



**NGH**

# Heritage Management Plan

## Walla Walla Solar Farm

October 2022

Project Number: 22-239



## Document verification

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## Acronyms and abbreviations

ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHCRP	Aboriginal Cultural Heritage Consultation Requirements for Proponents
AHIMS	Aboriginal Heritage Information Management System
ASIRF	Aboriginal Site Impact Recording Form
BCS	Bundy Cultural Services
CDC	Consolidated Development Consent
Code of Practice	Code of Practice for Archaeological investigation of Aboriginal Objects in NSW (DECCW NSW 2010)
Construction	The construction of the development, including but not limited to, the carrying out of any earthworks on site and the construction of solar panels and 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)
Construction Contractor	GranSolar Group (GRS)
CCP	Community Consultation Plan
DECCW	(Former) Department of Environment, Climate Change and Water (NSW) (now DPE)
DPE	Department of Planning and Environment (NSW)
EIS	<p>Environmental Impact Statement for Walla Walla Solar Farm dated October 2019 as amended by:</p> <ul style="list-style-type: none"> <li>• Walla Walla Solar Farm Submissions Report dated 7 April 2020;</li> <li>• Walla Walla Solar Farm Amendment Report dated 1 April 2020;</li> <li>• additional information provided by the Applicant to the Department dated 27 April 2020, 26 May 2020 and 11 September 2020;</li> <li>• Walla Walla Solar Farm Modification Report dated 24 August 2021;</li> <li>• Walla Walla Solar Farm Modification Submissions Report dated 7 December 2021;</li> <li>• additional information provided by the Applicant to the Department dated 8 December 2021, 24 January 2022, 27 January 2022, 1 February 2022 and 4 February 2022</li> <li>• Walla Walla Solar Farm Modification Report dated 30 March 2022;</li> <li>• Walla Walla Solar Farm Modification Submissions Report dated 8 June 2022;</li> <li>• Walla Walla Solar Farm Modification additional information provided to the Department dated 7 July 2022 and 28 July 2022</li> </ul>

EMS	Environmental Management Strategy
Project Owner	FRV Services Australia Pty Ltd
ha	hectares
Heritage Act	<i>Heritage Act 1977 (NSW)</i>
HMP	Heritage Management Plan
HSE	Health Safety and Environment
Incident	A set of circumstances that causes or threatens to cause material harm to the environment
IPC	Independent Planning Commission
km	kilometres
LALC	Local Aboriginal Land Council
LGA	Local Government Area
m	metres
NGH	NGH Pty Ltd
NGH Environmental	NGH Environmental Pty Ltd, now NGH Pty Ltd.
Non-compliance	An occurrence, set of circumstances or development that is a breach of the CDC but is not an incident
NPW Act	<i>National Parks and Wildlife Act 1974 (NSW)</i>
NSW	New South Wales
PAD	Potential Archaeological Deposit
Project Owner	FRV Services Australia Pty Ltd
RAP	Registered Aboriginal Party
RtS	Response to Submission Report
SEO	Site Environmental Officer
SSD	State Significant Development
The Project	Walla Walla Solar Farm
WMS	Work Method Statements



# 1. Introduction

Development Consent was granted on the 27 November 2020 for the construction, operation and decommissioning of the Walla Walla Solar Farm, located approximately 4 km northeast of the township of Walla Walla in the Greater Hume Local Government Area (LGA). The Walla Walla Solar Farm ('the Project') is a State Significant Development (SSD) (SSD 9874) that represents an important contribution to renewable energy generation in New South Wales (NSW). Since its approval, two modifications (have also been approved, Modification 1 on 03 March 2022, Modification 2 on 05 August 2022 and Consolidated Development Consent (CDC) provided. The first modification was to increase the height of solar panels and substation transmission towers and amended the construction access and transport route for the Project. The second modification was to increase the solar array area within the existing development footprint, increase vegetation clearance, add an additional creek crossing and increase daily truck numbers. The approved development footprint of the Walla Walla Solar Farm is shown in Appendix A and a copy of the CDC is provided in Appendix B.

The purpose of this Heritage Management Plan (HMP) is to describe how impacts on Aboriginal and historic heritage will be minimised and managed during construction, operation and decommissioning of the Project.

An Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared for the Walla Walla Solar Farm, which was included as part of the Walla Walla Solar Farm Environmental Impact Statement (EIS) (NGH Pty Ltd 2019, NGH Environmental Pty Ltd 2020). The EIS summarised the key findings of the ACHAR including impacts to Aboriginal heritage and any proposed mitigation measures to minimise impacts. The EIS did not identify any historic heritage items that would be impacted by the Project.

During detailed design, FRV Services Australia Pty Ltd (the Project Owner) identified aspects of the consented project that required amendment before construction commenced. Modification 1 (SSD-9874-Mod-1) amendments related to changes in the height of approved infrastructure and increased traffic for substation access. Modification 1 did not affect the project footprint and did not require additional Aboriginal or cultural heritage assessment. Modification 2 (SSD-9874-Mod-2) amendments related to changes to project layout to increase the solar array area in a 15.4 ha area within the existing development footprint, an additional creek crossing, increases to vegetation clearing and increased maximum daily truck numbers. An addendum ACHAR (NGH 2022) with subsurface test excavation was undertaken to assess the impact of the proposed modification (Modification 2) to cultural heritage values, continue consultation with registered Aboriginal parties and provide management strategies to mitigate potential impacts by the additional works.

## 1.1 Context

The Environmental Management Strategy (EMS) prepared for the project complies with the consent, issued by the NSW Independent Planning Commission (IPC), and all applicable legislation, during construction, operation and decommissioning of the Project.

This HMP is part of the Project Owner' and their contractor's environmental management framework for the Project, as described in the overall EMS. This HMP has been prepared to address the

requirements of the mitigation and management measures listed in the CDC from the IPC and all other applicable legislation during the construction, operation and decommissioning of the Project.

This HMP has been prepared by suitably qualified, independent, and experienced archaeologists Dr Tessa Bryant and Kirsten Bradley from NGH, who are endorsed by the Planning Secretary in accordance with Schedule 3 Condition 25(a) of SSD 9874 on 03 August 2022 as documented in Appendix C.

## **1.2 Environmental Management Strategic Framework**

The HMP is part of the Project Owners' and their construction contractor's environmental management framework for the Project, as described in the EMS. Mitigation and management measures identified in this plan will be incorporated into the site induction and Work Method Statements (WMS), as outlined in the EMS, where applicable.

All Project personnel, contractors and sub-contractors will undertake a site induction prior to commencing work on the Project site and will sign to acknowledge they have understood the contents of the induction. Additionally, all personnel undertaking a task governed by a work method statement must have signed that they have participated in a toolbox training on the work method statement, and that they have read and understood their obligations prior to commencing work.

Used together, the EMS, management measures, procedures, site induction and WMS form management guides that clearly identify required environmental management actions for reference by the personnel, contractors and sub-contractors for the Project.

As a subplan of the EMS, the review and document control processes for this plan will be undertaken in line with standard document control policy and procedures.



## 2. Purpose and Objectives

### 2.1 Purpose and Objectives

The purpose of this HMP is to describe how impacts on Aboriginal and historic heritage will be minimised and managed during construction, operation and decommissioning of the Project. In addition, the HMP provides guidance for the management of any unexpected Aboriginal and historic heritage objects that may be encountered during works for the Project.

The key objective of the HMP is to ensure that impacts to Aboriginal heritage items which are known to be present within the Project area are minimised and that any impacts are within the scope permitted by the planning approval. To achieve this objective, the following will be undertaken:

- Ensure appropriate controls and procedures are implemented during construction, operation and decommissioning activities to avoid (where necessary) or minimise potential adverse impacts to Aboriginal heritage in the Project footprint.
- Ensure appropriate measures are implemented to address the mitigation measures as detailed in the EIS, CDC and the Response to Submission Report (RtS).
- Ensure appropriate measures are implemented to comply with all relevant legislation and other requirements as described in Section 3 of this plan.
- Facilitate engagement with the local Aboriginal community in partnership to appropriately manage the Aboriginal cultural heritage values associated with the Project.

### 2.2 Targets

The following targets have been established for the management of Aboriginal and historic heritage impacts during the construction, operations and decommissioning of the Project:

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

These targets have been established to ensure the CDC conditions as listed below are met.

- Prevent, minimise and/or offset any adverse environmental impacts of the development;
- Set standards and performance measures for acceptable environmental performance; and
- Provide for the ongoing environmental management of the development.

## 3. Environmental Requirements

### 3.1 Legislative and Other Environmental Management Requirements

#### Legislation

Legislation relevant to heritage management includes:

- *Environmental Planning and Assessment Act 1979 (EP&A Act)*
- *National Parks and Wildlife Act 1974 (NPW Act)*
- *National Parks and Wildlife Regulations 2019*
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth)*
- *Heritage Act 1977*
- *Native Title Act 1993*

#### Guidelines and Standards

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

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

### 3.2 Consolidated Development Consent

Development consent was issued by the IPC on 27 November 2020. Modification 1 CDC were issued on 03 March 2022 and Modification 2 on 05 August 2022. Details of the CDC in relation to Heritage are summarised in Table 3-1 below.

A detailed list of heritage control measures to be implemented to ensure compliance with the CDC, EIS, RtS and heritage assessments undertaken for the Project to date is detailed in Section 7 and Appendix H of this document. As noted in the CDC all reasonable and feasible measures to prevent and/or minimise any material harm to the environment is noted, this includes harm to Aboriginal heritage objects. This document outlines how this is to be achieved.

Table 3-1 Location of information in this plan addressing the heritage requirement of the CDC.

Condition	Condition of Consent	Location of Relevant Information
1 of Schedule 2	In meeting the specific environmental performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures	This document and Section 7.

Condition	Condition of Consent	Location of Relevant Information
	to prevent and/or minimise any material harm to the environment that may result from the construction, operation, upgrading or decommissioning of the development.	
24 of Schedule 3	<p>The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 6 or any Aboriginal heritage items located outside the approved development footprint.</p> <p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.</p>	<p>CDC Table 1 of Appendix 6. HMP Table 3-2 and Section 6.</p> <p>CDC Table 2 of Appendix 6. HMP Table 3-3 and Section 6.</p>
25 of Schedule 3	<p>Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Appendix 6, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Planning Secretary in writing. This plan must:</p> <ul style="list-style-type: none"> <li>(a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Planning Secretary in writing.</li> <li>(b) be prepared in consultation with Heritage NSW and Aboriginal Stakeholders.</li> <li>(c) include a description of the measures that would be implemented for: <ul style="list-style-type: none"> <li>• protecting the Aboriginal heritage items identified in Table 1 of Appendix 6 or items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 6;</li> <li>• salvaging and relocating the Aboriginal heritage items located within the approved</li> </ul> </li> </ul>	<p>This document</p> <p>Section 1.1 Appendix C</p> <p>Section 4 and Appendix D</p> <p>Section 6 and 7</p> <p>Section 7 and</p>

Condition	Condition of Consent	Location of Relevant Information
	<p>development footprint, including subsurface salvage in PAD 2 as identified in Table 2 of Appendix 6;</p> <ul style="list-style-type: none"> <li>• avoidance of the potential hearth in PAD 1;</li> <li>• a contingency plan and reporting procedure if:               <ul style="list-style-type: none"> <li>○ previously unidentified heritage items are found; or</li> <li>○ Aboriginal skeletal material is discovered;</li> </ul> </li> <li>• ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and</li> <li>• ongoing consultation with Aboriginal stakeholders during the implementation of the plan; and</li> </ul> <p>(d) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.</p> <p>Following the Planning Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	<p>Appendix E</p> <p>Section 7</p> <p>Section 8.5</p> <p>Appendix F</p> <p>Appendix F.1</p> <p>Section 8.2</p> <p>Section 4 and 9</p> <p>Section 8.3, 8.4 and 8.5</p> <p>Noted</p>
2 of Schedule 4	<p>The Applicant must:</p> <p>(a) update the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary prior to carrying out any upgrading or decommissioning activities on site; and</p> <p>(b) review and, if necessary, revise the strategies, plans or programs required under this consent to the satisfaction of the Planning Secretary within 1 month of the:</p> <ul style="list-style-type: none"> <li>• submission of an incident report under condition 7 of Schedule 4;</li> <li>• submission of an audit report under condition 13 of Schedule 4; or</li> <li>• any modification to the conditions of this consent.</li> </ul>	<p>Section 9</p> <p>Section 9.2</p>

Condition	Condition of Consent	Location of Relevant Information
3 of Schedule 4	<p>With the approval of the Planning Secretary, the Applicant may submit any strategy, plan or program required by this consent on a progressive basis.</p> <p>To ensure the strategies, plans or programs under the conditions of this consent are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Planning Secretary for approval.</p> <p>With the agreement of the Planning Secretary, the Applicant may prepare any revised strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• While any strategy, plan or program may be submitted on a progressive basis, the Applicant must ensure that all development being carried out on site is covered by suitable strategies, plans or programs at all times.</li> <li>• If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.</li> </ul>	Section 9
7 of Schedule 4	<p>The Planning Secretary must be notified via the Major Projects website immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 7.</p>	Section 8.6
8 of Schedule 4	<p>The Department must be notified in writing via the Major Projects website within 7 days after the Applicant becomes aware of any non-compliance with the conditions of this consent. The notification must identify the development and the application number for it, set</p>	Section 8.6

Condition	Condition of Consent	Location of Relevant Information
	out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been done, or will be, undertaken to address the non-compliance.	
9 of Schedule 4	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020) to the following frequency: (a) within 3 months of commencing construction; and (b) within 3 months of commencement of operations.	Section 8.4
Appendix 7: Incident Notification and Reporting Requirements	<ol style="list-style-type: none"> <li>1. A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition 7 of Schedule 4 or, having given such notification, subsequently forms the view that an incident has not occurred.</li> <li>2. Written notification of an incident must:               <ol style="list-style-type: none"> <li>(a) identify the development and application number;</li> <li>(b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);</li> <li>(c) identify how the incident was detected;</li> <li>(d) identify when the applicant became aware of the incident;</li> <li>(e) identify any actual or potential non-compliance with conditions of consent;</li> <li>(f) describe what immediate steps were taken in relation to the incident;</li> <li>(g) identify further action(s) that will be taken in relation to the incident; and</li> <li>(h) identify a project contact for further communication regarding the incident.</li> </ol> </li> <li>3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the</li> </ol>	Section 8.6

Condition	Condition of Consent	Location of Relevant Information
	<p>Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.</p> <p>4. The Incident Report must include:</p> <ul style="list-style-type: none"> <li>(a) a summary of the incident;</li> <li>(b) outcomes of an incident investigation, including identification of the cause of the incident;</li> <li>(c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and</li> <li>(d) details of any communication with other stakeholders regarding the incident.</li> </ul>	

The Aboriginal heritage items referred to in Table 1 of Appendix 6 of the CDC, which are referred to in Condition 24 of Schedule 3 of the CDC, that are to be avoided by the development are listed below in Table 3-2 for easy reference. No harm must occur to these Aboriginal heritage sites.

Table 3-2 Aboriginal heritage items listed in Appendix 6 of the CDC to be avoided.

Item Name	CDC Requirements
Walla Walla SF AFT 6	Avoid Impacts
Walla Walla SF AFT 7	Avoid Impacts
Walla Walla AF IF 1	Avoid Impacts
Walla Walla AF IF 4	Avoid Impacts
Walla Walla SF IF 7	Avoid Impacts
Walla Walla SF IF 9	Avoid Impacts
Walla Walla SF IF 13	Avoid Impacts
Walla Walla SF IF 14	Avoid Impacts
Walla Walla SF IF 15	Avoid Impacts



Item Name	CDC Requirements
Walla Solar Farm 495495	Avoid Impacts
Walla Solar Farm 497946	Avoid Impacts
Walla Solar Farm 496602	Avoid Impacts
Walla Solar Farm 497199	Avoid Impacts
Walla Solar Farm 496812	Avoid Impacts
Walla Walla Hearth	Avoid Impacts

The Aboriginal heritage items listed in Table 2 of Appendix 6 of the CDC, which are referred to in Condition 25 of Schedule 3 of the CDC, that are to be salvaged and relocated if impacts cannot be avoided by the development are listed below in Table 3-3 for easy reference.

Table 3-3 Aboriginal heritage items listed in Appendix 6 of the CDC to be salvaged if they cannot be avoided by the development.

Item Name	CDC Requirements
Walla Walla SF AFT 1	Salvage- surface collection
Walla Walla SF AFT 2	Salvage- surface collection
Walla Walla SF AFT 3	Salvage- surface collection
Walla Walla SF AFT 4	Salvage- surface collection
Walla Walla SF AFT 5	Salvage- surface collection
Walla Walla SF AFT 8	Salvage- surface collection
Walla Walla SF AFT 9	Salvage- surface collection
Walla Walla SF AFT 10	Salvage- surface collection
Walla Walla SF AFT 11	Salvage- surface collection
Walla Walla SF IF 2	Salvage- surface collection
Walla Walla SF IF 3	Salvage- surface collection
Walla Walla SF IF 5	Salvage- surface collection
Walla Walla SF IF 6	Salvage- surface collection

Item Name	CDC Requirements
Walla Walla SF IF 8	Salvage- surface collection
Walla Walla SF IF 10	Salvage- surface collection
Walla Walla SF IF 11	Salvage- surface collection
Walla Walla SF IF 12	Salvage- surface collection
Walla Walla SF IF 16	Salvage- surface collection
Walla Walla SF IF 17	Salvage- surface collection
Walla Walla SF IF 18	Salvage- surface collection
Walla Walla SF IF 19	Salvage- surface collection
Walla Walla SF IF 20	Salvage- surface collection
Walla Walla SF IF 21	Salvage- surface collection
Walla Walla SF IF 22	Salvage- surface collection
Walla Walla SF IF 23	Salvage- surface collection
Walla Walla PAD 1	Salvage- surface collection
Walla Walla PAD 2	Salvage- surface collection and savage excavation

## 4. Consultation for the HMP

Condition 25(b) of Schedule 3 of the CDC requires the HMP be prepared in consultation with Heritage NSW and Aboriginal Stakeholders.

The consultation process for this Project began in 2019 for the ACHAR. The consultation with Aboriginal stakeholders was undertaken in accordance with clause 80C of the *National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2010* following the consultation steps outlined in the ACHCRP guide.

As a result of this process, there are three Registered Aboriginal Parties (RAPs) for this Project, as listed below and outlined in Appendix D.

- The Albury and District Local Aboriginal Land Council (Albury LALC);
- Bundy Cultural Services (BCS); and
- Yalmambirra

As per Condition 25(c) of the CDC, consultation with the Project RAPs would be ongoing during the implementation of the Plan. A log of consultation will be kept by the Project manager. Consultation with the RAPs will generally be provided in writing via email by the Project's Environmental Representative as required.

For this HMP additional consultation, as required by the CDC, with the RAPs as detailed in Appendix D. To date no feedback has been received from the RAPs.

## 5. Existing Heritage

NGH Environmental Pty Ltd (2020) prepared an ACHAR for the proposed Walla Walla Solar Farm. The findings of the ACHAR were summarised within the EIS (NGH 2019) and a brief summary is included below.

The assessment included a review of relevant information relating to the landscapes within the Project area. No Aboriginal sites had previously been recorded within the Project area with two Aboriginal sites (artefact scatters) previously recorded to the north of the Project area adjacent to Back Creek.

Based on previous archaeological investigations in the region and knowledge of Wiradjuri cultural practices and traditional activities, the Project area was noted as having the possibility of containing archaeological sites, especially given that Aboriginal people have lived in the region for tens of thousands of years. This would most likely be in the form of artefact scatters, isolated artefacts and scarred trees in remnant old growth vegetation areas within and adjacent to the Project area particularly adjacent to Back Creek.

Despite the variable visibility encountered during the survey, 11 artefact scatters, 23 isolated finds and two potential scarred trees were recorded (NGH Environmental 2020). Two (2) areas of potential archaeological deposit (PAD) were also identified in association with Back Creek. The Aboriginal community representatives also identified three (3) trees which have cultural values which they requested not be impacted by the proposed works.

As part of the Addendum ACHAR (NGH 2022) subsurface test excavation of the areas considered to have potential for *in situ* subsurface deposits was undertaken following the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. A total of 44 test pits were excavated across the two PADs within the Project area, 28 test pits excavated in PAD 1 and 16 test pits excavated in PAD 2. A total of 103 items were recovered from 26 of the excavated test pits.

The majority of artefacts came from test pits within PAD 2 which had artefact densities ranging from nil to 64/m<sup>2</sup>. Seventeen artefacts came from test pits within PAD 1 with artefact densities ranging from nil to 12/m<sup>2</sup>. Artefacts were recovered from the upper 20cm of deposit in PAD 1 and the upper 30cm of deposit in PAD 2 with the majority of artefacts recovered from the upper 10cm of deposit across both PAD areas. Quartz was the dominant raw material with two silcrete flake fragments recovered from test pits in PAD 2. Artefact types were mostly unretouched flaked pieces, flakes and flake fragments. The majority of retouched artefacts came from PAD 2 as did the single core.

In Test Pit 12 in PAD 1 a cultural hearth feature was identified. A burnt feature within this test pit was identified as a potential cultural/signal fire by RAPs with cultural importance. No other cultural material or artefactual material was recovered in association with this feature.

The density of artefacts recovered from the test excavation provide an indication of the variability of artefact numbers across the landforms investigated. Observing the pattern of artefact distribution the Project area was noted to be characterised by discrete low-density clusters of artefacts interspersed with areas of very low or no artefactual material. The subsurface material recovered was recorded as two (2) new subsurface artefact scatters (Walla Walla PAD 1 and Walla Walla PAD 2) and a possible hearth (Walla Walla Hearth as a feature of Walla Walla PAD 1). The material recovered from the subsurface testing was stored in locked cabinet in temporary care at the NGH office. The material recovered from the subsurface testing programme will be managed in accordance with long term management of sites as noted in Section 7.2 of this HMP.

The density of the surface and subsurface assemblage across the Project area was noted to indicate that small groups were occupying short-term camps for short periods of time across the Project area, with a focus along water sources and elevated areas in close proximity to a water source. No direct evidence of longer-term base camps was identified within the Project area.

Table 5-1 below lists the identified risks to known Aboriginal sites within the Project area and the mitigation measures as recommended in the ACHAR and Table 5-2 lists the updated identified risks to known Aboriginal sites as recommended in the Addendum ACHAR for the proposed Modification 2 works. Salvage and relocation of the Aboriginal heritage items that cannot be avoided by the development will be carried out in line with the Salvage methodology outlined in Appendix E and in accordance with long term management of sites as noted in Section 7.2 of this HMP.

Table 5-1 Identified risks to known Aboriginal sites within the Project area as noted in the ACHAR (NGH Environmental 2020).

AHIMS #	Site name	Site Type	Type of harm	Degree of harm	Consequence of harm	Recommendation
55-6-0163	Walla Walla SF AFT 1	Artefact Scatter	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0164	Walla Walla SF AFT 2	Artefact Scatter	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0165	Walla Walla SF AFT 3	Artefact Scatter	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0166	Walla Walla SF AFT 4	Artefact Scatter	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0167	Walla Walla SF AFT 5	Artefact Scatter	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0168	Walla Walla SF AFT 6	Artefact Scatter	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0169	Walla Walla SF AFT 7	Artefact Scatter	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0170	Walla Walla SF AFT 8	Artefact Scatter	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0171	Walla Walla SF AFT 9	Artefact Scatter	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0172	Walla Walla SF AFT 10	Artefact Scatter	Direct	Total	Total loss of value	Salvage surface objects prior to development.

**Heritage Management Plan**  
**Walla Walla Solar Farm**

<b>AHIMS #</b>	<b>Site name</b>	<b>Site Type</b>	<b>Type of harm</b>	<b>Degree of harm</b>	<b>Consequence of harm</b>	<b>Recommendation</b>
55-6-0173	Walla Walla SF AFT 11	Artefact Scatter	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0174	Walla Walla SF IF 1	Isolated Find	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0175	Walla Walla SF IF 2	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0176	Walla Walla SF IF 3	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0177	Walla Walla SF IF 4	Isolated Find	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0178	Walla Walla SF IF 5	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0179	Walla Walla SF IF 6	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0180	Walla Walla SF IF 7	Isolated Find	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0181	Walla Walla SF IF 8	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0182	Walla Walla SF IF 9	Isolated Find	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0183	Walla Walla SF IF 10	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0184	Walla Walla SF IF 11	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0185	Walla Walla SF IF 12	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0186	Walla Walla SF IF 13	Isolated Find	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0187	Walla Walla SF IF 14	Isolated Find	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.

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AHIMS #	Site name	Site Type	Type of harm	Degree of harm	Consequence of harm	Recommendation
55-6-0188	Walla Walla SF IF 15	Isolated Find	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0189	Walla Walla SF IF 16	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0190	Walla Walla SF IF 17	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0191	Walla Walla SF IF 18	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0192	Walla Walla SF IF 19	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0193	Walla Walla SF IF 20	Isolated Find	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0194	Walla Walla SF IF 21	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0195	Walla Walla SF IF 22	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0195	Walla Walla SF IF 23	Isolated Find	Direct	Total	Total loss of value	Salvage surface objects prior to development.
55-6-0144	Walla Solar Farm 495495	Potential Scarred Tree	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 10m buffer around site.
55-6-0148	Walla Solar Farm 497946	Potential Scarred Tree	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 10m buffer around site.
55-6-0147	Walla Solar Farm 496602	Cultural Tree	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 10m buffer around site.
55-6-0145	Walla Solar Farm 497199	Cultural Tree	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 10m buffer around site.
55-6-0146	Walla Solar Farm 496812	Cultural Tree	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 10m buffer around site.



AHIMS #	Site name	Site Type	Type of harm	Degree of harm	Consequence of harm	Recommendation
55-6-0270	Walla Walla PAD 1	Potential Archaeological Deposit	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.
55-6-0269	Walla Walla PAD 2	Potential Archaeological Deposit	None – outside development footprint	None	None	Site will be avoided by proposed development. Ensure avoidance with 5m buffer around site.

Table 5-2 Identified risks to known Aboriginal sites within the Project area as noted in the Addendum ACHAR for the proposed Modification 2 works (NGH 2022).

AHIMS #	Site name	Site Type	Type of harm	Degree of harm	Consequence of harm	Recommendation
55-6-0193	Walla Walla SF IF 20	Isolated Find	Direct	Total	Partial loss of value	Salvage surface objects prior to development.
55-6-0270	Walla Walla SF PAD 1	Potential Archaeological Deposit and Artefact scatter	Direct	Total	Partial loss of value	No mitigation recommended for the deposit due to the extremely low density of artefacts recovered.
55-6-0269	Walla Walla SF PAD 2	Potential Archaeological Deposit and Artefact scatter	Direct	Total	Partial loss of value	Subsurface salvage will be required before construction can commence. It is recommended that this occurs in two open areas of a minimum 2m x 2m to a maximum 3m x 3m centred around the locations of the area which had the highest density of artefacts. This would be from TP 25 and TP 32.
55-6-0270	Walla Walla Hearth	Possible hearth	NA- avoid feature	NA- avoid feature	NA- avoid feature	Feature to be avoided by works. Avoid the location of the identified cultural hearth, TP 12 with a 2 m buffer zone for exclusion.

## 6. Heritage Mapping

Mapping of the heritage items within the Project are shown in Figure 6-1. The recommended mitigation measures for PAD 1 and PAD 2 to be impacted by Modification 2 are shown in Figure 6-2 and Figure 6-3.

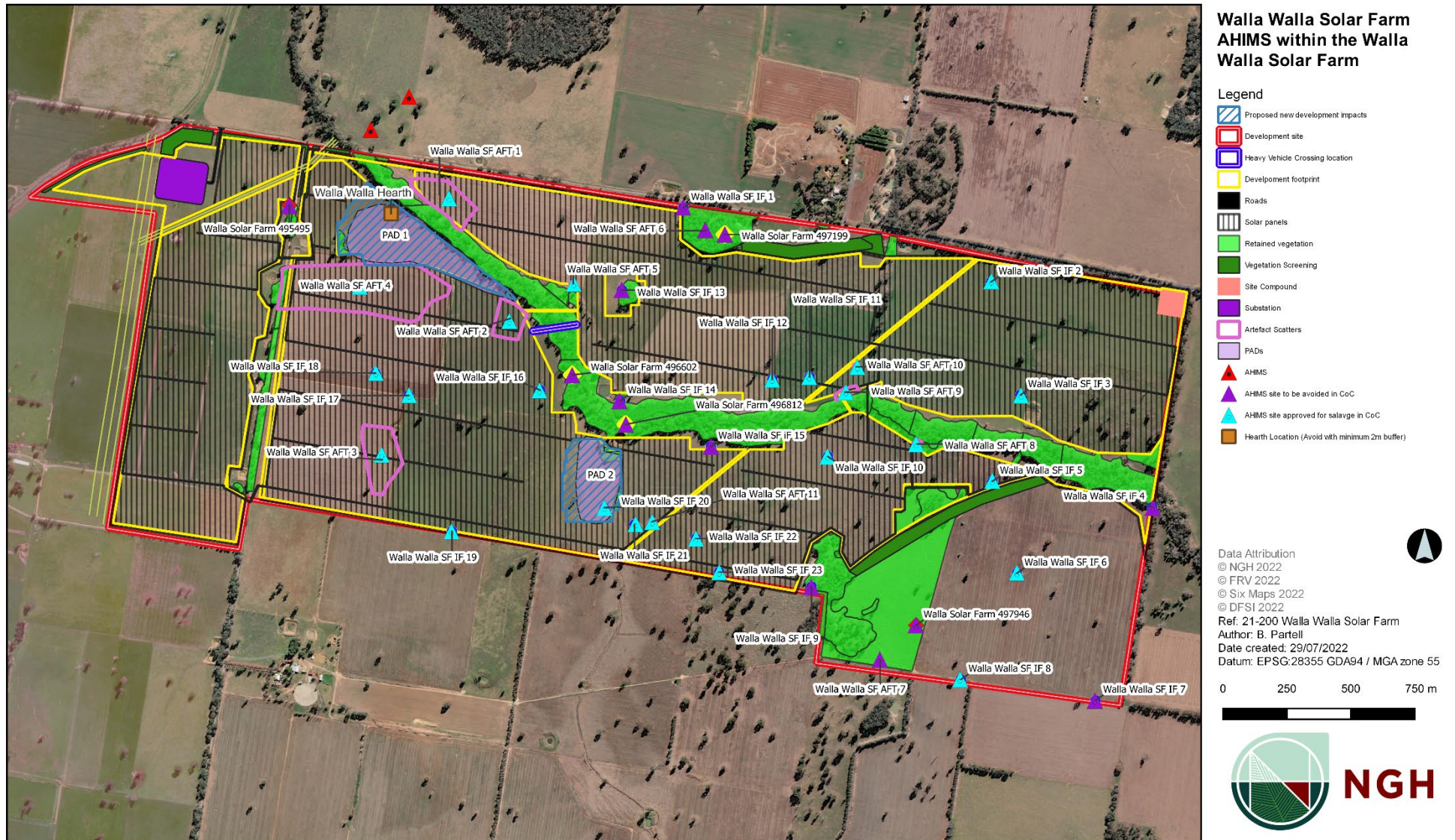


Figure 6-1 Location of known Aboriginal sites with the Project area to be Salvaged or Avoided.





Figure 6-2. Recommended Mitigation Measures for PAD1.



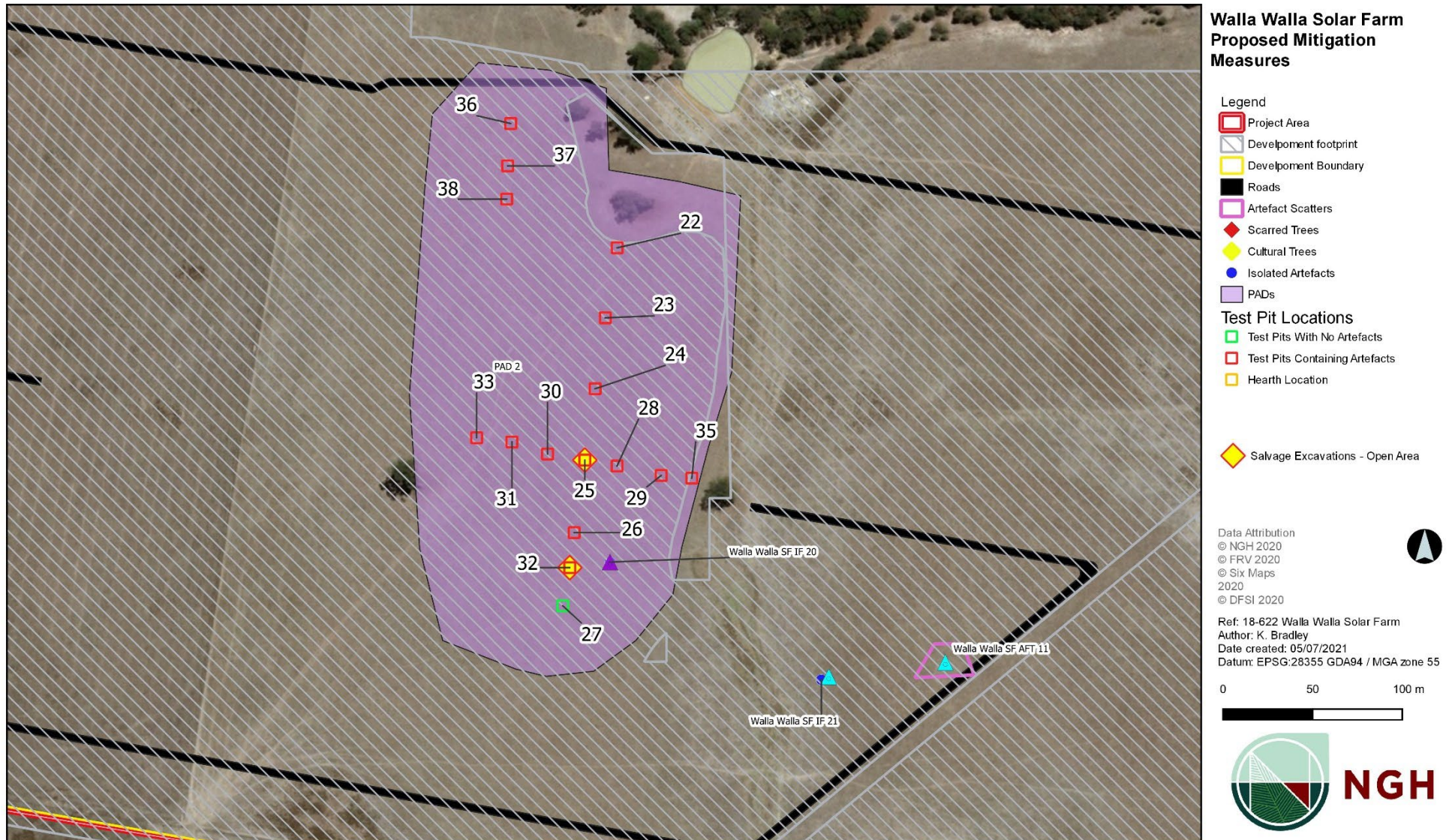


Figure 6-3. Recommended Mitigation Measures for PAD2.

## 7. Heritage Control Measures

A range of mitigation requirements and control measures are identified in the CDC, EIS, RtS and heritage assessments undertaken for the Project. Specific measures and requirements to address impacts to heritage values are outlined in Table 7-1. The measures have been listed to cover broad activities and as such there may be some repetition of mitigation measures.

Table 7-1 Heritage control measure as required under the CDC, EIS, RtS and heritage reports in relation to the Project.

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<b>General</b>				
All reasonable and feasible measures must be implemented to prevent and/or minimise any material harm to the environment, including Aboriginal objects, that may result from the construction, operation, upgrading or decommissioning of the development.	This document	Pre-construction Construction Operation Decommissioning	Construction Contractor Project Manager	This document
Ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in the CDC as sites to avoid impacting or other sites located outside the approved development footprint.	This document CDC	Design Pre-construction Construction Operation Decommissioning	Project Owner Construction Contractor Project Manager	This document CDC
Implementation of approved Heritage Management Plan.	This document	Pre-construction	Construction Contractor Project Manager	This document
A copy of the HMP should be kept on site during construction and operation of the Project and be readily available for reference if and as required.	This document	Pre-construction Construction Operation Decommissioning	Construction Contractor Project Manager	This document



Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
Training will be provided to all personnel involved in construction and management phases of the Project, including relevant sub-contractors on heritage requirements from this plan through inductions, toolboxes, and targeted training.	Induction package Toolbox training material Targeted training material	Pre-Construction Construction Operation Decommissioning	Project Manager Environmental Officer Construction Contractor	This document Section 8.2 and CDC Section 25(c)
All employees, contractors and utility staff working on site will receive Aboriginal Cultural Heritage Awareness Training. It will be provided to all personnel in the form of an induction before they begin work on site. A record of this training will be kept.	Induction package	Pre-construction Construction Operation Decommissioning	Project Manager Construction Contractor Environmental Officer	This document Section 8.2 CDC Section 25(c)
A strategy for the long-term management of any items or material that are salvaged would be developed in consultation with the registered Aboriginal parties. The artefacts recovered during salvage would be relocated and buried in a safe location within the Project area outside the approved development footprint.	CDC Heritage reports This Plan	Pre-construction	Project Manager Construction Contractor Environmental Officer Project Archaeologist	This document Appendix E and Section 7.2
The location of all Aboriginal sites which are not approved for impacts should be clearly shown on all relevant construction mapping and plans.	Construction mapping and plans	Pre-construction Construction Operation Decommissioning	Construction Contractor Project Manager	This document and construction mapping and plans
Cultural Heritage must be included within any major environmental audit for the Project	CDC This document	Pre-construction Construction Operation Decommissioning	Independent Auditor Project Manager	This document Section 8.4

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<b>Design</b>				
The design of the solar farm must avoid the sites not approved for impacts including the two potential scarred trees (Walla Solar Farm 495495 and Walla Solar Farm 497946) and three identified cultural trees sites (Walla Solar Farm 496602, Walla Solar Farm 497199 and Wall Solar Farm 496812). A minimum 10 m buffer must be placed around each potential scarred or cultural tree to protect the root system and canopy to ensure there are no inadvertent impacts to these tree sites. The buffer zone will be delineated by the placement of star pickets with either fencing wire and/or the appropriate tape for environmental sensitive zones placed around them to clearly denote the area to ensure no impacts.	Heritage reports CDC	Design Pre-construction Construction Operation Decommissioning	Project Owner Construction Contractor Project Manager	This document Table 5-1, Table 3-2, Section 6
A minimum 5 m buffer must be placed around any stone artefact sites that are outside the approved development footprint to ensure there are no inadvertent impacts to these sites. The buffer zone will be delineated by the placement of star pickets with either fencing wire and/or the appropriate tape for environmental sensitive zones placed around them to clearly denote the area to ensure no impacts.	Heritage reports CDC	Design Pre-construction Construction Operation	Project Owner Construction Contractor Project Manager	This document. Table 5-1 and Table 3-2. Section 3.2
Further archaeological assessment would be required if the Project activity extends beyond the areas assessed to date. This would include consultation with the registered Aboriginal parties and may include further field survey and subsurface testing. A formal modification to the development consent would be required if any activity were proposed to extend beyond the area assessed and granted for development approval in the CDC.	Heritage reports CDC	Design Pre-construction Construction Operation	Project Owner Construction Contractor Project Manager	CDC Heritage reports This document
Ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in the CDC as sites to avoid impacting or other sites located outside the approved development footprint. This to be achieved by the buffer zone of the sites listed to be avoided being delineated by the placement of star pickets with either fencing wire and/or the appropriate tape for environmental sensitive zones placed around them to clearly denote the area to ensure no impacts. All staff working onsite should be aware of the approved development footprint to ensure works only occur within approved areas.	Heritage reports CDC	Design Pre-construction Construction Operation	Project Owner Construction Contractor Project Manager	This document CDC



Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
Ensure that the development avoids (as far as practicable) any direct or indirect impacts on the Aboriginal heritage items prior to salvage of sites approved for impacts. This can be achieved by ensuring no works occur prior to a salvage programme being completed.	Heritage reports HMP CDC	Design Pre-construction Construction Operation Decommissioning	Project Owner Construction Contractor Environmental Officer	This document Section 3.2
To avoid inadvertent impacts on the two potential scarred trees (Walla Solar Farm 495495 and Walla Solar Farm 497946) and three identified cultural trees sites (Walla Solar Farm 496602, Walla Solar Farm 497199 and Wall Solar Farm 496812) all planting for the vegetation screening or any form of ground disturbance during fencing activities must occur outside the 10 m buffer placed around each tree. The 10 m buffer is to be measured out from the trunk. Any fencing wire installed will be a minimum of 1 m from physical contact with any part of the trees.	Heritage reports RtS	Design Pre-construction Construction Decommissioning	Project Owner Construction Contractor Project Manager	This document. Table 5-1
Work must avoid the Walla Walla Hearth with a minimum of a 2 m buffer. This site must be fenced to ensure no inadvertent impacts. Fencing will be put in place prior to any construction or preconstruction works commencing in within proximity to this site.	Heritage reports HMP CDC	Design Pre-construction Construction Operation Decommissioning	Project Owner Construction Contractor Project Manager	This document Section 3.2 and Figure 6-2
<b>PRE-CONSTRUCTION</b>				
Delineation and signage of Aboriginal sites that will not be impacted by the proposed development works as listed in the CDC will be put in place prior to any construction or preconstruction works commencing. Delineation and signage of the artefact relocation site/s will also occur once the relocation has occurred. A minimum 5 m buffer zone is required to be placed around the artefact relocation site/s to ensure they will not be impacted into the future.	Heritage reports HMP	Pre-construction Construction Operational	Construction Contractor Environmental Officer	This document Section 8.3 Table 5-1
A minimum 5 m buffer must be observed around all sites with stone artefacts until salvage of these heritage items/sites is undertaken as approved by the CDC.	Heritage reports CDC HMP	Pre-construction Construction	Construction Contractor Environmental Officer	This document Table 5-1

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
A new site card/s must be completed on the AHIMS database for the relocated/reburial location of the salvage sites. This must occur within 1 month of the actions being completed for the reburial of the salvaged sites.	Code of Practice	Pre-construction	Construction Contractor Project Manager Project archaeologist	Code of Practice Section 7.2
Salvage and/or relocate the Aboriginal heritage items located within the approved development footprint (as per the CDC list of Aboriginal sites to be salvaged if impacts cannot be avoided) to a suitable alternative location/s on site in accordance with the Code of Practice, outside the development footprint. Salvage would be conducted by an archaeologist with representatives of the Registered Aboriginal Parties invited to participate. The salvage of Aboriginal objects, as per the CDC, must occur prior to works commencing.	Code of Practice Heritage reports HMP CDC	Pre-construction Construction	Construction Contractor Project Manager Project archaeologist	This document Section 3.2 Appendix E Section 7.2
Salvage excavation of Test Pit 25 and 32 in Walla Walla PAD 2 will be required before construction can commence. It is recommended that this occurs in two open areas of a minimum 2m x 2m to a maximum 3m x 3m centred around the locations of PAD 2, TP 25 and TP 32 which had the highest density of artefacts recorded during the testing programme.	Code of Practice Heritage reports HMP CDC	Pre-construction	Construction Contractor Project Manager Project archaeologist	This document Appendix E
An Aboriginal Site Impact Recording Form will be completed and submitted to AHIMS (Aboriginal Heritage Information Management System) for any site harmed or destroyed from salvage and/or construction works. Artefact disposition and storage must be done in accordance with Requirement 26 of the Code of Practice (DECCW 2010:35-6).	Code of Practice Aboriginal Site Impact Recording Form	Pre-construction	Construction Contractor Project Manager Project archaeologist	Code of Practice Section 7.2
<b>Construction</b>				
Where any additional, unrecorded Aboriginal or non-Aboriginal objects are encountered during works within the approved development footprint (Appendix A of this Plan) the Unexpected Finds Procedure will be followed.	Unexpected Finds Procedure Site Plan CDC	Construction Operational Decommissioning	Construction Contractor Project Manager Environmental Officer All personnel	This document Unexpected Finds Procedure Appendix F

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<p>If human remains are discovered on site, then all work surrounding the area must cease immediately, the area must be secured and NSW Police notified. The Unexpected Finds Procedure will be followed to notify Heritage NSW as soon as possible. Work must not recommence in the area until this is authorised by Heritage NSW and/or NSW Police.</p>	<p>Unexpected Finds Procedure</p>	<p>Construction Operational Decommissioning</p>	<p>Construction Contractor Project Manager Environmental Officer All personnel</p>	<p>This document Unexpected Finds Procedure Appendix F.1 Section 8.5.1</p>
<p>Should an item of historic heritage be identified during works, the Unexpected Finds Procedure will be followed. The Heritage Division would be contacted prior to further work being carried out in the vicinity.</p>	<p>Unexpected Finds Procedure</p>	<p>Construction Operational</p>	<p>Construction Contractor Project Manager All personnel</p>	<p>This document Unexpected Finds Procedure Appendix F</p>

## **7.1 Temporary/short term storage of artefacts**

The Aboriginal artefacts recovered from the surface collection salvage programme, which is required to be undertaken prior to any development works, may be temporarily held in a secure locked cabinet at the NGH Wagga Wagga office for analysis and recording.

As part of the Addendum ACHAR (NGH 2022), a subsurface test excavation was undertaken. All artefacts recovered from the subsurface testing programme for this Project are currently in temporary care in a locked cabinet at NGH Wagga Wagga office. All objects recovered from the subsurface test excavation and surface collection salvage programme may be temporarily held together at the NGH Wagga Wagga office until an appropriate time that it can be arranged for them to be relocated within the Project area, outside the approved development footprint.

## **7.2 Long term management and relocation of salvaged artefacts**

The relocation site for the Aboriginal artefacts which will be salvaged via the surface collection salvage programme, salvage excavation and those previously recovered from the subsurface testing programme (which are currently in temporary care of NGH Wagga Wagga office) would need to be agreed to by the landowner, Project owner, and RAPs and be outside the proposed approved development footprint within the Project area. The site/s for the relocation of salvaged Aboriginal objects would be noted by submission of site card/s to the Aboriginal Heritage Information Management System (AHIMS) as legally required within 1 month from the reburial/relocation of the salvaged Aboriginal objects. The proposed relocation area is shown in Figure 7-1.

An Aboriginal Site Impact Recording Form must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage and/or construction works. Representatives from the RAPs (as selected by the Project owner and/or construction contractor) would be provided with the opportunity to assist the Project Archaeologist with the salvage programme and the relocation of the salvaged objects. Generally, a minimum of two representatives from the RAPs would be invited to participate in the salvage programme and the relocation of the Aboriginal salvaged objects. If Aboriginal representatives are available to participate in the relocation of the Aboriginal salvaged objects, they will be asked to conduct a ceremony (i.e. smoking) for the relocation site and artefacts if it is safe to do so. If representatives from the RAPs are not available to participate and all reasonable opportunities have been afforded, the collection and relocation of Aboriginal objects, would continue as scheduled by the Project Archaeologist.

Following the relocation of the Aboriginal objects, which have been salvaged as per the CDC, the site location/s will also be provided to the Project owner, Project team, and construction contractor to ensure the site/s are protected during the construction, operation and decommissioning of the Project. Following the relocation of salvaged Aboriginal objects, the mapping within the HMP would be updated to show and/or include the relocation site/s. It is intended that this would occur within 3 months of the relocation of the sites. A minimum 5 m buffer zone is required to be placed and delineated around the artefact relocation site/s to ensure they won't be impacted into the future.





**Walla Walla Solar Farm**  
**Proposed relocation area**

- Legend**
-  Proposed relocation area
  -  Development site

Data Attribution  
© NGH 2022  
© FRV 2022  
© Six Maps 2022  
© DFSI 2022

Ref: 21-200 Walla Walla Solar Farm  
Author: B. Partell  
Date created: 03/08/2022  
Datum: EPSG:28355 GDA94 / MGA zone 55

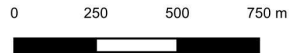


Figure 7-1. Proposed long term relocation area

### **7.3 Ground disturbance protocol**

A ground disturbance permit process will be implemented during construction. The ground disturbance permit process is integral to communicate the distinction between heritage sites which must be avoided and the ground disturbance footprints in which construction contractors will be working.

The ground disturbance permit process will be managed by the Health, Safety and Environment (HSE) Manager and/or the Site Environmental Officer (SEO). The steps that will be implemented are detailed below:

- Contractors are informed in their contract and site induction that all ground disturbing activities require them to obtain a ground disturbance permit prior to starting the work.
- The ground disturbance permit must be submitted to the HSE Manager / SEO via email at least 48 hours before the work is commenced.
- The HSE Manager / SEO will compare the proposed ground disturbance area to the project footprint detailed in the current approved design and the heritage shape files.
- The HSE Manager/ SEO will visit the site to ensure the delineation of any *in situ* heritage sites in the vicinity of the proposed ground disturbance permit.
- The HSE Manager/ SEO will either issue the permit unamended or contact the contractor for further clarification.
- Once the permit has been issued, the construction contractor may commence ground works as per their contract.
- Once the work has been completed (date specified in the permit), the HSE Manager/ SEO may be required to inspect the site, request any additional clean up or remediation activities and sign-off that the conditions of the permit have been met.
- If no *in situ* Aboriginal sites are present within the vicinity (within 50 m) of the works area the permit may be approved without a site inspection.

An example of a ground disturbance permit form is provided in Appendix H.1.

### **7.4 Heritage site status database**

Prior to any works occurring onsite a database of all previously recorded Aboriginal heritage sites will be established. This database will include as a minimum the following information:

- AHIMS number of the site;
- Site name;
- CDC for site;
- Status of the site;
- Date status of site updated on AHIMS; and
- Comments.
- GIS Shape Files showing the location and status of all recorded sites

This database will be updated by the SEO within 1 month following the salvage of a site and submission of impact site cards and/or if any new site cards within the Project area are submitted to AHIMS. An example of the Heritage site status database for this Project is provided in Appendix H.2.

The SEO and site survey team coordinate access, updating and status of the shape files.

## 8. Compliance Management

### 8.1 Structure and Responsibility

The organisational structure and overall roles and responsibilities, including those for contractors and sub-contractors, are outlined in the EMS. Specific responsibilities for the implementation of environmental controls in this document are summarised in Table 7-1 and the roles and responsibilities relevant to this plan are outlined in Table 8-1 below.

Table 8-1 Construction team roles and responsibilities

Role	Responsibility	Authority and accountability
Project Manager	<ul style="list-style-type: none"> <li>• Ensure resources are made available to enable works to comply with EMS and other environmental management requirements.</li> <li>• Ensure that all procedures are followed adequately.</li> <li>• Ensure appropriate approvals and licences are held.</li> <li>• Ensure all staff and contractors are aware of environmental compliance requirements and environmental controls.</li> <li>• Responsible for reporting incidents and non-compliance with the conditions of consent.</li> </ul>	<ul style="list-style-type: none"> <li>• Order Stop-work for an activity that may cause material or environmental harm.</li> <li>• Release of environmental hold points, if required.</li> <li>• Recommend Stop-work for an activity that may cause harm to Aboriginal objects</li> </ul>
Health Safety and Environment (HSE) Advisor and Site Environmental Officer (SEO)	<ul style="list-style-type: none"> <li>• Maintaining all environmental management documents.</li> <li>• Identifying where environmental measures are not meeting the targets and where improvements can be achieved.</li> <li>• Monitoring and reporting environmental compliance.</li> <li>• Reviewing Project environmental documents.</li> <li>• Reporting of incidents.</li> </ul>	<ul style="list-style-type: none"> <li>• Recommend Stop-work for an activity that may cause material or environmental harm.</li> <li>• Release of environmental hold points, if required.</li> <li>• Recommend Stop-work for an activity that may cause harm to Aboriginal objects</li> </ul>
Construction Contractor	<ul style="list-style-type: none"> <li>• Ensure contractors are working in accordance with the requirements of the EMS, as required under the construction contract.</li> <li>• Undertake site visits during construction to monitor compliance with EMS requirements.</li> <li>• Report and raise any issues that</li> </ul>	<ul style="list-style-type: none"> <li>• Report any issues that may have the potential to cause material or environmental harm.</li> <li>• Report any incidents or near-misses that may impact on the environment or breach conditions set-out in this plan of the EMS.</li> </ul>



Role	Responsibility	Authority and accountability
	<p>arise that may have an environmental impact.</p> <ul style="list-style-type: none"> <li>• Report and raise the discovery of any artefacts, Aboriginal relics or places and cease work until the matter has been addressed.</li> </ul>	<ul style="list-style-type: none"> <li>• Recommend Stop-work for an activity that may cause harm to Aboriginal objects</li> </ul>
Project archaeologist	<ul style="list-style-type: none"> <li>• Acting as an environmental subcontractor, specialist work as required.</li> <li>• Operate as instructed by the Project Manager/ Project Owner in compliance with all environmental requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• Undertake salvage works of sites as approved in the CDC as subsequent reporting, including impact site cards if applicable.</li> <li>• Inspection of unexpected finds as required.</li> <li>• Recommend Stop-work for an activity that may cause harm to Aboriginal objects.</li> </ul>

Further details regarding specific responsibilities for the implementation of environmental and heritage controls are detailed in the EMS.

## 8.2 Training

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

All training will be undertaken and records kept in accordance with the CDC Condition 25 (c) of Schedule 3 which notes workers on site will receive suitable heritage inductions prior to carrying out any development on site, and records will be kept of these inductions.

All employees, contractors, sub-contractors and utility staff working on site will receive Aboriginal Cultural Heritage Awareness Training. It will be provided to all personnel in the form of an induction before they begin work on site. This training will address obligations under the Project CDC, the *National Parks and Wildlife Act 1974* and Project specific site identification, heritage conservation and management measures, procedures for dealing with previously unidentified Aboriginal heritage items, and any specific responsibilities for the protection of heritage items. Where possible any training and/or cultural awareness will involve the Registered Aboriginal Parties and/or the local Aboriginal community.

Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in heritage management. Further information regarding staff induction and training are outlined in the EMS.

A refresher induction and/or additional training will be implemented following any incident that involves heritage. If future revision of the HMP occurs consideration must be given as to whether a refresher induction and/or additional training will be undertaken.

### **8.3 Inspections and Monitoring**

Periodic inspection of the Aboriginal heritage sites located within the Project area which are not approved to be impacted, as per the CDC, will take place for the duration of construction, operation and decommissioning of the Project. The Aboriginal sites which are not approved to be impacted, as per the CDC, will be identified by the Project Archaeologist and/or the Site Environmental Officer (SEO) and marked by fencing to ensure there are no inadvertent impacts during the construction, operation and decommissioning of the Project. The fencing of the Aboriginal sites which are not approved to be impacted will be undertaken a minimum of 7 days prior to any construction works occurring. Inspection of these sites will occur fortnightly during construction and every six (6) months thereafter by the SEO.

The objective of inspections and monitoring will be to validate the impacts predicted for the Project, to measure the effectiveness of the heritage controls and implementation of this EMS, and to address specific obligations. The Project Owner, Project Manager and their contractor's will respond in a timely manner to any requests relating to monitoring or the effectiveness of heritage/environmental controls and their implementation raised by NSW Government Agencies.

The report provided by the Project Archaeologist following the completion of the salvage programme would also provide comment on the effectiveness of heritage controls relevant to the salvage programme.

Any stone artefacts collected and/ or recovered during the salvage programme will be relocated and buried at a safe location outside the approved development footprint within the Project area. The relocation site/s of the salvaged stone artefacts and subsurface artefacts recovered during the subsurface testing programme will also be subject to fencing, monitoring and inspection to ensure there are no inadvertent impacts during the construction, operation, and decommissioning phases of the solar farm. Inspection of the relocation site/s will occur fortnight during construction and six (6) months thereafter by the SEO. All inspections of heritage sites will be undertaken following a reporting checklist.

### **8.4 Auditing**

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

Heritage must be included within any major environmental audit of impacts undertaken during the construction, operation and decommissioning phases of works for the Project.

Audit requirements are detailed in the EMS and must comply with the CDC Schedule 4 Conditions 9 to 14.

### **8.5 Contingency Plan and Reporting**

Contingency plan and reporting requirements and responsibilities are documented in the EMS and would comply with the CDC.

### **8.5.1 Contingency Plan and Reporting Human Remains**

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately and the Unexpected Finds Protocol which is provided in Appendix F of this Plan must be followed to report the find. The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant local police. If there are reasonable grounds to believe that the remains are Aboriginal, Heritage NSW must also be contacted as soon as practicable and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555. If the find is determined to be Aboriginal Heritage NSW will provide advice on any additional reporting requirements.

### **8.5.2 Contingency Plan and Reporting Unexpected Finds**

If any previously unidentified heritage items are found the Unexpected Finds Protocol which is provided in Appendix F of this Plan must be followed to report the find. If impacts to the unexpected find is determined to be covered under the CDC the object/s will be salvaged in line with the mitigation methods noted in the HMP. For Aboriginal objects covered under the CDC an AHIMS site card will be completed upon the salvage of the newly identified Aboriginal object/s. Should the object/s be salvaged under the CDC an Aboriginal Site Impact Recording Form (ASIRF) must be completed and submitted to AHIMS.

## **8.6 Incident and Non- Compliance Notification and Reporting**

Non-compliance is defined in the CDC as an occurrence, set of circumstances or development that is a breach of the consent but is not an incident.

An incident is defined in the CDC a set of circumstances that causes or threatens to cause material harm to the environment. Material Harm is harm that:

- involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- 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)

Instances of non-compliance and/or incident notification will be recorded and raised with the relevant authorities as per the CDC Schedule 4 Condition 7 and 8 that note that the Planning Secretary must be notified in writing via the Major Projects website immediately after one becomes aware of an incident and within seven (7) days after a non- compliance issue.

The notification to the Planning Secretary via the Major Projects website must identify the development (including the development application number) and set out the location and nature of the incident. A non-compliance that has been notified as an incident does not need to also be notified as a non-compliance.

Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in CDC Appendix 7 which have the steps outlined below for Heritage non-compliance and incidents.

1. Written incident notification must be submitted to the Planning Secretary via the Major Projects website within seven (7) days after the incident is known about. Written notification of an incident must identify the development and application number and the following items:

- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
  - Identify how the incident was detected and when you became aware of the incident;
  - Identify any actual or potential non-compliance with the CDC;
  - Describe what immediate steps were taken in relation to the incident and identify further action(s) that will be taken in relation to the incident; and
  - Identify a project contact for further communication regarding the incident.
2. Within 30 days of the date on which the incident occurred (or as otherwise agreed to by the Planning Secretary), an incident report will be provided to the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary). The Incident Report must include:
- A summary of the incident;
  - Outcomes of an incident investigation, including identification of the cause of the incident;
  - Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
  - Details of any communication with other stakeholders regarding the incident.

## **9. Review and Improvement**

### **9.1 Continuous Improvement**

Continuous improvement of this Plan will be achieved when opportunities for improvement are identified. Any proposed improvement and/or changes to this Plan are required to be approved by the Planning Secretary prior to implementation.

The continuous improvement process will be designed to:

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

### **9.2 HMP Update and Amendment**

During the Project, a hard copy of the most recent version of this Plan will be stored at the main site compound. It is the responsibility of the Environmental Officer to ensure this hard copy is the most recent version and to remove older versions of the plan once they are superseded at the main site compound.

The processes and plans described in the EMS may result in the need to update or revise this Plan. Any revision of the HMP is to ensure it incorporates any recommended measures to improve the environmental performance of the Development. Any proposed changes to this Plan are required to be approved by the Planning Secretary prior to implementation.

Prior to carrying out any upgrading or decommissioning activities on site the HMP will be updated to the satisfaction of the Planning Secretary to comply with Schedule 4 Condition 2.

A copy of the updated HMP with any changes, once approved by the Planning Secretary, will be distributed to all relevant stakeholders in accordance with the approved document control procedure (refer to the EMS) and to the RAPs as noted in Section 4 of this Plan.

In the instance of any modification to the CDC the HMP will be reviewed within 1 month and if revisions of the plan are required the plan will be submitted to the Planning Secretary for approval and comply with the CDC Schedule 4 Condition 2 (Revision of Strategies, Plans and Programs) and CDC Schedule 4 Condition 3 (Updating and Staging of Strategies, Plans and Programs).

In the instance of an incident report (CDC Schedule 4 Condition 7) or an audit report (CDC Schedule 4 Condition 9) which notes non-compliance for Heritage the HMP will be reviewed within 1 month and if revisions of the plan are required the plan will be submitted to the Planning Secretary for approval and comply with the CDC Schedule 4 Condition 2 (Revision of Strategies, Plans and Programs) and CDC Schedule 4 Condition 3 (Updating and Staging of Strategies, Plans and Programs).

## 10. General Project Communications

The EMS and associated Community Consultation Plan (CCP) details the processes that will be used to keep the local community and relevant agencies informed about the operation and environmental performance of this Project. The main point of contact with DPE for this Project will be via the Major Projects website.

While a number of steps will be implemented in order to engage with the community and other stakeholders throughout the various stages of the development as detailed in the EMS and CCP, one of the main portals for community engagement will be via the Walla Walla Solar Farm website (<http://www.wallawallasolarfarm.com.au>). The website will be used to provide updates as relevant about the progress of the solar farm development.

The website will be regularly updated throughout all stages of the proposed development and include information such as:

- Layout and general overview of the development.
- How complaints about the development can be made and a complaints handling procedure.
- Contact details of the Proponent or online contact form.

A link to the Major Projects website is also provided, which contains information relating to:

- The EIS.
- Current statutory approvals for the development.
- The proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged.
- Modification to this Project CDC.

The procedures for dispute resolution will be undertaken in accordance with the Complaint's Procedure which is detailed in the EMS. All complaints received via post, phone, email or the project website during construction will be recorded and responded to. It is the intention of the Project Owner, Project Manager and their contractor's to maintain an open and clear relationship with all stakeholders to prevent complaints from arising. Should the resolution of a complaint not be able to be reached by both parties, following presentation of investigation results to the complainant, either party may refer the dispute to an independent mediator and/or follow the steps outlined in the complaints procedure as detailed in the EMS.

## **11. References**

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

DECCW NSW 2010b, *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

NGH Pty Ltd, 2019, *Environmental Impact Statement Walla Walla Solar Farm*, Unpublished report for FRV Services Australia Pty Ltd.

NGH Environmental Pty Ltd, 2020, *Aboriginal Cultural Heritage Assessment Walla Walla Solar Farm*, Unpublished report for FRV Services Australia Pty Ltd.

NGH Pty Ltd, 2020, *Response to Submissions Walla Walla Solar Farm*, Unpublished report for FRV Services Australia Pty Ltd.

NGH Pty Ltd 2022, *Addendum Aboriginal Cultural Heritage Assessment Walla Walla Solar Farm*, Unpublished report for FRV Services Australia Pty Ltd.

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



## **Appendix A Approved Layout of Development**

# Heritage Management Plan Walla Walla Solar Farm

Walla Walla Solar Farm Constraints

Figure  
Legend

- Additional impact area
- Subject Land Boundary
- Development Footprint
- Security Fence
- Site Compound
- Substation
- Roads
- Vehicular creek crossings
- Main access
- Substation access
- Gas pipeline access
- Schneiders road access
- Adjacent Landholders
- Vegetative Screening
- Watercourse
- Dams for Removal
- Dams retained
- Heritage**
- Hearth location (5m buffer from location)
- Artefact scatters
- Isolated artefacts
- PADs
- Scarred trees
- Cultural tree
- Biodiversity**
- Retained Vegetation
- PCT's impacted**
- 278: Blakley's Red Gum Yellow Box Woodland
- 5: River Red Gum Forest Woodland
- 76: 76: Grey Box Woodland Derived Grassland
- 76: Grey Box Woodland
- Paddock trees**
- Non-hollow bearing remove
- Hollow bearing remove
- Non-hollow bearing retain
- Hollow bearing retain

Ref: 21-200 Walla Walla Post Approval works  
210805 \ Walla Walla Solar Farm Constraints  
Figure  
Author: kyle.m  
Date created: 13.07.2022  
Datum: GDA94 / MGA zone 55



**NGH**



Data Attribution  
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© FRV 2022  
© ESRI Base Map, 2022

## Appendix B Copy of Consolidated Development Consent Appendix 6

### APPENDIX 6: ABORIGINAL HERITAGE ITEMS

*Table 1: Aboriginal heritage items – avoid impacts*

<i>Item name</i>	<i>Item Name</i>
Walla Walla SF AFT 6	
Walla Walla SF AFT 7	Walla Solar Farm 495495
Walla Walla SF IF 1	Walla Solar Farm 497946
Walla Walla SF IF 4	Walla Solar Farm 496602
Walla Walla SF IF 7	Walla Solar Farm 497199
Walla Walla SF IF 9	Walla Solar Farm 496812
Walla Walla SF IF 13	Walla Walla Hearth
Walla Walla SF IF 14	
Walla Walla SF IF 15	

\* Refer to the Figure in this Appendix to identify items

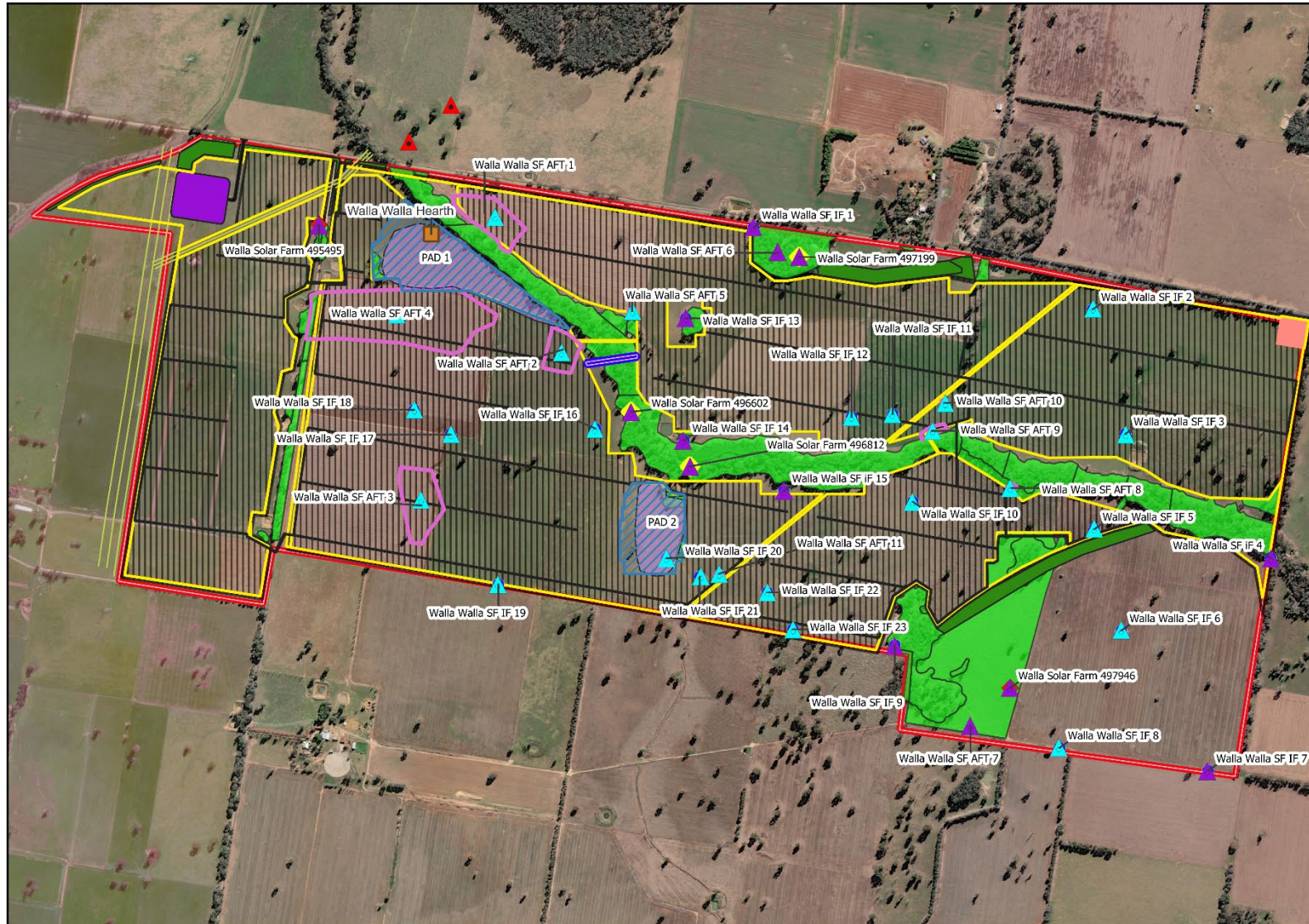
*Table 2: Aboriginal heritage items – salvage*

<i>Item name</i>	<i>Item Name</i>
Walla Walla SF AFT 1	Walla Walla SF IF 6
Walla Walla SF AFT 2	Walla Walla SF IF 8
Walla Walla SF AFT 3	Walla Walla SF IF 10
Walla Walla SF AFT 4	Walla Walla SF IF 11
Walla Walla SF AFT 5	Walla Walla SF IF 12
Walla Walla SF AFT 8	Walla Walla SF IF 16
Walla Walla SF AFT 9	Walla Walla SF IF 17
Walla Walla SF AFT 10	Walla Walla SF IF 18
Walla Walla SF AFT 11	Walla Walla SF IF 19
Walla Walla SF IF 2	Walla Walla SF IF 21
Walla Walla SF IF 3	Walla Walla SF IF 22
Walla Walla SF IF 5	Walla Walla SF IF 23
Walla Walla PAD 1	Walla Walla SF IF 20
Walla Walla PAD 2	

\* Only items located within the development footprint are to be salvaged (refer to the Figure in this Appendix to identify items)













Blue wording above are Modification 2 changes to the approval



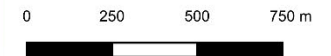


**Walla Walla Solar Farm**  
**AHIMS within the Walla**  
**Walla Solar Farm**

**Legend**

-  Proposed new development impacts
-  Development site
-  Heavy Vehicle Crossing location
-  Development footprint
-  Roads
-  Solar panels
-  Retained vegetation
-  Vegetation Screening
-  Site Compound
-  Substation
-  Artefact Scatters
-  PADs
-  AHIMS
-  AHIMS site to be avoided in CoC
-  AHIMS site approved for salvage in CoC
-  Hearth Location (Avoid with minimum 2m buffer)

Data Attribution  
 © NGH 2022  
 © FRV 2022  
 © Six Maps 2022  
 © DFSI 2022  
 Ref: 21-200 Walla Walla Solar Farm  
 Author: B. Partell  
 Date created: 29/07/2022  
 Datum: EPSG:28355 GDA94 / MGA zone 55



## Appendix C Endorsement of Heritage Experts

**From:** Andy Nixey [REDACTED]  
**Sent:** Wednesday, 3 August 2022 9:11 AM  
**To:** Rob Beckett [REDACTED]; Kurtis Wathen [REDACTED] >  
**Cc:** Alan Robinson [REDACTED]  
**Subject:** RE: Walla Walla Solar Farm - Proposed Heritage team

Hi Rob

The Department reviewed the proposed heritage team and also contacted Heritage NSW who provided the following comments:

*'The listed NGH Pty Ltd staff appear to meet the minimum qualifications required under the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010) and we have no concerns regarding the ability of NGH to conduct this work. However, please note that Heritage NSW does not "endorse" heritage consultants. We have an advisory role only in this matter.*

*We encourage the Department and any heritage consultant that may be appointed to continue to consult with Heritage NSW in relation to the preparation of the Heritage Management Plan.'*

The 'no comment' response you received confirms the Department/Planning Secretary is satisfied with the proposed heritage team and has no further comment. Hope this clarifies the situation.

Kind regards

**Andy Nixey**

**Team Leader, Energy Assessments**

Planning and Assessment | Department of Planning and Environment

[REDACTED]  
4 Parramatta Square, 12 Darcy Street Parramatta NSW 2150

Locked Bag 5022, Parramatta NSW 2124

[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*



## Appendix D Stakeholder Consultation

The Registered Aboriginal Parties for this project are listed below.

### The Albury & District LALC

Email Contact: [admin@alburydistrictlalc.org](mailto:admin@alburydistrictlalc.org)

[ceo@alburydistrictlalc.org](mailto:ceo@alburydistrictlalc.org)

### Bundy Cultural Services

Email Contact: [marksad@live.com.au](mailto:marksad@live.com.au)

### Yalmambirra

Email Contact: [yalmambirra@outlook.com](mailto:yalmambirra@outlook.com)

The following consultation has occurred in the preparation of this HMP with copies of the email responses also provided.

Organisation	Action	Date Sent	Follow up email	Follow up email	Reply Date	Replied by	Response/ Comments
<b>Heritage NSW</b>	Draft CHMP sent via email	30/08/2022			30/08/2022	email	recommend that the draft reports be sent to the Department of Planning Major Project Portal team. This is so the reports can be logged with the Department in the portal. From there the reports will be referred to Heritage NSW. The Major Project Team usually provides our team with a timeframe to provide comments to them.
<b>Albury LALC</b>	Draft CHMP sent via email	08/08/2022	Reminder email sent 22/08/2022 requesting any comments				No response as of 30/08/2022
<b>Bundy Cultural Services</b>	Draft CHMP sent via	08/08/2022	Reminder email sent 22/08/2022				No response as of 30/08/2022

Organisation	Action	Date Sent	Follow up email	Follow up email	Reply Date	Replied by	Response/ Comments
	email		requesting any comments				
<b>Yalmambirra</b>	Draft CHMP sent via email	08/08/2022	Reminder email sent 22/08/2022 requesting any comments		23/08/2022	Email	No comment on project as not involved in fieldwork due to insurance issues

Email responses to draft HMP:

**From:** [yalmambirra\\_valmambirra](#)  
**To:** [Tessa Bryant](#)  
**Subject:** RE: 22-239 Walla Walla Solar Farm HMP  
**Date:** Tuesday, 23 August 2022 1:47:47 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hullo Tessa

Thank you. As NGH will not allow me to participate due to insurance issues, then I cannot comment on the project etc...

Maybe someday we'll get the chance to work together...

Yal

Sent from [Mail](#) for Windows 10

---

**From:** [Tessa Bryant](#)  
**Sent:** Monday, 22 August 2022 4:46 PM  
**To:** [REDACTED]  
**Subject:** RE: 22-239 Walla Walla Solar Farm HMP

Good Afternoon Yal,

I was just wanting to touch base and see if you had any comments on the draft HMP for Walla Walla Solar Farm that was sent on the 8<sup>th</sup> of August (also attached to this email for ease of reference). If you have any comments, could you please provide these by COB on the 24<sup>th</sup> of August (Wednesday)? If no comments are received the draft HMP will be sent to Heritage NSW noting that no RAP comments were received.

Kind Regards

Tessa

**DR TESSA BRYANT**  
**SENIOR HERITAGE CONSULTANT**

[REDACTED]  
Unit 8, 27 Yallourn St  
(PO Box 62) Fyshwick ACT 2609

**NSW · ACT · QLD · VIC**  
[WWW.NGHCONSULTING.COM.AU](http://WWW.NGHCONSULTING.COM.AU)



*NGH acknowledges that we work on the traditional lands of First Nations people across Australia and recognises the enduring connection to the land. We pay our respects to elders, past present and emerging.*

## Appendix E Salvage Methodology

### E.1 Surface Collection

Each Aboriginal site with surface artefacts that cannot be avoided within the approved development footprint as listed Table 2 of Appendix 6 in the CDC will need to be salvaged via surface collection prior to construction works commencing for the Project. We would also take the opportunity to examine the immediate surrounds of the recorded sites to identify any other artefacts that may be present within the approved development footprint. The salvage collection fieldwork would be carried out with representatives of the Aboriginal community.

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

- All reasonable attempts would be made to relocate the originally recorded surface stone artefacts however it is acknowledged that changes in the visibility, continued farming activities and standard taphonomic and other environmental factors may impede the relocation of all of the previously recorded stone artefacts. If any additional surface stone artefacts are identified within the approved development footprint these newly identified stone artefacts will be salvaged with the sites that they are associated with or in accordance with the Unexpected Finds Protocol (as listed in the HMP, Appendix F).
- Walk across the site area (within the approved development footprint), use 'pin' flags to identify and mark artefacts.
- Photograph site area.
- If considered necessary, construct a collection grid of 2 m x 2 m or 5 m x 5 m or similar as appropriate to the size of the site, only larger sites or sites with higher densities of artefacts will have this strategy.
- As an alternative, GPS plot artefacts if required, this is suitable for smaller sites (~<20).
- Collect artefacts. At each collection site the artefacts will be recorded, bagged and labelled in accordance with their collection position, that is either individual number and/or their collection grid.
- Recording of stone artefacts will be conducted in line with standard archaeological practice to include raw material, type, dimensions and any other characteristics considered relevant and in accordance with the Code of Practice. Photos of particularly rare items only or those asked to be photographed by the Aboriginal representatives onsite would be taken.
- The salvaged Aboriginal objects may be temporarily stored until the long-term management and relocation of the salvaged objects can occur.
- The site of the relocated salvaged Aboriginal objects would be noted by the submission of site cards to the Aboriginal Heritage Information Management System (AHIMS) as legally required.
- An Aboriginal Site Impact Recording Form must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage.



## **E.2 Salvage Excavation**

The salvage excavation will be undertaken by hand excavation to retrieve a suitable sample of Aboriginal stone artefacts in two open areas which had the highest density of subsurface artefacts recovered from PAD 2 during the initial subsurface test excavation (area of Test Pit 25 and Test Pit 32 as shown in the below figure). The excavation would aim to “follow” any high density artefactual presences to enable as much of a sample of stone artefacts to be recovered as possible prior to impacts for the Walla Walla Solar Farm. The salvage excavation will occur in a minimum two open excavation areas of a minimum 2m x 2m to a maximum 3m x 3m centred around the locations of PAD 2, TP 25 and TP 32 within the approved disturbance footprint of the Walla Walla Solar farm. All excavations and sieving should be undertaken with the assistance of a minimum of two representatives from the registered Aboriginal Parties (as selected by the Project Owner, Project Manager and/or Construction Company).

Where a sufficient number of artefacts continue to be recovered, excavation would continue up to a point where the archaeologist considers that a suitable sample of finds is achieved. Where artefacts were not found or where density numbers consistently drop below comparative pits, excavation would cease at the completion of the salvage of two areas which area a minimum of a 2m x 2m area.

Soil samples and charcoal may be retained for analyses where it is considered warranted to answer questions about the taphonomy of the site and the relationship of cultural finds.

Hand excavation will proceed in each of the two open areas through the following standard excavation methodology:

- Set out grid of 1 m squares, excavation will proceed in once square metre units, each of which will be assigned an alpha-numeric identifier;
- All excavation will be carried out using manual hand tools including shovels, crowbar, mattocks and trowels.
- All excavation units will be in 10 cm spits down to either clay, a culturally sterile depth as determined by previous test excavation, the base of extant A horizon or until excavation is unable to continue deeper by hand (whichever occurs first).
- If encountered, charcoal and or other organic material deemed suitable for radiocarbon dating will be collected using best practice guidelines.
- Pit stratigraphy for each excavation unit will be recorded using standard recording forms, terminology and methods.
- Dry sieving or wet sieve, as deemed to be appropriate by an archaeologist, would be undertaken with all material processed through either a 5 mm or 3 mm sieve;
- Artefacts recovered from sieving will be retained in plastic zip lock bags and labelled with the appropriate provenance data
- Representative and otherwise notable soil profiles if present will be photographed and drawn to scale as the excavation progresses.
- Once completed a photographic record of the entire excavation will be made and an overall site plan produced;
- All excavation units if required will be backfilled upon completion of the salvage program if required to be warranted by the project owner, project manager, construction company and/or landowner. If backfilling after wet sieving (if undertaken) is warranted this would be facilitated by the project owner, project manager and/or construction company.
- Analyse finds in lab to confirm if Aboriginal artefacts and then fully record Aboriginal stone objects in line with standard archaeological practice and in accordance with the Code of Practice.







### **E.3 Management of recovered material and Reporting**

The salvaged objects may be temporarily held at secure locked cabinet at the NGH Wagga Wagga office for analysis and recording until an appropriate time as they can be arranged to be relocated and buried within the Project Area, outside the approved development footprint.

The temporary storage of salvaged objects, if required, is not intended to exceed 24 months from the conclusion of the salvage programme.

The relocation site for the Aboriginal objects which will be salvaged via the surface collection salvage programme, salvage excavation and those recovered from the subsurface testing programme which are currently in temporary care of NGH Wagga Wagga office would need to be agreed to by the landowner, Project owner, Project Archaeologists and RAPs and be outside the proposed approved development footprint within the Project area. A map of the proposed relocation area is provided below. The site/s for the relocation of salvaged Aboriginal objects would be noted by submission of site cards to the Aboriginal Heritage Information Management System (AHIMS) as legally required.

An Aboriginal Site Impact Recording Form must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage and/or construction works. Representatives from the RAPs would be provided with the opportunity to assist the Project Archaeologist with the salvage programme and the relocation of the salvaged objects. Generally, a minimum of two representative from the RAPs would be invited to participate in the salvage programme and the relocation of the Aboriginal salvaged objects. If representatives from the RAPs are not available to participate and all reasonable opportunities have been afforded, the collection and relocation of Aboriginal objects, would continue as scheduled by the Project Archaeologist.

Following the relocation of the Aboriginal objects, which have been salvaged as per the procedure in this HMP, the site location/s will also be provided to the Project owner, Project team, and construction contractor to ensure the site/s are protected during the construction, operation and decommissioning of the Project.

The recording and relocation of artefacts will be compliant with the Code of Practice for Archaeological Investigations [http://www.environment.nsw.gov.au/resources/cultureheritage/10783\\_FinalArchCoP.pdf](http://www.environment.nsw.gov.au/resources/cultureheritage/10783_FinalArchCoP.pdf)

A salvage report will be prepared outlining the steps taken above. A copy of the report on the salvage and relocation of objects for the Project in line with the CDC would be provided to the Project Manager. The report will also be provided to Heritage NSW, the Department of Planning and Environment and the RAPs. A copy of the brief salvage report will be kept on site with a copy of the HMP. The report would document the salvage programme and its results. The report may also be used to inform the independent environmental audit, which would include heritage.

The salvage report would include, as applicable, the following:

- Introduction
- Purpose and objective
- Aboriginal involvement and consultation
- Surface collection salvage
  - Surface collection methodology
  - Surface collection results
  - Surface collection Discussion

- Salvage excavation
  - Salvage excavation methodology
  - Salvage excavation results
  - Salvage excavation discussion
- Relocation and burial of salvaged objects
- Conclusions



**Heritage Management Plan**  
**Walla Walla Solar Farm**



**Walla Walla Solar Farm**  
**Proposed relocation area**

- Legend**
-  Proposed relocation area
  -  Development site

Data Attribution  
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© DFSI 2022



Ref: 21-200 Walla Walla Solar Farm  
Author: B. Partell  
Date created: 03/08/2022  
Datum: EPSG:28355 GDA94 / MGA zone 55

0 250 500 750 m



**NGH**

Proposed long term relocation area

## Appendix F Unexpected Finds Protocol

### Introduction

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

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

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

### What is a Heritage Unexpected Find?

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

Unexpected heritage finds may include:

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

### Aboriginal Heritage places or objects

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

An Aboriginal object is defined as:

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

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

## Historic heritage

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

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

## Unexpected find management procedure

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

1. Works within the immediate identified heritage location will cease. Personnel should notify their supervisor of the find, who will notify the project manager.
2. Establish whether the unexpected find is located within an area covered by approved Development Consent or not.
3. **If the unexpected find is determined to be covered under the existing approved development footprint for the Development Consent for the Project undertake the following steps:**
  - (a) Establish an appropriate buffer to allow for the assessment and management of the find. All site personnel will be informed about the buffer zone with no further works to occur within the buffer zone.
  - (b) A heritage specialist or the Project Archaeologist will be engaged to assess the Aboriginal place or object encountered and undertake appropriate salvage of the site, if required, in line with the mitigation methods noted in this HMP. An AHIMS site card will be completed on the discovery of the newly identified Aboriginal objects / Aboriginal heritage items. Should the object(s) / heritage items be salvaged (within the approved development footprint as per the Development Consent for the Project and in line with this HMP) an Aboriginal Site Impact Recording Form (ASIRF) must be completed and submitted to AHIMS. Salvage of Aboriginal heritage items would not include scarred trees. If previously unidentified scarred trees are identified, further consultation with Heritage NSW and Aboriginal stakeholders would need to be undertaken regarding management as avoidance is the preferred mitigation method for scarred trees.
  - (c) Following appropriate salvage of the unexpected find works may continue at this location.
4. **If the unexpected find is not covered under the existing approved development footprint for the Development Consent for the Project undertake the following steps.**
  - (a) All works at this location must cease.
  - (b) An appropriate buffer zone of at least 20 metres to allow for the assessment and management of the find must be established. All site personnel will be informed about the buffer zone with no further works to occur. A temporary exclusion area would be established around this buffer zone.
  - (c) A heritage specialist or the Project Archaeologist will be engaged to assess the Aboriginal place or object encountered. Registered Aboriginal Party representatives



will also be engaged (if available) to assess the cultural significance of the place or object.

- (d) The discovery of an Aboriginal object will be reported to the local office of Heritage NSW and works will not recommence at the heritage place or object until advised to do so by Heritage NSW. A site card will be completed and submitted to AHIMS for registration.
- (e) If the unexpected find can be managed *in situ*, works at the location will not recommence until appropriate heritage management controls have been implemented, such as protective fencing.
- (f) If the unexpected find cannot be managed *in situ*, works at the heritage location will not recommence until further assessment is undertaken and appropriate permits and approvals to impact Aboriginal cultural heritage are approved and issued by Heritage NSW.

For historic relics, work must cease in the affected area and the Heritage Council must be notified in writing. This is in accordance with section 146 of the *Heritage Act 1977*. To protect the historic relics until their significance can be determined high visibility markers or temporary fencing (using star pickets) must be immediately placed a minimum of 20 m around the location of the find by site personnel. A minimum no work buffer zone radius of 20 m must be implemented around the historic relics by taping off the area as an environmental sensitive zone. Depending on the nature of the discovery, additional assessment may be required prior to the recommencement of work in the area. At a minimum, any find should be recorded by an archaeologist.



## **F.1 Unexpected Human Skeletal Remains**

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

### **Discovery:**

- If any human remains or suspected human remains are found during any activity, works in the vicinity **must** cease and the Project Manager must be contacted immediately.
- The remains must be left in place and protected from harm or damage. To protect the remains until their origins can be determined high visibility markers or temporary fencing which will not cause ground disturbance must be immediately placed a minimum of 10 m around the location of the human remains or suspected human remains by site personnel. A minimum no work buffer zone radius of 50 m must be implemented around the remains by taping off the area as an environmental sensitive zone.
- All personnel should then leave the fenced off area immediately.
- The Environmental Officer is responsible to ensure that these temporary measures are implemented onsite within 24 hours of identification.

### **Notification:**

- The NSW Police must be notified immediately. Details of the location and nature of the human remains must be provided to the relevant authorities.
- If there are reasonable grounds to believe that the remains are Aboriginal, the following must also occur:
  - a. Heritage NSW must be contacted as soon as practicable, and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555.
  - b. The relevant Aboriginal community groups must be notified immediately when the remains are confirmed to be Aboriginal, as advised by Heritage NSW.
  - c. The relevant Project Archaeologist may be contacted to facilitate communication between the police, Heritage NSW and Aboriginal community groups.

### **Process:**

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

## **Appendix G Sample registers**

## G.1 Ground disturbance permit - Heritage

<b>Project: Walla Walla Solar Farm</b>	<b>Project No:</b>
<b>Requested By:</b>	
<b>Start Date:</b>	<b>Expected Completion Date:</b>

**CLEARING LOCATIONS – ATTACH DRAWINGS / SKETCHES IF NECESSARY**

Location	Comments
<p>This section will be completed by either the Health, Safety and Environment (HSE) Manager or the Site Environmental Officer (SEO), with reference to constraints mapping.</p>	
<p><b>Are there any recorded Aboriginal Heritage sites within the vicinity (within 50 m) of the works?</b></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Has salvage of the Aboriginal Heritage sites within the vicinity (within 50 m) of the works previously been completed to date.</b></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>State the AHIMS number of the site/s present in the vicinity (within 50 m) of the works if not salvaged to date.</b></p>	
<p><b>Are the Aboriginal Heritage site/s listed as do not impact in the Development Consent for the Project?</b></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Has the site been appropriately buffered and delineated if it remains <i>in situ</i>?</b></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Have relevant workers been given toolbox talks about working near <i>in situ</i> Aboriginal Heritage sites and the heritage unexpected finds protocol?</b></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p><b>Is a site inspection of the work area required by the HSE or SEO (heritage sites within 50 m of the works)?</b></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Is a sign-off of this form required once works have been completed (heritage sites within 50 m of the works)?</b></p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p><b>Comments:</b></p>	

**APPROVALS**

<b>Site Inspection completed by HSE or SEO (if required):</b> Signature Required	<b>Date:</b>
<b>Approval by HSE or SEO:</b> Signature Required	<b>Date:</b>

**IS A SIGN-OFF (ONCE WORKS COMPLETED) REQUIRED**

Yes  No

<b>Have the conditions of the permit been met if a sign off is required?</b> HSE or SEO Signature Required	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>Date:</b>
---	--

**Note:** Sign off required if works within 50m of a heritage site or if other matters are raised.

## G.2 Heritage site status database example

AHIMS#	Site name	CDC for site	Site Status	Date status of site updated on AHIMS	Comments
55-6-0168	Walla Walla SF AFT6	Avoid Impacts	Active		
55-6-0169	Walla Walla SF AFT 7	Avoid Impacts	Active		
55-6-0174	Walla Walla SF IF 1	Avoid Impacts	Active		
55-6-0177	Walla Walla SF IF 4	Avoid Impacts	Active		
55-6-0180	Walla Walla SF IF 7	Avoid Impacts	Active		
55-6-0182	Walla Walla SF IF 9	Avoid Impacts	Active		
55-6-0186	Walla Walla SF IF 13	Avoid Impacts	Active		
55-6-0187	Walla Walla SF IF 14	Avoid Impacts	Active		
55-6-0188	Walla Walla SF IF 15	Avoid Impacts	Active		
55-6-0144	Walla Solar Farm 495495	Avoid Impacts	Active		
55-6-0148	Walla Solar Farm 497946	Avoid Impacts	Active		
55-6-0147	Walla Solar Farm 496602	Avoid Impacts	Active		
55-6-0145	Walla Solar Farm 497199	Avoid Impacts	Active		
55-6-0146	Walla Solar Farm 496812	Avoid Impacts	Active		
55-6-0270	Walla Walla Hearth	Avoid Impacts	Active		



<b>AHIMS#</b>	<b>Site name</b>	<b>CDC for site</b>	<b>Site Status</b>	<b>Date status of site updated on AHIMS</b>	<b>Comments</b>
55-6-0270	Walla Walla PAD 1	To be salvaged prior to any impacts	Active		
55-6-0269	Walla Walla PAD 2	To be salvaged prior to any impacts	Active		
55-6-0163	Walla Walla SF AFT 1	To be salvaged prior to any impacts	Active		
55-6-0164	Walla Walla SF AFT 2	To be salvaged prior to any impacts	Active		
55-6-0165	Walla Walla SF AFT 3	To be salvaged prior to any impacts	Active		
55-6-0166	Walla Walla SF AFT 4	To be salvaged prior to any impacts	Active		
55-6-0167	Walla Walla SF AFT 5	To be salvaged prior to any impacts	Active		
55-6-0170	Walla Walla SF AFT 8	To be salvaged prior to any impacts	Active		
55-6-0171	Walla Walla SF AFT 9	To be salvaged prior to any impacts	Active		
55-6-0172	Walla Walla SF AFT 10	To be salvaged prior to any impacts	Active		
55-6-0173	Walla Walla SF AFT 11	To be salvaged prior to any impacts	Active		
55-6-0175	Walla Walla SF IF 2	To be salvaged prior to any impacts	Active		
55-6-0176	Walla Walla SF IF 3	To be salvaged prior to any impacts	Active		
55-6-0178	Walla Walla SF IF 5	To be salvaged prior to any impacts	Active		

<b>AHIMS#</b>	<b>Site name</b>	<b>CDC for site</b>	<b>Site Status</b>	<b>Date status of site updated on AHIMS</b>	<b>Comments</b>
55-6-0179	Walla Walla SF IF 6	To be salvaged prior to any impacts	Active		
55-6-0181	Walla Walla SF IF 8	To be salvaged prior to any impacts	Active		
55-6-0183	Walla Walla SF IF 10	To be salvaged prior to any impacts	Active		
55-6-0184	Walla Walla SF IF 11	To be salvaged prior to any impacts	Active		
55-6-0185	Walla Walla SF IF 12	To be salvaged prior to any impacts	Active		
55-6-0189	Walla Walla SF IF 16	To be salvaged prior to any impacts	Active		
55-6-0190	Walla Walla SF IF 17	To be salvaged prior to any impacts	Active		
55-6-0191	Walla Walla SF IF 18	To be salvaged prior to any impacts	Active		
55-6-0192	Walla Walla SF IF 19	To be salvaged prior to any impacts	Active		
55-6-0193	Walla Walla SF IF 20	To be salvaged prior to any impacts	Active		
55-6-0194	Walla Walla SF IF 21	To be salvaged prior to any impacts	Active		
55-6-0195	Walla Walla SF IF 22	To be salvaged prior to any impacts	Active		
55-6-0195	Walla Walla SF IF 23	To be salvaged prior to any impacts	Active		

## **Appendix H Heritage Control Measures - Quick find**

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<b>General</b>				
All reasonable and feasible measures must be implemented to prevent and/or minimise any material harm to the environment, including Aboriginal objects, that may result from the construction, operation, upgrading or decommissioning of the development.	This document	Pre-construction Construction Operation Decommissioning	Construction Contractor Project Manager	This document
Ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in the CDC as sites to avoid impacting or other sites located outside the approved development footprint.	This document CDC	Design Pre-construction Construction Operation Decommissioning	Project Owner Construction Contractor Project Manager	This document CDC
Implementation of approved Heritage Management Plan.	This document	Pre-construction	Construction Contractor Project Manager	This document
A copy of the HMP should be kept on site during construction and operation of the Project and be readily available for reference if and as required.	This document	Pre-construction Construction Operation Decommissioning	Construction Contractor Project Manager	This document
Training will be provided to all personnel involved in construction and management phases of the Project, including relevant sub-contractors on heritage requirements from this plan through inductions, toolboxes, and targeted training.	Induction package Toolbox training material Targeted training material	Pre-Construction Construction Operation Decommissioning	Project Manager Environmental Officer Construction Contractor	This document Section 8.2 and CDC Section 25(c)
All employees, contractors and utility staff working on site will receive Aboriginal Cultural Heritage Awareness Training. It will be provided to all personnel in the form of an induction before they begin work on site. A record of this training will be kept.	Induction package	Pre-construction Construction Operation Decommissioning	Project Manager Construction Contractor Environmental Officer	This document Section 8.2 CDC Section 25(c)



Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
A strategy for the long-term management of any items or material that are salvaged would be developed in consultation with the registered Aboriginal parties. The artefacts recovered during salvage would be relocated and buried in a safe location within the Project area outside the approved development footprint.	CDC Heritage reports This Plan	Pre-construction	Project Manager Construction Contractor Environmental Officer Project Archaeologist	This document Appendix F and Section 7.2
The location of all Aboriginal sites which are not approved for impacts should be clearly shown on all relevant construction mapping and plans.	Construction mapping and plans	Pre-construction Construction Operation Decommissioning	Construction Contractor Project Manager	This document and construction mapping and plans
Cultural Heritage must be included within any major environmental audit for the Project	CDC This document	Pre-construction Construction Operation Decommissioning	Independent Auditor Project Manager	This document Section 8.4
<b>Design</b>				
The design of the solar farm must avoid the sites not approved for impacts including the two potential scarred trees (Walla Solar Farm 495495 and Walla Solar Farm 497946) and three identified cultural trees sites (Walla Solar Farm 496602, Walla Solar Farm 497199 and Wall Solar Farm 496812). A minimum 10 m buffer must be placed around each potential scarred or cultural tree to protect the root system and canopy to ensure there are no inadvertent impacts to these tree sites. The buffer zone will be delineated by the placement of star pickets with either fencing wire and/or the appropriate tape for environmental sensitive zones placed around them to clearly denote the area to ensure no impacts.	Heritage reports CDC	Design Pre-construction Construction Operation Decommissioning	Project Owner Construction Contractor Project Manager	This document Table 5-1, Table 3-2, Section 6

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<p>A minimum 5 m buffer must be placed around any stone artefact sites that are outside the approved development footprint to ensure there are no inadvertent impacts to these sites. The buffer zone will be delineated by the placement of star pickets with either fencing wire and/or the appropriate tape for environmental sensitive zones placed around them to clearly denote the area to ensure no impacts.</p>	<p>Heritage reports CDC</p>	<p>Design Pre-construction Construction Operation</p>	<p>Project Owner Construction Contractor Project Manager</p>	<p>This document. Table 5-1 and Table 3-2. Section 3.2</p>
<p>Further archaeological assessment would be required if the Project activity extends beyond the areas assessed to date. This would include consultation with the registered Aboriginal parties and may include further field survey and subsurface testing. A formal modification to the development consent would be required if any activity were proposed to extend beyond the area assessed and granted for development approval in the CDC.</p>	<p>Heritage reports CDC</p>	<p>Design Pre-construction Construction Operation</p>	<p>Project Owner Construction Contractor Project Manager</p>	<p>CDC Heritage reports This document</p>
<p>Ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in the CDC as sites to avoid impacting or other sites located outside the approved development footprint. This to be achieved by the buffer zone of the sites listed to be avoided being delineated by the placement of star pickets with either fencing wire and/or the appropriate tape for environmental sensitive zones placed around them to clearly denote the area to ensure no impacts. All staff working onsite should be aware of the approved development footprint to ensure works only occur within approved areas.</p>	<p>Heritage reports CDC</p>	<p>Design Pre-construction Construction Operation</p>	<p>Project Owner Construction Contractor Project Manager</p>	<p>This document CDC</p>
<p>Ensure that the development avoids (as far as practicable) any direct or indirect impacts on the Aboriginal heritage items prior to salvage of sites approved for impacts. This can be achieved by ensuring no works occur prior to a salvage programme being completed.</p>	<p>Heritage reports HMP CDC</p>	<p>Design Pre-construction Construction Operation Decommissioning</p>	<p>Project Owner Construction Contractor Environmental Officer</p>	<p>This document Section 3.2</p>
<p>To avoid inadvertent impacts on the two potential scarred trees (Walla Solar Farm 495495 and Walla Solar Farm 497946) and three identified cultural trees sites (Walla Solar Farm 496602, Walla Solar Farm 497199 and Wall Solar Farm 496812) all planting for the vegetation screening or any form of ground disturbance during fencing activities must occur outside the 10 m buffer placed around each tree. The 10 m buffer is to be measured out from the trunk. Any fencing wire installed will be a minimum of 1 m from physical contact with any part of the trees.</p>	<p>Heritage reports RtS</p>	<p>Design Pre-construction Construction Decommissioning</p>	<p>Project Owner Construction Contractor Project Manager</p>	<p>This document. Table 5-1</p>

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<p>Work must avoid the Walla Walla Hearth with a minimum of a 2 m buffer. This site must be fenced to ensure no inadvertent impacts. Fencing will be put in place prior to any construction or preconstruction works commencing in within proximity to this site.</p>	<p>Heritage reports HMP CDC</p>	<p>Design Pre-construction Construction Operation Decommissioning</p>	<p>Project Owner Construction Contractor Project Manager</p>	<p>This document Section 3.2 and Figure 6-2</p>
<b>PRE-CONSTRUCTION</b>				
<p>Delineation and signage of Aboriginal sites that will not be impacted by the proposed development works as listed in the CDC will be put in place prior to any construction or preconstruction works commencing. Delineation and signage of the artefact relocation site/s will also occur once the relocation has occurred. A minimum 5 m buffer zone is required to be placed around the artefact relocation site/s to ensure they will not be impacted into the future.</p>	<p>Heritage reports HMP</p>	<p>Pre-construction Construction Operational</p>	<p>Construction Contractor Environmental Officer</p>	<p>This document Section 8.3 Table 5-1</p>
<p>A minimum 5 m buffer must be observed around all sites with stone artefacts until salvage of these heritage items/sites is undertaken as approved by the CDC.</p>	<p>Heritage reports CDC HMP</p>	<p>Pre-construction Construction</p>	<p>Construction Contractor Environmental Officer</p>	<p>This document Table 5-1</p>
<p>A new site card/s must be completed on the AHIMS database for the relocated/reburial location of the salvage sites. This must occur within 1 month of the actions being completed for the reburial of the salvaged sites.</p>	<p>Code of Practice</p>	<p>Pre-construction</p>	<p>Construction Contractor Project Manager Project archaeologist</p>	<p>Code of Practice Section 7.2</p>
<p>Salvage and/or relocate the Aboriginal heritage items located within the approved development footprint (as per the CDC list of Aboriginal sites to be salvaged if impacts cannot be avoided) to a suitable alternative location/s on site in accordance with the Code of Practice, outside the development footprint. Salvage would be conducted by an archaeologist with representatives of the Registered Aboriginal Parties invited to participate. The salvage of Aboriginal objects, as per the CDC, must occur prior to works commencing.</p>	<p>Code of Practice Heritage reports HMP CDC</p>	<p>Pre-construction Construction</p>	<p>Construction Contractor Project Manager Project archaeologist</p>	<p>This document Section 3.2 Appendix F Section 7.2</p>

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
Salvage excavation of Test Pit 25 and 32 in Walla Walla PAD 2 will be required before construction can commence. It is recommended that this occurs in two open areas of a minimum 2m x 2m to a maximum 3m x 3m centred around the locations of PAD 2, TP 25 and TP 32 which had the highest density of artefacts recorded during the testing programme.	Code of Practice Heritage reports HMP CDC	Pre-construction	Construction Contractor Project Manager Project archaeologist	This document Appendix F
An Aboriginal Site Impact Recording Form will be completed and submitted to AHIMS (Aboriginal Heritage Information Management System) for any site harmed or destroyed from salvage and/or construction works. Artefact disposition and storage must be done in accordance with Requirement 26 of the Code of Practice (DECCW 2010:35-6).	Code of Practice Aboriginal Site Impact Recording Form	Pre-construction	Construction Contractor Project Manager Project archaeologist	Code of Practice Section 7.2
<b>Construction</b>				
Where any additional, unrecorded Aboriginal or non-Aboriginal objects are encountered during works within the approved development footprint (Appendix A of this Plan) the Unexpected Finds Procedure will be followed.	Unexpected Finds Procedure Site Plan CDC	Construction Operational Decommissioning	Construction Contractor Project Manager Environmental Officer All personnel	This document Unexpected Finds Procedure Appendix F
If human remains are discovered on site, then all work surrounding the area must cease immediately, the area must be secured and NSW Police notified. The Unexpected Finds Procedure will be followed to notify Heritage NSW as soon as possible. Work must not recommence in the area until this is authorised by Heritage NSW and/or NSW Police.	Unexpected Finds Procedure	Construction Operational Decommissioning	Construction Contractor Project Manager Environmental Officer All personnel	This document Unexpected Finds Procedure Appendix F.1 Section 8.5.1
Should an item of historic heritage be identified during works, the Unexpected Finds Procedure will be followed. The Heritage Division would be contacted prior to further work being carried out in the vicinity.	Unexpected Finds Procedure	Construction Operational	Construction Contractor Project Manager All personnel	This document Unexpected Finds Procedure Appendix F