNI-GG01-GG09 inclusive, SNI-GG15 -GG17 inclusive, Argyll No.3 (#36-3-0111) SNI-AS65; and as required for the following: AH05: #36-3-3918, SNI-CMT02, SNI-CMT04, SNI-CMT16, SNI-CMT19	Heritage NSW AHIMS database (site card updates and ASIRFs) RAPs	REMM AH6
ACHAR and AHIMS	A copy of the Aboriginal cultural heritage assessment report (and Addendum ACHAR) and all relevant AHIMS site recording forms	A copy of the Aboriginal cultural heritage assessment report (and Addendum ACHAR) and all relevant AHIMS site recording forms	Heritage NSW and each of the RAPs.	REMM AH9
Aboriginal archaeological report	The undertaking of archaeological mitigation activities (excavation of surface collection) at the specified sites	An archaeological report documenting the outcomes of management activities including (but not limited to) archival recording and analysis of stone artefact assemblages and other information relevant to addressing research questions	DPHI RAPs Heritage NSW	MCoA (NSW) B28 (d) (iv),
Cultural Heritage Sensitivity Assessment	If sites CWO-23-HH01 and CWO-23-HH02 cannot be avoided through detailed design	A site inspection assessment to determine cultural heritage sensitivity for these sites: CWO-23-HH01 CWO-23-HH02	N/A	REMM HH4
Archival recording (Historical Sites)	If avoidance of sensitive sites cannot be established during the detailed design stage, where determined to have state or local significance	An Archival recording for the following sites: CWO-22-HH08 CWO-22-HH10 CWO-22-HH18 CWO-22-HH19 CWO-22-HH14	Heritage NSW and local councils	REMM HH5
Laheys Creek Cemetery Structural Engineer Report	Prior to construction in the vicinity of CWO-22-HH06 (Laheys Creek Cemetery)	A report from a structural engineer assesses the stability of the headstones in the cemetery and identify vibration tolerance levels to avoid damage;	N/A	REMM HH9 and HH10



Report	Report trigger	Included content	To whom	Reference
		The report must certify that the proposed exclusion buffer is sufficient to avoid damage to the items, as informed by a vibration assessment of adjacent works.		

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Appendix A Minister’s Conditions of Approval (NSW)

Table A-1 MCoA (NSW) relevant to heritage

MCoA	Condition requirement	Document reference
B27	The Proponent must: (a) Ensure the development does not cause any harm to any Aboriginal heritage objects/sites or historic heritage items located outside the approved construction area (see Table 3-1 and Table 3-3 of Appendix 3) (b) Manage the sites identified in Table 3-2 of Appendix 3 in accordance with the specified mitigation and management measures and in accordance with the requirements of the Heritage Management Plan, as outlined in condition B28, including any subsequent revision of this plan (c) Implement all reasonable and feasible measures to avoid and minimise harm to historic heritage items within the approved construction area (identified in Table 3-4 of Appendix 3) (d) Salvage and relocate items that would be impacted to a suitable location, in accordance with the Heritage Management Plan described in condition B28	Section 6.2.1.1 Section 6.3.1 Section 6.2 Section 6.3.1 Section 6.2.9
B28	Prior to carrying out any development that could harm heritage items, the Proponent must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) Be prepared by a suitably qualified and experienced Aboriginal cultural heritage specialist whose appointment has been endorsed by the Planning Secretary (b) Be prepared in consultation with Aboriginal Stakeholders, NPWS and reviewed by Heritage NSW (c) Undertake an assessment of the unsurveyed areas of the construction areas, in accordance with Code of Due Diligence (d) Include a description of the measures that would be implemented for: (i) Protecting heritage items in accordance with conditions B27(a) (ii) Undertaking the management activities specified in Table 3-2 of Appendix 3, including a detailed methodology for each of the approved management activities (iii) Avoiding harm to Laheys Creek Cemetery (CWO-22-HH06) ,Tallawang Creek Archaeological Site 02 (CWO-22-HH11) and the suspected graves and buried architecture within Tallawang Union Church (CWO-22-HH09b) and Tallawang Catholic Church (CWO-22-HH-09c) (iv) Undertaking detailed reporting on the outcomes of management activities including (but not limited to) archival recording and analysis of stone artefact assemblages and other information relevant to addressing research questions (v) A strategy for the management of any salvaged Aboriginal objects (vi) A contingency plan and reporting procedure if: • Heritage items outside the approved construction area are harmed • Previously unidentified heritage items are found • Skeletal material is discovered (vii) Ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions (viii) Ongoing consultation with Aboriginal Stakeholders during the implementation of the plan	Table 1-2

MCoA	Condition requirement	Document reference
	(e) Include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project Following the Planning Secretary's approval, the Proponent must implement the Heritage Management Plan	

Appendix B Revised Environmental Management Measures

Table B-1 REMMs relevant to heritage and the HMP

REMM	REMM Requirement	Timing	Where applicable	HMP reference
AH1	The project will avoid impacts to the following identified Aboriginal objects and/or sites within the construction area: - The proposed workforce accommodation camps and construction activities at the Merotherie Energy Hub will establish a heritage protection zone to avoid SNI-GG02 to SNI-GG09 inclusive - The proposed workforce accommodation camps and construction activities at Neeleys Lane will establish a heritage protection zone to avoid SNIAS65 - The proposed construction activities at brake and winch sites near the Talbragar River will establish a heritage protection zone to avoid direct impacts to Argyll No.3 (#36-3-0111) - A protection zone will also be implemented at the Elong Elong energy hub to protect cultural material within 150 m of Laheys Creek (excluding the unavoidable impacts associated with the crossing of Laheys Creek by the transmission corridor, which will be minimised and ground disturbance associated with upgrades and maintenance along Spring Ridge Road and Dapper Road). Some guiding principles for consideration of avoidance are presented in Appendix E of the Addendum Aboriginal Cultural Heritage Assessment Report (ACHAR) (Appendix H of the Amendment Report). Any site-specific avoidance measures developed to address this commitment would be integrated into AH4.	Pre-Construction Construction	SNI-GG02 – GG09 inclusive, SNI-AS65; Argyll No.3 (#36-3-0111), and 150 m of Laheys Creek	Section 0
AH2	The project will investigate the micro-siting of project infrastructure and construction activities in consultation with an Aboriginal heritage specialist to avoid or minimise impacts to: - Rockshelters (#36-3-3794, #36-3-0449, #36-3-0570, #36-3-3790, SNI-RS01 – RS04 inclusive) - Grinding groove sites (SNI-GG01, SNI-GG15 and SNI-GG16-17 inclusive) - A culturally modified tree (SNI-CMT02) following validation (AH7) - High-density and/or significant stone artefact sites (#36 3 1140, #36 3 1141, SNI-FA02, SNI-FA05/SNIAS80, SNI-FA12, SNI-IF104) - Within 150 m of Deadmans Creek, Bora Creek, Cumbo Creek, Wilpinjong Creek, Tallawang Creek (north crossing), Copes Creek and Laheys Creek. - Some guiding principles for consideration of avoidance and/or impact minimisation are presented in Appendix E of the Addendum Aboriginal Cultural Heritage Assessment Report (ACHAR) (Appendix H of the Amendment Report). Management and any site specific mitigation measures developed to address this commitment would be integrated into AH4	Pre-Construction Construction	#36-3-3794, #36-3-0449, #36-3-0570, #36-3-3790, SNI-RS01 – RS04 inclusive, SNI-GG01, SNI-GG15, SNI-GG16-17 inclusive, SNI-CMT02, SNI-AS101 (#36-3-1140, #36-3-1141), SNI-FA02, SNI-FA05/ SNI-AS80, SNI-FA12, SNI-IF104, and areas within 150 m of	Section 6.2.1.3

REMM	REMM Requirement	Timing	Where applicable	HMP reference
			Deadmans Creek, Bora Creek, Cumbo Creek, Wilpinjong Creek, Tallawang Creek (north crossing), Copes Creek and Laheys Creek.	
AH3	On-Country meetings will be undertaken with participating Elders and key knowledge-holders of the project to discuss efforts to conserve and communicate appropriate important information about places of cultural value intersected by the project. If identified, feasible and reasonable measures would be developed in consultation with the Elders and key knowledge-holders and integrated into AH4.	Pre-Construction Construction	SNI-CS4 – CS6 inclusive and travelling routes #1 and #5 where they intersect the construction area.	Section 3.3.1
AH4	An Aboriginal Cultural Heritage Management Plan (ACHMP) will be jointly prepared by the proponent and a suitably qualified heritage professional, with the latter providing archaeological and cultural heritage inputs and requirements, and final endorsement of the document. The ACHMP would be developed in consultation with the Registered Aboriginal Parties (RAPs) and Heritage NSW. - The contents and guiding principles for the management of identified site types for the ACHMP are presented in Appendix E of Technical paper 5 (Aboriginal cultural heritage assessment report), and include: - Processes, timing, communication methods and project involvement for maintaining Aboriginal community consultation and participation through the remainder of the project - Inputs and content of a cultural heritage induction package for all construction personnel and subcontractors - Descriptions and methods for archaeological test/salvage excavations of rockshelters, stone - Artefact scatters, potential archaeological deposits, and cultural deposits that will be adversely affected by the project - Descriptions and methods for surface collection of identified isolated objects and stone artefact scatters that will be adversely affected by the project - Descriptions and method for mitigation and/or recovery of grinding grooves and culturally modified trees that will be adversely affected by the project - Delineating and protecting Aboriginal and cultural sites within or in close proximity to the construction area, including clear marking, appropriate screen for any gender-specific areas, surface protection, etc.	Pre-Construction Construction	Construction area, and all identified Aboriginal objects, sites and deposits in the Chapter 5 of the Addendum ACHAR that will be adversely impacted by the project.	Table 1-1 Sections 3.1, 3.2, 3.3.6, 6.1.1, 6.1.2, 6.2, 6.2.1, 6.2.4, 6.2.5, 6.2.6.5, 6.2.7, 6.2.8, 6.2.9, 7.3

REMM	REMM Requirement	Timing	Where applicable	HMP reference
	- Procedures for managing the unexpected discovery of Aboriginal objects, sites and/or human remains during the project - Procedures for the curation and long-term management of recovered cultural materials - Methods of post-excavation analysis and reporting of the archaeological investigations, including suitable collection and processing of stone artefacts, palaeo-environmental, chronological and other soils from archaeological activities - A monitoring regime for implementing the above measures			
AH5	An inspection will be undertaken by a qualified arboriculturist of all tentatively identified culturally modified trees to confirm whether they have formed through anthropogenic or natural processes. The findings from this inspection and subsequent management of the trees confirmed as being culturally modified will be integrated into the ACHMP (AH04) as required.	Pre-Construction	#36-3-3918, SNI-CMT02, SNI-CMT04, SNI-CMT16, SNI-CMT19	Section 6.2.6
AH6	Archival recording will be undertaken of all rockshelters, grinding grooves, and culturally modified trees that may be adversely impacted by the project. Archival recording will be undertaken in accordance with relevant Heritage NSW guidelines and submitted to the Heritage NSW AHIMS database.	Pre-Construction	#36-3-3794, #36-3-0449, #36-3-0570, #36-3-3790, SNI-RS01-RS04 inclusive, SNI-RS-06, SNI-GG01-GG09 inclusive, SNI-GG15 -GG17 inclusive, Argyll No.3 (#36-3-0111) SNI-AS65; and as required for the following AH05: #36-3-3918, SNI-CMT02, SNI-CMT04, SNI-CMT16, SNI-CMT19	Section 6.2.3

REMM	REMM Requirement	Timing	Where applicable	HMP reference
AH7	An Aboriginal heritage-interpretation strategy and plan will be developed by an Aboriginal heritage specialist, in consultation with Registered Aboriginal Parties, which will identify the interpretive values of the construction area (and specifically Aboriginal heritage values) and provide direction for interpretive installations and devices. The contents and guiding principles for the management of the strategy and plan are presented in Appendix E of Technical paper 5 and include the need to incorporate Registered Aboriginal Parties' views on traditional and contemporary values, local ethnographic and post-Contact information, and archaeological data developed for the project.	Construction Post-Construction	Construction area	Section 3.3.2 Section 6.2.10
AH8	Consultation will be maintained with the Registered Aboriginal Parties where cultural heritage requires management.	Pre-construction Construction	All Aboriginal objects, sites and places	Section 3.3
AH9	A copy of the Aboriginal cultural heritage assessment report (and Addendum ACHAR) and all relevant AHIMS site recording forms and information for the project will be lodged with Heritage NSW and provided to each of the RAPs.	Pre-construction Construction	All Aboriginal objects, sites and places described in Chapter 5 of the Addendum ACHAR.	Section 3.3.3 Section 7.5
AH10	Where ground disturbance activities are unable to avoid areas within 150 m of Deadmans Creek, Bora Creek, Cumbo Creek, Wilpinjong Creek, Tallawang Creek (north crossing), Copes Creek and Laheys Creek (excluding areas already disturbed during construction of existing access tracks and access roads), archaeological excavations will be undertaken. Where sub-surface artefacts or cultural materials are uncovered, archaeological excavations will be followed immediately by salvage mitigation requirements in locations where ground disturbance activities would occur, following the methods outlined in Appendix E of the Addendum Aboriginal Cultural Heritage Assessment Report (ACHAR) (Appendix H of the Amendment Report) and described in the ACHMP (AH4).	Construction	The construction area, where it is located within 150 m of Deadmans Creek, Bora Creek, Cumbo Creek, Wilpinjong Creek, Tallawang Creek (north crossing), Copes Creek and Laheys Creek	Section 6.2.4
HH1	Prior to construction, an exclusion barrier (e.g. fencing or suitable alternative) will be installed to prevent construction activities or access into the portion of CWO-22-HH11 which extends into the construction area. The barrier would be maintained for the duration of construction.	Pre-construction Construction	CWO-22-HH11	Section 6.3.1.1

REMM	REMM Requirement	Timing	Where applicable	HMP reference
HH2	Construction methodologies will be refined to avoid and/or minimise direct impacts to listed and potential historic heritage items where reasonable and feasible.	Pre-construction Construction	CWO-22-HH03 CWO-22-HH05a CWO-22-HH05b CWO-22-HH08 CWO-22-HH09a CWO-22-HH09b CWO-22-HH09c CWO-22-HH10 CWO-22-HH13 CWO-22-HH16 CWO-22-HH18 CWO-22-HH19 CWO-22-HH20 CWO-22-HH21 CWO-22-HH14 CWO-23-H01 CWO-23-H02	Section 6.3.3
HH3	Construction methodologies will be refined to avoid and/or minimise indirect impacts to listed and potential historic heritage items where reasonable and feasible.	Pre-construction Construction	CWO-22-HH06 CWO-22-HH22 CWO-22-HH23	Section 6.3.3
HH4	Cultural Heritage Sensitivity Assessment If sites CWO-23-HH01 and CWO-23-HH02 cannot be avoided through detailed design, a site inspection assessment will be completed in accordance with NSW guidelines for items to determine their cultural heritage sensitivity.	Pre-construction	CWO-23-HH01 CWO-23-HH02	Section 6.3.6
HH5	Archival recording If avoidance of sensitive sites cannot be established during the detailed design stage, where determined to have state or local significance in accordance with HH4, an archival recording will be completed in accordance with the following guidelines and be lodged with the Heritage NSW and local councils for access to researchers.	Pre-construction	CWO-22-HH08 CWO-22-HH10 CWO-22-HH18 CWO-22-HH19 CWO-22-HH14	Section 6.3.7

REMM	REMM Requirement	Timing	Where applicable	HMP reference
HH6	Archaeological test excavation If direct impacts to a heritage item cannot be reasonably and feasibly avoided during the detailed design stage, a program of archaeological test excavation will be undertaken (where the extent of the archaeological deposit is not known). This will include development of: • A detailed archaeological research design • Consultation with Heritage NSW • Systematic test excavation of historical archaeological sites that meet the 'relics' threshold identified for impact • Where archaeological deposits are uncovered, sampled recovery of historic heritage relics will occur prior to disturbance Once recorded and analysed artefacts will be offered to local heritage society/museum A detailed excavation method and research design for this process will be included in the historical heritage Management sub-plan (HHMP).	Pre-construction Construction	CWO-22-HH03 CWO-22-HH05a CWO-22-HH13 CWO-22-HH16	Section 6.3.8
HH7	Archaeological salvage excavation Salvage excavation will be undertaken on archaeological sites subject to direct impacts where the extent of the archaeological deposit is known. This will include development of: • A detailed archaeological research design • Consultation with Heritage NSW • Systematic salvage excavation of historical archaeological sites. Once recorded and analysed, salvaged artefacts will be offered to local heritage society/museum A detailed excavation method and research design for this process will be included in the HHMP.	Pre-construction	CWO-22-HH03 CWO-22-HH05a CWO-22-HH09a CWO-22-HH09b CWO-22-HH09c CWO-22-HH13 CWO-22-HH16	Section 0
HH8	Unexpected finds procedure Any items of potential heritage conservation significance or human remains discovered during construction and operation will be managed in accordance with an Unexpected Finds Procedure. A description of the types of finds that will stop works within the vicinity of the finds will be determined prior to construction as part of the HHMP and staff involved in excavation work will be informed about how to apply it. Finds would include objects such as bonded bricks, timber or stones appearing in formation indicating a wall or floor for instance are found or excavated soil with artefact concentrations. The unexpected finds procedure will include actions such as: • Stop work procedures and exclusion buffers • Utilising the advice of a technical specialist • Consultation with Heritage NSW	Pre-construction Construction	Construction area	Section 6.1.2 Appendix C

REMM	REMM Requirement	Timing	Where applicable	HMP reference
	Protocols for continuing work in the area after assessment			
HH9	A structural assessment of the standing headstones will be undertaken to determine if additional conservation works may be required to mitigate nearby construction works. Prior to and during any activities with the potential to generate vibration levels that exceed tolerance levels identified by the structural assessment, a vibration monitor will be installed within the cemetery at the closest point to construction works to confirm that vibration levels are compliant with applicable criteria. A vibration monitor will be installed within the cemetery at the closest point to construction works to confirm that vibration levels are compliant with applicable criteria.	Pre-construction Construction	CWO-22-HH06	Section 6.3.1.2
HH10	Prior to construction in the vicinity of CWO-22-HH06 (Laheys Creek Cemetery), an exclusion area of a suitable minimum width, as confirmed by a vibration assessment, will be installed to ensure impacts to the cemetery are avoided. The initial nominated exclusion buffer for CWO-22-HH06 will be determined on the following basis: - A report from a structural engineer assesses the stability of the headstones in the cemetery and identify vibration tolerance levels to avoid damage - The report must certify that the proposed exclusion buffer is sufficient to avoid damage to the items If a reduction in the initial exclusion area is required: - A structural engineer must certify that the proposed revised exclusion buffer is sufficient to avoid damage to the items - If vibration-generating works are unavoidable within the exclusion buffer, headstones identified as being at risk of collapse will be stabilised and conserved - The report can provide and certify vibration criteria; vibration monitoring equipment is installed, and vibration criteria are not exceeded - Any damage sustained to the cemetery during construction or in the succeeding 12-month period will be repaired and rectified by the proponent	Pre-construction Construction	CWO-22-HH06	Section 6.3.1.2
HH11	To avoid harm to any relics present, Restricted Zones will be established around the suspected graves and buried architecture within specific areas of the Tallawang Catholic Church lots. To implement this recommendation: The detailed design and construction methodology will be developed to avoid excavation and ground disturbance within the Restricted Zones to the greatest extent practicable	Pre-construction Construction	CWO-22-HH09b CWO-22-HH09c	Section 6.3.2.1

REMM	REMM Requirement	Timing	Where applicable	HMP reference
	- Subsurface anomaly confidence locations identified in the Ground Penetrating Radar Interpretation Report (EMM 2024) will be marked out within the construction area using non-intrusive (i.e. non-ground-penetrating) methods prior to project-related activities commencing in the vicinity - Heavy vehicle access within the Restricted Zones will be limited to only essential movements to support other construction activities required within the zones - A clearing approach will be developed and implemented within the Restricted Zones to avoid accessing the subsurface anomaly confidence locations and minimise ground/subsurface disturbance generally during the clearing process, where feasible and reasonable - If surface activities in the immediate vicinity of the subsurface anomaly confidence locations are unavoidable, implementing protective measures (for example using road plates) to prevent ground disturbance and minimise potential compaction - Heritage specialist surveillance of any excavations required in the immediate vicinity of the Moderate High subsurface anomaly confidence locations			
NV5	Vibration sensitive Aboriginal and non-Aboriginal heritage items which have potential to be impacted by the project works will be confirmed prior to the commencement of vibration generating works in proximity to relevant structures. Suitable, item specific criteria will be developed for heritage items and vibration impacts at these locations will be managed before commencement of construction. This may include the use of alternative construction methods which generate lower levels of ground vibration and the installation of vibration monitors while vibration intensive activities are conducted	Detailed design	All heritage items where exceedances of the applicable construction vibration criteria are predicted.	Section 6.1.4

Appendix C Unexpected Heritage Finds Procedure

Potential Aboriginal object(s) (other than human remains)

This section outlines the procedure for handling unexpected Aboriginal archaeological objects.

In the event that construction activity reveals possible Aboriginal objects other than those identified for impact in existing project documentation or identified as a result of the archaeological activities described in this HMP, the following procedure is to be followed.

1. All work is to halt at that location immediately and the Project environmental manager on site is to be immediately notified to allow assessment and management:
 - i. Stop all activities
 - ii. Secure the site
 - a. Do not remove any find(s) or unnecessarily disturb the area of the find(s)
 - b. Ensure that the area of the find(s) is adequately marked as a no-go area for machinery or further disturbance, and that the potential for accidental impact is avoided
2. Contact the project archaeologist to assess the find and determine if it is an Aboriginal object consistent with the MCoA (NSW):
 - i. If the find is not an Aboriginal object, the archaeologist will allow work to continue
 - ii. If the find is an Aboriginal object consistent with the MCoA (NSW), the archaeologist will allow work to continue
 - iii. If the find is an Aboriginal object inconsistent with the MCoA (NSW), DPHI and Heritage NSW would be notified and the following process followed
3. For unexpected finds located on, or at the interface of NPWS managed land, NPWS Mudgee Area Office (npws.mudgee@environment.nsw.gov.au) will be notified.
4. Where feasible, ensure that any excavation remains open so that the finds can be recorded and verified. An excavation may be backfilled if this is necessary to comply with work safety requirements, and where this action has been approved by Heritage NSW. An excavation that remains open should only be left unattended if it is safe and adequate protective fencing is installed around it.
5. Following consultation with the relevant statutory authority Heritage NSW, project RAPs, NPWS (where the find is within NPWS Estate) and, where advised, any other relevant stakeholder groups, the significance of the find(s) should be assessed and an appropriate management strategy followed. Depending on project resources and the nature of the find(s), this process will require further input from the project archaeologist. The management strategy should be consulted on with the project RAPs.
6. Development work in the area of the find(s) may re-commence, if and when outlined by the management strategy, developed in consultation with, and approved by the relevant statutory authority.

If suspected human skeletal material is encountered, the protocol for the discovery of suspected human remains should be followed.

Suspected human remains

This section outlines the procedure for handling suspected human remains, in accordance with the *Skeletal Remains – Guidelines for the Management of Human Skeletal Remains under the Heritage Act 1977* (NSW Heritage Office 1998) and the *Aboriginal Cultural Heritage Standards and Guidelines Kit* (NPWS 1997).

Note that Project Approvals do not include the disturbance or destruction of Aboriginal remains

In the event that construction activity reveals possible human skeletal material (remains), the following procedure is to be followed.

1. All work is to halt at that location immediately and the Project environmental manager on site is to be immediately notified to allow assessment and management:
 - i. Stop all activities
 - ii. Secure the site
 - a. Do not remove any find(s) or unnecessarily disturb the area of the find(s)
 - b. Ensure that the area of the find(s) is adequately marked as a no-go area for machinery or further disturbance, and that the potential for accidental impact is avoided
2. If there is substantial doubt regarding a human origin for the remains, then consider if it is possible to gain a qualified opinion within a short period of time. If feasible, contact the project archaeologist or gain a qualified opinion (this can circumvent proceeding further along the protocol for remains which are not human). If conducted, this opinion must be gained without further disturbance to the find(s) or the immediate area of the find(s). (Be aware that the site may be considered a crime scene that retains forensic evidence). If a quick opinion cannot be gained, or the identification is positive, then proceed to Step 3.
 - i. If the finds are not human in origin but are considered to be archaeological material relating to Aboriginal occupation then proceed with the Protocol for the discovery of Aboriginal objects
3. Contact NSW Police: the discovery of human remains triggers a process which assumes that they are associated with a crime. The NSW Police retain carriage of the process until such time as the remains are confirmed to be Aboriginal or historic:
 - i. Co-operate and be advised by the Police and/or Coroner with regard to further actions and requirements concerning the area of the find. If required, facilitate the definitive identification of the material by a qualified person (if not already completed)
 - ii. In the event that the Police and/or Coroner instigate an investigation, construction

work is not to resume in the designated area until approval in writing is gained from the NSW Police

- iii. If the remains are identified as not being human as a result of the police process, work can recommence once the appropriate clearances have been given
- iv. In the event that the Police and/or Coroner advise that they do not have a continuing or statutory role in the management of the finds (i.e. human remains not associated with a contemporary crime) then proceed with the following steps

- 4. DPHI, as the approval authority, will be notified when human remains are found. DPHI will act in consultation with Heritage NSW as appropriate.
- 5. For unexpected finds located on, or at the interface of NPWS managed land, NPWS Mudgee Area Office (npws.mudgee@environment.nsw.gov.au) will be notified.
- 6. If the finds are Aboriginal or probably Aboriginal in origin:

- i. Notify Heritage NSW archaeologist, project RAPs, and the project archaeologist (if not already notified)
- ii. Ascertain the requirements of Heritage NSW, the Project Manager, and the views of the RAPs, and the project archaeologist
- iii. DPHI will determine the process, in consultation with Heritage NSW as appropriate. Based on the above, appropriate management actions may be determined and acted upon. Possible strategies could include one or more of the following:

- Avoiding further disturbance to the find and conserving the remains in situ
- Conducting archaeological salvage of the finds following receipt of any required statutory approvals
- Scientific description (including excavation where necessary), and possibly also analysis of the remains prior to reburial
- Recovering samples for dating and other analyses, and/or
- Subsequent reburial at another place and in an appropriate manner determined in consultation with the RAPs

- 7. If the finds are determined to be non-Aboriginal (historical) in origin:

- i. Notify Heritage NSW archaeologist, project RAPs, other relevant identified community stakeholders as required, the project archaeologist (if not already notified)
- ii. Ascertain the requirements of Heritage NSW, the Project Manager, and the views of any relevant community stakeholders, and the project archaeologist
- iii. DPHI will determine the process, in consultation with Heritage NSW as appropriate. Based on the above, appropriate management actions may be determined and acted upon. Possible strategies could include one or more of the following:

- Avoiding further disturbance to the find and conserving the remains in situ
 - Conducting archaeological salvage of the finds following receipt of any required statutory approvals
 - Scientific description (including excavation where necessary), and possibly also analysis of the remains prior to reburial
 - Recovering samples for dating and other analyses, and/or
 - Subsequent reburial at another place and in an appropriate manner determined in consultation with Heritage NSW and other relevant stakeholders
8. Construction related work in the area of the remains (designated area) may not resume until the proponent receives written approval in writing from DPHI as the approval authority and from the relevant statutory authority: from the Police or Coroner in the event of an investigation, or from Heritage NSW in the case of Aboriginal or non-Aboriginal (historical) remains outside of the jurisdiction of the Police or Coroner.

Potential historical relics or heritage items (other than human remains)

This section outlines the procedure for handling unexpected potential historical relics or heritage items. In the event that construction activity reveals possible historical relics or heritage items, the following procedure is to be followed.

Examples of items that may constitute a potential unexpected historical heritage find include:

- Indicators of structural remains such as bonded brick, worked timber or stone materials, concrete, ironwork or other metal (i.e. historical construction materials)
 - Subsurface (buried) evidence for postholes, structural foundations or footings
 - Cisterns or wells, usually of rendered brick
 - Refuse pits (middens), potentially with charcoal, animal bones and other domestic refuse
 - Other domestic materials such as glass, ceramic or metal (crocery, flatware, glass beverage and medicine bottles, coins, smoking pipes)
 - Evidence of historical agricultural practices – wooden post-and-rail fencing, historical farm machinery and equipment
1. All work is to halt at that location immediately and the Project environmental manager on site is to be immediately notified to allow assessment and management:
 - i. Stop all activities
 - ii. Secure the site
 - a. Do not remove any find(s) or unnecessarily disturb the area of the find(s)
 - b. Ensure that the area of the find(s) is adequately marked as a no-go area for machinery or further disturbance, and that the potential for accidental impact is avoided
 2. Contact the project archaeologist to assess the find and determine if it is an historical heritage item/relic of probable State or local significance:
 - i. If the find is not a historical heritage item/relic of State or local significance, no further action is required and the archaeologist will allow work to continue
 - ii. If the find is a historical heritage item/relic of State or local significance, DPHI and Heritage NSW would be notified and the following process followed
 3. For unexpected finds located on, or at the interface of NPWS managed land, NPWS Mudgee Area Office (npws.mudgee@environment.nsw.gov.au) will be notified.
 4. Where feasible, ensure that any excavation remains open so that the find can be recorded and verified. An excavation may be backfilled if this is necessary to comply with work safety requirements, and where this action has been approved by Heritage NSW. An excavation that remains open should only be left unattended if it is safe and adequate protective fencing is installed around it.

5. Following consultation with the relevant statutory authority Heritage NSW and, where advised, any other relevant stakeholder groups, the significance of the finds should be assessed and an appropriate management strategy followed. Depending on project resources and the nature of the find(s), this process will require further input from the project archaeologist. The management strategy should be consulted on with DPHI and Heritage NSW as required.
6. Development work in the area of the find(s) may re-commence, if and when outlined by the management strategy, developed in consultation with, and approved by the relevant statutory authority.

If suspected human skeletal material is encountered, the protocol for the discovery of suspected human remains should be followed.

Appendix D MCoAs (NSW) Appendix 3 (Heritage)

Table 3-1 Aboriginal Heritage items – avoid impacts

AHIMS ID / Site name / area	Corresponding project site ID
36-3-0111	Argyll No.3 (SNI-GG14 / SNI-AS01)
36-3-4031	SNI GG02
36-3-3968 / 36-3-4038	SNI-GG03
36-3-4042	SNI-GG06
36-3-4043	SNI-GG05
36-3-4044	SNI-GG04
36-3-4045	SNI-GG07
36-3-4046	SNI-GG08
36-3-4027	SNI-AS65
36-3-4052	SNI-GG09

Table 3-2 Aboriginal heritage items - Management and mitigation measures for sites within construction area. Additional column highlighted grey shows where included in HMP.

AHIMS ID/Site name/ Area (corresponding project site ID)	Site type	Level of harm	Mitigation and management measure	Relevant Section of HMP
Zone within 150m from Laheys Creek	Area of archaeological sensitivity	Partial harm – transmission line corridor, road upgrades and maintenance along Spring Ridge Road and Dapper Road. Remainder of area is subject to indirect harm only (visual impact)	Establish heritage protection zone that excludes direct harm outside the transmission line corridor and road corridors. Where impacts cannot be avoided within the footprint of the transmission line corridor and road corridor, undertake archaeological excavations and subsequent salvage mitigation, as required	Section 0 Section 6.2.4
36-3-3794 (S1MC487) 36-3-0449 (UWF SU51/L3) 36-3-0570 (WCP137) 36-3-3790 (S1MC488) 36-3-4029 (SNI-RS01) 36-3-4028 (SNI-RS02) 36-2-0674 (SNI-RS04) 36-2-0675 (SNI-RS03) 36-3-4113 (SNI-RS06)	Rock shelters	Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites. Detailed archival recording to be undertaken. If direct impact is to be avoided, develop Blast Monitoring Strategy to evaluate potential for indirect impacts from blasting. Where moderate or high risk of indirect impact is identified, undertake monitoring.	Section 6.2.1.3 Section 6.2.3 Section 6.1.4
36-3-4048 (SNI-GG01) 36-3-4047 (SNI-GG15) 36-3-4060 (SNI-GG16) 36-3-4110 (SNI-GG17)	Grinding grooves		Where impacts are identified at rock shelters, undertake test excavation and subsequent salvage excavation, as required.	Section 6.2.4
36-3-1140/36-3-1141 (SNI-AS101) 36-2-0680 (SNI-FA02) 36 2 0682 (SNI-FA05/SNI-AS80)	High density artefact scatter	Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.	Section 6.2.1.3

AHIMS ID/Site name/ Area (corresponding project site ID)	Site type	Level of harm	Mitigation and management measure	Relevant Section of HMP
36-2-0748 (SNI-FA12) 36-3-4115 (SNI-IF104)			Where impacts cannot be avoided, undertake surface collection and salvage excavation focused on areas of highest artefact density.	Section 6.2.4 Section 6.2.5
Zones within 150m of Deadmans, Bora, Cumbo, Wilpinjong, Tallawang and Copes creeks	Areas of archaeological sensitivity	Level of direct harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites. Where impacts cannot be avoided, undertake surface collection, archaeological excavations and subsequent salvage excavation, as required.	Section 6.2.1.3 Section 6.2.4 Section 6.2.5
SNI-CS4 SNI-CS5 SNI-CS6	Cultural areas	Indirect harm - visual	Undertake additional on-Country meetings with RAPs to document relevant information and identify feasible and reasonable measures to mitigate indirect harm	Section 3.3.1
36-3-3918 (Birriwa Bus Route South ST 1) 36-3-4034 (SNI-CMT02) 36-2-0747 (SNI-CMT04) 36-3-4058 (SNI-CMT16) 36-3-4059 (SNI-CMT19)	Culturally modified trees (potential)	Level of harm subject to confirmation pending design finalisation	Inspection by qualified arboriculturist to confirm whether scarring is natural or cultural. If confirmed as culturally modified tree, undertake detailed archival recording. Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites. Where impacts cannot be avoided, salvage may be undertaken.	Section 6.2.6.1 Section 6.2.3 Section 6.2.1.3 Section 6.2.6.5
36-2-0678 (SNI-AS41) 36-3-4030 (SNI-AS43) 36-2-0677 (SNI-AS57) 36-3-0496 (WCP220) 36-3-0503 (WCP227)	High or moderate density artefact scatters, including areas of subsurface deposit	Level of harm subject to confirmation pending design finalisation	Investigate micro-siting of the project infrastructure and construction activities to avoid or minimise impacts to sites.	Section 6.2.1.3

AHIMS ID/Site name/ Area (corresponding project site ID)	Site type	Level of harm	Mitigation and management measure	Relevant Section of HMP
36-3-0658 (WC OS 17 with PAD)			Where impacts cannot be avoided, undertake surface collection and salvage excavation (as required).	Section 6.2.4
36-3-0793 (WCP260)				Section 6.2.5
36-2-0688 (SNI-AS71)				
36-2-0676 (SNI-AS02)				
36-3-4040 (SNI-FA04)				
36-2-0683 (SNI-FA06)				
36-3-4041 (SNI-FA07)				
36-3-4112 (SNI-FA08)				
36-3-4111 (SNI-FA09)				
36-2-0746 (SNI-FA10)				
36-3-4114 (SNI-FA11 / SNI-AS91)				
SNI BS1 (see note below)	Low density artefact scatter	Direct harm within project footprint	No mitigation works required	Section 6.2.2
Note: SNI-BS1 incorporates #36-3-0353, #36-3-0497, #36-3-0634, #36-3-0691, #36-3-0815, #36-3-0816, #36-3-0817, #36-3-0818, #36-3-0819, #36-3-0820, #36-3-0821, #36-3-1047, #36-3-1048, #36-3-1049, #36-3-1050, #36-3-1051, #36-3-1053, #36-3-1054, #36-3-1055, #36-3-1058, #36-3-1062, #36-3-1063, #36-3-1064, #36-3-1065, #36-3-1066, #36-3-1067, #36-3-1068, #36-3-1090, #36-3-1402, #36-3-1404, #36-3-1428, #36-3-3406, #36-3-1052, #36-3-1056, #36-3-1057, #36-3-1401, #26-3-2514, #36-3-3291, #36-3-3523, #36-2-0627, #36-3-3917, SNI-IF01-15 inclusive, SNI-IF17, SNI-IF20, SNI-IF28, SNI-IF33, SNI-IF39, SNI-IF41, SNI-IF43, SNI-IF47, SNI-IF48, SNI-IF51, SNI-IF56, SNI-IF58, SNI-IF62, SNI-IF65, #36-3-0336, #36-3-0470, #36-3-0498, #36-3-0569, #36-3-0660, #36-3-0139, #36-3-1403, #36-3-2833, #36-3-3182, #36-3-3227, #36-3-3233, #36-3-3432, #36-3-3805, #36-3-3828, #36-3-3832, #36-3-3833, #36-3-3835, #36-2-0533, #36-2-0580, #36-3-1396, SNI-AS01, SNI-AS03-07 inclusive, SNI-AS09, SNI-AS012-13 inclusive, SNI-AS15, SNI-AS17, SNI-AS29, SNI-AS31, SNI-AS37, SNI-AS40, SNI-AS51-52 inclusive, SNI-AS61, SNI-AS66, SNI-AS68-70 inclusive, SNI-AS72-73 inclusive, SNI-AS76-77 inclusive, SNI-Q01, SNI-FA01, SNI-AS79, SNI-AS83, SNI-AS87-90, SNI-AS92, SNI-AS95, SNI-AS97, SNI-AS99, #36-3-0685/SNI-FA03, #36-3-0720/SNI-AS100, #36-2-0613, #36-3-3884, SNI-IF66-68, SNI-IF70-76, SNI-IF78-80, SNI-IF83-86, SNI-IF88-90, SNI-IF93-96, SNI-IF99-103.				

Table 3-3 Historic Heritage items – avoid impacts

Item name
CWO-22-HH11
CWO-22-HH06

Table 3-4 Historic Heritage items– avoid, minimise and/or salvage

Item name
CWO-22-HH03
CWO-22-HH05a
CWO-22-HH05b
CWO-22-HH08
CWO-22-HH09a
CWO-22-HH09b
CWO-22-HH09c
CWO-22-HH10
CWO-22-HH13
CWO-22-HH16
CWO-22-HH18
CWO-22-HH19
CWO-22-HH20
CWO-22-HH21
CWO-22-HH14
CWO-23-H01
CWO-23-H02
CWO-22-HH22
CWO-22-HH23
CWO-22-HH14

Appendix E RAP Consultation Log

Table E-1 Log of consultation with RAPs on HMP

Date	From	To	Medium	Description/attachment
29/11/2024	KNC	A1 Indigenous Services Pty Ltd	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	AGA Services, Bawurra and Cactua	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	AT Gomilaroi Cultural Consultancy	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Booral Maliyan	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Binjang Wellington Wiradjuri heritage Survey	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Corroboree Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Didge Ngunawal Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Dubbo LALC	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Edgerton Kwiembul Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025

Date	From	To	Medium	Description/attachment
29/11/2024	KNC	Gallangabang Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Girragirra Muran Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Gomeroi Native Title Applicant c/o NTS Corp	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Hunters and Collectors	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Ibbai Waggan Wiradjuri People P/L	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Jarban and Mugreba	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Jeremy Duncan	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Kamilaroi Yankuntjatjara Working Group	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Konanggo Aboriginal Cultural Heritage Services	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025

Date	From	To	Medium	Description/attachment
29/11/2024	KNC	Michael Long	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Mingaan Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Mudgee LALC	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Murong Gialinga Aboriginal & Torres Strait Islander Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Murra Bigee Mullangari	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Natasha Rodgers	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Ngumbaay Indigenous Corporation/Summit Employment	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	North- Eastern Wiradjuri	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Red Earth Gallery/Warrabinya Cultural Services	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025

Date	From	To	Medium	Description/attachment
29/11/2024	KNC	The Gomeroi People	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Thomas Dahlstrom	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Three Rivers Regional Assembly (TRRA)	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Timothy Stubbs	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Ungooroo Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Warrabinga Native Title Claimants Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Wellington LALC	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Wellington Valley Wiradjuri Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Wiradjuri Elders Council/Wiradjuri Council of Elders	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025

Date	From	To	Medium	Description/attachment
29/11/2024	KNC	Woka Aboriginal Corporation	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Wurrumay Consultants	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	KNC	Yurwang Gundana	Email	See Attachment 1 Cover letter and copy of draft HMP provided, requesting comments by 24/01/2025
29/11/2024	Email bounceback - Ngumbaay Indigenous Corporation/Summit Employment	KNC	Email	Email bounceback - tatum.moore wasn't found at summit-et.com.au.
29/11/2024	Email bounceback - Three Rivers Regional Assembly (TRRA)	KNC	Email	Email bounceback - traa.community no such domain
11/11/2024	Email bounceback - Corroboree Aboriginal Corporation	KNC	Email	Email bounceback - mailbox is full
03/12/2024	Kamilaroi Yankuntjatjara Working Group (Phil Khan)	KNC	Email	See Attachment 2 Email response from Phil Khan stating they were happy with the HMP for the project.
12/12/2024	Warrabinga Native Title Claimants Aboriginal Corporation (Warrabinga Wiradjuri #7 - Kylie Manson)	KNC	Email	See Attachment 2 Email and attached letter response from Kylie Manson outlining key concerns and suggested amendments to the draft HMP.
20/01/2025	The Gomeroi People	KNC	Email	See Attachment 2

Date	From	To	Medium	Description/attachment
				Email response from Steven Talbott outlining concerns with the review period and consultation process and request for further discussion at meeting
23/01/2025	Wellington Valley Wiradjuri Aboriginal Corporation	KNC	Email	See Attachment 2 Email and attached letter response from Brad Bliss outlining key concerns and suggested amendments to the draft HMP.
14/03/2025	KNC	Kamilaroi Yankuntjatjara Working Group (Phil Khan)	Email	See Attachment 3 Email response from KNC acknowledging receipt of comments and providing response
14/03/2025	KNC	Warrabinga Native Title Claimants Aboriginal Corporation (Warrabinga Wiradjuri #7 - Kylie Manson)	Email	See Attachment 3 Email response from KNC acknowledging receipt of comments and providing response
14/03/2025	KNC	The Gomeroi People	Email	See Attachment 3 Email response from KNC acknowledging receipt of comments and providing response
14/03/2025	KNC	Wellington Valley Wiradjuri Aboriginal Corporation	Email	See Attachment 3 Email response from KNC acknowledging receipt of comments and providing response

Appendix F Items Requiring Avoidance of Impact

