

Spicers Creek Wind Farm

Heritage Management Plan
SSD-41134610



24 April 2026



Final

Revision Control

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Abbreviations

Term	Definition
ACHA	Aboriginal Cultural Heritage Assessment
AHIMS	Aboriginal Heritage Information Management System
CEMP	Construction Environmental Management Plan
CHL	Commonwealth Heritage List
DPE	Department of Planning and Environment (now referred to as Department of Planning, Housing and Infrastructure)
DPHI	NSW Department of Planning, Housing and Infrastructure
EIS	The Environment Impact Statement for Spicers Creek Wind Farm dated July 2023, the Submissions Report dated December 2023
EMS	Environmental Management Strategy
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)
EPC	Engineering Procurement and Construction contractor; also refers to any other principal contracting entity engaged on the Project, such as Energy Corporation and the REZ Network Operator
HMP	Heritage Management Plan
HSEQ	Health, Safety, Environment and Quality
ILUA	Indigenous Land Use Agreement
LALC	Local Aboriginal Land Council
LGA	Local Government Area
NHL	National Heritage List
ORALRA	The Office of the Registrar, Aboriginal Land Rights Act 1983
OSOM	Over Size, Over Mass vehicle; vehicle configuration which requires a permit from the National Heavy Vehicle Regulator.
PAD	Potential Archaeological Deposit
RAP	Registered Aboriginal Party
SCWF	Spicers Creek Wind Farm
SHR	State Heritage Register
SQE	Squadron Energy
WHL	World Heritage List
WTG	Wind Turbine Generator

Key Terms

Term	Definition
Ancillary infrastructure	All project infrastructure with the exception of wind turbines, including but not limited to collector substations, switching stations, permanent offices, electricity transmission lines, site compounds, communication cables (including control cables and earthing), wind monitoring masts and internal roads.
Applicant	Spicers Creek Wind Farm Pty Ltd, or any person carrying out the development approved under this consent.
Battery storage	Large scale energy storage system.
Clearing	As defined in Part 5A of the Local Land Services Act 2013.
Commissioning	The testing of the components, equipment and systems of the development following completion of construction, prior to operations commencing.
Construction	The construction of the Project, including but not limited to, the carrying out of any earthworks on site and the construction of any ancillary infrastructure (but excludes road upgrades or maintenance works to the public road network, building/road dilapidation surveys, installation of fencing, artefact survey and/or salvage, overhead line safety marking and geotechnical drilling and/or surveying).
Development Consent	SSD-41134610
Development Corridor	The area generally bound by a buffer of 100 m radius around the Development Footprint. For the absence of doubt, the over-sail of WTGs may extend beyond this Development Corridor but will be within the Project Site.
Development Footprint	The extent of ground disturbance including earthworks associated with permanent infrastructure and temporary facilities (other than temporary field laydown areas) in the Project Site.
Ground Disturbance	Activities that cut into the existing ground surface. For the absence of doubt this does not include activities that occur on the ground surface including but not limited to driving vehicles on the ground, parking vehicles, placing infrastructure or materials such as stockpiles on the ground.
Heavy Vehicle	As defined under the <i>Heavy Vehicle National Law</i> (NSW), but excluding light and medium rigid trucks and buses no more than 8 tonnes and with not more than 2 axles.
Light Vehicle	Car or rigid truck to 8T GVM or bus to 12 seats.
Meteorological Masts	Temporary and Permanent masts up to hub height of the WTGs and of a guyed, narrow lattice or tubular steel design and concrete footings of approximately 1 m ² for each of the mast and guy wires. Guy wires may extend beyond 100 m from the base of the mast. The final number and location of the masts will be determined post-Development Consent, post-WTG selection and detailed design. The masts and the guy wires that secure them may need to be located outside of the Development Corridor, however they will remain within the Project Site.
Micro-siting	The process of locating WTGs, battery storage, ancillary infrastructure and temporary infrastructure during detailed design without further approval providing: <ul style="list-style-type: none"> the ground disturbance remains within the Development Corridor (with the exception of wind monitoring masts) no WTG is moved more than 100 metres from the relevant GPS coordinates. the revised location of the blade of a WTG is at least 50 metres from the canopy of existing native vegetation; or where the proposed location of the blade of a WTG is already within 50 metres of the canopy of existing native vegetation, the revised location is not any closer to the existing native vegetation the meteorological masts are located within the Project Site
Operation	The operation of the project, but does not include commissioning, trials of equipment or use of temporary facilities,

Term	Definition
Pre-construction Minor Works	Includes the following activities: <ul style="list-style-type: none"> • surveys; • overhead line safety marking; • building/road dilapidation surveys; • investigative drilling, excavation or salvage; • minor clearing or translocation of native vegetation; • establishment of temporary site office (in locations meeting the criteria defined in the Development Consent); • installation of environmental impact mitigation measures, fencing, enabling works; • wind monitoring masts; and • Construction of minor access roads and minor adjustments to services/utilities, etc.
Project	The Spicers Creek Wind Farm
Project Site	The land within the cadastral boundaries associated with the proposed Project, as defined in Appendix 1 and 2 of the Development Consent.
Proponent	Spicers Creek Wind Farm Pty Ltd
Substations	Infrastructure required to collect the internal electrical reticulation to increase the voltage for transmission to connect to the grid, and the infrastructure to physically connect to the grid (i.e. switching station). Typically includes step-up transformers, an array of cable marshalling, busbars, switchgear and protection, various voltage and current transformers, operation and facilities building with parking, communication facilities and tower, diesel generator, lighting, a buried earth grid, lightning masts, power conditioning equipment, a reactive power control system, and network support equipment as required and agreed with REZ Network Operator (or other transmission network system operator).
The Minister	Minister for the Environment and Water (Commonwealth)
The Secretary	Planning Secretary under the EP&A Act, or nominee.

1 Introduction

1.1 Background

The Proponent, Spicers Creek Wind Farm Pty Ltd (SCWF), has obtained Development Consent for the construction, operation, maintenance, and decommissioning of the Spicers Creek Wind Farm (the Project). The Project is located approximately 25 km north west of Gulgong and 35 km north east of Wellington in the Central West Orana region of NSW, within the Dubbo Regional and Warrumbungle Shire Local Government Areas (LGA). The Project locality is shown in **Figure 1.1**.

The Project will have a capacity of approximately 700 megawatts (MW), with the potential to power approximately 397,000 homes. The Project comprises up to 117 wind turbine generators (WTGs), battery storage and associated infrastructure including, access roads, hardstands, laydown areas, internal electrical reticulation, temporary construction compounds, rock crushing facilities, concrete batching plant(s), substations, an operations and maintenance facility, overhead transmission line and switching stations. The Development Footprint comprises of a total area of approximately 1,471 ha.

Refer to **Figure 1.2** for the approved Project layout. This layout will be further refined throughout detailed design and a Final Layout Plan will be prepared and submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) in accordance with Development Consent Condition **C8**.

A full description of the Project is provided in the Submissions Report which can be accessed on the Spicers Creek Wind Farm website at <https://www.squadronenergy.com/our-projects/spicers-creek-wind-farm>.

1.2 Purpose and Scope of this HMP

This Heritage Management Plan (HMP) describes how impacts to Aboriginal and historical cultural heritage values within the Project Site will be protected and managed.

Specific objectives of the HMP are to address Development Consent Conditions **B28** and **B29** by providing guidance on:

- Processes to maintain ongoing consultation with the Project's Registered Aboriginal Parties (RAPs) and Heritage NSW (**Section 3.2.4**)
- Management procedures for Aboriginal and historical cultural heritage values associated with the Project during pre-construction and construction phases (**Section 6**)
- Protocols and procedures for new finds, including Aboriginal objects, historical heritage items and human remains (**Sections 6.1.6, 6.1.7, 6.2.5**)
- Other administrative requirements, including project management of Aboriginal and historical heritage finds and recovered material, ongoing compliance, regular review and update of the HMP to ensure its functionality is maintained through the Project (**Section 9**).

The HMP is prepared for a range of stakeholders including Aboriginal stakeholders, regulatory authorities and site personnel, the latter of which are responsible for implementing this plan as part of day-to-day operations.

This plan incorporates the relevant management measures presented in the Project Aboriginal Cultural Heritage Assessment (ACHA) (NSW Archaeology 2023a) submitted as part of the Environmental Impact Statement (EIS), the Aboriginal Cultural Response to Submissions (NSW Archaeology 2023b) supporting the Submissions Report, the Project Historic Heritage Assessment (HHA) (NSW Archaeology 2023c) and Development Consent conditions relating to Aboriginal and historical cultural heritage.

1.3 Staging

In accordance with Development Consent Condition C3, any strategy, plan or program required under the Development Consent may be prepared and submitted on a staged basis, with the approval of the NSW Planning Secretary.

Pursuant to Condition C3 of the Development Consent, SCWF is seeking approval from the NSW Planning Secretary to stage Project management plans as outlined in **Table 1.1** below.

This version of the HMP applies to Stages 1a - d. Triggers for review and revisions required to support the transition of this HMP between stages are outlined in **Table 1.1** below.

Table 1.1: Project Staging Approach

Stage	Description / Scope	Trigger for HMP Preparation and Revision
Stage 1a	Pre-construction minor works activities associated with the wind farm and associated infrastructure, and road upgrades.	HMP to be prepared prior to carrying out any development that could directly or indirectly impact the heritage items identified in condition B28.
Stage 1b	Commence construction of the wind farm (excluding high-risk heavy vehicles requiring escort).	<i>HMP to cover stages 1a – 1d.</i>
Stage 1c	Continue construction of the wind farm (including high-risk heavy vehicles requiring escort).	
Stage 1d	Commence operation of the wind farm.	
Stage 2a	Commence construction of the Battery Energy Storage System (BESS).	Revise HMP to incorporate relevant details and measures associated with the BESS construction and operation.
Stage 2b	Commence operation of the BESS.	<i>Revised HMP to cover Stages 1d – 2b.</i>
Stage 3	Decommissioning of the wind farm (and battery storage system, if construction) at end of life.	Revise HMP to incorporate all necessary details and measures associated with Decommissioning. <i>Revised HMP to cover Stage 3 only.</i>

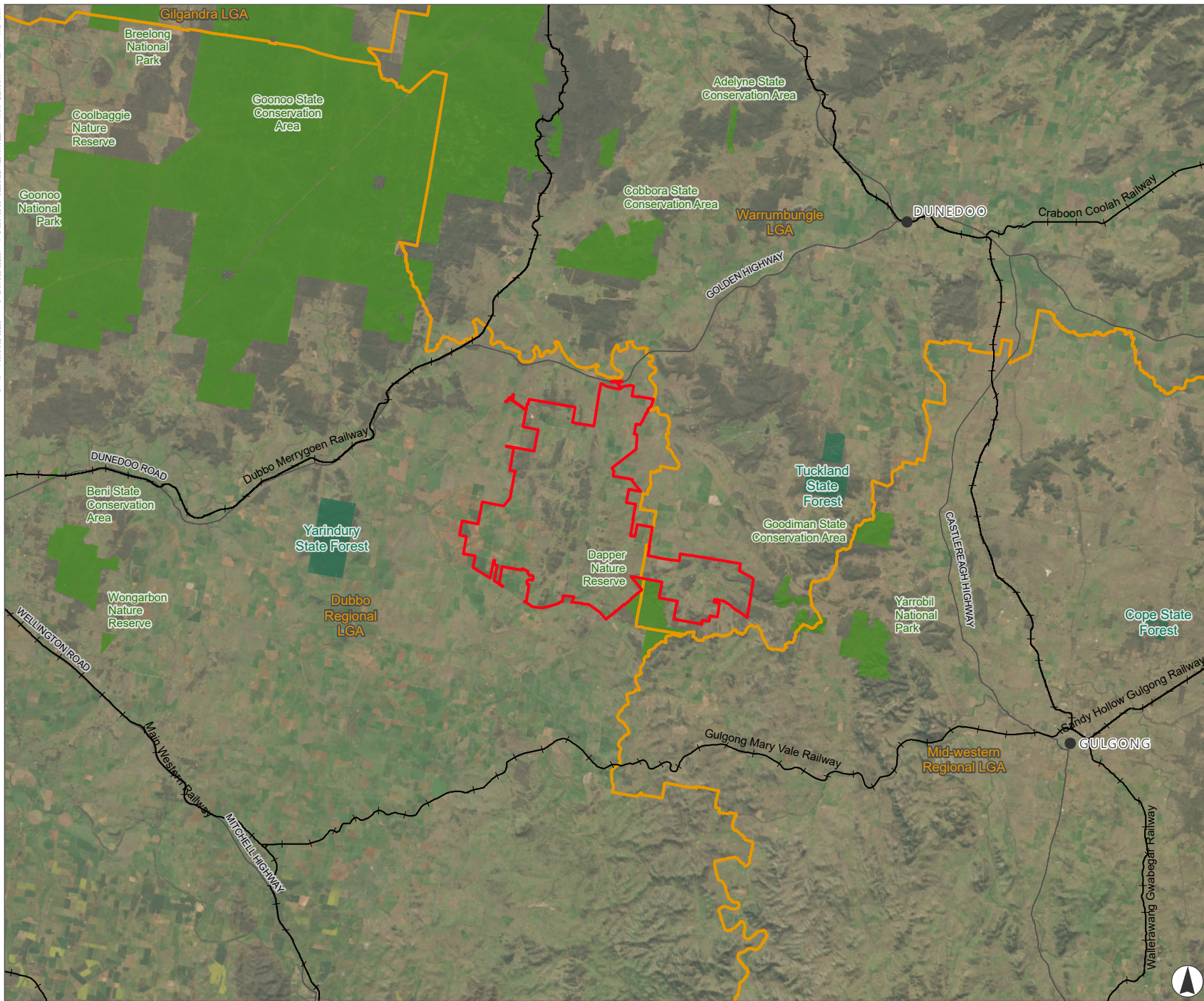
1.4 Environmental Management System

Development Consent Condition C1 requires the preparation of an Environmental Management Strategy (EMS) for the Project. The EMS provides the Project's strategic framework for environmental management under which the HMP operates. The HMP should be read in conjunction with the Project EMS.

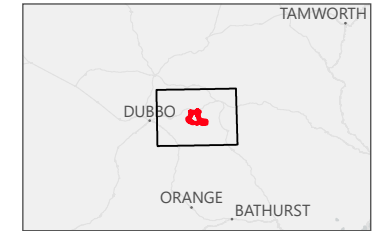
1.5 Methodology and Authorship

The HMP was prepared by Umwelt Principal Archaeologist, Aboriginal Heritage Team Leader, Ryan Desic (BA Hons Historical and Prehistoric Archaeology) who was endorsed by the Planning Secretary as a suitably qualified and experienced person on 14 November 2024 (refer to **Appendix C**). Ryan has 15 years' experience in heritage consulting and has prepared heritage management plans for major projects across New South Wales (NSW). The HMP was also reviewed by Dr Julie Dibden (NSW Archaeology) who prepared the ACHA and HHA reports for the Project (NSW Archaeology 2023a).

FIGURE 1.1
Project Locality



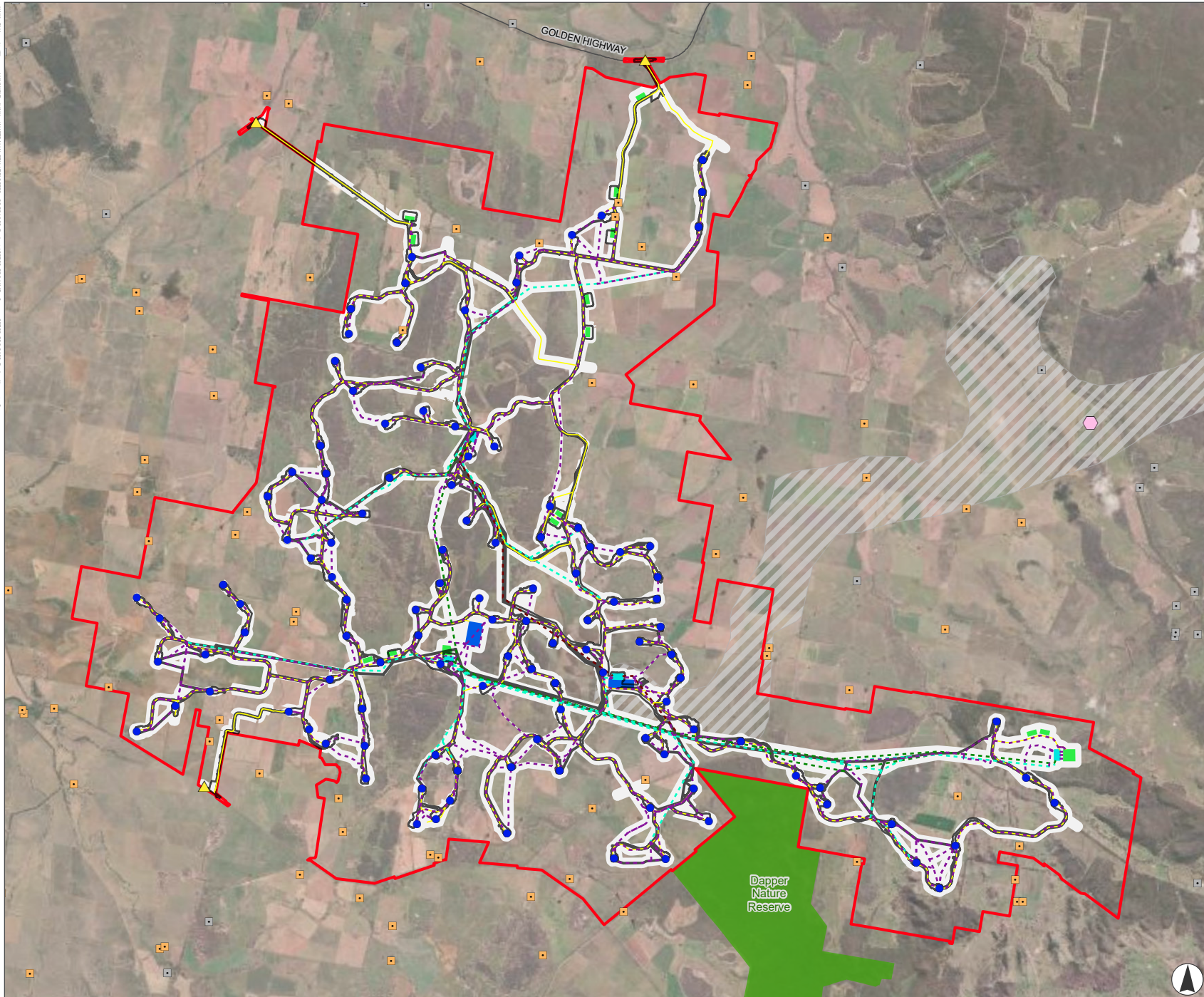
- Legend
- Project Site
 - NPWS Reserve
 - State Forest
 - Local Government Area
 - Road
 - Railway
 - Locality



Kilometres
Scale 1:400,000 at A4
GDA2020 MGA Zone 55

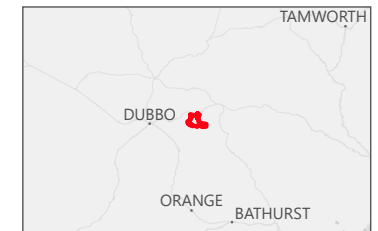
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FIGURE 1.2
Spicers Creek Wind Farm
Approved Project Layout



Legend

- Project Site
- Development Corridor
- Development Footprint
- EnergyCo Indicative REZ Transmission Corridor
- Site Compound
- Electrical Plant Compound
- Substation
- Associated - House
- Non Associated - House
- Non Associated - House
- Wind Turbine Generator
- ▲ Site Access Point
- EnergyCo Elong Elong Energy Hub
- Overhead Powerline (HV or MV)
- Overhead Powerline (HV)
- Overhead Powerline (MV)
- Underground Powerline
- Access Track
- NPWS Reserve
- State Forest
- Road
- Railway
- Locality



Kilometres
 Scale 1:110,000 at A4
 GDA2020 MGA Zone 55

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1.6 Document Structure

The structure of the HMP is outlined in **Table 1.2**.

Table 1.2: Structure of the HMP

Section	Content
Section 1	Provides an overview of the Project and objectives of the plan.
Section 2	Outlines statutory requirements associated with the development consent, and regulator consultation undertaken in developing the plan.
Section 3	Provides an overview of regulator and Aboriginal consultation completed for the Project, and processes to maintain ongoing consultation with the Project's RAPs.
Section 4	Provides an overview of the Project activities and potential impacts to Aboriginal and historical cultural heritage within the Development Footprint.
Section 5	Provides an overview of the Aboriginal and historical cultural heritage context of the Project Site which has provided the basis for the heritage management measures presented in this HMP.
Section 6	Provides management procedures for Aboriginal and historical cultural heritage within the Development corridor during pre-construction, construction and development footprint during operation. Provides protocols and procedures for new cultural finds, including Aboriginal objects, historical items and human remains.
Section 7	Outlines the roles and responsibilities for implementation of this HMP and training requirements for site personnel.
Section 8	Provides requirements, procedures and protocols for monitoring and reporting.
Section 9	Details incident and non-compliance management actions and requirements.
Section 10	Outlines how data will be managed in relation to this HMP and how this HMP will be reviewed.
Section 11	References.
Appendix A	Provides the archaeological excavation methodology for the relevant Aboriginal sites requiring this management measure.
Appendix B	Provides site definitions and descriptions for a range of Aboriginal site types.
Appendix C	Provides details of regulator and Aboriginal consultation undertaken in preparing the HMP
Appendix D	Provides an overview of relevant legislation and reporting requirements under NSW law.

2 Statutory Approvals

2.1 NSW Development Consent SSD-41134610

This HMP has been prepared in accordance with Development Consent Condition B29. **Table 2.1** presents the Development Consent conditions relevant to the HMP and identifies where each condition has been addressed in this plan.

Table 2.1: Development Consent Requirements Relevant to Cultural Heritage (Aboriginal and Historical)

Condition No.	Condition Requirement	Section Reference
B28	The Applicant must:	Section 6.1.2 (Aboriginal sites) Section 6.2 (Historical sites) <i>Note: Although this condition requires no impact to Table 3 items, Condition (c) allows for salvage and relocation if impacts are unavoidable. This aligns with Table 3, which includes avoidance, partial avoidance, relocation or archival recording. The HMP prioritises avoidance but includes mitigation measures where necessary.</i>
	(a) Ensure the development does not cause any direct or indirect impacts to Aboriginal heritage items identified in Table 1 of Appendix 6, historic heritage items identified in Table 3 of Appendix 6, and any items located outside the disturbance area;	
	(b) Implement all reasonable and feasible measures to avoid and minimise harm to Aboriginal heritage items identified in Table 2 of Appendix 6; and	Section 6.1.2 6.2.2
	(c) Salvage and relocate items that would be impacted to a suitable alternative location, in accordance with the Heritage Management Plan described in condition B29.	Aboriginal Heritage: Section 6.1.3 (Community Collection as salvage) Section 6.1.5 and Appendix A (Archaeological excavation as salvage) Section 6.1.8 (reburial of salvaged objects as relocation) Historical Heritage: Section 6.2.2 (relocation of historical sites)
B29	Prior to carrying out any development that could directly or indirectly impact the heritage items identified in condition B28, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	This document.
	(a) Be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Planning Secretary;	Section 1.5 and Appendix C
	(b) Be prepared in consultation with Aboriginal stakeholders and reviewed by Heritage NSW;	Section 3 and Appendix C
	(c) Provide an updated list of Aboriginal heritage items identified in condition B28 that would be protected and remain in-situ throughout construction and items that would be salvaged and relocated to suitable alternative locations;	Due to the refinements to the Project developed during the Submissions Report, 23 Aboriginal sites identified by NSW Archaeology in the Project ACHA are no longer in the Development Footprint and no longer proposed to be impacted (subject to detailed design). Accordingly, the Aboriginal sites listed in

Condition No.	Condition Requirement	Section Reference
		<p>Table 5.1 reflect those that are within the Project Corridor boundary</p> <p>Section 5.1.2 outlines the anticipated impacts and the associated management and mitigation measures based on the current detailed design and confirmed Stage 1a&b development footprint. In accordance with Condition B29(c), Table 5.1 provides an updated list of Aboriginal heritage items that will be protected and remain in situ throughout construction, and those that will be salvaged and relocated to suitable alternative locations. Any minor adjustments to the development footprint or the identification of previously unrecorded heritage during construction will be managed in accordance with the approved micro-siting controls and New Finds procedures in this HMP, to ensure ongoing avoidance or appropriate mitigation consistent with the Conditions of Consent.</p>
	(d) Include a justification where impact to Aboriginal heritage items identified in condition B28(b) cannot be avoided;	<p>Section 6.1.2 outlines the implementation of the avoidance and protection process, which includes micro-siting, detailed design reviews, and protection measures. Where avoidance is not possible, the decision reflects the outcome of applying this structured approach.</p> <p>A report summarising items successfully avoided; and justification for any unavoidable impacts to Aboriginal heritage items will be prepared following completion of construction when all heritage management measures and impacts can be accurately consolidated, and appended to this HMP as part of the next scheduled update..</p>
	(e) Include a description of the measures that would be implemented for:	<p>Section 6.1.2 Section 6.2</p>
	(i) Protecting heritage items in accordance with condition B28.	
	(ii) Minimising and managing the impacts of the development on Aboriginal heritage items identified in condition B28(b) that cannot be avoided, including: <ul style="list-style-type: none"> • Salvaging and relocating items to suitable alternative locations; and • A strategy for the long-term management of any Aboriginal items or material collected during the test excavation or salvage works; 	<p>Section 6.1.3 (Community Collection as salvage)</p> <p>Section 6.1.5 and Appendix A (Archaeological excavation as salvage)</p> <p>Section 6.1.8 (reburial of salvaged objects as relocation)</p>
	(iii) A contingency plan and reporting procedure if: <ul style="list-style-type: none"> • Heritage items outside the approved disturbance area are damaged; 	<p>Any damage to heritage items outside the disturbance area to be managed through incident reporting (Section 9.1)</p> <p>New finds and skeletal finds:</p> <p>Aboriginal heritage:</p>

Condition No.	Condition Requirement	Section Reference
	<ul style="list-style-type: none"> Previously unidentified heritage items are found; or Skeletal material is discovered; 	Section 6.1.6 Section 6.1.7 Historical Heritage: Section 6.2.4 Section 6.2.5
	(iv) Ensuring workers on site receive suitable heritage inductions prior to carrying out development on site, and that records are kept of these inductions; and	Section 7.2
	(f) Include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.	Section 8

2.2 Legislative Context

Legislation and its relevance to the Project is summarised in **Table 2.2**. Further details of statutory obligations relating to Aboriginal cultural heritage is provided in **Appendix D**.

Table 2.2: Commonwealth and State Legislation Relevant to the HMP

Legislation	Description	Relevant to the Project?	Details
Commonwealth			
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	Recognises sites with universal value on the World Heritage List (WHL). Protects heritage places with outstanding heritage value to the nation on the National Heritage List (NHL), and significant heritage value on the Commonwealth Heritage List (CHL).	Yes (but not in terms of heritage)	<p>There are no heritage places within the Project Site that are listed on the WHL, NHL, or the CHL.</p> <p>The Project was referred under the EPBC Act and was determined to be a controlled action (EPBC 2022/09387) on 4 January 2023 requiring assessment and approval under the EPBC Act due to controlling provisions related to:</p> <ul style="list-style-type: none"> listed threatened species and communities; listed migratory species. <p>However, the Project did not trigger any Matters of National Environmental Significance (MNES) relating to heritage aspects, including world heritage properties or national heritage places.</p>
<i>Native Title Act 1993</i>	Administers rights and interests over lands and waters by Aboriginal people. Provides for negotiation and registration of Indigenous Land Use Agreements (ILUAs). Often used in NSW to identify relevant stakeholders for consultation.	No	No native title claim applications or determinations or Indigenous Land Use Agreements exist over the Project Site.

Legislation	Description	Relevant to the Project?	Details
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	Preserves and protects areas and objects of particular significance to Aboriginal people that are under threat from injury or desecration.	No	There are no areas or objects within the Project Site subject to a Declaration under the Act.
State			
<i>Environmental Planning and Assessment Act 1979</i>	Requires environmental impacts, including to Aboriginal heritage, to be considered in land use planning. Provides for the development of environmental planning instruments, including State Environmental Planning Policies and Local Environmental Plans.	Yes	The Project was assessed as State Significant Development (SSD) under Part 4, Division 4.7 of the Act.
<i>National Parks and Wildlife Act 1974 (NPW Act)</i>	Provides blanket protection for all Aboriginal objects and declared Aboriginal places. Includes processes and mechanisms for development where Aboriginal objects are present, or where Aboriginal Places are proposed for harm.	Yes	The NPW Act generally remains in force for the Project in relation to the discovery, impact notification and care of Aboriginal objects in NSW. However, as the Project is classed as SSD, an Aboriginal Heritage Impact Permit (AHIP) is therefore not required to permit harm to Aboriginal objects associated with the Project to the extent that the Development Consent applies. Instead, the Development Consent and an approved HMP serve as an approval to impact on and manage impacts to Aboriginal objects.
<i>Heritage Act 1977</i>	The Heritage Act 1977 is the primary piece of State legislation affording protection to items of environmental heritage (predominantly cultural) in NSW. Items listed on the State Heritage Register (SHR) are protected by this act, along with 'relics' (as defined by the act) regardless of their listing status.	Yes	The Project Site does not contain any SHR listed items and no 'relics' have been identified within the Project Site. Notwithstanding, unexpected finds protocols apply if suspected 'relics' are encountered during Project construction and operation.

Legislation	Description	Relevant to the Project?	Details
<i>Aboriginal Land Rights Act 1983</i>	<p>Establishes Local Aboriginal Land Councils (LALCs). Allows transfer of ownership of vacant crown land to a Local Aboriginal Land Council.</p> <p>The Office of the Registrar, Aboriginal Land Rights Act 1983 (ORALRA), registers Aboriginal land claims and maintains the Register of Aboriginal Owners. Often used in NSW to identify relevant stakeholders for consultation.</p>	No	The Project Site does not appear to have Registered Aboriginal Owners pursuant to Division 3 of the Act.

3 Stakeholder Consultation Requirements

3.1 Regulator Consultation

Development Consent Condition B29 requires this plan be prepared in consultation with Heritage NSW. The HMP was provided to Heritage NSW for review through the DPHI Major Projects portal on 13 January 2026 and their comments have been addressed in this updated version of the HMP. Heritage NSW responded on 4 March 2026 indicating that the updated ACHMP had adequately responded to each of Heritage NSW's comments. Details of comments and correspondence with Heritage NSW is attached to the HMP as **Appendix C.1**. It is also noted that the Historic Heritage department of Heritage NSW also reviewed the HMP and responded on 4 March 2026 that Heritage NSW concurs with the proposed measures and has no further comment on Environmental Heritage.

All consultation feedback received from Heritage NSW has been addressed in this HMP. No unresolved matters or outstanding disagreements remain.

3.2 Aboriginal Consultation

The Project has an established list of RAPs (refer to Table 3.2) that require ongoing consultation during the finalisation of, and any updates to, the HMP regarding Aboriginal cultural heritage; for the implementation of Project-specific protection and mitigation measures relating to Aboriginal cultural heritage; and in the event of any unexpected finds being encountered for Aboriginal cultural heritage. Timing for notification of each of these activities is provided in **Table 3.3**. Full documentation of the consultation process and its outcomes is included in **Appendix C.2**. All consultation feedback received from Registered Aboriginal Parties has been addressed in this HMP. No unresolved matters or outstanding disagreements remain.

3.2.1 Registered Aboriginal Parties

There are 14 Aboriginal parties registered for the Project. The RAPs were identified, registered and consulted as part of the ACHA (NSW Archaeology 2023a) and the original contact details are provided in **Appendix C.2**. Contact details have changed over time and the consolidated and updated RAP contact details are provided in **Table 3.1**.

3.2.2 Previous Consultation for the Project ACHA

The following provides a summary of the Aboriginal consultation process completed previously for the ACHA to support the Project EIS. Further detail of this process is provided in the project ACHA (NSW Archaeology 2023a)

The *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010a) were followed for the ACHA. RAPs were invited to provide cultural information about the Project, were provided with draft assessment and fieldwork methods for review, were consulted about Project updates and management and were provided with assessment documentation for review and comment. In summary, consultation involved:

- The identification, notification and registration of RAPs (May–June 2022).
- Presentation of Project information and assessment methodologies and gathering cultural information (June–July 2022).
- Archaeological survey and test excavation with RAP representatives (22 August to 16 December 2022).
- Provision of draft ACHAR for RAP review (March–April 2023).
- Notification of final ACHA lodgement as part of Project EIS (26 September 2023).

3.2.3 Aboriginal Consultation in Developing this HMP

Provision of Draft HMP

In accordance with Development Consent Condition B29, RAPs were consulted in developing this HMP. Aboriginal consultation for this HMP was approached in a manner consistent with the requirements set out in the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010a).

Umwelt issued a draft of the HMP to the RAPs identified in the ACHA (NSW Archaeology 2023a) on 5 September 2025 that offered a 28-day review period for feedback and comments.

In addition to the RAP list, SCWF recommended additional Aboriginal stakeholder contacts for consultation that represent the local Aboriginal community. These additional stakeholders were also issued a copy of the draft HMP on 31 October 2025 and 6 November 2025 and were invited to provide feedback. Through this process of consultation for the HMP, the following RAPs and additional Aboriginal stakeholders were invited to review the HMP, which includes updated contact details (**Table 3.3**).

Table 3.1: Updated List of RAPs and Additional Aboriginal Stakeholder Contacts

Organisation	Contact Name	Phone	Email
Project RAPs			
Tubba-Gah (maing) Wiradjuri Aboriginal Corporation	Lewis Burns	[REDACTED]	[REDACTED]
Corroboree Aboriginal Corporation	Marilyn Carroll-Johnson	[REDACTED]	[REDACTED]
Vicky Hannah Gomerioi Duncan		[REDACTED]	[REDACTED]
Timothy Stubbs		[REDACTED]	[REDACTED]
Jeremy Duncan		[REDACTED]	[REDACTED]
Kevin Sampson		[REDACTED]	[REDACTED]
Wellington Aboriginal Action Panel (WAAP)	Keiyanas Guihot		[REDACTED]
Wellington Advisory Panel	Kerry Anne Stanley		[REDACTED]
Dubbo Aboriginal Working Party	Kerry Anne Stanley		[REDACTED]
Wellington Aboriginal Action Party	Kerry Anne Stanley		[REDACTED]
TNL Site Tracker	Troy David Silver	[REDACTED]	[REDACTED]
Wellington Valley Wiradjuri Aboriginal Corporation (VWVAC)	Brad Bliss	[REDACTED]	[REDACTED]
Gallangabang	Melissa Chown		[REDACTED]
Binjang Wellington Wiradjuri Allodial Heritage Surveys	Jamie Gray	[REDACTED]	[REDACTED]
Additional Aboriginal Stakeholder Contacts			
Murong Gialinga Aboriginal And Torres Strait Islander Corop	Deb Foley		[REDACTED]
Wellington LALC	Marsha Hill; Ray Peckham		[REDACTED]
Mudgee LALC	CEO		[REDACTED]
Dubbo LALC	Irene Peachey		[REDACTED]

Organisation	Contact Name	Phone	Email
Pam Wells	Pam Weels		
Three Rivers Regional Assembly	Paul Carr		

Feedback from Consultation

Table 3.2 provides a summary of consultation and feedback from developing the HMP. The responses column also provides reference to the relevant section of the HMP which has been updated to address any outcomes of the consultation process.

Table 3.2 Feedback on Draft HMP

Summary of Feedback	Response
Feedback from WVVAC (Brad Bliss) 2 October 2025	
WVVAC stated that it had concerns with sites being designated for unmitigated impacts in Section 6 of the HMP. WVVAC stated that they cannot agree to any cultural heritage item being knowingly subject to Unmitigated impacts and stated that all artefacts and cultural materials must be salvaged through surface collection and later returned to site for reburial.	<p>WVVAC's concern about this matter is acknowledged. This nominated measure was part of the project Aboriginal Cultural Heritage Assessment (NSW Archaeology 2023) and was therefore carried into the draft HMP.</p> <p>It is acknowledged that the Aboriginal community considers all cultural objects of high value. SCWF supports the collection of all surface artefacts sites that would be subject to project impacts.</p> <p>Accordingly, Table 5.1 has been updated to reflect that all surface sites, should they fall within the final Development Footprint, will be subject to Community Collection.</p>
WVVAC members agree to Sections 6.1.8 Management of Salvaged Aboriginal Objects.	<p>The draft HMP included provisions for the temporary storage of recovered materials to be stored at the nominated heritage consultant's office for cataloguing and recording. Long term storage was proposed to involve the reburial of objects at a suitable location on the Project Site.</p> <p>The draft provisions have been modified to respond to wider feedback received, including that from WAAP (refer to their feedback section in this table). As such, Section 6.1.8 now steps out the process for further consultation that is required to determine appropriate short- and long-term management of recovered objects.</p>
WVVAC requested for an additional research question to be added to Appendix A: Aboriginal Archaeological Excavation Methodology: "What is the anthropological relationship to the materials identified to those in other areas of this project and how do they relate to materials found in surrounding projects both surface and sub-surface deposits"	Appendix A has updated to include this research question. However, further consultation with WVVAC will be required once salvage measures are completed in order to firstly understand the nature and characteristics of the cultural assemblage. It would then need to be understood if the results could support this question and clarify any specific methods needed in the attempt to address this research question.
Feedback from WAAP (2 October 2025 via email and virtual meeting 26 November 2025)	
1. As WAAP has a partnership agreement with Squadron Energy, we should have been consulted from the beginning.	<p>SCWF would like to clarify that WAAP has been a Registered Aboriginal Party (RAP) throughout the consultation process for the Aboriginal Cultural Heritage Assessment (ACHA) since June 2022 and is committed to continuing consultation with WAAP.</p> <p>SCWF has engaged its First Nations Engagement Facilitator to continue consultation with WAAP including arranging a meeting on 26 November which is summarised further in this table below.</p>
2.The list of Registered Aboriginal Parties is outdated (for example,	It is understood that the nominated contact for WAAP has changed since the preparation of the project ACHA in June 2023. During the

Summary of Feedback	Response
Kerryann is no longer with DRC). Would WAAP have received this document?	distribution of the draft HMP we endeavoured to find the appropriate contacts for all listed RAPs. Table 3.1 has been updated to reflect the appropriate contacts as provided by WAAP.
3. Clarification is needed on who some of the other parties listed are, and which Wiradjuri people have been involved.	SCWF has consulted with Aboriginal community members as per Heritage NSW guidelines since May 2022 for the ACHA. Details of the people and parties consulted are provided in Chapter 3 of the ACHA (NSW Archaeology 2023a) and updated in Table 3.1 of this HMP.
4. The applicants for Aboriginal site measures should be a Wiradjuri person.	SCWF is committed to providing suitably skilled, equipped and insured Aboriginal persons to provide Aboriginal cultural heritage management services. Once SCWF requests expressions of interest from RAPs, we encourage WAAP to apply to ensure that Wiradjuri people are involved in these measures.
5. WAAP requests a face-to-face consultation to go over some of this document.	SCWF organised a virtual meeting between WAAP, SCWF and Umwelt on 26 November 2026. Appendix C.2 provides a summary of the meeting, however the primary item affecting the HMP related to WAAP indicating that they wanted to keep salvaged artefacts on country and advised they would be happy for materials to be temporarily stored/displayed in a local cultural heritage education centre (or similar) to help educate the community. The exact location/s for storage and display of these artefacts would be subject to further consultation with RAPs and Wellington LALC. WAAP also indicated they were open to discussing long-term artefact management options e.g. repatriation however this would occur closer to the time of requiring to do so and would require further consultation. As such, Section 6.1.8 now steps out the process for further consultation that is required to determine appropriate short- and long-term management of recovered objects

3.2.4 Ongoing Aboriginal Consultation Required for the Project

The RAPs and additional Aboriginal stakeholders will continue to be consulted on matters of Aboriginal heritage management for the Project. Primary communication will be via letter or email which may be emailed or posted depending on preferred means of communication. Issues raised in conversations, whether by telephone or in person, should be documented writing (email or letter) by the person raising the issue within a reasonable time of the conversation.

Table 3.3 provides the required Aboriginal consultation to be implemented prior to, and during Project development activities. Any Aboriginal consultation undertaken as part of these activities should be documented in **Appendix C.2**.

Table 3.3: Aboriginal Consultation to be Undertaken as Part of the Project

Activity	Type and Preferred Method of Communication	Comment or Notification Period to be Provided ¹
Development of HMP	Provision of a draft copy HMP to RAPs and additional stakeholders for review and comment.	4 weeks (28 days)
Finalisation of HMP	Provision of final report via e-mail and/or post prior to its implementation.	1 week
Updates to the HMP	Initial notification via phone/e-mail to advise of proposed update. Provision of updated HMP for review and inputs via e-mail and/or post. Where significant changes are proposed, a face-to-face meeting may be offered.	3 weeks

¹ Base on calendar days unless business days are specified.

Activity	Type and Preferred Method of Communication	Comment or Notification Period to be Provided ¹
Aboriginal site management measures	<p>SCWF will give consideration to expressions of interest from suitably skilled, equipped and insured Aboriginal persons to provide Aboriginal cultural heritage management services.</p> <p>Successful applicants would be invited to provide a fieldwork representative(s) to participate in Aboriginal heritage management tasks described in Section 6.1 of the HMP. Depending on the scope of specific management tasks, RAP and/or additional Aboriginal stakeholder fieldwork representatives may be required to work to a roster. All fieldwork management tasks will include at least one Project Archaeologist and will work in accordance with this plan.</p>	Successful applicants will be provided with a minimum of 1 week's notice prior to fieldwork engagement.
Significant cultural unexpected finds	<p>Contact all RAPs via phone and/or e-mail to advise of any new finds, unexpected cultural materials or skeletal remains and proposed management. This may include invitation to undertake on-site observations and/or face-to-face meetings where significant cultural materials, such as human remains are discovered.</p> <p>Refer to Section 6.1.7 and Section 6.1.7 for new finds procedures.</p>	Within 2 days of find or within next two business days if occurring on a Friday, weekend or Public Holiday.
Other activities as required (e.g. additional assessments or fieldwork, management decisions required under this HMP, or opportunities for fostering cultural awareness).	Initial notification/discussion via phone and e-mail followed by provision of documentation for review as required. Where significant or major changes, suitable face-to-face meetings and/or on-site observation should be provided.	<p>≥1 weeks notification for additional fieldwork</p> <p>Minimum of 2 weeks for RAP review of additional assessments or feedback about management decisions required in accordance with this plan.</p>

Table 3.4 provides a list of dates that are culturally sensitive, and when works requiring Aboriginal heritage input and/or participation should be avoided where possible.

Table 3.4: Culturally Sensitive Dates during which Activities Requiring Aboriginal Person Participation should be Avoided

Date(s)	Activity	Description
26 January	Australia Day	The public holiday and surrounding days are increasingly seen as a time of trauma for Aboriginal people, and work activities requiring Aboriginal person participation (where known) should be re-scheduled to avoid this date.
27 May – 3 June	National Reconciliation Week, includes Sorry Day	A week during which Australians are encouraged to learn about shared histories, cultures and achievements, and to explore how one can contribute to achieving reconciliation in Australia. Aboriginal people are often committed to activities during this week and will often be unavailable.
First Sunday – Second Sunday July	NAIDOC week	A week during which Australians are encouraged to celebrate Aboriginal history, culture and achievements. Aboriginal people are often committed to activities during this week and will often be unavailable.

4 Project Activities and Potential Heritage Impacts

Table 4.1 lists the potential impacts on Aboriginal or historical heritage items during Stage 1 of the Project, which includes pre-construction minor works, construction, and operation and maintenance (excluding the battery storage system). It identifies key ground-disturbing activities involving heavy machinery that may affect Aboriginal or historical heritage items. As any disturbance to the ground surface has the potential to impact such items if present, this underpins the need for the avoidance and mitigation measures outlined in this HMP.

Section 6.1.2 Avoidance and Protection provides further information about assessing opportunities for avoiding impact to Aboriginal and historical heritage which should be considered using the information in **Table 4.1**.

Table 4.1 Project Phases and Relevant Impacts

Project Phase (Stage 1)	Approximate Duration	Activities	Potential Heritage Impacts
Pre-construction Minor Works	6-8 months	Surveys, overhead line safety markings, building and road dilapidation surveys, investigative drilling, excavation or salvage, minor clearing or translocation of native vegetation, establishing temporary site offices, installation of environmental impact mitigation measures, wind monitoring masts and construction of minor access roads and minor adjustments to services/utilities.	Minor clearing and minor disturbance of the ground surface and/or are proposed on areas with known surface Aboriginal objects or historical heritage items.
Construction	40 months	Including but not limited to the carrying out of any earthworks and construction of ancillary infrastructure and excluding any works defined as pre-construction minor works.	Clearing, earthworks, trenching within A-horizon soils, and disturbance of the ground surface and/or are proposed on areas with known surface Aboriginal objects or historical heritage items. Other associated activities such as laydown areas, vehicle movement and temporary stockpiles not involving ground disturbance and not occurring over known surface Aboriginal sites or historical heritage items objects are unlikely to cause an impact to cultural heritage.
Operation and Maintenance	30 years	Ongoing monitoring and maintenance of all Project infrastructure, including replacement of major components (e.g. WTG blades) as required and land management within the Development Corridor	Earthworks, trenching or clearing in areas not previously disturbed during pre-construction or construction. Other associated activities such as vehicle movement and temporary stockpiles not involving ground disturbance and not occurring over known surface Aboriginal sites or historical heritage items objects are unlikely to cause an impact to cultural heritage.

5 Heritage Context and Impacts

5.1 Aboriginal Cultural Heritage Context

5.1.1 Summary of Aboriginal Cultural Heritage Assessment

NSW Archaeology prepared an ACHA to inform the Project EIS (2023a). The ACHA was conducted in accordance with Secretary's Environmental Assessment Requirements (SEARs) for the Project and included Aboriginal community consultation, desktop studies and archaeological fieldwork (survey and test excavation). The ACHA focused on the Project Development Corridor determined during the EIS phase of the Project (refer to **Figure 1.2**).

Only one Aboriginal site had previously been registered on the Aboriginal Heritage Information Management System (AHIMS) in the Project Site prior to the ACHA. This is a low-density artefact scatter in a ploughed field recorded in 1998 (AHIMS #36-2-0063). This site was inspected during the ACHA field survey, but no artefacts were identified. This management plan acknowledges that there are a further two AHIMS sites recorded separately to the NSW Archaeology ACHA within the Project Site but outside of the Project Development Corridor: Sandy Creek 1, AHIMS #36-20038, DTG/OC19 – Narran Creek 2 AHIMS #36-2-0064.

NSW Archaeology and RAP representatives conducted an archaeological field survey in August/September 2022. The Development Corridor was divided into 90 Survey Units which are defined according to landform morphological criteria. The ACHA noted that most surveyed areas, particularly crests and simple slopes, were highly eroded and featured skeletal or absent topsoil layers. It also noted soil creep and aggradation on simple slopes and flats which is also related to these erosional processes.

The survey team identified a total of 61 stone artefact locales, two grinding groove sites and one potential stone procurement area. The ACHA noted that the main limitation to survey was low ground surface exposure/visibility, often the result of continuous grass cover. Nevertheless, given the large landscape scale of the Project Site, large ground exposures were reasonably numerous across most Survey Units so that it was possible to judge the sensitivity of the landform elements with a reasonably high level of certainty. Accordingly, both the survey results and recourse to the predictive model has enabled a sound characterisation of artefact distribution within the Development Corridor. NSW Archaeology noted that most of the Development Corridor had very low archaeological potential (subsurface), primarily due to nature of the landforms, absence of water (generally) and past erosional processes. However, certain portions of lower landforms next to 3rd order (Strahler stream order) streams were predicted to have higher archaeological potential, particularly on stable landforms with uneroded topsoils.

These key predictions of archaeological potential were confirmed through a test excavation program led by NSW Archaeology with RAP representative participation (refer to **Figure 5.1** to **Figure 5.10** for excavation locations).

Subsequent to the EIS (and ACHA) public exhibition period, a Submissions Report was prepared to reflect revisions to the Project made during this stage, and to consider and respond to agency and public submissions. Due to the minor refinements to the Project made during this stage and associated minimal implications for impact to Aboriginal cultural heritage, an updated ACHA was not prepared. Instead, an Aboriginal Cultural Response to Submissions document (NSW Archaeology 2023b) was prepared for Heritage NSW to consider the revised Development Footprint and Development Corridor in relation to Aboriginal cultural heritage impacts.

An updated AHIMS search undertaken on 27 January 2026 identified three additional Aboriginal sites within the Project Site: SNI-GG10 (AHIMS #36-3-4116), recorded on 11 March 2024; SNI-AS98 (AHIMS #36-2-0755), recorded on 13 March 2024; and SNI-IF25 (AHIMS #36-2-0741), recorded on 7 March 2024. Review of site information confirms that SNI-IF25 is a duplicate recording of previously identified site SCWF SU77/L1 (AHIMS #36-2-0657), with both artefacts displaying identical dimensions and dorsal negative flake scarring

patterns and occurring within the same exposure. Accordingly, SNI-IF25 does not represent a new site or introduce additional impacts beyond those already assessed.

The Aboriginal sites listed in **Table 5.1** reflect those that are within the Project Site.

5.1.2 Aboriginal Sites Subject to this HMP

A summary of the Aboriginal sites relevant to this HMP are provided in Table 5.1, including the confirmed impact status and the corresponding management and mitigation measures based on the current detailed design and Stage 1a&b development footprint. Table 5.1 identifies the Aboriginal heritage items that will be protected and retained in situ throughout construction, and those that will be subject to salvage and relocation in accordance with Condition B29(c) of the Consent.

The Aboriginal sites/locales, and locations of previous test pitting where Aboriginal objects have been identified, relevant to the Project Site are illustrated in Figure 5.1 to Figure 5.10. Details of the required management measures are presented in Section 6.1. Further details of the findings for all Survey Units are included in the Project ACHA (NSW Archaeology 2023a).

Community collection and excavation will only apply where impacts are confirmed within the approved Stage 1a&b development footprint. Where impacts are not confirmed, avoidance and in situ conservation measures will apply in accordance with this HMP. Any previously unrecorded heritage encountered during construction will be managed in accordance with the New Finds protocol.

Table 5.1: Aboriginal Sites within the Project Site and their Associated Impacts and Management

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU2/L1 Grinding groove site AHIMS #36-2-0558	N/A Grinding groove site	Moderate local significance	Nil: Avoid impacts	Nil	Nil	Conservation Exclude locale from inadvertent impacts by fencing and clear signage as no go zone.	Figure 5.3
SCWF SU2/L2 (6 stone artefacts) AHIMS #36-2-0557	Very low/negligible: Broad amorphous landform away from water, exposed to weather.	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.3
SCWF SU6/L1 One stone artefact AHIMS #36-2-0559	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.3
DTG/OC21 - Medway 2 AHIMS #36-2-0063	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.3
SCWF SU9/L1 One stone artefact AHIMS #36-2-0560	Very low/negligible	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.3

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU9/L2 (Two possible stone artefacts) AHIMS #36-2-0561	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.3
SCWF SU9/L3 One stone artefact AHIMS #36-2-0562	Very low/negligible	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.3
SCWF SU11/L1 (Two stone artefacts) AHIMS #36-2-0563	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.3
SCWF SU11/L2 Very low density artefact scatter AHIMS #36-2-0564	Very low	Low local significance	Direct	Partial (eastern extent of scatter may extend into Disturbance Footprint as site is across 60 x 25 m area)	Partial loss of value	Community Collection (if site extends into Development Footprint)	Figure 5.3
SCWF SU12/L1 Artefact AHIMS # 36-2-0565	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.3

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU12/L2 Artefact AHIMS # 36-2-0566	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.3
SCWF SU12/L3 Artefact AHIMS # 36-2-0567	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.3
SCWF SU12/L4 Highly eroded: 22 stone artefacts AHIMS #36-2-0568	Low	Low local significance	Direct	Partial (southern extent of scatter may extend into Disturbance Footprint as site is across 15 x 15 m area)	Partial loss of value	Community Collection (if site extends into Development Footprint)	Figure 5.3
SCWF SU12/L5 Ground edged hatchet head AHIMS # 36-2-0569	Very low	High local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.3
SCWF SU13/L1 Artefact AHIMS # 36-2-0570	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.3
SCWF SU19/L1 Highly eroded: 4 stone artefacts AHIMS # 36-2-0571	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.4

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU19/L2 Highly eroded: 4 stone artefacts AHIMS # 36-2-0572	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.4
SCWF SU19/L3 Eroded: 2 stone artefacts AHIMS # 36-2-0573	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.4
SCWF SU19/L4: Highly eroded: 18 stone artefacts AHIMS # 36-2-0574	Low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.4
SCWF SU19/L5 Artefact scatter and subsurface deposit AHIMS # 36-2-0575	Moderate	Moderate local significance	Direct	Partial	Partial loss of value	Minimise impacts as much as feasible. Include locale in an impact mitigation program including artefact collection and salvage excavation	Figure 5.4
SCWF SU19/L5 Transect 2 Part of AHIMS # 36-2-0575 above	113.3 artefacts per sq. m.	Moderate local significance: Moderate artefact density; relatively undisturbed	Nil	Nil	Nil	Avoid	Figure 5.4

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU19/L5 Transect 3 Part of AHIMS # 36-2-0575 above	Moderate 56 artefacts per sq. m.	Moderate local significance: Moderate artefact density; somewhat disturbed	Direct	Partial	Partial loss of value	Minimise impacts as much as feasible. Include locale in an impact mitigation program including artefact collection and salvage excavation	Figure 5.4
SCWF SU19/L6 Artefact scatter and subsurface deposit AHIMS # 36-2-0556	Moderate	Moderate local significance	Nil	Nil	Nil	Avoid	Figure 5.4
SCWF SU19/L6 Transect 1 Part of AHIMS # 36-2-0556 above	Moderate 46.7 artefacts per sq. m.	Moderate local significance: Moderate artefact density; relatively undisturbed	Nil	Nil	Nil	Avoid	Figure 5.4
SCWF SU20/L1 Grinding groove site AHIMS #36-2-0549	N/A Grinding groove site	High local significance	Nil	Nil	Nil	Conservation Exclude locale from inadvertent impacts by fencing and clear signage as no go zone. Archival recording: orthophotography and surveying	Figure 5.4

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU25/L1 Possible Stone procurement Area (SPA) AHIMS #36-2-0550	N/A Possible SPA	Low/moderate local significance	Nil	Nil	Nil	Conservation Exclude locale from inadvertent impacts by fencing and clear signage as no go zone.	Figure 5.7
SCWF SU27/L1 Eroded to bedrock: 12 chert artefacts AHIMS #36-2-0551	Low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.7
SCWF SU29/L1 Artefact scatter and subsurface deposit AHIMS #36-2-0552	Low/moderate	Low/moderate local significance	Nil	Nil	Nil	Avoid	Figure 5.4
SCWF SU29/L1 Transect 1 Part of AHIMS #36-2-0552 above	Low/moderate 47.6 artefacts per sq. m.	Low/moderate local significance: Low/moderate artefact density; relatively undisturbed	Nil	Nil	Nil	Avoid	Figure 5.4
SCWF SU29/L1 Transect 2 Part of AHIMS #36-2-0552 above	Low/moderate 10 artefacts per sq. m.	Low/moderate local significance: Low/moderate artefact density; relatively undisturbed	Nil	Nil	Nil	Avoid	Figure 5.4

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU33/L1 AHIMS # 36-2-0553	Very low	High local significance	Nil	Nil	Nil	Avoid	Figure 5.4
SCWF SU34/L1 One stone artefact AHIMS # 36-2-0554	Very low/negligible	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.4
SCWF SU34/L2 One stone artefact AHIMS # 36-2-0555	Very low/negligible	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.4
SCWF SU39/L1 One stone artefact AHIMS #36-2-0669	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.6
SCWF SU39/L2 Artefact scatter and subsurface deposit AHIMS # 36-2-0861	Low/moderate	Low/moderate local significance: disturbed	Nil	Nil	Nil	Avoid	Figure 5.6
SCWF SU39/L2 Transect 1 AHIMS as per above	Moderate 63.3 artefacts per sq. m.	Moderate local significance: moderate artefact density; relatively undisturbed	Nil	Nil	Nil	Avoid	Figure 5.6

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU39/L2 Transect 2 AHIMS as per above	Low 8.7 artefacts per sq. m.	Low local significance: low artefact density; disturbed	Nil	Nil	Nil	Avoid	Figure 5.6
SCWF SU43/L1 One stone artefact AHIMS #36-2-0670	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.6
SCWF SU45/L1 One stone artefact AHIMS #36-2-0671	Very low	Low local significance	Direct	Total	Total Loss	Community Collection	Figure 5.2
SCWF SU45/L2 Eroded: Four stone artefacts AHIMS #36-2-0672	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.2
SCWF SU45/L3 Eroded: One stone artefact and 2 possible artefacts AHIMS #36-2-0673	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.2

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU45/L4 Eroded: Two possible artefacts AHIMS #36-2-0659	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.2
SCWF SU45/L5 Artefact scatter and subsurface deposit AHIMS # 36-2-0862	Low	Low local significance	Direct	Partial	Partial loss of value	Unmitigated impact (subsurface deposit only) Include locale in an impact mitigation program of surface artefact Community Collection.	Figure 5.2
SCWF SU45/L5 Transect 1 AHIMS as per above	Low 4 artefacts per sq. m.	Low local significance: Low artefact density; disturbed	Direct	Partial	Partial loss of value	Unmitigated impact	Figure 5.2
SCWF SU45/L5 Transect 2 AHIMS as per above	Low/moderate 18.7 artefacts per sq. m.	Low/moderate local significance: Low/moderate artefact density; relatively undisturbed	Direct	Partial	Partial loss of value	Unmitigated impact	Figure 5.2
SCWF SU45/L6 Artefact scatter and subsurface deposit AHIMS # 36-2-0863	Low	Low local significance	Direct	Partial	Partial loss of value	Unmitigated impact. (subsurface deposit only). Include locale in an impact mitigation program of surface artefact Community Collection	Figure 5.2

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU45/L6 Transect 1 AHIMS as per above	Low 6.7 artefacts per sq. m.	Low local significance: low artefact density; relatively undisturbed	Direct	Partial	Partial loss of value	Unmitigated impact	Figure 5.2
SCWF SU45/L6 Transect 2 AHIMS as per above	Low 7.3 artefacts per sq. m.	Low local significance: low artefact density; relatively undisturbed	Direct	Partial	Partial loss of value	Unmitigated impact	Figure 5.2
SCWF SU52/L1 One stone artefact AHIMS #36-2-0661	Very low/negligible	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.5
SCWF SU54/L1 Eroded: Four stone artefacts AHIMS #36-2-0660	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.5
SCWF SU54/L2 One stone artefact AHIMS #36-2-0662	Very low	Low local significance	Direct	Partial (ACHA notes site may continue beyond 1 x 1 m recorded area)	Partial loss of value	Community Collection (if site extends into Development Footprint)	Figure 5.5

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU57/L1 One stone artefact AHIMS #36-2-0664	Very low/negligible	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.5
SCWF SU57/L2 One stone artefact AHIMS #36-2-0663	Very low/negligible	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.5
SCWF SU57/L3 Eroded: 15 stone artefacts AHIMS #36-2-0665	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.5
SCWF SU60/L1 AHIMS #32-2-0661	Very Low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.5
SCWF SU64/L1 Eroded: 3 stone artefacts AHIMS #36-2-0668	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.5
SCWF SU65/L1 Eroded: 4 stone artefacts AHIMS #36-2-0667	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.5

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU69/L1 One stone artefact AHIMS #36-2-0649	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.8
SCWF SU70/L1 One stone artefact AHIMS #36-2-0651	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.8
SCWF SU73/L1 Highly eroded: 4 stone artefacts AHIMS #36-2-0651	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.9
SCWF SU73/L2 Two stone artefacts AHIMS #36-2-0652	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.9
SCWF SU73/L3 Two stone artefacts AHIMS #36-2-0653	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.9

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU76/L1 Highly eroded: 6 stone artefacts AHIMS #36-2-0654	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.10
SCWF SU76/L2 One stone artefact AHIMS # 36-2-0655	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.10
SCWF SU76/L3 Artefact scatter and subsurface deposit AHIMS # 36-2-0656	Moderate	Moderate local significance	Nil	Nil	Nil	Avoid	Figure 5.10
SCWF SU76/L3 Transect 1 AHIMS as per above	Moderate 63.3 artefacts per sq. m.	Moderate local significance: moderate artefact density; relatively undisturbed	Nil	Nil	Nil	Avoid	Figure 5.10
SCWF SU76/L3 Transect 2 AHIMS as per above	Moderate 146.6 artefacts per sq. m.	Moderate local significance: moderate artefact density; relatively undisturbed	Nil	Nil	Nil	Avoid	Figure 5.10

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU76/L3 Transect 3 AHIMS as per above	Moderate 61.3 artefacts per sq. m.	Moderate local significance: moderate artefact density; relatively undisturbed	Nil	Nil	Nil	Avoid	Figure 5.10
SCWF SU76/L4 Transect 1 AHIMS # 36-2-0864	Low/moderate 31 artefacts per sq. m.	Low/moderate local significance: low/moderate artefact density; relatively undisturbed	Nil	Nil	Nil	Avoid	Figure 5.10
SCWF SU76/L4 Transect 2 AHIMS as per above	Low 8 artefacts per sq. m.	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.10
SCWF SU77/L1 One stone artefact AHIMS #36-2-0657 <i>Duplicate of SNI-IF25 AHIMS #36-2-0741</i>	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.9
SCWF SU77/L2 Eroded: 4 stone artefacts AHIMS #36-2-0648	Very low	Low local significance	Direct	Total	Total loss	Community Collection	Figure 5.9

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU77/L3 Highly eroded: 4 stone artefacts AHIMS #36-2-0640	Very low	Low local significance	Direct	Total	Total loss	Community Collection	Figure 5.9
SCWF SU78/L1 One stone artefact AHIMS #36-2-0658	Very low/negligible	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.8
SCWF SU79/L1 Eroded: 8 stone artefacts AHIMS #36-2-0641	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.5
SCWF SU79/L2 One stone artefact AHIMS #36-2-0642	Low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.5
SCWF SU79/L3 Highly disturbed: 6 stone artefacts AHIMS #36-2-0643	Low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.5

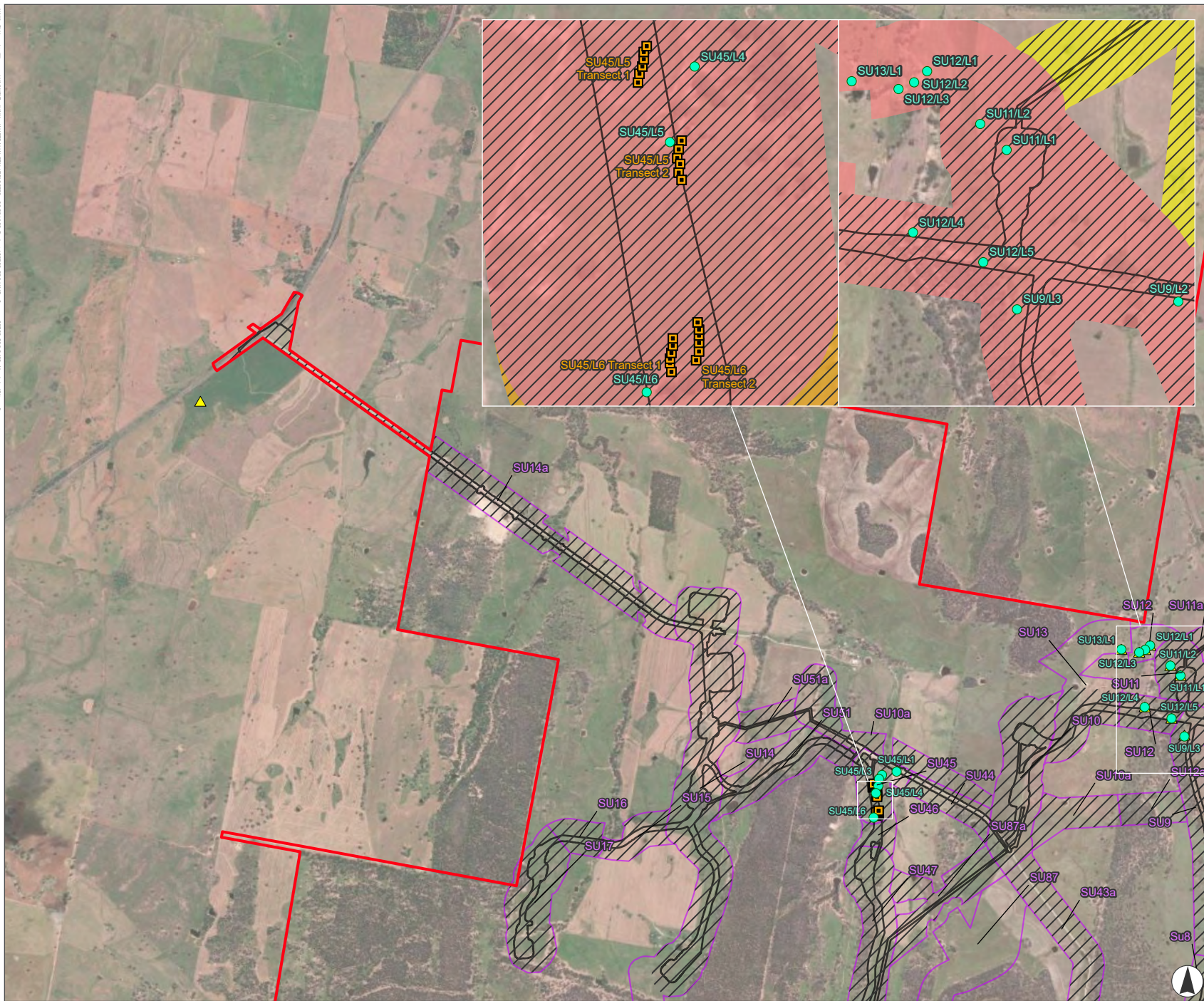
Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SCWF SU80/L1 One stone artefact AHIMS #36-2-0644	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.5
SCWF SU80/L2 Artefact scatter and subsurface deposit AHIMS #36-2-0645	Low/moderate	Low/moderate local significance	Direct	Partial	Partial loss of value	Minimise impacts as much as feasible. Include locale in an impact mitigation program including artefact collection and salvage excavation	Figure 5.5
SCWF SU80/L2 Transect 1 AHIMS as per above	Low/moderate 35 artefacts per sq. m.	Low/moderate local significance: low/moderate artefact density; relatively undisturbed	Direct	Partial	Partial loss of value	As per above	Figure 5.5
SCWF SU81/L1 One stone artefact AHIMS #36-2-0646	Very low	Low local significance	Direct	Total	Total loss of value	Community Collection	Figure 5.5
SCWF SU81/L2 One stone artefact AHIMS #36-2-0647	Very low	Low local significance	Nil	Nil	Nil	Avoid	Figure 5.5

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Type of Harm	Degree of Harm	Consequence of Harm	Management Measures	Figure Reference
SNI-GG10 AHIMS #36-3-4116	TBC	TBC	Nil	Nil	Nil	Avoid	Figure 5.8
SNI-AS98 AHIMS #36-2-0755	TBC	TBC	Nil	Nil	Nil	Avoid	Figure 5.8
SNI-IF25 AHIMS #36-2-0741 <i>Duplicate of SCWF</i> <i>SU77/L1</i> <i>AHIMS</i> #36-2-0657	Very low	Low local significance	Direct	Total	Total loss	Community Collection	Figure 5.9

Table 5.2: Aboriginal Sites Previously Recorded on AHIMS and not Within the Development Corridor

Aboriginal Site (Survey Unit/ Object Locale)	Predicted Artefact Density	Significance	Figure Reference
Sandy Creek 1 AHIMS #36-20038	N/A – previously recorded site on AHIMS	Not assessed – within Project Site but outside Project Development Corridor	Figure 5.10
DTG/OC19 – Narran Creek 2 AHIMS #36-2-0064	N/A – previously recorded site on AHIMS	Not assessed – within Project Site but outside Project Development Corridor	Figure 5.3

FIGURE 5.2
Aboriginal Sites In Relation to the Development Footprint



Legend

- Project Site
- Development Corridor
- Development Footprint
- Archaeology Survey Unit Boundary (NSW Archaeology 2023a)
- Aboriginal Site – Recorded in 2022/2023 (NSW Archaeology 2023a)
- Archaeological Test Pits (NSW Archaeology 2023a)
- ▲ Aboriginal Site – Previously Registered on the AHIMS



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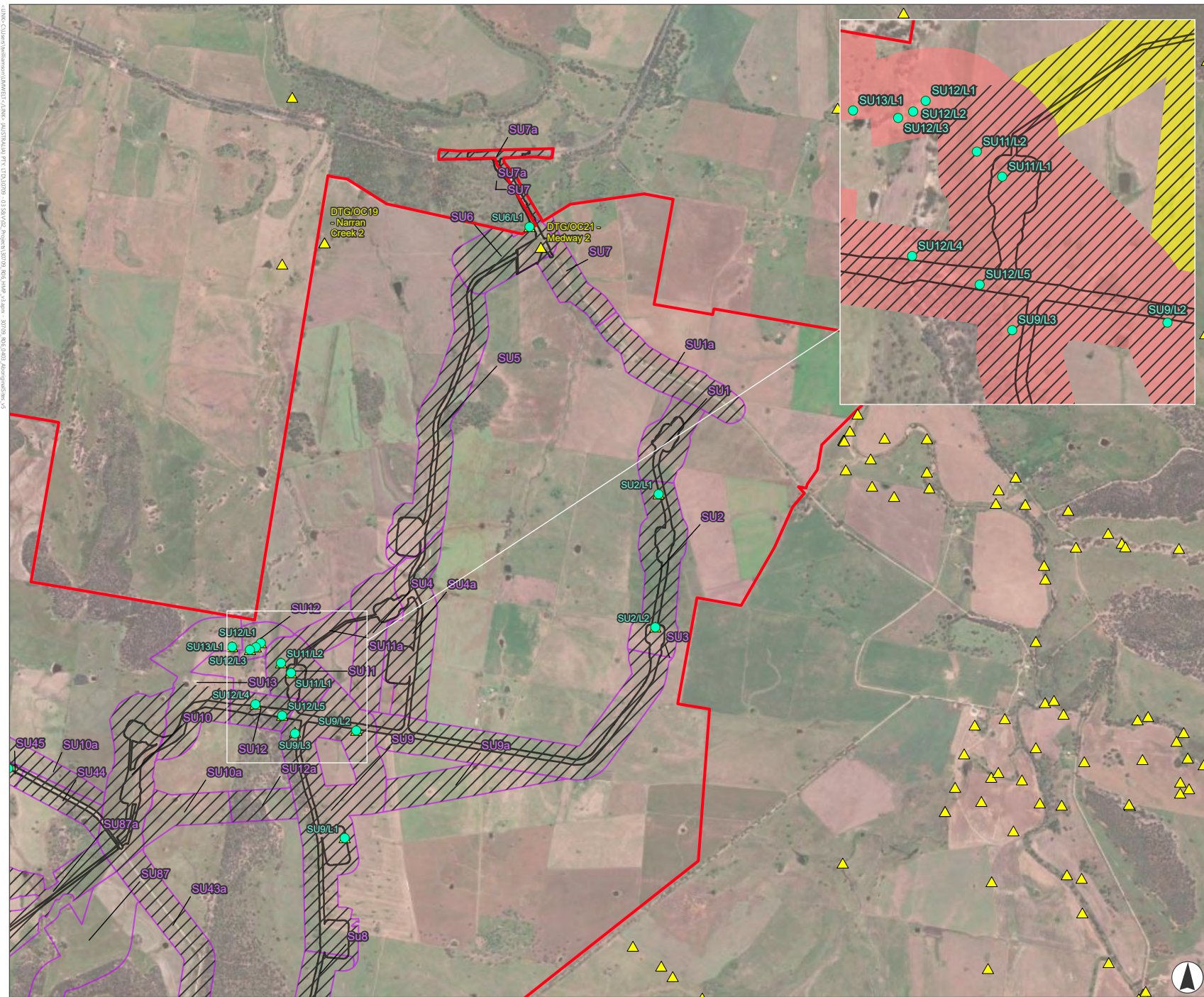
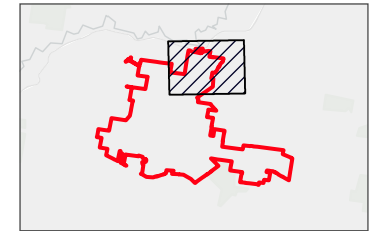


FIGURE 5.3
 Aboriginal Sites In Relation to the Development Footprint

Legend

- Project Site
- Development Corridor
- Development Footprint
- Archaeology Survey Unit Boundary (NSW Archaeology 2023a)
- Aboriginal Site – Recorded in 2022/2023 (NSW Archaeology 2023a)
- ▲ Aboriginal Site – Previously Registered on the AHIMS



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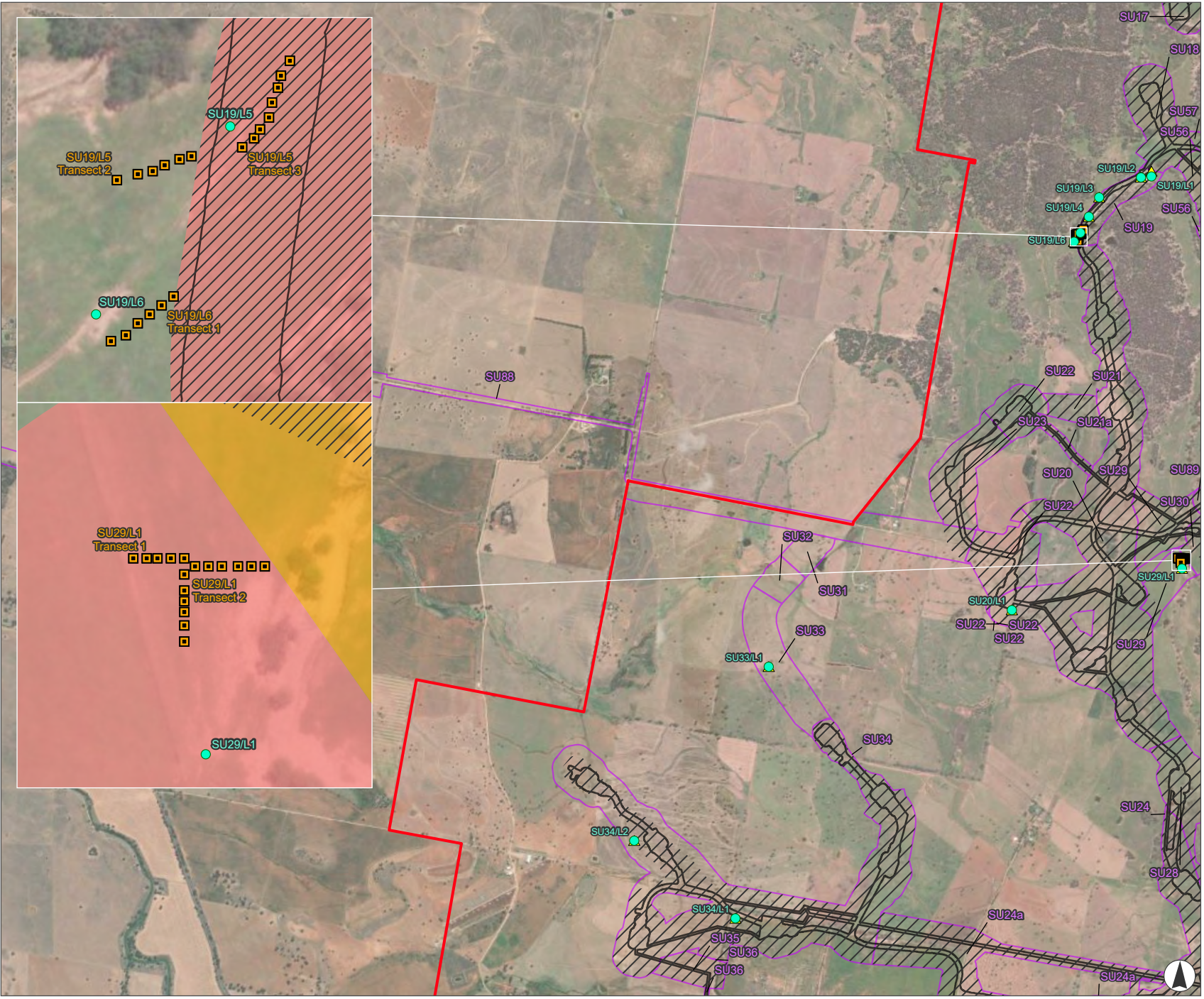
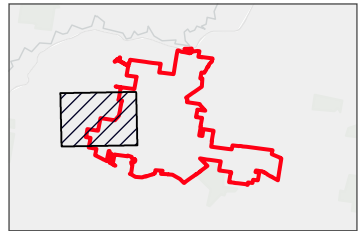


FIGURE 5.4
Aboriginal Sites In Relation to the Development Footprint

- Legend**
- Project Site
 - Development Corridor
 - Development Footprint
 - Archaeology Survey Unit Boundary (NSW Archaeology 2023a)
 - Aboriginal Site – Recorded in 2022/2023 (NSW Archaeology 2023a)
 - Archaeological Test Pits (NSW Archaeology 2023a)
 - ▲ Aboriginal Site – Previously Registered on the AHMS



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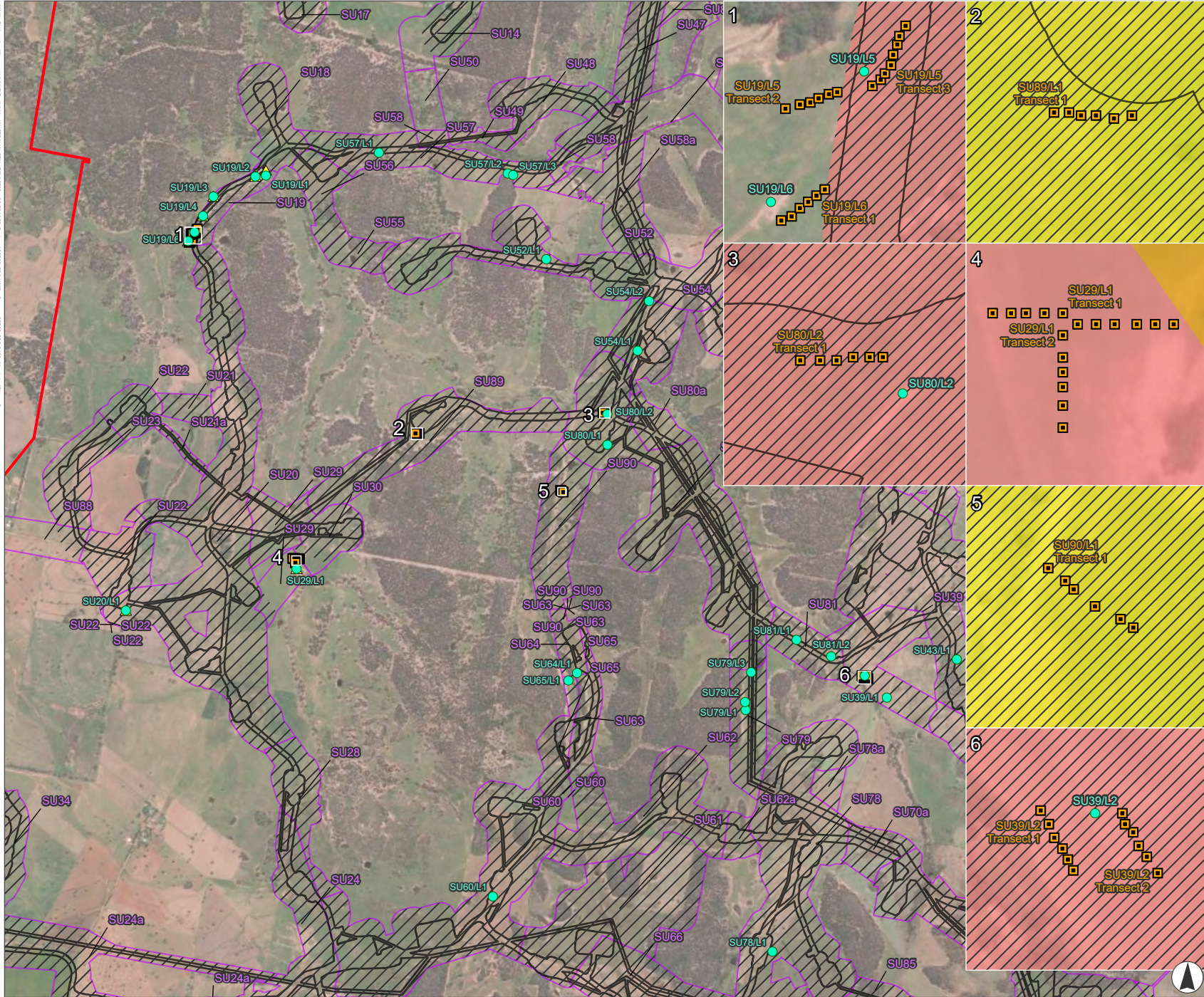
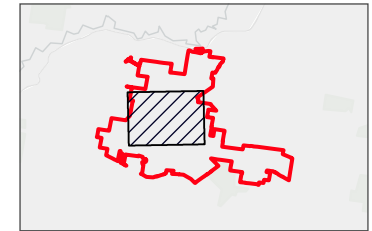


FIGURE 5.5
Aboriginal Sites In Relation to the Development Footprint

- Legend**
- Project Site
 - Development Corridor
 - Development Footprint
 - Archaeology Survey Unit Boundary (NSW Archaeology 2023a)
 - Aboriginal Site – Recorded in 2022/2023 (NSW Archaeology 2023a)
 - Archaeological Test Pits (NSW Archaeology 2023a)
 - ▲ Aboriginal Site – Previously Registered on the AHMS



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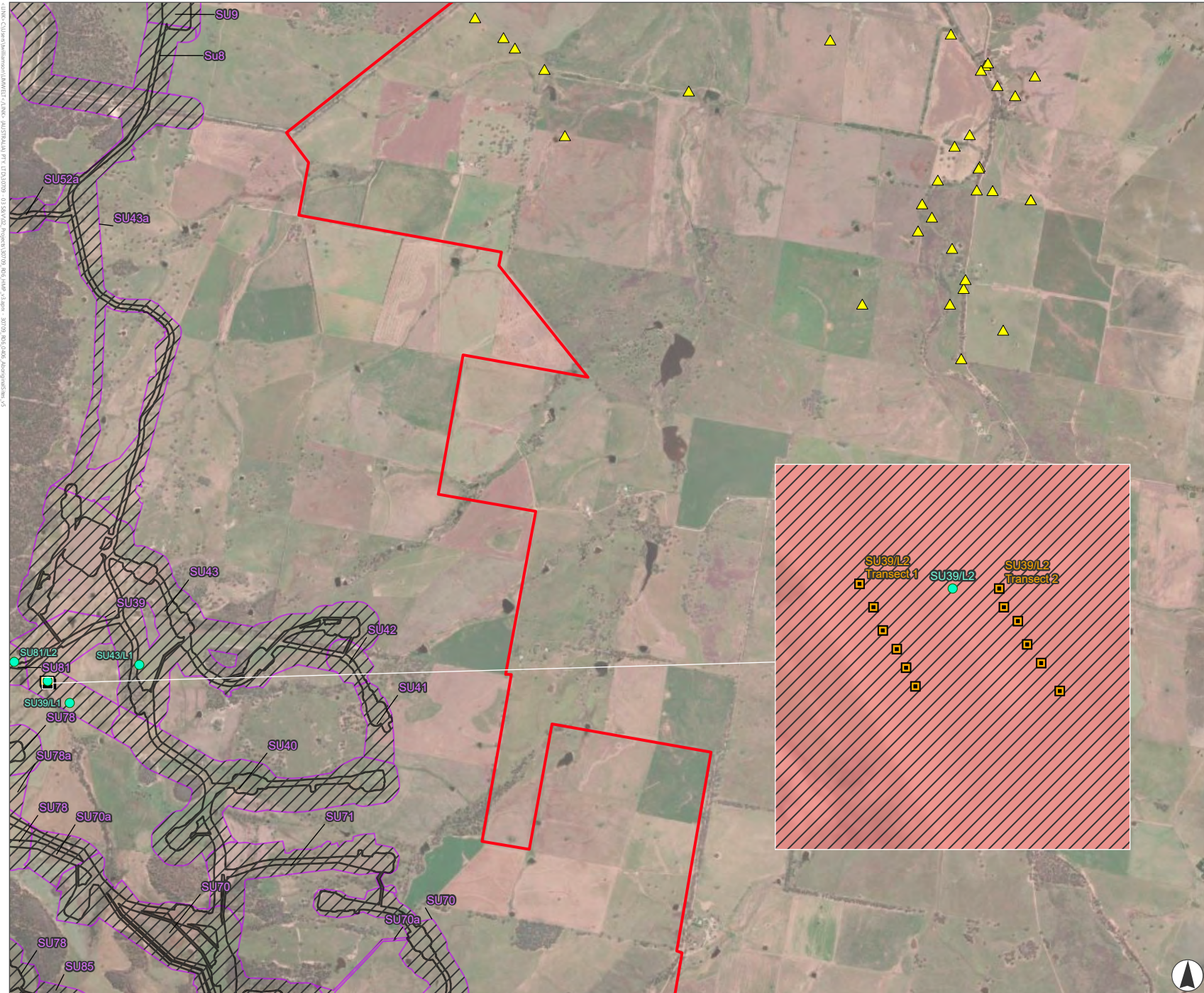
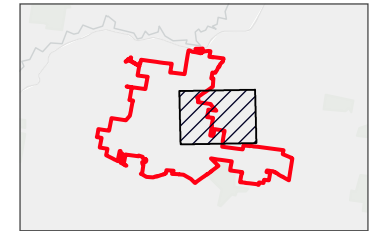


FIGURE 5.6
Aboriginal Sites In Relation to the Development Footprint

- Legend**
- Project Site
 - Development Corridor
 - Development Footprint
 - Archaeology Survey Unit Boundary (NSW Archaeology 2023a)
 - Aboriginal Site – Recorded in 2022/2023 (NSW Archaeology 2023a)
 - Archaeological Test Pits (NSW Archaeology 2023a)
 - ▲ Aboriginal Site – Previously Registered on the AHIMS



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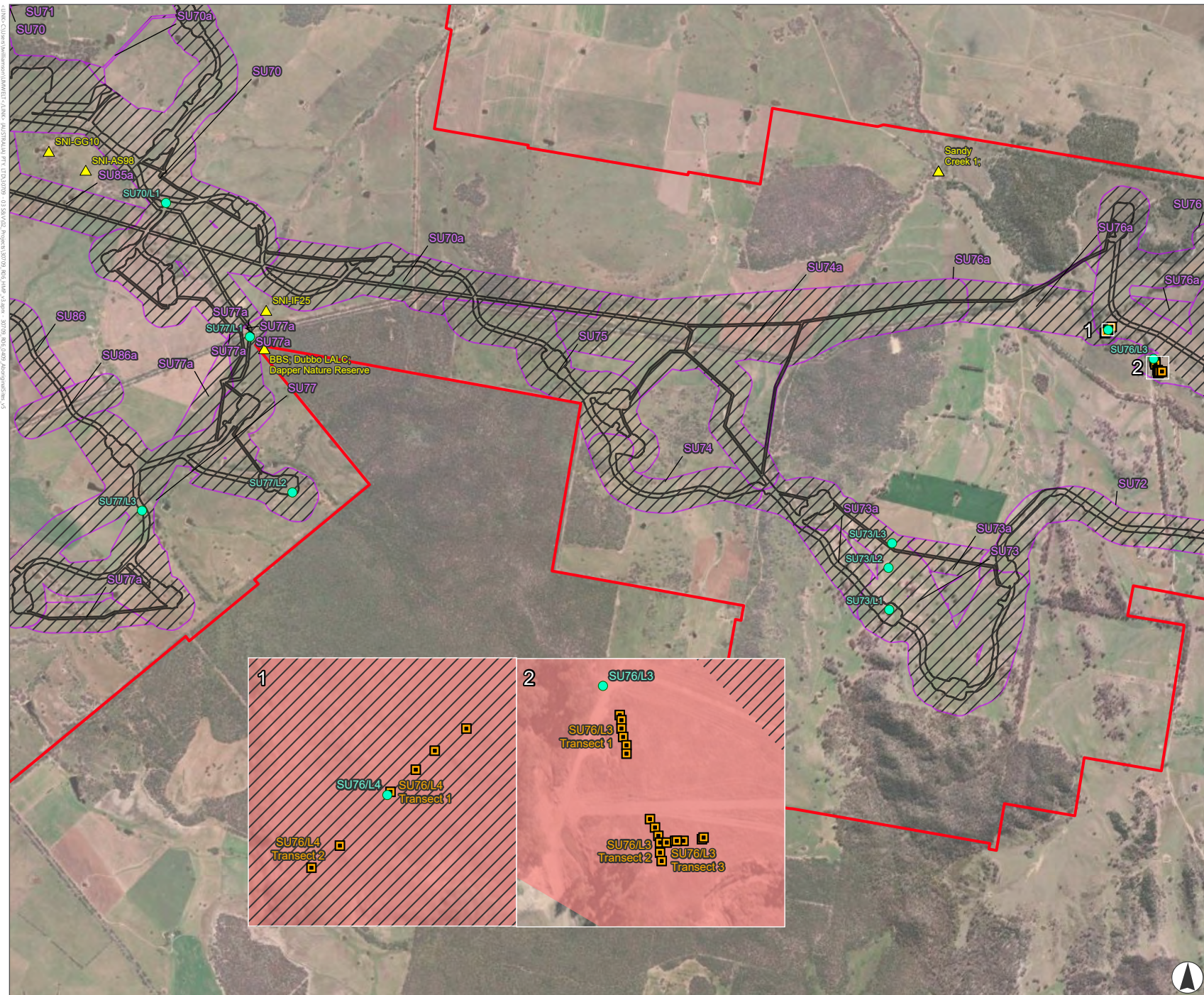
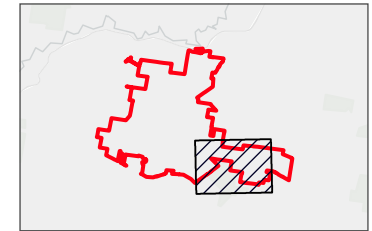


FIGURE 5.9
Aboriginal Sites In Relation to the Development Footprint

- Legend**
- Project Site
 - Development Corridor
 - Development Footprint
 - Archaeology Survey Unit Boundary (NSW Archaeology 2023a)
 - Aboriginal Site – Recorded in 2022/2023 (NSW Archaeology 2023a)
 - ▲ Aboriginal Site – Previously Registered on the AHMS
 - Archaeological Test Pits (NSW Archaeology 2023a)

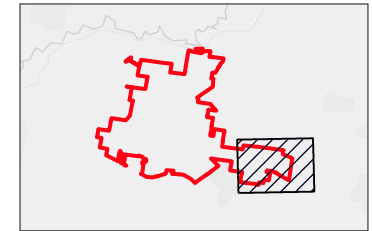
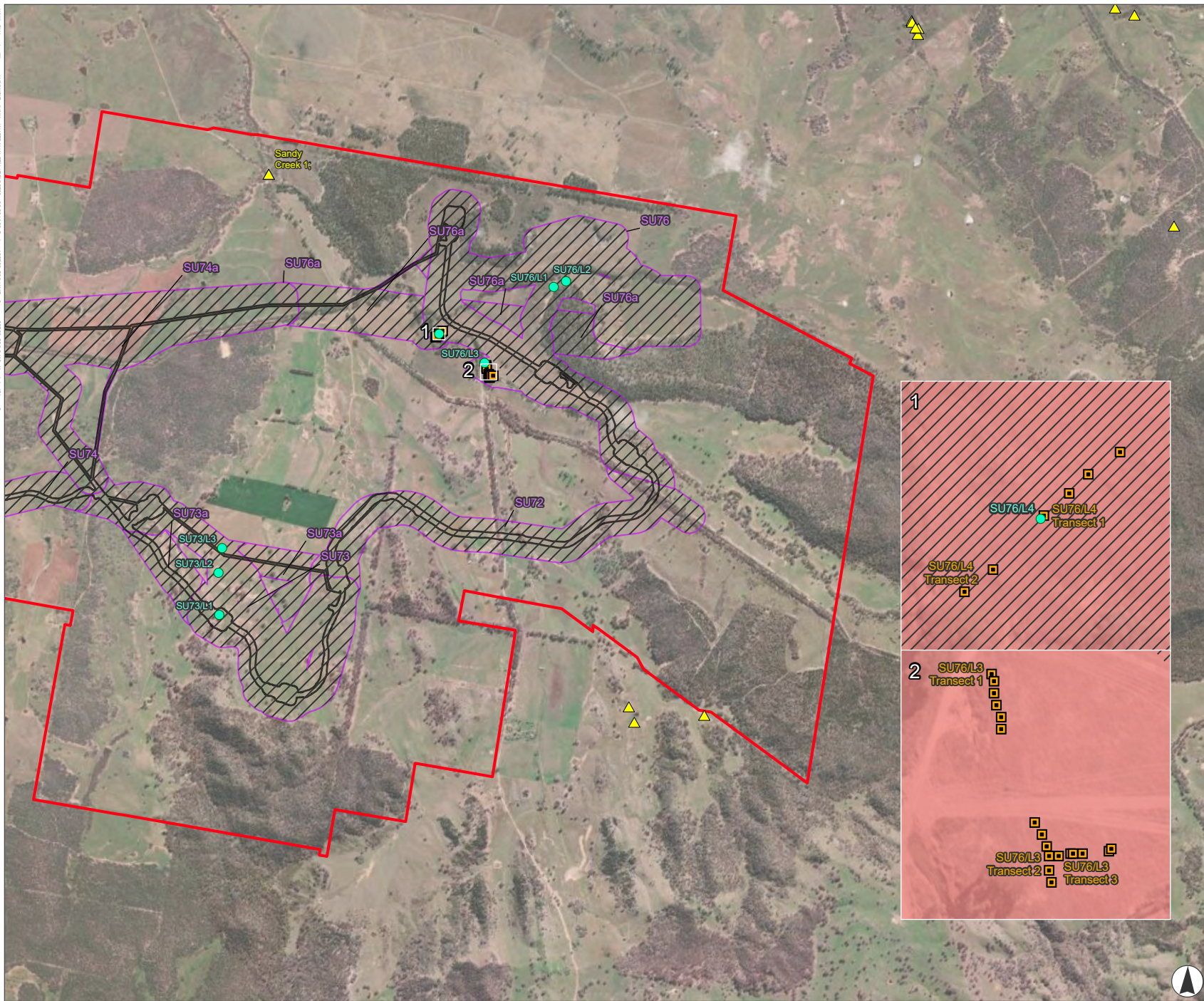


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FIGURE 5.10
Aboriginal Sites In Relation to the Development Footprint

- Legend**
- Project Site
 - Development Corridor
 - Development Footprint
 - Archaeology Survey Unit Boundary (NSW Archaeology 2023a)
 - Aboriginal Site – Recorded in 2022/2023 (NSW Archaeology 2023a)
 - Archaeological Test Pits (NSW Archaeology 2023a)
 - ▲ Aboriginal Site – Previously Registered on the AHMS



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5.2 Historical Heritage Context

5.2.1 Summary of Historical Heritage Assessment

NSW Archaeology prepared a Historical Heritage Assessment (HHA) to inform the Project EIS. The HHA was conducted in accordance with SEARs for the Project which specified for historical heritage to have regard to the NSW Heritage Manual. The HHA involved desktop research on the historical context of the region, review of relevant statutory and non-statutory registers, a field survey of the Development Corridor available at the time of the assessment, significance assessment, and the development of management and mitigation measures for historical heritage.

A search of the following heritage registers identified no listed heritage items within the Project Site:

- Commonwealth Heritage List;
- National Heritage List;
- NSW State Heritage Register (SHR);
- Relevant Local Environment Plans (LEP).

NSW Archaeology conducted a field survey in August/September 2022. A total of eight historical items were identified during the survey, which are listed in **Section 5.2.2**. All of the items were related to historical rural and agricultural life but none were assessed to meet local or State significance criteria under any of the NSW Heritage Council's criteria.

5.2.2 Historical Items Subject to this HMP

A summary of the historical items relevant to this HMP are provided in **Table 5.3**. This also includes an anticipated impact summary and assigned management/mitigation measures. The historical items relevant to the Project Site are illustrated in **Figure 5.11**. Details of the required management measures are presented in **Section 6.2**.

Table 5.3: Historical Items Subject to this HMP

Item ID	Item	Location and Impact	Management
SCWF SU4/H1	Old peppercorn trees	Outside development Corridor: No impacts	None required (avoid)
SCWF SU10/H1	Old wood power pole alignment	In development corridor: Impacts possible	Avoid poles if practical, otherwise relocate as per landowner's advice.
SCWF SU17/H1	Tree with surveyor's mark	In development corridor: Impacts possible	Avoid clearance of tree if practical otherwise undertake archival recording.
SCWF SU22/H1	Metal dam scoop	In development corridor: Impacts possible	Avoid if practical, otherwise relocate as per landowner's advice
SCWF SU43/H1	Alignment of wooden fence posts on crown road	In development corridor: Impacts possible	Avoid fence posts if practical otherwise undertake archival recording.
SCWF SU47/H1	Historical dam and stone wall	In development corridor: Impacts possible	Avoid impacts if practical otherwise undertake archival recording.
SCWF SU57/H1	Homestead site in 40 x 40 m area	In development corridor: Impacts possible	Avoid impacts to site if practical otherwise undertake archival recording.
SCWF SU71/H1	Vintage farm machinery in 50 x 50 m area	Outside development Corridor: No impacts	None required (avoid)

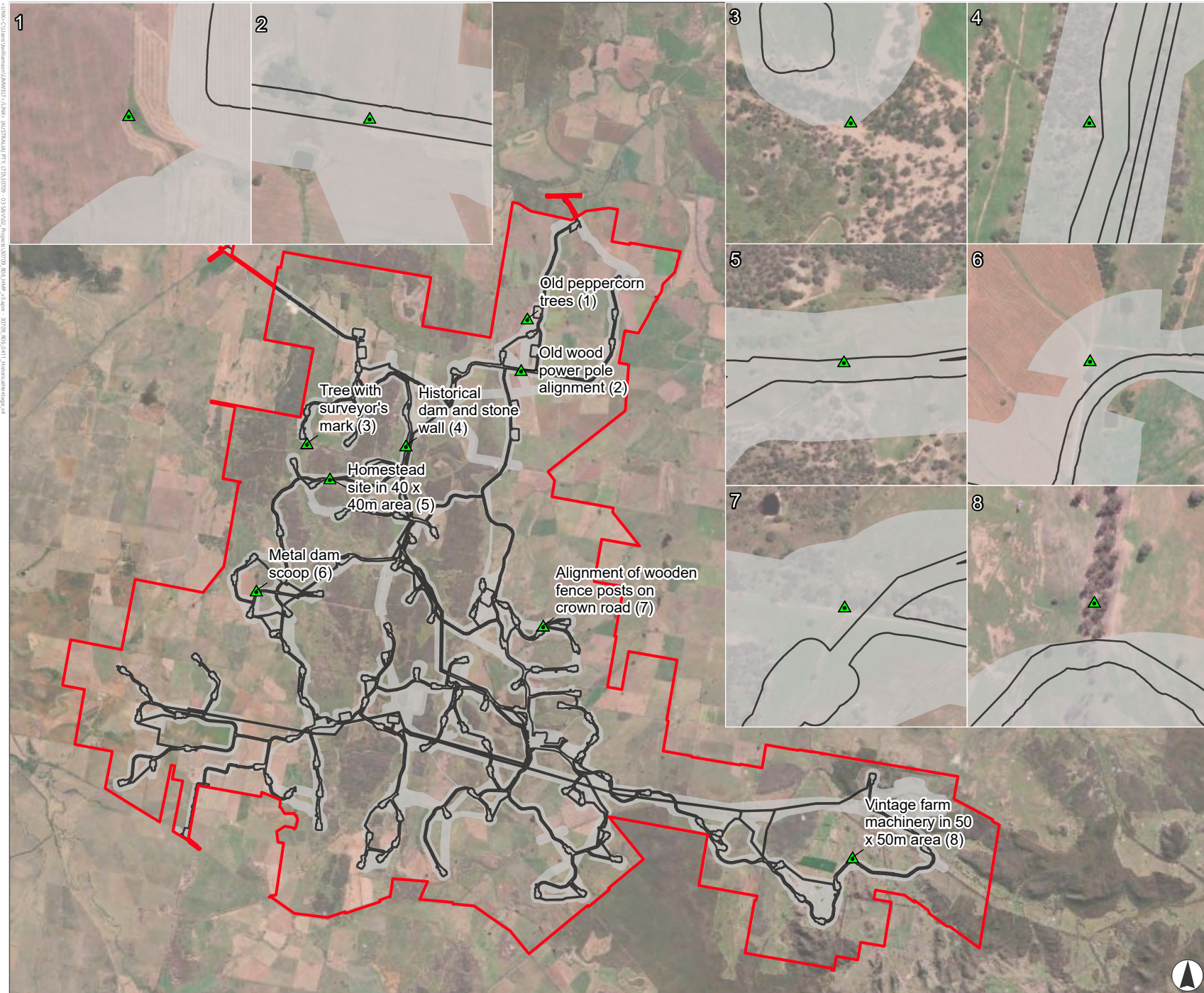
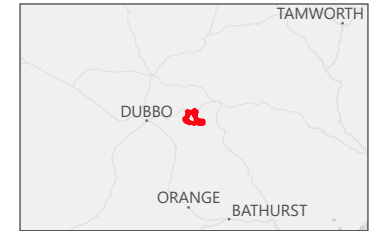


FIGURE 5.11
Historical Heritage Items In Relation to the Development Footprint

- Legend**
- ▭ Project Site
 - Development Corridor
 - Development Footprint
 - ▲ Historical Heritage Sites



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6 Heritage Mitigation and Management

6.1 Aboriginal Heritage Mitigation and Management

6.1.1 Key Points

- Aboriginal site management over the life of the Project will primarily take the form of either protective strategies for avoided sites, or salvage as mitigation for sites that will be impacted: **Avoid:** there are a number of Aboriginal sites that were identified during the course of archaeological investigations for the Project that may fall outside the Development Footprint and will not be subject to Project impacts. Additionally, avoidance strategies will apply to sites that fall within the Development Corridor but outside of the final Development Footprint. The HMP includes active protection provisions if Aboriginal sites or objects are identified within 20 m of the Development Footprint and can be avoided from Project impacts.
- **Archival Recording:** this measure will apply to grinding groove site SCWF SU20/L1 and will involve orthophotography and accurate surveying of its location.
- **Community Collection:** certain Aboriginal sites warrant surface artefact collection if within the Development Footprint, which would be completed by an archaeologist and RAP representatives. This must occur prior to Project-related ground disturbance occurring near individual sites specified for this measure in **Table 5.1**.
- **Salvage Excavation:** Within the Development Footprint, an archaeological salvage excavation programme will be completed for certain potential archaeological deposits (PADs) of moderate archaeological significance with confirmed archaeological deposit. This must occur prior to Project-related ground disturbance occurring near individual sites specified for this measure in **Table 5.1**.
- **Unmitigated impacts:** Within the Development Footprint, sites and/or survey units of low archaeological significance will be subject to unmitigated Project impacts. These sites do not warrant further archaeological investigation or salvage.
- **General:** Several ongoing heritage requirements. These are outlined in detail in this section and include the management of all salvaged Aboriginal objects protocols in the event that unexpected cultural materials are found.

6.1.2 Avoidance and Protection

Assessing Opportunities for Avoidance

The Project has been amended to avoid certain Aboriginal sites since the initial Project ACHA (as presented in NSW Archaeology 2023a) as explained in the ACH Response to Submissions Report (NSW Archaeology 2023b). Additionally, following finalisation of the Project's detailed design, SCWF will undertake a review of the Development Footprint to assess the potential to avoid impacts to Aboriginal sites and historical items, where feasible and reasonable, taking into consideration The Project activities and potential impacts in **Section 4**. This may include but not be limited to:

- Mirco-siting WTGs within the Development Corridor to avoid Aboriginal site locales,
- Designing pre-construction minor works to avoid known Aboriginal sites (e.g. geotechnical investigations).
- Designing ancillary infrastructure to avoid ground disturbance where feasible, primarily where it may intersect with known Aboriginal objects.

If avoidance can apply, the avoidance measures set out in this section of this HMP will apply to that site.

Avoidance Measures

Active Protection

Active protection will apply to sites: SCWF SU2/L1 Grinding groove site, SCWF SU20/L1 Grinding groove site, SCWF SU25/L1 Possible Stone procurement Area (SPA). Fencing may comprise stake and wire fencing or similar materials that form a clear visual and physical barrier between the site and construction areas. Fencing will be erected prior to construction occurring in the vicinity of the sites scheduled for active protection. Fencing will be on the boundaries marked in a drawing plan, prepared by the Project Archaeologist and at least one RAP representative with assistance by a qualified surveyor or fencing contractor. These boundaries will be guided by Aboriginal site GIS data layers contained in the SCWF Heritage Database (refer to **Section 10.1**).

The barriers and fencing will incorporate a 10 m minimum buffer from site features (e.g. the physical grinding grooves) to ensure the site is adequately protected from all construction activities.

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

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

Environmentally sensitive area

Do not disturb

Contact the Environmental Advisor

At the end of Project construction, if these sites are inside of the Development Footprint, SCWF will assess the need for ongoing active protection of the sites with respect to the nature of operations in the vicinity of any particular site. If SCWF determines that the site does not require active protection during operations, SCWF will consult RAPs in accordance with Table 3.3 of this document and remove the active protection measures, only if the majority of RAP feedback received shows that such a measure is appropriate.

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

Where it is practical and feasible to employ suitably qualified and certified Aboriginal person(s) for weed management activities relating to the Aboriginal sites, SCWF and/or its contractors will aim to prioritise this.

Passive Protection

Passive management will apply to the Aboriginal sites located outside the Development Footprint. These sites will not be subject to fencing, signage, or active land management measures. Their locations will be maintained in the SCWF Heritage Database, and where activities occur within 50 metres of a known site, relevant personnel will be notified of the site's location to ensure appropriate protection.

Monitoring of Avoided Sites

Avoided Aboriginal sites located within the Development Footprint will be subject to a single post-construction monitoring exercise to confirm their condition and the effectiveness of the implemented avoidance measures. Prior to the post-construction monitoring exercise, a visual condition assessment template may be developed in consultation with RAPs and the Project Archaeologist. Where appropriate, the assessment will include recommendations for further action—such as collection, additional protective measures, remediation, or excavation.

The condition assessment will be appended to the HMP as part of the next scheduled update, which will occur at a key project transition – specifically at the commencement of wind farm operations (Stage 1d), unless required earlier. Avoided sites within the Project Site and Development Corridor will not be subject to ongoing monitoring, as SCWF has no management control or authority over these areas. Activities within these areas are at the discretion of the landholders.

6.1.3 Community Collection

Surface artefact collection (community collection) of Aboriginal sites scheduled for this measure (refer to **Table 5.1**) within the Development Footprint will be completed by a suitably qualified archaeologist and RAP representatives. This will be undertaken prior to any project ground disturbance activities in the vicinity of the Aboriginal sites.

The collection method will be as follows:

1. Site coordinates for each site will be entered into mobile GPS devices to re-locate and confirm locations.
2. The general vicinity of each site location will be inspected by the field team. Stone artefacts will be flagged on the ground and a photo taken of the flagged site. Each flagged artefact will be marked as a waypoint in the GPS.
3. All artefacts will be collected into snap lock plastic bags or similar, marked with the project name, site name, collection date and waypoint number. If additional stone artefacts are identified during the artefact collection fieldwork, they will be managed in the same manner.
4. All artefacts will be sorted and recorded post-fieldwork with respect to technological type, implement type, raw material, maximum block length and weight.
5. The collected artefacts will be incorporated into a salvage report detailing the results of the fieldwork, the artefacts recovered at each site and GIS figures showing the artefact locations.
6. The AHIMS records will be updated with a site impact recording form for each collected site.

In relation to sites scheduled for collection where ground surface visibility is low at the time of collection fieldwork, consideration will be given to undertaking community collection following the initial removal of surface vegetation. Surface vegetation removal will follow this method:

1. Vegetation will be cleared using a combination of mechanical slashing, mowing and line trimmer (as required).
2. An archaeologist and RAP representatives will monitor or undertake the vegetation clearance and provide guidance to ensure it is employed to a level satisfactory to reveal the ground surface for the identification of Aboriginal objects.
3. The vegetation clearance will cover the mapped area of the site of the relevant sites. For isolated finds without mapped areas, this will require clearing an area of up to approximately 10 m x 10 m over the original site coordinates.
4. Following vegetation clearance, RAPs and an archaeologist will inspect the cleared areas. If the artefacts are not identified through vegetation clearance alone, the RAPs and an archaeologist will use suitably fine gauged steel rakes over the areas to reveal artefacts for collection.
5. Any artefacts identified within these areas will be recorded and collected in accordance with the surface artefact collection method in this HMP (list items 1 to 6 in this section above).

It may not be possible to find all of the previously recorded artefacts designated for collection. This may be due to a number of environmental changes since being identified, including changes in ground surface visibility conditions. Regardless of whether stone artefacts are identified at each site during this process, no further collection attempts or mitigation measures will be required after a reasonable attempt at collection has been undertaken. Following this procedure, the management status of these sites will be regarded as completed.

6.1.4 Archival Recording

Grinding groove site SCWF SU20/L1 will be subject to detailed archival recording via orthophotography sub-metre locational recording using surveyor equipment. Recording will require the use of appropriate scales, along with adequate contextual photos. The archival recording will also aim to capture a 3D digital model of the grinding groove site if the site is suitable for such methods (subject to a site inspection). Archival recording will be undertaken in accordance with the Guidelines for preparing archival recordings of heritage items as a condition of consent (DCCEEW 2025), or any superseding guideline. The outputs of this exercise will be documented in the wider salvage report for Aboriginal heritage required under this HMP.

6.1.5 Archaeological Excavation

Where impacts are proposed within Aboriginal sites listed for salvage excavation in **Table 5.1**, a secondary inspection of the Potential Archaeological Deposit (PAD) will be conducted prior to the commencement of construction in the vicinity. This inspection will serve to clearly demarcate the impact area and support discussions on the appropriate extent of excavation required. Where the Aboriginal parties and archaeologist undertaking the secondary inspection identify that excavation is warranted with reference to the impact area, the methodology provided in **Appendix A** will be followed.

Following the completion of the Salvage Program, SCWF must prepare an Aboriginal Cultural Heritage Excavation Report. The report must:

- Document the results of the archaeological salvage excavations (with artefact analysis and identification of a final repository for finds);
- Be provided to RAPs with a minimum of 28 days to consider the report and provide comments before the report is finalised, and.
- Once finalised the report must be provided to the Planning Secretary, Heritage NSW - ACH, the relevant LALC and RAPs.

6.1.6 Management of New Finds

Overview

Table 6.1 outlines the measures to be implemented in the event that any newly observed cultural material is identified during the pre-construction, construction and operational phases of the Project. Importantly, the procedures set out in this section do not apply during the salvage activities (collection and excavation) set out in **Section 6.1.3** and **Section 6.1.5** of this HMP, unless the new find is classed as an 'Unexpected Site' as specifically defined in **Table 6.1**.

The recording of, and any proposed mitigation measures will be completed by the Project Archaeologist (or delegated heritage professional(s)) in consultation with RAPs. Avoidance of newly identified Aboriginal objects is the preferred heritage outcome where feasible. Mitigation measures will only be employed when it can be reasonably demonstrated that avoidance is not possible. All sites that cannot be avoided will be assessed of their archaeological significance prior to impacts in accordance with best practice heritage guidelines.

Table 6.1: Management of New Finds (except skeletal/human remains)

Protocols to Follow
1. Initial identification of suspected new find
<ol style="list-style-type: none"> 1. All works within the location of the Aboriginal object/s must stop. 2. The person who identified the Aboriginal object/s must immediately notify the person in charge of the activity e.g., Principal Contractor Project Manager or delegate.

Protocols to Follow
<ol style="list-style-type: none"> 3. All construction that could potentially harm the Aboriginal objects or values must cease (including stopping all construction within at least 15 m of the location). Only construction that is required to make the area safe is permissible. 4. The Aboriginal object/s is to be protected with the establishment of a no-go zone. 5. Contact the Project Archaeologist to verify the find. If confirmed, the Archaeologist will notify the RAPs and lead the subsequent management of the objects. 6. Consideration of avoiding the cultural materials should be undertaken.
2a. Where avoidance can be achieved:
<ol style="list-style-type: none"> 7. Where avoidance can be achieved, implement the following: <ol style="list-style-type: none"> a. If within 20 m of the Development Footprint apply active management comprising fencing and signage if considered of significance requiring conservation, or b. if over 20 m from the Development Footprint apply passive management. 8. All sites must be suitably recorded in accordance with AHIMS site card standards by a heritage professional and lodged on AHIMs. The site/s must be integrated into the cultural inductions (Section 7.2.1) to ensure all personnel are aware of the location and to avoid inadvertent impacts during construction. The site will be included on the SCWF Heritage Database (Section 10.1).
2b. Where avoidance cannot be achieved:
Measures for Common Site Types (open artefact sites and scarred trees)
<p>Open artefact sites</p> <p>For sites of low to moderate archaeological significance², surface collection will be employed prior to project impact. The collection will be undertaken by the Project Archaeologist (or delegated heritage professional(s) and RAP representatives. The collection method will be as per Section 6.1.3.</p> <p>For sites of high archaeological significance, or with potential to be of high archaeological significance through the identification of a significant PAD (as determined by the Project Archaeologist in consultation with RAPs), excavation may be undertaken guided by the methodology set out in Appendix A.</p> <p>Any salvage excavation program would require a report on the methods and outcomes of the excavation.</p>
<p>Scarred trees</p> <p>Note that Aboriginal tree scars may require verification by a qualified scar tree expert such as an arborist or Arboriculturist if the scars are ambiguous to a degree that they cannot be determined by the Project Archaeologist. If a tree is assessed by an expert and deemed to not to be an Aboriginal object, then RAPs and Heritage NSW will be notified of the conclusion and that works will proceed in the area of the tree.</p> <p>If the find is determined to be an Aboriginal scar tree that cannot be avoided, the following Aboriginal scar tree removal procedure will be followed after adequate consultation with Project RAPs and Heritage NSW:</p> <ol style="list-style-type: none"> 1. A suitably qualified person in scar tree management (e.g., archaeologist with scar tree specialisation, Arboriculturist or arborist) will be engaged to determine a suitable removal method in consultation with RAPs. This may involve the requirement to saw the tree above the scar location allowing a suitable buffer from the scar feature. The process of removal will be photographed. 2. The removed tree and scar may be treated to preserve the scar to prevent its further deterioration. Any treatment option would be completed in consultation with RAPs, SCWF and a suitably qualified curator. 3. The tree will be relocated to a nominated location as guided by RAPs and appropriately displayed using suitable materials in consultation with SCWF and RAPs. 4. The outcomes of the tree management activity will be documented in a short letter report including records of the original and new tree location. Note that long term management of any salvaged trees may require a Care Agreement. 5. The AHIMS records will be updated with a site impact recording form for the site.
Measures for Unexpected Sites
<p>This category addresses rarer site types not expected to occur within the Project Site based on previous archaeological assessments or predictive modelling. This includes the site types: midden concentrations, stone</p>

² Assessments of archaeological significance must be completed by an archaeologist and made with reference to the significance ascribed to known sites of similar nature in the Project Site using the significance framework employed for the Project ACHA.

Protocols to Follow

engravings, stone arrangements, art sites, ceremonial sites, carved trees, and grinding grooves. Although some features—like grinding grooves—are known in the area, further examples are unlikely due to prior survey coverage that should have accounted for their presence.

As Unexpected Site have a very limited chance of being identified in the Development Footprint, no specific management methodology has been devised.

If Unexpected Sites are identified:

1. A salvage method must be prepared by the Project Archaeologist in consultation with RAPs and Heritage NSW. If the salvage excavation method outlined in Appendix A is not suitable to address the nature or type of site requiring management, then a new method will be prepared.

For sites of high archaeological significance, or with potential to be of high archaeological significance through the identification of a significant PAD, as determined by the project Archaeologist, excavation may be undertaken guided by the methodology set out in **Appendix A**. Any salvage activity to such sites may require additional assessment and approvals in consultation with RAPs and Heritage NSW and would require a report on the methods and results of the exercise.

Post-fieldwork

Once the archaeological on-site activities are complete to the satisfaction of the Project Archaeologist in consultation with the RAPs, construction activities may continue in the area of Aboriginal site(s). The Project Archaeologist must provide written notification clearly specifying that construction activities may continue in the area of new finds, which must be documented internally as per compliance monitoring protocols set out in **Section 0**.

All archaeological activities should involve suitable analysis of cultural materials. Chronological, paleoenvironmental and sedimentological samples (if retrieved) should be suitably analysed and documented in a report that is provided to Heritage NSW.

6.1.7 Discovery of Suspected Human Skeletal Remains

In the event that known or suspected human skeletal remains are encountered during works at the Project Site, the procedure presented in **Table 6.2** will be applied.

Table 6.2: Procedure for the Discovery of Suspected Human Skeletal Remains

Stage	Actions
1. Stop work and secure site	<ul style="list-style-type: none"> • All work must STOP in the vicinity of the remains. • The immediate vicinity will be secured to protect the find and the find will be immediately reported to the person in charge of the activity e.g., Principal Contractor Project Manager or Delegate who will immediately advise the SCWF Project Manager. • A no-go zone will be established around the immediate area of the site. • Complete review of proposed activities in the vicinity of the Remains to enable compliance and continued activities.
2. Notification to authorities and stakeholders	<ul style="list-style-type: none"> • The SCWF Project Manager should notify NSW Police of the discovery as soon as possible. All subsequent steps will be dictated by the NSW Police. • Contact the Project Archaeologist and RAPs (listed in Section 3.2.1) to brief them on the developing situation. • If advised by NSW Police, engage suitably qualified archaeologist or forensic anthropologist to assist NSW Police in monitoring of skeletal material.

Stage	Actions
3. Determination of the find and further notification	<ul style="list-style-type: none"> • If it is determined that the skeletal material is of ancestral Aboriginal remains, RAPs must be notified, and consultative arrangements will be made to discuss ongoing care of the remains. • Contact Heritage NSW (1300 361 967) and the NSW Environment Line (131 555) to notify them of the find, and DPHI. • Engage Project Archaeologist to assist and/or facilitate management of the Aboriginal ancestral remains with RAPs and SCWF. • Proceed to Step 4. <hr/> <p>If the skeletal material is not human, resume work. Ensure determination of non-human material is provided by relevant experts (e.g., Coroner or NSW Police) before resuming work.</p> <hr/> <p>If the remains are historical but non-Aboriginal human remains, the NSW Heritage Council (or delegate of the Heritage Council) will be consulted to determine requirements in accordance with the NSW <i>Heritage Act 1977</i> and relevant guidelines. Further actions are likely to require adherence with the following NSW Heritage Council guidelines (or their latest versions):</p> <ul style="list-style-type: none"> • <i>Conservation Management Documents: Guidelines on Conservation Management Plans and other Management Documents.</i> • <i>Skeletal Remains; Guidelines for Management of Human Skeletal Remains.</i> <hr/> <p>If the remains are non-Aboriginal and non-historical human remains, SCWF is to coordinate involvement of NSW Police. Works will not proceed until written approval is granted from relevant authorities.</p>
4. Initial planning and reporting if it is determined that the remains are Aboriginal ancestral remains.	<ul style="list-style-type: none"> • Aboriginal ancestral remains certificate to be submitted to NSW Police/Coroner to address the <i>Coroners Act 2009</i>. • In consultation with RAPs, Heritage NSW and archaeologist, establish investigation area and any additional protocols to be adhered to during further investigation. The investigation will aim to establish whether any other burials are within or likely to occur nearby. Suitable methods could include controlled and monitored hand or machine excavation and/or non-invasive techniques such as geophysical techniques. • Engage an archaeologist to record the site and undertake significance and impact assessment of the burial site with RAPs and archaeologist. Site recordings must involve drawings and photography. Additional technical studies and samples may be taken with the consent of RAPs such as those for dating and biological information (e.g., age, sex and health of deceased). • Record burial site on AHIMs register, noting any restricted access requirements requested by RAPs.

Stage	Actions
<p>5. Engagement with stakeholders to determine whether disturbance of the burial site(s) can be avoided.</p>	<ul style="list-style-type: none"> • Explore and demonstrate options have been considered for site avoidance if RAPs desire for the skeletal material to remain in-situ. • If the Aboriginal ancestral remains cannot be avoided: <ul style="list-style-type: none"> ○ Consult with RAPs, Heritage NSW and Project Archaeologist to facilitate recovery and reburial protocols and actions. Approval for recovery methods must be obtained by relevant authorities prior to any further movement of the remains. ○ Recovery methods must include: <ul style="list-style-type: none"> ▪ Exhumation in a controlled archaeological method and in consultation with RAPs and placed into a secure, temperate controlled storage location until a final reburial site can be identified. ▪ Access to the secure storage location containing any human remains will be managed and facilitated by SCWF in consultation with RAPs. ▪ RAPs will determine if further studies, media releases or other investigations are appropriate for the finds. ▪ Where required, SCWF will help facilitate any culturally appropriate reburial or ceremonial methods. • Prepare report for Heritage NSW and RAPs on the outcome of relevant investigation, recovery and reburial outcomes. • Works will not recommence until written approval is received from relevant authorities. <hr/> <p>If the Aboriginal ancestral remains can be avoided:</p> <ul style="list-style-type: none"> • Develop appropriate management and mitigation measures in consultation with RAPs, Heritage NSW and Project Archaeologist; • Prepare report for DPHI, Heritage NSW and RAPs and receive written confirmation that DPHI is satisfied with the approach; • Works will not recommence until written advice is provided from the Project Archaeologist that the remains are suitably protected and away from Project impacts.

6.1.8 Management of Salvaged Aboriginal Objects

Temporary Storage of Salvaged Objects

Artefacts salvaged under the provisions of this HMP will be temporarily stored at suitable location on Wiradjuri Country. This location is yet to be determined and will require further consultation with RAPs prior to the commencement of Project salvage activities. The process for determining the short term storage of objects will involve SCWF nominating a suitable and secure location in consultation with RAPs, involving SCWF firstly requesting expressions of interest for suitable storage locations. The nominated location(s) will be provided to RAPs with a 14 day feedback period. If the feedback received from RAPs during this period does not reach a general consensus, then the temporary storage location will default to the Project archaeologist's storage location or a suitable office on Wiradjuri Country held by SCWF.

Heritage NSW must be notified about the temporary storage location prior to objects being stored. SCWF may temporarily release salvaged objects to qualified consultants for the purposes of analysis and reporting, providing that the consultant nominates the storage location, and that the location is safe and lockable.

Long-term Care of Salvaged Objects

The long-term management of salvaged Aboriginal objects is an aspect of cultural heritage management driven by the desires of local Aboriginal community. Salvaged Aboriginal objects are typically either stored in a long-term facility (known as a 'keeping place') or reburied on Country in an area that will receive long term protection from further development or other impacts.

Detailed provisions for the Aboriginal objects recovered as part of the Project mitigation measures are yet to be determined, primarily because not all objects have been identified yet, and the number and characteristics of any salvaged assemblage is unknown. Instead, the management plan seeks to step out a process for how decisions will be made about long term management of the materials, including relevant consultation with RAPs and Heritage NSW. The provisions below are based on RAP consultation to date, whereby we have established that there is a desire for a portion of recovered material to be reburied within the Project Area, and possibly a portion of exemplary objects (or their replicas) to be placed on display within a suitable location for educational and cultural purposes, while fostering cultural awareness about the rich Aboriginal history of the Spicers Creek area. The proposed process is as follows:

1. After completing the archaeological mitigation measures in **Section 5**, the assemblage will be reviewed and catalogued. The Project archaeologist will develop a shortlist of materials suitable for interpretation and display. The details of these will be shared with SCWF and RAPs and their suitability for display will be determined.
2. Details regarding display and interpretation of selected objects will be developed by SCWF in consultation with RAPs. A draft of the relevant interpretation plan content/sections will be shared with RAPs for their review and comment within a 28-day period.
3. If a selection of objects is to be placed on display, SCWF would prepare a Care Agreement application to be lodged with Heritage NSW for review and approval. The Care Agreement application would provide details of the proposed display and interpretation, a list of the Aboriginal objects nominated, and evidence of RAP consultation.
4. Upon receipt of approval of the Care Agreement, SCWF would implement the display and interpretation measures in accordance with the conditions of the Care Agreement.
5. The assemblage of objects that does not form a part of a Care Agreement (which may be all of the objects if none are determined for display) will be subject to reburial within a suitable location in the Project Area. The final location and protocols for reburial will be determined in consultation with RAPs, with a 28-day review period included.
6. The reburial activity will be undertaken in general accordance with Requirement 26 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, 2010*. However, the reburial vessel and materials used in this process may vary from this Code depending on the feedback from the Aboriginal community received in the step above. For example, the Aboriginal community may nominate natural or cultural materials to be used instead of plastics.

6.1.9 Aboriginal Heritage Assessment Requirements for Outside the Approved Development Corridor

Any activity that may cause ground disturbance outside the approved Development Corridor will not occur without prior Aboriginal heritage assessment and potentially other relevant legislative and internal approvals.

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

- If the proposed activity requires a Modification to the existing development consent, this may trigger additional environmental assessments—such as an Aboriginal heritage assessment—but only where proposed changes are expected to result in new or increased impacts. In cases where no new impacts are anticipated, a high-level review will be undertaken to demonstrate that the findings of the original assessment remain valid, consistent with the requirements of Heritage NSW/DPHI.
- If the proposed activity is permissible under the existing Development Consent (i.e., an Aboriginal heritage impact permit (AHIP) not required), an Aboriginal heritage assessment must initially be completed to a level consistent with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010b) guidelines. Any potential impacts to known or newly identified Aboriginal objects will be managed in accordance with the **Section 6.1.6**.
- If the proposed activity requires a separate approval pathway not permissible as part of the existing Development Consent, then an Aboriginal heritage assessment must initially be completed to a level consistent with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010b) guidelines. Depending on the outcomes of the due diligence assessment, further investigation may be required in accordance with the *Guide to Investigating*,

Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (DECCW 2010c) and/or other relevant guidelines. If Aboriginal objects are likely to be impacted, further approvals under the National Parks and Wildlife Act 1974 and/or Environmental Planning and Assessment Act 1979 as required may be required prior to work being permissible.

6.1.10 Unmitigated Impact

Within the Development Footprint, subsurface sites of low archaeological significance, as scheduled in **Table 5.1**, will be subject to unmitigated Project impacts. These sites do not warrant further archaeological investigation or salvage. Impacts to these sites will be assumed once Project related ground disturbing activities have taken place over the area of the site. Impacts will be acknowledged by updating the SCWF Heritage Database (refer **Section 10.1**) and by preparing an Aboriginal Site Impact Recording Form (ASIRF) for lodgement with the AHIMS Registrar.

6.2 Historical Heritage Mitigation and Management

6.2.1 Archival Recording Methods

Historical sites SCWF SU17/H1, SCWF SU43/H1, SCWF SU47/H1, SCWF SU57/H1 (as listed in **Table 5.3**) will be subject to archival recording if within the final Development Footprint.

Photographic archival recording is important in recording change for posterity, future research and in cases where impacts will be reversed, providing guidance to the place's state before that change. The digital photographic record will be prepared in accordance with the Heritage Manual guidelines *Photographic Recording of Heritage Items Using Film or Digital Capture* (Heritage Office 2006) and *How to prepare archival records of heritage items* (NSW Heritage Office 1998). Archival recording will be undertaken in accordance with the Guidelines for preparing archival recordings of heritage items as a condition of consent (DCCEEW 2025), or any superseding guideline. The output will be a photographic archival report that will be submitted to Heritage NSW within 12 months of all archival recording fieldwork completion.

Photographs will be taken by the Project Archaeologist or nominated site personnel.

Sites subject to archival recording may be removed after:

- The completion of the archival recording fieldwork, and
- Written sign-off by the Project Archaeologist is provided that acknowledges that the photography taken has been suitably stored/backed up in preparation for future reporting.

6.2.2 Relocation

Historical sites SCWF SU10/H1 (old wood power pole alignment) and SCWF SU22/H1 (metal dam scoop) will be relocated to a suitable nearby location if at risk of impact within the final Development Footprint. The nature of the relocation activity and the final location of these sites would be subject to landowner advice.

6.2.3 Passive Avoidance

Passive management will apply to the historical sites that are outside of the Development Footprint and/or not subject to archival recording or relocation activities as described above in this section. These sites will not be subject to fencing, signage, or active land management measures. Their locations will be maintained in the SCWF Heritage Database, and where activities occur within 50 m of a known site, relevant personnel will be notified of the site's location to ensure appropriate protection.

6.2.4 Management of New Historical Items

In the event of discovery of new historical sites/suspect relics within the Development Footprint the following will apply:

- Work will immediately but temporarily cease and a minimum of 5 m around the site will be secured to protect the find with temporary fencing/ flagging;
- The find will be immediately reported to the work supervisor who will immediately advise the Principal Contractor manager or their delegate;
- An archaeologist will be contacted to assess the find, where relevant, and determine if it is clearly a relic or has moderate to high potential to be a relic (this may require additional research) – if possible, identification would be completed over email using photographs and if necessary, the archaeologist will attend the site;
- If the find is determined to be a relic, a 146 notification (of the *NSW Heritage Act 1977*) will be forwarded to the Heritage Council who will be consulted on the appropriate management measure;
- If the find is assessed and is not a relic, work inside the area that was made a no-go area can recommence; and
- New information will be incorporated into the HMP at key transition points in the project—specifically at the commencement of wind farm operations (Stage 1d), unless required earlier.

Appropriate management measures range from do nothing to archaeological excavation and would be developed in consultation with Heritage NSW.

6.2.5 Discovery of Suspected Human Remains (Non-Aboriginal)

Procedures for the discovery of non-Aboriginal human remains are addressed under Step 3 of the procedure outlined in **Table 6.2** that covers all suspected skeletal remains.

7 Roles, Responsibility and Training

7.1 Roles and Responsibilities

SCWF will implement this HMP as approved by the Planning Secretary. The individuals responsible for the implementation of the plan are provided in **Table 7.1**. The plan will be stored in SCWF's document control system; the latest version will be available electronically at all times. As the document owner, SCWF is the contact point for this plan and its requirements and will provide guidance and training to any person that requires additional training regarding this plan. Note that Section 4 of the EMS document provides more detail on the roles and responsibilities of key personnel, whereas this plan identifies responsibilities directly relating to the HMP.

Table 7.1: Roles and Responsibilities for Heritage Management

Role	Responsibilities
SCWF Project Manager	<ul style="list-style-type: none"> • Ensure that the HMP is implemented as approved by the Planning Secretary. • Ensure adequate financial and personnel resources are made available for the implementation of this plan. <ul style="list-style-type: none"> • Responsible for approval and management of Principal Contractor; • Review and approve Project design changes, and update Project Environmental Advisor; • Issue non-conformance notices and issue actions to avoid or minimise potential environmental impacts, and failing the effectiveness of such steps, order cessation of a specific activity; and • Ensure all Project personnel attend an environmental site induction prior to commencing work.
SCWF Project Environmental Advisor	<ul style="list-style-type: none"> • Primary contact with RAPs. • Ensure the implementation of this plan is carried out appropriately during construction and operations. • Ensure the heritage management measures required to be undertaken prior to ground disturbance activities are conducted in accordance with the measures outlined in this plan. • Distribute copies of this plan as required. • Engage and coordinate relevant specialist personnel to undertake management measures or additional assessment as specified in this plan. • Maintain records of Aboriginal RAP and regulator consultation. • Ensure relevant reporting, data management and AHIMS registration is conducted, maintained and updated (including the SCWF Heritage Database). • Arrange for a review of this plan in accordance with review cycles and conditions specified in this plan.
Project Archaeologist	<ul style="list-style-type: none"> • Implement relevant management measures that require archaeologist supervision. The Project Archaeologist may delegate tasks to suitably qualified heritage professionals where appropriate. • Undertaking heritage assessments where required. • Assist in implementing responsibilities of the Project Environmental Advisor, where engaged by SCWF. • Review all entries into the SCWF Heritage Database.
Principal Project Manager	<ul style="list-style-type: none"> • Manage the implementation of this plan during construction. • Authorise stop-work in the event of new finds. • Ensure all contractors and subcontractors are inducted prior to commencing work. • Ensure inclusion of Aboriginal and historical heritage in work inductions through delivery or input to induction documents.

Role	Responsibilities
Principal Environmental Advisor	<ul style="list-style-type: none"> • Notify and report new/unexpected finds, incidents or non-compliance to the SCWF Project Advisor. • Ensure inclusion of Aboriginal and historical heritage in work inductions through delivery or input to induction documents.

7.2 Training

7.2.1 Site inductions

All employees, contractors, sub-contractors involved in ground-disturbance activities will undergo a cultural heritage induction conducted either by the Project Archaeologist, the Principal contractor or a representative of SCWF (once appropriately trained to present the induction), or their subcontractor (once appropriately trained to present the induction). In addition, visitors to the Project and general contractors not involved in ground-disturbance activities will be made aware of their obligation to avoid harm to heritage through a cultural heritage component of the general site induction. Records of these inductions will be kept by SCWF and the Principal contractor.

The Aboriginal heritage component of the site induction will be prepared by qualified professionals (such as the project Archaeologist or nominated expert), drawing on relevant cultural information previously agreed upon through consultation with RAPs during the ACHA.

The following points will be conveyed through site induction material:

- Aboriginal sites and historical items that have been identified across the Project Corridor.
- Aboriginal sites of high significance to the Aboriginal community, are important to the wider community and must be treated with respect.
- Aboriginal sites are protected by law and that development consent includes conditions allowing impacts to certain specified Aboriginal sites in accordance with this plan.
- Recorded Aboriginal sites in relation to the Project have included stone artefact sites, grinding grooves and areas of archaeological deposit.
- Historical items relate to the rural history of the area and include fence alignments, stone walls, surveyor marks on trees and other farming items.
- Heritage sites can be hard to recognise, therefore reference must be made to the heritage maps in this HMP in order to clearly identify demarcated site boundaries (in instances prior to the salvage measures being undertaken as part of this plan).
- Certain sites must be protected, recorded or salvaged by the Project Archaeologist and RAPs prior to ground disturbance activities.
- That there are new finds procedures which involve stopping work if suspected new Aboriginal sites, historical items or skeletal material is identified in the Development Footprint and Development Corridor.

7.2.2 Fostering Cultural Heritage Awareness

SCWF will provide opportunities for RAP representatives to participate in activities related to training and fostering cultural heritage awareness for the Project. This will involve SCWF exploring opportunities to involve RAPs in training the lead contractor and/or relevant subcontractors to give cultural heritage inductions, toolbox sessions during construction and operations (as may be relevant).

8 Monitoring, Reporting and Corrective Action

8.1 Inspections

Inspections of avoided Aboriginal sites within the Development Footprint will occur in accordance with the timing and measures outlined for avoidance monitoring in **Section 6.1.2**. Specifically, Aboriginal sites within the Development Footprint that are designated for avoidance will be monitored to address any actual or potential secondary impacts, such as erosion or other natural damage.

8.2 Compliance Monitoring

Implementation and compliance with the plan will be monitored by environmental auditing procedures undertaken at regular intervals. The audit will include an assessment of compliance with Development Consent conditions related to the HMP (as outlined in **Section 2.1**).

Monitoring will be undertaken to measure/record the implementation of heritage management measures to address approval requirements. **Table 8.1** outlines how compliance will be monitored for the key management measures of this HMP.

Table 8.1: Compliance Monitoring

Item	Measure to Monitor Compliance
Aboriginal Heritage	
Salvage of scheduled sites (collection and excavation) and appropriate management of salvaged materials (Table 5.1 and Section 6.1.8)	<p>Prepare and update the SCWF Heritage Database in accordance with Section 10.1 of this document to record which sites have been salvaged. Update to SCWF heritage database to be completed within 3 months of completion of all project salvage measures or any subsequent additional recording.</p> <p>Include Project Archaeologist written sign-off as part of SCWF database maintenance to confirm that salvage measures are completed within an area before project impacts can occur.</p> <p>SCWF heritage database is to include checklist to track reporting of impacts to Aboriginal sites on the AHIMS register.</p>
Reporting on salvage, archival recording of grinding groove site, excavations and collection (Section 6.1.5 and 6.1.4)	<p>Documentation that the reporting for salvage and archival recording is provided to RAPs for 28 days review and to relevant parties upon finalisation of the report according to reporting requirements set out in (Section 6.1.5 and 6.1.4)</p>
Avoidance measures have been implemented for scheduled sites (Section 6.1.2)	<p>Once avoidance measures have been implemented in accordance with Section 6.1.2 Project Archaeologist and/or a nominated specialist or RAP will either inspect each location and/or review georeferenced photos to confirm that measures are in place prior to commencement of construction works/ground disturbance activities in the vicinity of the site.</p> <p>Update on as need basis the SCWF database to document and include written sign-off by Project Archaeologist to confirm measures are completed. Update the SCWF database within 3 months of completion of all project salvage measures.</p> <p>Inspection of avoided sites will be undertaken in accordance with Section 6.1.2.</p>
Ongoing Aboriginal consultation requirements (Section 33.2)	<p>An Aboriginal consultation log is prepared and maintained for the Project to document correspondence requirements set out in Section 3.2 of the HMP.</p>
Inductions are taking place and includes appropriate material.	<p>The induction protocols set out in Section 7.2.1 will be managed by the Principal Environmental Advisor during construction and SCWF Environmental Advisor during operation.</p>

Item	Measure to Monitor Compliance
Reburial of salvaged objects (Section 6.1.8)	<p>Once salvage measures are completed for the project and reburial has been completed, the SCWF heritage database will be updated with the reburial location treated as a new Aboriginal site.</p> <p>The SCWF database includes a checklist to confirm that AHIMS site card has been prepared for the location and submitted to AHIMS.</p> <p>Update SCWF database within 3 months of completion of all project salvage measures.</p>
Historical Heritage	
Archival Recording has been completed	<p>Documentation that the reporting for relevant historical items has been provided to Heritage NSW within 12 months of completion of all archival recording fieldwork.</p>
Applicable to Aboriginal and Historical Heritage	
Reporting and managing any newly identified Aboriginal objects, historical items or skeletal remain in accordance with this plan (Section 6.1.6 and 6.2.4)	<p>Update the SCWF database in accordance with Section 6.1.6 and 6.2.4 which should include a checklist to track:</p> <ul style="list-style-type: none"> • That Aboriginal new sites are registered on AHIMS. • That impacts to any newly identified sites are reported on AHIMS. <p>Update SCWF database to be completed within 3 months of completion of all project salvage measures.</p> <p>A communications log must be kept to document that all relevant parties are contacted throughout the new finds processes listed in (Section 6.1.6, 6.1.7, and 6.2.4) (e.g., RAPs, Heritage NSW, DPPI, Coroner/Police, Project Archaeologist).</p>
Inductions are taking place and include appropriate material.	<p>The induction protocols set out in Section 7.2.1 will be managed by the Principal Environmental Advisor during construction and SCWF Environmental Advisor during operation.</p>

8.3 Complaints and Disputes

8.3.1 Complaints Management

A complaints register will apply to the works associated with this HMP. Complaints will be recorded and considered in improvements and subsequent updates of the HMP. Detail regarding complaint management procedures are outlined in the EMS.

8.3.2 Disputes Resolution

SCWF aims to maintain a good relationship with all internal and external stakeholders and all efforts will be made to resolve any disputes internally with the affected party. Detail regarding dispute resolution procedures are outlined in the EMS.

9 Incident and Non-Compliance Management

9.1 Incident Notification and Reporting

In accordance with Development Consent, an 'Incident' is defined as:

An occurrence or set of circumstances that causes or threatens to cause material harm to the environment, and as a consequence of that environmental harm, may cause harm to the health and safety of human beings, and which may or may not be or cause a non-compliance.

And the definition of 'Material Harm' is:

Is harm that:

- a. involves actual or potential harm to the environment that may include (but not be limited to) a leak, spill, emission or other escape or deposit of a substance, and as a consequence of that environmental harm (pollution), may cause harm to the health and safety of people; 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.*

In accordance with Development Consent Condition C10, SCWF will notify DPHI within 24 hours of becoming aware of an incident after it becomes aware of an incident resulting in unauthorised Aboriginal or Historical heritage impacts.

Further information regarding the requirements of incident notification and reporting is provided in the EMS.

9.2 Non-Compliance Notification and Reporting

The development consent defines a 'non-compliance' as:

"An occurrence, set of circumstances or development that is a breach of this approval".

In accordance with Development Consent Condition C12, SCWF will provide written notification to the NSW Planning Secretary via the Major Project website within seven days of becoming aware of a non-compliance with the Development Consent. The written notification will identify the Project and the application number, the condition of consent that the Project is in non-compliance with, the reason for which SCWF does not comply, the reasons for the non-compliance (if known), and what actions have been taken, or will be taken, and when, to address the non-compliance.

It is noted that a non-compliance which has already been notified as an incident does not need to be notified as a non-compliance.

Further information regarding the requirements of non-compliance identification, investigation and notification is provided in the EMS.

10 Review, Revision and Data Management

10.1 Data Management

The SCWF Heritage Database will be created and maintained by SCWF. The database will be a 'live' register of the Aboriginal and historical heritage resources within the Development Corridor that will be updated as required to reflect new finds and the management status of all Aboriginal and historical sites within the Development Corridor. The SCWF Heritage Database will be used to guide SCWF staff and contractors on the location and status of Aboriginal heritage and historical items and will fill the role of Environmental Control Maps used by SCWF. This approach supports the adaptive intent of the HMP.

The database will include:

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

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

SCWF and the Principal Contractor will be responsible for ensuring that all relevant employees, RAPs and subcontractors are provided with up-to-date datasets, on an as need basis.

The database will be updated in the following circumstances:

- Discovery of a confirmed new site/item or human remains
- Changes or incidents relating to existing heritage sites/items
- Changes to the management status of heritage sites/items and areas, and/or
- The completion of heritage activities such as survey, archival recording, excavation, surface collection, and protective measures.

Note that any newly identified Aboriginal object must be registered on AHIMS.

10.2 Review Frequency

In accordance with Development Consent Condition C2, the HMP will be reviewed (and updated if necessary), to the satisfaction of the Planning Secretary, in the following circumstances:

Within 3 months of:

- (a) the submission of an incident report under Development Consent Condition C10;
- (b) the submission of an audit report under Development Consent Condition C14; or
- (c) any modification to the conditions of the Development Consent.

In accordance with Development Consent Condition C3(c), with the approval of the Planning Secretary, the Applicant may update the HMP where additional measures or amendments are identified that improve environmental performance of the development.

Additional Trigger for Review and Revision

A review of the Heritage Management Plan (and updates, if necessary) will be triggered prior to the transition to Stage 2 of the Project, to the satisfaction of the Planning Secretary (refer to **Section 1.3**).

10.3 Adaptive framework of the HMP

The SCWF Heritage Database operates as a live register that captures ongoing changes and updates related to Aboriginal and historical heritage resources. This continuous record supports the adaptive nature of the HMP, which remains the guiding framework throughout the life of the Project. As such in addition to the instances described in Section 10.1 the following occurrences will be recorded in the SCWF Heritage Database:

- Where modifications to the project result in changes that affect impacts on Aboriginal or historical heritage—specifically, where approved project amendments change or remove previously anticipated impacts for which mitigation measures were proposed in the HMP, but are now no longer necessary; and/or Where complaints and/or non-compliances have been identified that require changes to ensure suitable management of Aboriginal or historical heritage as applicable to future Stages of the Project

Where additional impacts are proposed to Aboriginal or historical heritage, the recommended management measures will be provided to Heritage NSW and RAPs³ for review and comment for a minimum of 14 days. The SCWF Heritage Database will then be updated accordingly.

³ RAP are only to be consulted for updates relevant to Aboriginal cultural heritage.

11 References

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

2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*.

2010c, *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*.

Heritage Office 2006, *Photographic Recording Of Heritage Items Using Film or Digital Capture*

1998, *How to prepare archival records of heritage items*

1996, *Archaeological Assessments*

OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales*.

NSW Archaeology 2023a, *Spicers Creek Wind Farm Aboriginal Cultural Heritage Assessment*, prepared for Spicers Creek Wind Farm Pty Ltd

NSW Archaeology 2023b, *Spicers Creek Wind Farm Aboriginal Cultural Heritage Response to Submissions*, prepared for Spicers Creek Wind Farm Pty Ltd

NSW Archaeology 2023c, *Spicers Creek Wind Farm Historic Heritage Assessment*, prepared for Spicers Creek Wind Farm Pty Ltd

Appendix A Aboriginal Archaeological Excavation Methodology

Appendix A.1 Overview

The scope of archaeological excavation applies to the Aboriginal sites/Survey Units listed for salvage excavation in **Table 5.1** of the HMP. It should be noted that the necessity to undertake salvage excavation in specific areas of relevant Survey Units will be dependent on how the final Development Footprint intersects with predicted archaeological deposit. For example, **Table 5.1** lists that Transect 2 and Transect 3 of SU19/L5 warrants salvage excavation; however, only Transect 3 would require salvage excavation if Transect 2 falls outside the final Development Footprint and is not at risk of impact. Therefore, as outlined in **Section 6.1.5**, a secondary inspection of the PAD will be undertaken prior to the commencement of nearby construction activities. This inspection will define the precise boundaries of the impact area and inform discussions regarding the appropriate extent of excavation.

Appendix A.2 Aims and Research Questions

Aims

The archaeological excavation scope has been proposed based on the predicted impacts from the Project, the research questions about the area and the regional archaeological information already present. Excavation aims to provide information that would otherwise have been lost and that may not already have been obtained by previous investigations in the region. The proposed excavations could provide insight into Aboriginal populations, occupation and behaviour of the region, as well as provide a type of site for future cultural resource management in the area. Ensuring good archaeological data is available for future cultural resource management projects is essential to good archaeological predictions and improved outcomes for future management of the region.

The excavation program has the following aims:

- To further characterise the archaeological deposits relating to past Aboriginal occupation of the local area through excavation and environmental analyses. This may include greater understanding of resource exploitation; identification of any change through time in spatial and chronological phases of activity; and site formation processes.
- To provide a representative sample of the assemblage from each site/area and may inform further understanding of how Aboriginal people accessed resources, manufactured stone artefacts and travelled through the local area.

Research Questions

- What is the spatial and stratigraphic patterns of cultural materials within the excavated areas? Can inter and/or intra-site past Aboriginal activities be determined through excavation in these areas?
- What is the age, composition, technological attributes, and significance of cultural materials within this part of the Central West Orana and Macquarie River catchment?
- What are the environmental characteristics associated with the distribution of Aboriginal cultural heritage within the area? Can the formative processes of the stratigraphic profile provide information on the nature and/or survivability of the archaeological resources? Are there other key factors in the distribution and extent of the material culture within the area?
- What are the cultural, social and public values associated with the cultural materials in the area? Do the excavations support or require modification of the significance and values previously assigned to Aboriginal sites/locales within the Development Footprint?

- How should the cultural materials be conserved and managed in future?
- What is the anthropological relationship to the materials identified to those in other areas of this project and how do they relate to materials found in surrounding projects both surface and sub-surface deposits? This question was raised by WVVAC and requires further consultation to determine avenues of investigation into answering this question.

Appendix A.3 Excavation Methods

Pre-Excavation Verification

Where impacts are proposed to occur within scheduled Aboriginal sites/Survey Units listed in **Table 5.1**, prior to the commencement of construction works in the vicinity of a scheduled site, a secondary inspection of such locations by the Project Archaeologist will be undertaken to clearly demarcate the impact area and to facilitate discussion of the extent of excavation required. Where the archaeologist undertaking the secondary inspection identifies that excavation is warranted with reference to the Project impact area, the excavation methods presented below will be followed.

Phase 1 Excavation – Investigative Phase (If Required)

Overview

Phase 1 Excavations may be required in circumstances where the final proposed ground disturbance area of the Development Footprint does not align with the test excavation transects previously excavated as part of the Project ACHA (NSW Archaeology 2023a). In these circumstances, there may not be test pit locations to readily expand upon into an open area, and therefore further investigative test pits would be required to establish appropriate locations where artefact densities are high enough to warrant their expansion. However, in instances where prior test pit transects (those completed during the ACHA) are within the proposed Development Footprint, and have established artefact densities warranting salvage, then salvage excavation can be readily employed, and Phase 1 is not required (i.e. skip this step and move straight to Phase 2 excavations).

Method

- Phase 1 excavations will be undertaken in units of 50 cm by 50 cm.
- The location and distribution of Phase 1 excavation units will be determined in field to avoid areas of localised disturbance and to focus the excavations on areas most likely to contain intact archaeological deposit. Where possible Phase 1 excavation units will be distributed along the centreline of the impact area (for linear impacts) or in a generalised grid pattern (for non-linear impacts such as larger workspace areas).
- Each Phase 1 excavation unit will be excavated in 10 cm spits or stratigraphically (where possible), ensuring that the soil profile is adequately described.
- Excavations will cease where one or more of the following criteria are established:
 - B horizon deposits are encountered.
 - It is deemed unsafe to continue to excavate because of risk of collapse or water ingress.
 - If it is agreed by the archaeologist and Aboriginal party representatives present on site that the excavation has continued past the depth of deposits containing cultural material.
 - Where the depth of anticipated Project impacts has been reached.

- Excavated materials (with the exception of sediments from features such as hearths or heat treatment pits) will be sieved using 5 mm wire mesh sieves. Where necessary, wet sieving may be undertaken.

Field Documentation:

- All test pits would be documented using photographic records, written descriptions, and scaled drawings of representative test pits.
- Soil samples may be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information. Optically Stimulated Luminescence (OSL) samples would be taken in areas where Aboriginal objects are found, and generally try to bracket the deposit (to provide a maximum and minimum age). Material for radiocarbon analysis may also be undertaken opportunistically if archaeological features containing charcoal or other dateable material are evident.
- Reduced levels of the top and bottom of the test pit would be documented using a dumpy level against a known elevation in instances where OSL or other samples are taken. Other levels may be taken as required.
- If features (including a hearth or heat treatment pit or an accumulation of animal bone or shell likely to relate to Aboriginal cultural activities) are identified, the feature will be excavated in accordance with the methodology provided under the heading '**Excavation of Features**' below.
- Throughout the Phase 1 excavations, a plan will be maintained showing excavation locations. Data will be collated on the outcomes of each excavation such that the nature of the soil profile and any cultural material identified is documented. Preliminary artefact counts, information on raw material types and description of key artefact classes in the assemblage from each excavation unit will be documented. This information will be used to inform decision making on requirements for Phase 2 works, as discussed below.
- Excavation procedures and protocols may be modified at the discretion of the Excavation Director, in consultation with the RAPs and SCWF as the conditions in the field and nature of the excavations develop. This includes the movement/discontinuance of test pits to avoid existing obstacles, buried services and disturbances.

Excavation of Features

Should a feature such as a possible hearth or heat treatment pit or an accumulation of animal bone or shell likely to relate to Aboriginal cultural activities be identified during excavations, the following methodology will apply:

- The surface of the feature will be cleaned by hand (using trowels, hand shovels and brushes as required) to allow the edges of the feature to be identified.
- The feature will then be excavated in cross-section (half-sectioned or part thereof depending on the location of the feature within the excavation unit and whether it extends outside the excavation unit) to investigate the dimensions and orientation of the feature to more accurately assess whether it is a cultural feature or the result of natural process (for example, a burnt tree root/stump or accumulation of bone within a former void). The excavation will proceed according to the stratigraphy (if any) of the in-filling materials.
- If it is identified as a feature, it will be photographed in cross-section and a stratigraphic profile of the cross-section will be recorded (where possible).
- If it is identified as a feature, it will then be excavated in its entirety within the excavation unit. All excavated cultural materials (including those from original cross-sectional excavation) will be retained for analysis and samples of relevant materials will be sent for additional analysis, including radio-carbon dating. If the feature extends outside the excavation unit, it will be further assessed whether excavation should continue into the adjoining area. This will be considered with reference to the need to maintain the integrity of the feature during excavation and/or backfilling if required.

- Following the removal of all in-filling material, the remaining cut feature (where present) will be planned to scale and photographed.
- Following this excavation can resume in the remaining portion of the excavation unit.

Phase 2 Excavation – Salvage Phase

Overview

As mentioned in the Overview section under Phase 1 Excavations above, the salvage phase can readily be employed in instances where prior test pit transects (as undertaken during the ACHA) are within the proposed Development Footprint, and have established high artefact densities warranting salvage. In these instances, the Salvage Excavation Method can be employed without the need to consider thresholds for salvage.

In instances where Phase 1 Excavations have been employed under this HMP, the thresholds for triggering open area/salvage (i.e. the Salvage Excavation Method) excavation include:

- Stone artefact densities greater than an average of 40/m² and therefore indicative of concentrated past occupation based on our broader understanding of the region and the test excavation results for this Project. In the instance of lower than 40/m² densities on average being encountered, the extent of salvage required would default to net salvage area values of 12 m² or less.
- Where evidence of multiple phases of past activity is identified through changing raw material types and/or distinct technological attributes at different depths within the soil profile.
- Where dense concentrations of cultural materials are discovered at significant depths that may indicate extreme age.
- Where rare or unique stone artefacts and/or other archaeological material is recovered.
- Where unique and/or rare archaeological features (e.g., hearths, cooking pits, etc) are identified.

Salvage Excavation Method

Salvage excavation will consist of contiguous open area salvage excavation using higher resolution recovery techniques. The number and size of these open area excavations would be dictated by the number and characteristics of the identified cultural material.

The extent of salvage excavations within each open area will be dependent on the outcomes of excavation as results develop and artefact densities are retrieved. A maximum extent of salvage excavation has been applied to guide the scope of mitigation required for the Project and to focus where salvage resources should be allocated. This methodology proposes a maximum extent of salvage excavation on a cumulative level across the Aboriginal sites/Survey Units currently scheduled for that measure with the aim best gather a representative sample of the local archaeological record subject to impact.

It therefore considers that a maximum area of 100 m² is an cumulative upper limit for excavation across the salvage locations⁴ (i.e., certain areas can receive more salvage excavation than others depending on their archaeological potential and significance, but that the total excavation for the Project should not exceed 100 m²). If the maximum extent of 100 m² is reached across the Project Area, then consultation with the Project Archaeologist, RAPs, SCWF, and Heritage NSW will be undertaken to determine if further excavation is required.

The total extent of excavation will not extend beyond the impact footprint. Phase 2 excavations will be undertaken in units of 1 m by 1 m. Apart from the size of excavation units, the salvage methods will be consistent with that detailed for Phase 1 Excavations.

⁴ This has been proposed based on if potentially eight Aboriginal sites scheduled for salvage excavation in Table 5-1 were to be impacted by the Project. However, the number sites impacted may vary based on final design.

Excavation procedures and protocols may be modified at the discretion of the Project Archaeologist, in consultation with the RAPs and SCWF as the conditions in the field and nature of the excavations develop. This includes the movement/discontinuance of excavation locations to avoid existing obstacles, buried services and disturbances.

Post Excavation Analysis and Reporting

An Aboriginal Cultural Heritage Excavation Report will be prepared following the completion of the Excavation Program. The report will:

- Document the results of the archaeological excavations (with artefact analysis and identification of a final repository for finds).
- Be provided to Registered Aboriginal Parties a minimum of 28 days to consider the report and provide comments before the report is finalised.
- Once finalised the report must be provided to the Planning Secretary, Heritage NSW - ACH, the relevant LALC and RAPs.

Appendix B Aboriginal Site Definitions

A description of terms used to describe different site features that should be used as a guide when identifying and interpreting Aboriginal site types.

Site Feature	Definition and Recording Methods
Aboriginal ceremony and Dreaming	Previously referred to as mythological sites these are spiritual/story places where no physical evidence of previous use of the place may occur, e.g., natural unmodified landscape features, ceremonial or spiritual areas, men's/women's sites, dreaming (creation) tracks, marriage places etc.
Artefact site (open stone artefact site)	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people.
Burials	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be marked, e.g., in caves, marked by stone cairns, in sand areas, along creek banks etc.
Fish trap	A modified area on watercourses where fish were trapped for short-term storage and gathering.
Grinding grooves	Grinding grooves are defined as an area of outcropping bedrock containing evidence of one or more grinding grooves where ground-stone hatchets or other grinding practices (i.e., seed grinding) were implemented.
Habitation structure	Structures constructed by Aboriginal people for short- or long-term shelter. More temporary structures are commonly preserved away from the NSW coastline, may include historical camps of contemporary significance. Smaller structures may make use of natural materials such as branches, logs and bark sheets or manufactured materials such as corrugated iron to form shelters. Archaeological remains of a former structure such as chimney/fireplace, raised earth building platform, excavated pits, rubble mounds etc.
Modified tree (carved or scarred)	Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc., or alternately intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers.
Potential archaeological deposit (PAD)	PAD sites are areas where sub-surface stone artefacts and/or other cultural materials are likely to occur (DECCW 2010, 38). These areas are generally recorded as part of ACHAs as areas where test excavation in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010) is to occur. Notably, when identifying a PAD, there is meant to be an explanation as to 'why the PAD is anticipated to be of higher significance than the continuous distribution of archaeological material in which it exists' (DECCW 2010, 25). In the ACHA for the Project, (NSW Archaeology 2023a) instead of PAD terminology, 'Survey Unit' terminology was used, where predicted artefact density (very low/negligible to very high scale of sensitivity was applied to each Survey Unit. Unless previously identified, it is considered unlikely that a PAD would be classified through an unexpected finds process.
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering or consumption. Usually found in deposits previously referred to as shell middens. Must be found in association with other objects like stone tools, fish bones, charcoal, fireplaces/hearths, and burials. Will vary greatly in size and composition.

Site Feature	Definition and Recording Methods
Stone quarry/Stone procurement area	<p>Usually, a source of good quality stone which is quarried and used for the production of stone tools.</p> <p>Stone quarries or areas of stone procurement represent where Aboriginal people gathered raw stone materials for stone tools and/or manufactured stone tools from the adjacent source material. Quarry sites are found at rock outcrops where the material was of suitable quality to have been used to manufacture stone tools. Stone quarries were defined by the presence of outcropping stone material with nearby evidence of the same material type used in the stone tool manufacture process. This was most commonly indicated by large stone cores or stone flakes distributed amongst the same naturally outcropping material.</p>

Appendix C Consultation and Endorsement

Appendix C.1 Consultation with Heritage NSW

Date	Consultation	Response
13/01/2026	Please update Table 5.1 with the relevant Aboriginal Heritage Information Management System numbers for all sites contained within the ACHMP.	Table 5.1 has been updated with the AHIMS IDs
	<p>2. Please clarify the number of sites that are included within the project area and approved for harm as the number of sites listed in Table 5.1 exceeds those listed in Appendix 6 of the Conditions of Consent.</p>	<p>Our understanding of the Conditions of Consent B28 and B29 is that Appendix 6 does not specify the number of sites approved for harm. The Development Consent permits harm to the known/recorded Aboriginal sites within Development Corridor (subject to justification of impacts), with the exception of the sites listed Table 1 of Appendix 6.</p> <p>The Aboriginal sites listed in Appendix 6 of the Conditions of Consent only include sites that were designated for avoidance/minimisation of impacts, or salvage measures. It does not include the sites in the 2023 NSW Archaeology project ACHA that were designated for unmitigated impact, which comprised multiple surface stone artefact scatters considered to be of low archaeological significance. However, through Aboriginal consultation in developing the HMP, it was raised by RAPs (refer Table 3.2 of the HMP) that the formerly proposed unmitigated impacts for surface artefact sites in the Development Corridor was not an appropriate measure. As such, there are now several sites listed for 'Community Collection' that were previously designated for unmitigated impact.</p> <p>Overall, the HMP includes provisions for increased mitigation efforts through Community Collection, rather than proposing increased harm to Aboriginal sites.</p>
	<p>3. The ACHMP states that pending final design the management and mitigation measures presented in Table 5.1 are subject to change. As this ACHMP forms part of the Conditions of Consent and is a statutory document, greater certainty is required in the ACHMP on the avoidance and conservation of sites prior to Stage 1 commencing.</p>	<p>Condition B29(c) requires a definitive list of Aboriginal heritage items to be protected in situ and those to be salvaged and relocated prior to commencement of construction. The HMP has therefore been updated based on the current detailed design and confirmed Stage 1a&b development footprint, and Table 5.1 now identifies the management outcome for each recorded site.</p> <p>It is acknowledged that minor refinements to the development footprint and the potential for previously unrecorded heritage to be identified during works cannot be entirely excluded. Such circumstances will be managed in accordance with the approved micro-siting controls and New Finds procedures in the HMP, which provide the statutory mechanism for addressing unforeseen impacts while maintaining compliance with the Conditions of Consent.</p> <p><i>Table 2.1 has been revised as follows:</i></p> <p>Section 5.1.2 outlines the anticipated impacts and the associated management and mitigation measures based on the current detailed design and confirmed Stage 1a&b development footprint. In accordance with Condition B29(c), Table 5.1 provides an updated list of Aboriginal heritage items that will be protected and remain in situ throughout construction, and those that will</p>

Date	Consultation	Response
		<p>be salvaged and relocated to suitable alternative locations.</p> <p>Any minor adjustments to the development footprint or the identification of previously unrecorded heritage during construction will be managed in accordance with the approved micro-siting controls and New Finds procedures in this HMP, to ensure ongoing avoidance or appropriate mitigation consistent with the Conditions of Consent.</p> <p><i>Section 5.1.2 Has been revised as follows:</i></p> <p>A summary of the Aboriginal sites relevant to this HMP are provided in Table 5.1. including the confirmed impact status and the corresponding management and mitigation measures based on the current detailed design and Stage 1a&b development footprint. Table 5.1 identifies the Aboriginal heritage items that will be protected and retained in situ throughout construction, and those that will be subject to salvage and relocation in accordance with Condition B29(c) of the Consent.</p> <p>The Aboriginal sites/locales, and locations of previous test pitting where Aboriginal objects have been identified, relevant to the Project Site are illustrated in Figure 5.1 to Figure 5.10. Details of the required management measures are presented in Section 6.1. Further details of the findings for all Survey Units are included in the Project ACHA (NSW Archaeology 2023a).</p> <p>Community collection and excavation will only apply where impacts are confirmed within the approved Stage 1a&b development footprint. Where impacts are not confirmed, avoidance and in situ conservation measures will apply in accordance with this HMP. Any previously unrecorded heritage encountered during construction will be managed in accordance with the New Finds protocol.</p>

Appendix C.2 Additional Information: Consultation with Registered Aboriginal Parties (RAPs)

Issues with RAP Contact Details

The RAP contact details in the 2023 ACHA (NSW Archaeology 2023a) are shown in the table below but have changed over time and superseded contact details have been crossed out. The consolidated and updated RAP contact details are provided in **Table 3.1** in the main HMP report.

Umwelt identified several issues with out-of-date RAP contact details, whereby Kerry Anne Stanley was nominated as the contact for five RAPs but the nominated email address was disconnected. Umwelt was able to contact TNL Site Tracker (Troy Silver) for an updated email and contacted the Dubbo Council Aboriginal Liaison and successfully retrieved updated contact details for Kerry Anne Stanley. Kerry Anne was able to provide additional contacts for the WAAP.

List of Project RAPs and Contact Details As Per ACHA (NSW Archaeology 2023a)

Organisation	Contact Name	Phone	Email
Tubba-Gah (maing) Wiradjuri Aboriginal Corporation	Lewis Burns	[REDACTED]	[REDACTED]
Corroboree Aboriginal Corporation	Marilyn Carroll-Johnson	[REDACTED]	[REDACTED]
Vicky Hannah Gomerioi Duncan		[REDACTED]	[REDACTED]
Timothy Stubbs		[REDACTED]	[REDACTED]
Jeremy Duncan		[REDACTED]	[REDACTED]
Kevin Sampson		[REDACTED]	[REDACTED]
Wellington Aboriginal Action Panel (WAAP)	Kerry Anne Stanley	[REDACTED]	[REDACTED]
Wellington Advisory Panel	Kerry Anne Stanley	[REDACTED]	[REDACTED]
Dubbo Aboriginal Working Party	Kerry Anne Stanley	[REDACTED]	[REDACTED]
Wellington Aboriginal Action Party	Kerry Anne Stanley	[REDACTED]	[REDACTED]
TNL Site Tracker	Troy Silver	[REDACTED]	[REDACTED]
Wellington Valley Wiradjuri Aboriginal Corporation (WVWAC)	Brad Bliss	[REDACTED]	[REDACTED]
Gallanggabang	Brad Bliss	[REDACTED]	[REDACTED]
Binjang Wellington Wiradjuri Allodial Heritage Surveys	Jamie Gray	[REDACTED]	[REDACTED]

Notes from SCWF Meeting with WAAP and Umwelt on 26 November 2025

In response to WAAP's request for a face to face meeting on 2 October 2025, SCWF organised and facilitated a face-to-face meeting between WAAP, Wellington LALC, SCWF and Umwelt to provide a forum for further discussion on the draft HMP. The meeting was held on 26 November 2025 at the Wellington TAFE campus, with some attendees joining the meeting virtually. Attendees were:

- Zeina Jodakar: Squadron Energy
- Justin Toomey-White Squadron Energy First Nations Engagement Facilitator

- Ryan Desic – Umwelt Principal Archaeologist
- Kirsty Davis – Umwelt Principal Environmental Consultant
- Corey Deverell – Umwelt Senior Environmental Consultant
- Jody Chester - Chairperson of WAAP
- Keiyana Guhiot - Secretary of WAAP
- Aunty Anita Johnston - WAAP member
- Kerry-Ann Stanley - WAAP member

The purpose of the meeting was to clarify the HMP consultation process and outcomes, and to provide an opportunity for additional Aboriginal groups and stakeholders to share informal commentary. It was noted that formal consultation with the RAPs had already been completed in accordance with the Heritage NSW guidelines, and that the meeting was hosted in good faith to ensure all interested groups have the opportunity to be heard and to strengthen ongoing relationships.

Key discussion points throughout the meeting included:

- WAAP provided feedback on the RAP list and enquired into the suitability of some of these parties in relation to regional locality and active participation in cultural heritage matters relating to the Project.
- WAAP indicated that they wanted to keep salvaged artefacts on country and advised they would be happy for materials to be temporarily stored/displayed in a local cultural heritage education centre (or similar) to help educate the community. The exact location/s for storage and display of these artefacts would be subject to further consultation with RAPs and Wellington LALC.
- WAAP also indicated they were open to discussing long-term artefact management options e.g. repatriation however this would occur closer to the time of requiring to do so.

As an outcome of the meeting, **Section 6.1.8** of the HMP was updated to enable continued engagement with the RAPs and other interested parties to determine the preferred storage locations and mechanisms for both short-term storage and long-term management of artefacts.

Appendix C.3 Author Endorsement

Appendix D Legislation and Obligations

Appendix D.1 Obligation To Protect Cultural Heritage

National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NPW Act) provides protection for Aboriginal objects and places across NSW:

- An Aboriginal object is defined as: Any deposit, object or material evidence (not being a handcraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction and includes Aboriginal remains.
- An Aboriginal place is: *any place declared to be an Aboriginal place under section 84*. This is a very specific piece of legislation that provides process and management of Aboriginal sites of cultural, but not necessarily scientific, values. They are commonly, but not always associated with intangible values.
- Any place declared to be an Aboriginal place by the Minister for the Environment, under Section 84 of the Act.

Heritage Act 1977

The NSW *Heritage Act 1977* (the Heritage Act) is administered by Heritage NSW. The purpose of the Heritage Act is to ensure cultural heritage in NSW is adequately identified and conserved. The Heritage Act is the primary item of state legislation affording protection to items of environmental heritage (natural and cultural) in NSW.

Under the Heritage Act 'items of environmental heritage' include places, buildings, works, relics, moveable objects and precincts identified as significant based on historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic values. State significant items are listed on the NSW State Heritage Register (SHR) and are given automatic protection against any activities that may damage an item or place or affect its heritage and/or archaeological significance.

The Heritage Council of NSW, appointed by the Minister, is responsible for heritage in NSW, as constituted under the Heritage Act. The Heritage Council is a cross-section of heritage experts, with Heritage NSW being the operational arm of the Heritage Council.

Relics Provision of the Heritage Act 1977

The Heritage Act affords automatic statutory protection to 'relics' which form part of archaeological deposits (except where these provisions are suspended by other prevailing legislation). The Heritage Act defines a 'relic' as any deposit, object or material evidence that:

relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement; and is of State or local heritage significance.

Sections 139 to 145 of the Heritage Act prevent the excavation of a 'relic' (on non-State Heritage Registered land), except in accordance with a gazetted exception or exclusion under the SSD process, or an excavation permit issued by the Heritage Council of NSW.

Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) requires that consideration be given to environmental impacts – including heritage – as part of the land use planning process, and the provisions of the EP&A Act allow for the implementation of Local Environmental Plans (LEPs).

The Environmental Planning and Assessment Act 1979 (EP&A Act) requires consideration of environmental impacts — including Aboriginal and non-Aboriginal heritage — as part of the land use planning process. For State Significant Development (SSD), heritage matters are assessed under Division 4.7 of the EP&A Act, guided by the Secretary's Environmental Assessment Requirements (SEARs). These requirements replace

the need for separate approvals under the National Parks and Wildlife Act 1974 or the Heritage Act 1977, and are addressed through the Environmental Impact Statement (EIS) and supporting documentation such as the Aboriginal Cultural Heritage Assessment Report (ACHAR) and Heritage Management Plan (HMP).

Appendix D.2 Obligation to Protect and Implement Management Measures

Site personnel, contractors and subcontractors responsible for land management or construction have an obligation to protect cultural heritage within their area or work responsibility. This extends to both cultural materials identified as part of earlier phases of the Project, and any additional cultural materials identified during construction. Protection means active recognition of known cultural heritage and active measure to avoid and/or suitably mitigate impacts to it.

This may include fencing, erosion control and modification of work plans to avoid impacts, as well as facilitating a process where work personnel are aware of the nearby heritage. Site personnel, contractors and subcontractors also have the responsibility to ensure that appropriate management measures have been employed prior to, or in association with, their activities which impact cultural heritage.

Appendix D.3 Discovery of Aboriginal Objects

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

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

Notifications to Heritage NSW are required in relation to discovery, impact and care of Aboriginal objects under the NPW Act

Appendix D.4 Discovery of Relics

If a find is determined to be a relic, a 146 notification (of the NSW Heritage Act 1977) is to be forwarded to the Heritage Council/Heritage NSW.

Appendix D.5 Care Agreements

Under s85A of the NPW Act, Aboriginal objects remain the property, and under the protection of, the Crown until formal transfer to a person or persons of a class prescribed by the regulations occurs. While a Care Agreement is not currently proposed under this plan, its inclusion as a potential mitigation measure in this HMP ensures that, should Aboriginal objects of significant cultural value be identified during salvage, RAPs have the option to pursue a Care Agreement for their retention. This process can be undertaken without requiring an amendment to the HMP. Care Agreement application forms can be downloaded at:

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

Appendix D.6 Reporting Impacts to Heritage Sites

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

- as a result of test excavation carried out in accordance with the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW

- as authorised by an Aboriginal Heritage Impact Permit (AHIP) issued by Heritage NSW
- for the purpose of complying with Secretary's environmental assessment requirements issued by DPHI for:
 - state significant development (SSD),
 - state significant infrastructure (SSI), or
 - a major project, or
 - authorised by a SSD/SSI approval under the EP&A Act.

Completed forms must be submitted to the AHIMS Registrar at ahims@environment.nsw.gov.au.

Aboriginal Site Impact Recording Forms can be downloaded at:

<https://www.environment.nsw.gov.au/resources/cultureheritage/aboriginal-site-impact-recording-form-120558.pdf>.

Squadron Energy is Australia's leading renewable energy company. Proudly Australian owned, our mission is to be a driving force in Australia's transition to a clean energy future by providing green power to our customers.

We develop, operate and own renewable energy assets in Australia, with 1.1 gigawatts (GW) of renewable energy in operation and a development pipeline of 20GW.

With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

Squadron Energy acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present, and emerging.

