

**Final Version 1.1**  
**Coppabella (formally Yass Valley) Wind Farm**  
**Heritage Management Plan**

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**Local Government Area:** Hilltops Council and Yass Valley Council



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Draft 1-3	2016-2017	Internal documents
Draft 4	21/9/2017	Update to reflect additional Mod 1 surveys. Version sent to stakeholders.
Draft 5	14/12/2018	Update to reflect Mod 1 approval. Version sent to stakeholders
Final 1	30/4/2019	Version sent to DPE for endorsement. Version incorporates stakeholder comments and salvage methodology
Final 1.1	20/6/2019	Update to address DPE comments

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## EXECUTIVE SUMMARY

Goldwind Australia is planning to construct the Coppabella Wind Farm (CWF) formally known as the Yass Valley Wind Farm.

New South Wales Archaeology Pty Ltd conducted an Aboriginal and historic cultural heritage assessment for the project during the development phase in 2008/2009 with further work to support the project Modification 1 in 2016/2017. Some 82 Aboriginal object locales and one historic item were identified across the Coppabella Hills precinct.

Development Consent was issued in 2016 for the project, a condition of which is that a Heritage Management Plan (HMP) be prepared. Modification 1 to the project was approved in December 2018, which includes further detail regarding the content of the HMP. This document provides a framework to ensure that the Development Consent conditions are complied with during the development, construction and operation of the wind farm.

This HMP has been provided for review to the Registered Aboriginal Parties (RAPs) and the NSW Office of Environment and Heritage (OEH). The HMP has been updated to reflect the approved Development Corridor. Accordingly, this HMP is a *live* document responsive to changes to the wind farm layout and any other relevant considerations. The HMP will support the Environmental Management Strategy (EMS) for the CWF and will be available on the project website.

## 1. INTRODUCTION

Development Consent under Section 89E of the Environmental Planning and Assessment Act 1979 was issued to Epuron Pty Ltd for the Coppabella Wind Farm in 2016 (SSD - 6698). The project was acquired by Goldwind Australia in 2017 and Modification 1 for the project was approved in December 2018.

The Development Consent allows for up to 75 turbines with 132kV connection to the north of the site (Figure 1). The Development Consent includes a Development Corridor within which infrastructure can be micro-sited during detailed design.

NSW Archaeology Pty Ltd has been commissioned by Goldwind Australia to prepare a Heritage Management Plan (HMP) that will guide the management and mitigation of impacts to Aboriginal and historic cultural heritage during the construction and operation of the Coppabella Wind Farm.

This plan is based on the recommendations as set out in the Aboriginal Cultural Heritage Assessment Report prepared by NSW Archaeology Pty Ltd during the Environmental Impact Assessment (Dibden 2009; and see revised report for Modification 1: Dibden 2017) and the Conditions of Consent issued by the NSW Department of Planning and Environment in 2018.

During the initial Aboriginal heritage study in 2008/2009, background research and a field survey was undertaken, in conjunction with a formal process of Aboriginal consultation. Some 70 Aboriginal object locales and one historic item were identified across the Coppabella Hills precinct.

Some 12 additional Aboriginal object locales were recorded in 2016 and 2017 as part of the assessment for the project Modification 1. The Development Consent provides authorisation for development impact to the sites (i.e. Aboriginal object locales) that intersect the development footprint, with certain conditions.

A total of 82 Aboriginal object locales and one scar tree have been identified as part of the Aboriginal heritage surveys for the CWF. Of these, 49 are located within the approved Development Corridor.

The Registered Aboriginal Parties (RAPs) in the process of consultation for the project are: Buru Ngunawal Aboriginal Corporation, Ngunawal Heritage Aboriginal Corporation and Onerwal Local Aboriginal Land Council.

This HMP has been developed in consultation with the Registered Aboriginal Parties and the NSW Office of Environment and Heritage (NSW OEH). The HMP sets out strategies

for the inclusion of the relevant Aboriginal stakeholders in the management of their cultural heritage.

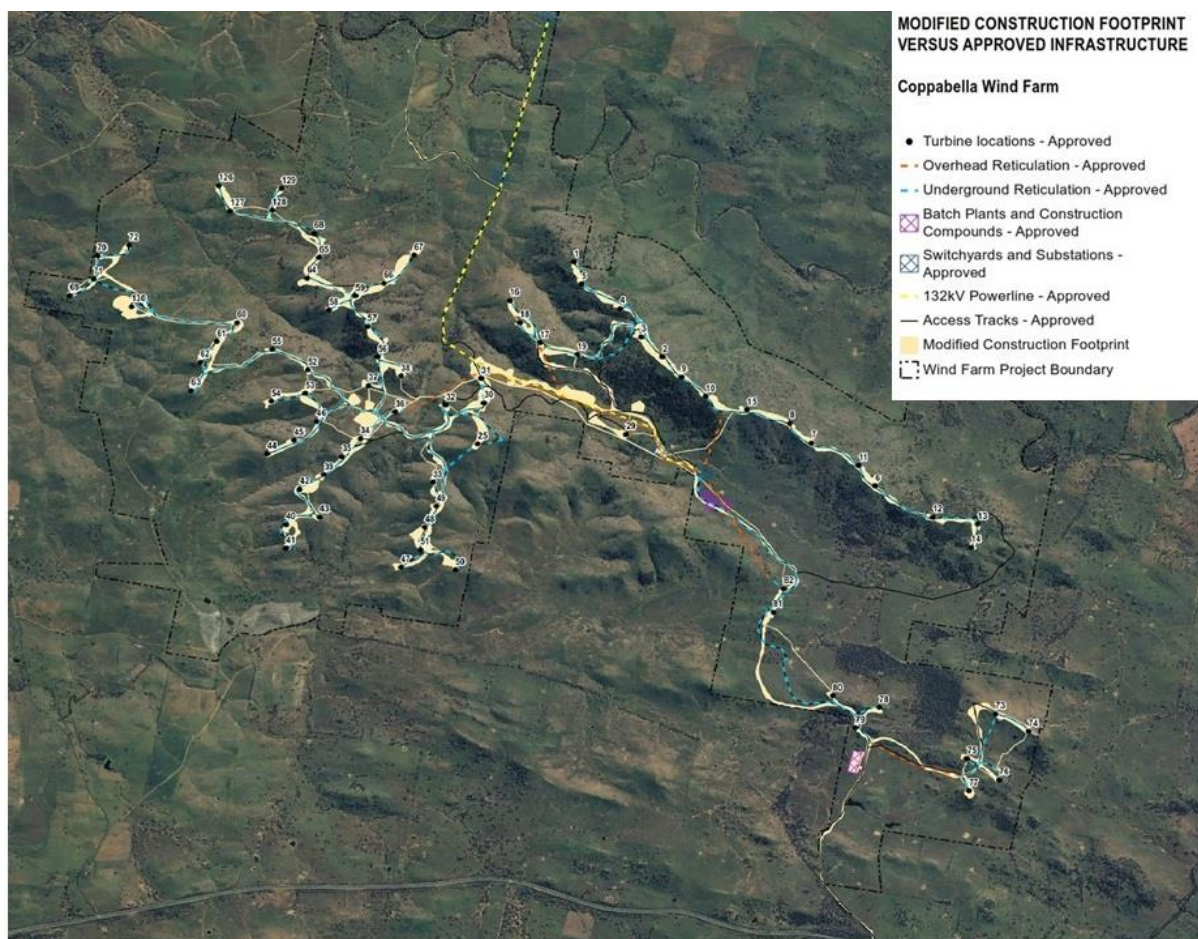


Figure 1 Approved layout of the proposal (supplied by proponent).

## 2. LEGISLATIVE CONTEXT

The National Parks and Wildlife Act 1974 (NPW Act) is the primary legislation for the protection of some aspects of Aboriginal cultural heritage in NSW. One of the objectives of the NPW Act is:

*... the conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including but not limited to: (i) places, objects and features of significance to Aboriginal people ... (s.2A(1)(b))*

Part 6 of the NPW Act is administered by the NSW OEH and provides specific protection for Aboriginal objects and declared Aboriginal places by establishing offences of harm. Harm is defined to mean destroying, defacing or damaging an Aboriginal object or declared Aboriginal place, or moving an object from the land. Anyone proposing to carry out an activity that may harm an Aboriginal object or declared Aboriginal place must investigate, assess and report on harm that may be caused by the activity they propose.

Section 86 of the NPW Act, *Harming or desecrating Aboriginal objects and Aboriginal places*, sets out the penalties for harming an Aboriginal object. For an individual, the penalty for harming an object the person knows is an Aboriginal object, is imprisonment for up to two years and a significant fine (>\$200,000). For corporations, the penalties exceed \$1,000,000.

Part 6 of the National Parks and Wildlife Act 1974 (NPW Act) provides specific protection for Aboriginal objects and declared Aboriginal places by establishing offences of harm. There are a number of defences and exemptions to the offence of harming an Aboriginal object or place. One of the defences is that the harm is carried out under an Aboriginal Heritage Impact Permit (AHIP).

However, under Section 89J of the Environmental Planning and Assessment Act 1979, the following authorisations are not required for a Major Project/State Significant Development that is authorised by a development consent granted after the commencement of this Division (and, accordingly, the provisions of any Act that prohibit an activity without such an authority do not apply):

*an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974.*

A number of other aspects of the NPW Act are relevant as set out below.

Under Section 89A Notification of sites of Aboriginal objects. A person who is aware of the location of an Aboriginal object that is the property of the Crown or, not being the property of the Crown, is real property, and does not, in the prescribed manner, notify the Director-General thereof within a reasonable time after the person first becomes aware of that location is guilty of an offence against this Act unless the person believes on reasonable grounds that the Director-General is aware of the location of that Aboriginal object. An

Aboriginal Site Recording Form allows for primary site recording (see link in Appendix 2). Aboriginal Site Recording Forms are provided to the Aboriginal Heritage Information Management System (AHIMS) which is maintained by NSW OEH.

An Aboriginal Site Impact Recording Form has been developed to ensure that current information about the status of AHIMS sites is maintained and an accurate picture of the condition of all registered Aboriginal sites is always available. The form must be completed after authorised impacts to AHIMS sites occur. Once completed, the forms must be sent to the AHIMS Registrar. Authorised impacts are those:

- which occur as a result of test excavation carried out in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW;
- allowed by an AHIP issued by the NSW OEH;
- undertaken for the purpose of complying with Director-General Requirements issued by the Department of Planning and Infrastructure for State Significant Development (SSD – Part 4), State Significant Infrastructure (SSI – Part 5.1) or a Major Project (Part 3A – now repealed) under the Environmental Protection and Assessment Act 1979 – EP&A Act); or
- allowed by an SSD/SSI/Part 3A consent/approval under the EP&A Act.

The Coppabella Wind Farm transitioned from a ‘transitional Part 3A project’ to State Significant Development (SSD) in March 2014, and as such, for the purposes of the consent is considered SSD.

Many Aboriginal communities wish to have care of Aboriginal objects which have been excavated, disturbed or moved by development activities, erosion or other processes. Under Section 85A of the NP&W Act 1974, the transfer of Aboriginal objects from a site to an Aboriginal person or organisation for safe keeping is allowed. The person or organisation must enter into an agreement with the NSW OEH. A Care Agreement Application Form must be completed and sent to the relevant NSW OEH regional office. A link to the form can be found in Appendix 2.

Links to various relevant web sites relating to Aboriginal heritage regulation in NSW are provided in Appendix 2.

### 3. RATIONALE FOR THE HMP

#### 3.1 Background

New South Wales Archaeology Pty Ltd conducted a Cultural Heritage Assessment of the proposed Yass Valley Wind Farm in September 2008. At the time, the proposal consisted of three geographically separate precincts, of which the Coppabella Hills was one. The assessment is documented in Dibden (2009) and the Coppabella section is summarised below. Further survey of the Coppabella Hills was undertaken in respect of various changes in 2016 and 2017 (Dibden 2017).

The Coppabella Hills is predominantly cleared, grazing land. The existing Transgrid 330/132kV transmission line crosses to the north and the electricity harvested from the wind farm will be transferred to this.

The site possesses evidence of active erosion especially on crests and hillslopes, apparent by both evidence of surface movement and bare earth in erosional floors and sides (cf McDonald *et al.* 1998). Erosional features caused by wind and water vary across the area between moderate and severe. The underlying geology is volcanic which is present as low boulders, cobbles, and shatter within the soil exposures. In the southeast ridge (SU2) the bedrock geology almost entirely encompasses the crest. Soils are generally rocky and given the accelerated erosional context are generally deflated with most or the entire surface removed leaving hard material and/or shattered weathered.

The Coppabella hills consist of a long, central and narrow ridge extending east/west (encompassed by SU1 and SU3) and numerous surrounding ridge clusters. The majority of the Coppabella ridges are moderately to steeply undulating and separated by steep slopes and narrow, “v” shaped valleys. Generally where crests are of moderate or steep gradient the erosional context is high; similarly knolls are usually deflated and eroded to hard material and/or bedrock. Saddles on crests contain deeper soil profiles due to aggradation of deposit onto these lower elements. Saddles, however, are generally highly disturbed as a result of stock treadage and other natural processes. The remaining Survey Units are located on lower elevation, simple slopes or valleys in which roads and transmission lines are proposed.

During the heritage assessment, the Coppabella Hills area was originally divided into 24 Survey Units (Dibden 2009). A total of 70 Aboriginal object locales were recorded. Artefacts were recorded in all Survey Units except SU4, SU8, SU10, SU12, SU13, SU14 and SU22 which were assessed to be of low archaeological potential on environmental grounds. Artefacts were recorded along the crests in which turbines are proposed; the majority of locales contain either single or otherwise very few artefacts. Given the relatively large areas of exposure and the very few artefacts recorded, it was concluded that artefact density, generally is very low in the Coppabella Hills. This result is not unexpected and, indeed, consistent with the predictive model of Aboriginal land use.



Artefacts were commonly found in saddles and on knolls along crests. The majority of locales on crests are situated on deflated and eroded soil profiles.

Several Survey Units and locales within some Survey Units have been predicted to contain subsurface artefacts in low/moderate density including several ridge saddles in SU2 and SU20, a large upland basin in SU17 and the valleys in which SU23 and SU24 are located.

One potential Non-Indigenous heritage item was recorded in and adjacent to areas of proposed impacts. This item is an area of ploughland (Coppabella SU24/H1) and is assessed to be of insufficient significance to warrant heritage listing. This site is outside the current wind farm layout.

During the field surveys conducted in 2016 and 2017, 22 additional Survey Units were defined, and 12 new Aboriginal object locales recorded. One scar tree was identified opportunistically by NGH Environmental along Whitefields Road in late 2018.

All Aboriginal 82 object locales and one scar tree recorded in the Coppabella hills are summarised in Table 1 and described in detail in Dibden (2017: Section 9.2). Their location is shown here in Figures 2-9.

Table 1 Summary of Aboriginal object locales.

Site name	Datum	Easting	Northing
Coppabella Hills SU1/L1	GDA	642819	6154584
Coppabella Hills SU1/L2	GDA	643703	6154378
Coppabella Hills SU1/L3	GDA	644253	6153990
Coppabella Hills SU1/L4	GDA	645389	6153125
Coppabella Hills SU1/L5	GDA	645333	6153158
Coppabella Hills SU1/L6	GDA	642729	6154727
Coppabella Hills SU2/L1	GDA	644323	6150581
Coppabella Hills SU2/L2	GDA	644896	6150090
Coppabella Hills SU2/L3	GDA	646005	6149548
Coppabella Hills SU2/L4	GDA	646036	6149982
Coppabella Hills SU2/L5	GDA	646503	6150176
Coppabella Hills SU3/L1	GDA	641827	6155876
Coppabella Hills SU3/L2	GDA	641472	6156158
Coppabella Hills SU3/L3	GDA	641288	6156280
Coppabella Hills SU3/L4	GDA	641707	6156002
Coppabella Hills SU5/L1	GDA	641084	6155360
Coppabella Hills SU5/L2	GDA	641008	6155364
Coppabella Hills SU5/L3	GDA	640835	6155471
Coppabella Hills SU6/L1	GDA	640209	6157045
Coppabella Hills SU6/L2	GDA	640294	6157581
Coppabella Hills SU6/L3	GDA	640342	6157439
Coppabella Hills SU6/L4	GDA	640339	6157674
Coppabella Hills SU6/L5	GDA	640339	6157816
Coppabella Hills SU6/L6	GDA	640453	6157793

Site name	Datum	Easting	Northing
Coppabella Hills SU7/L1	GDA	638080	6156655
Coppabella Hills SU7/L2	GDA	638017	6156556
Coppabella Hills SU7/L3	GDA	638434	6156064
Coppabella Hills SU7/L4	GDA	638282	6155984
Coppabella Hills SU9/L1	GDA	637855	6154746
Coppabella Hills SU11/L1	AGD	634419	6152505
Coppabella Hills SU11/L2	AGD	634321	6152869
Coppabella Hills SU15/L1	GDA	638378	6153948
Coppabella Hills SU15/L2	GDA	637864	6153147
Coppabella Hills SU15/L3	GDA	639064	6155097
Coppabella Hills SU16/L1	GDA	637737	6154110
Coppabella Hills SU16/L2	GDA	637801	6154132
Coppabella Hills SU16/L3	GDA	638024	6154255
Coppabella Hills SU17/L1	GDA	638683	6154636
Coppabella Hills SU17/L2	GDA	638709	6154712
Coppabella Hills SU17/L3	GDA	638847	6154749
Coppabella Hills SU17/L4	GDA	638874	6154783
Coppabella Hills SU17/L5	GDA	638844	6154932
Coppabella Hills SU17/L6	GDA	638959	6154781
Coppabella Hills SU18/L1	GDA	639229	6154275
Coppabella Hills SU18/L2	GDA	639395	6154281
Coppabella Hills SU19/L1	GDA	640167	6154207
Coppabella Hills SU19/L2	GDA	639639	6153716
Coppabella Hills SU20/L1	GDA	640920	6153539
Coppabella Hills SU20/L2	GDA	641683	6154204
Coppabella Hills SU20/L3	GDA	640486	6153798
Coppabella Hills SU20/L4	GDA	640265	6154202
Coppabella Hills SU21/L1	GDA	641693	6153406
Coppabella Hills SU21/L2	GDA	641821	6153340
Coppabella Hills SU23/L1	GDA	643822	6151618
Coppabella Hills SU23/L2	GDA	643698	6151244
Coppabella Hills SU24/L1	GDA	642211	6154076
Coppabella Hills SU24/L2	GDA	642257	6154017
Coppabella Hills SU24/L3	GDA	642397	6153909
Coppabella Hills SU24/L4	GDA	642754	6153595
Coppabella Hills SU24/L5	GDA	642848	6153502
Coppabella Hills SU24/L6	GDA	643036	6153332
Coppabella Hills SU24/L7	GDA	643037	6153228
Coppabella Hills SU24/L8	GDA	643111	6153329
Coppabella Hills SU24/L9	GDA	643186	6153216
Coppabella Hills SU24/L10	GDA	643226	6153181
Coppabella Hills SU24/L11	GDA	643299	6153075
Coppabella Hills SU24/L12	GDA	643495	6152972
Coppabella Hills SU24/L13	GDA	643554	6152908
Coppabella Hills SU24/L14	GDA	643640	6152844
Coppabella Hills SU24/L15	GDA	643850	6152583
Coppabella Hills SU25/L1	GDA	644346	6149223

Site name	Datum	Easting	Northing
Coppabella Hills SU6a/L1	GDA	639873	6156630
Coppabella Hills SU7a/L1	GDA	637830	6157130
Coppabella Hills SU14a/L1	GDA	635428	6156421
Coppabella Hills SU17a/L1	GDA	638493	6154738
Coppabella Hills SU17a/L2	GDA	638473	6154601
Coppabella Hills SU17a/L3	GDA	638416	6154549
Coppabella Hills SU17b/L1	GDA	638645	6154549
Coppabella Hills SU29/L1	GDA	636844	6156398
Coppabella Hills SU30/L1	GDA	636953	6156483
Coppabella Hills SU30/L2	GDA	637089	6156639
Coppabella Hills SU30/L3	GDA	637001	6156515
Scar Tree (Whitefields Lane ST1)	GDA	644593	6147455

### *Impact Assessment*

The majority of the Aboriginal object locales recorded in the wind farm area are low or very low density stone artefact distributions, assessed to be of low archaeological significance. However, a certain number have been assessed to be of low/moderate or moderate archaeological significance.

The construction of the wind farm will result in substantial physical impacts to any Aboriginal objects which may be located within direct impact areas - irrespective of their archaeological significance. That is, any Aboriginal object situated within an area of direct impact will be comprehensively disturbed, and/or destroyed during construction.

However, in regard to the majority of Aboriginal object locales such as artefact scatters assessed to be of low significance, the impacts can be viewed as being correspondingly low. On the other hand, impacts to any object locales which are assessed to be of higher archaeological significance can be viewed as being of correspondingly higher impact. This assessment has formed the basis for the formulation of management strategies which aim to mitigate development impact.

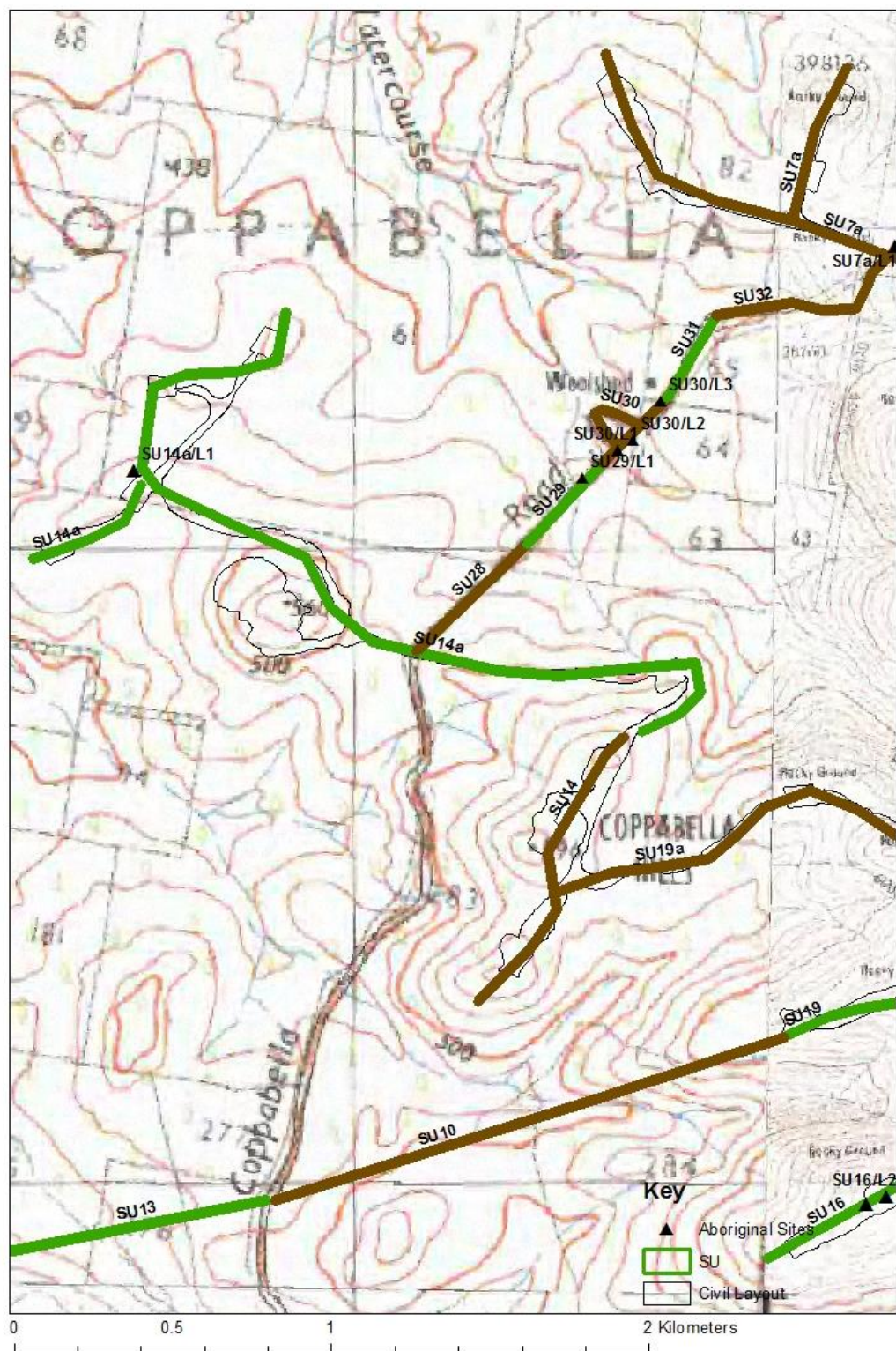


Figure 2 Location of Aboriginal object locales; northwest.



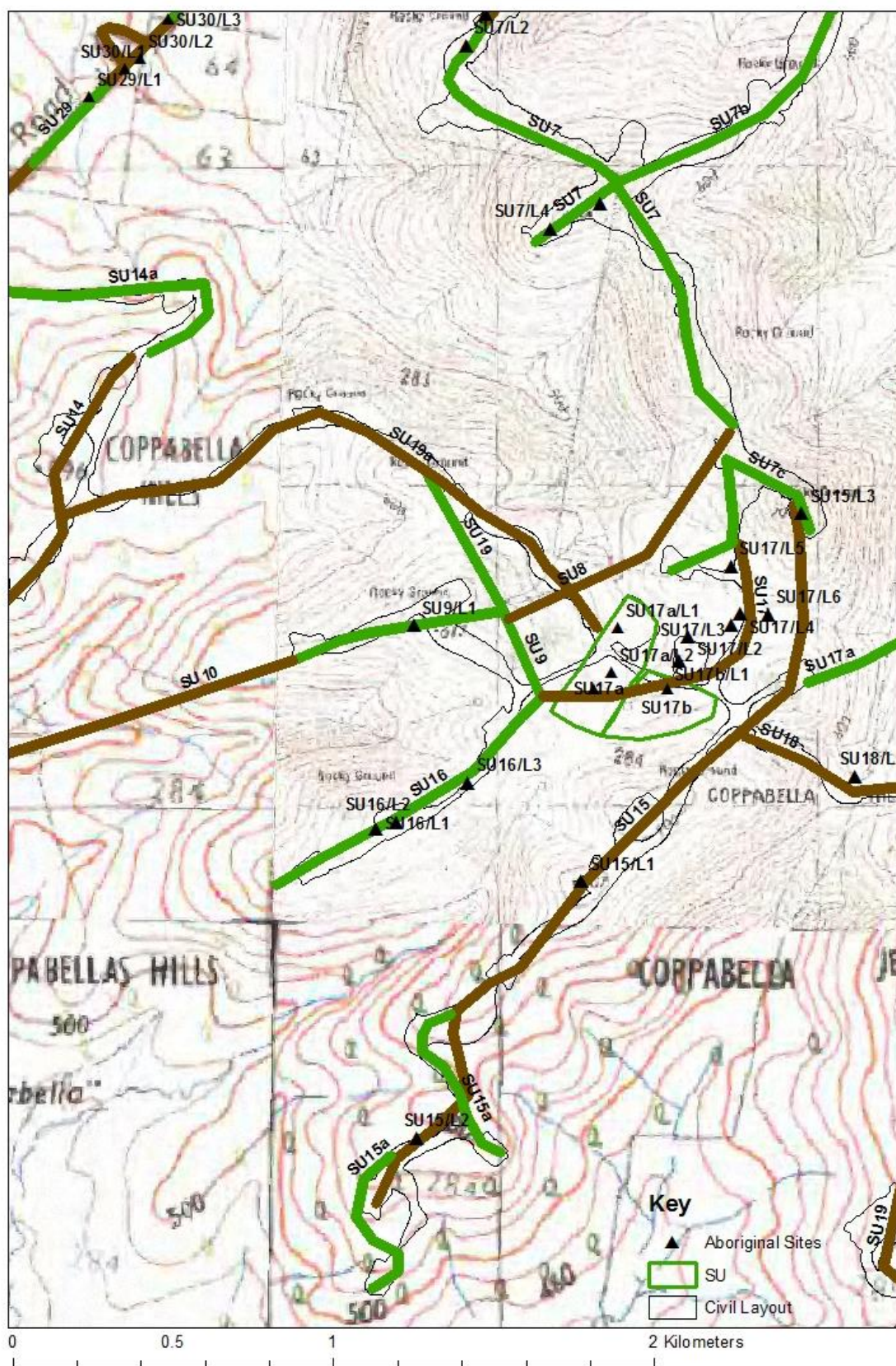


Figure 3 Location of Aboriginal object locales; southwest.



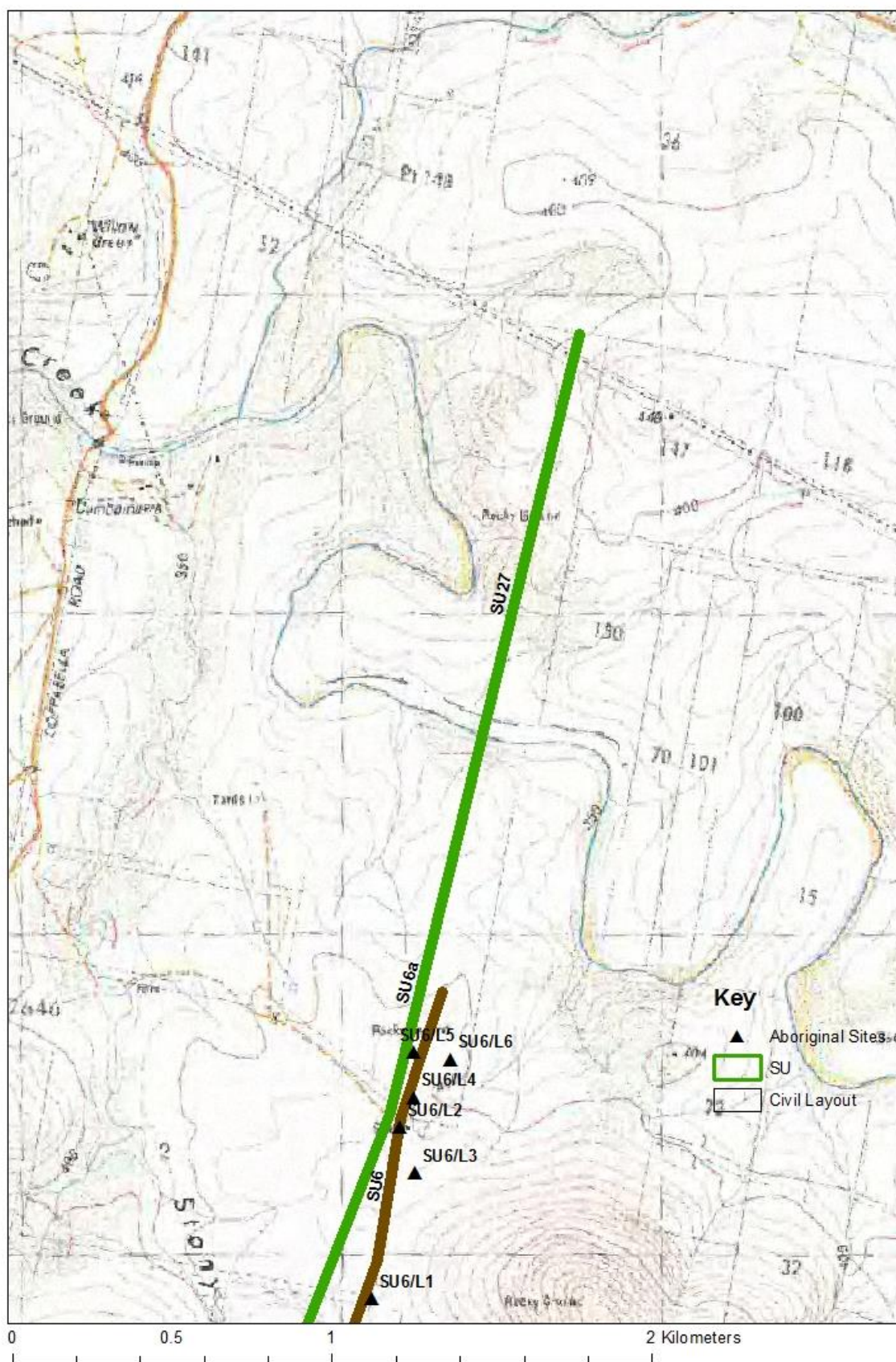
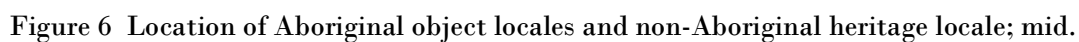


Figure 4 Location of Aboriginal object locales; electrical connection to north.











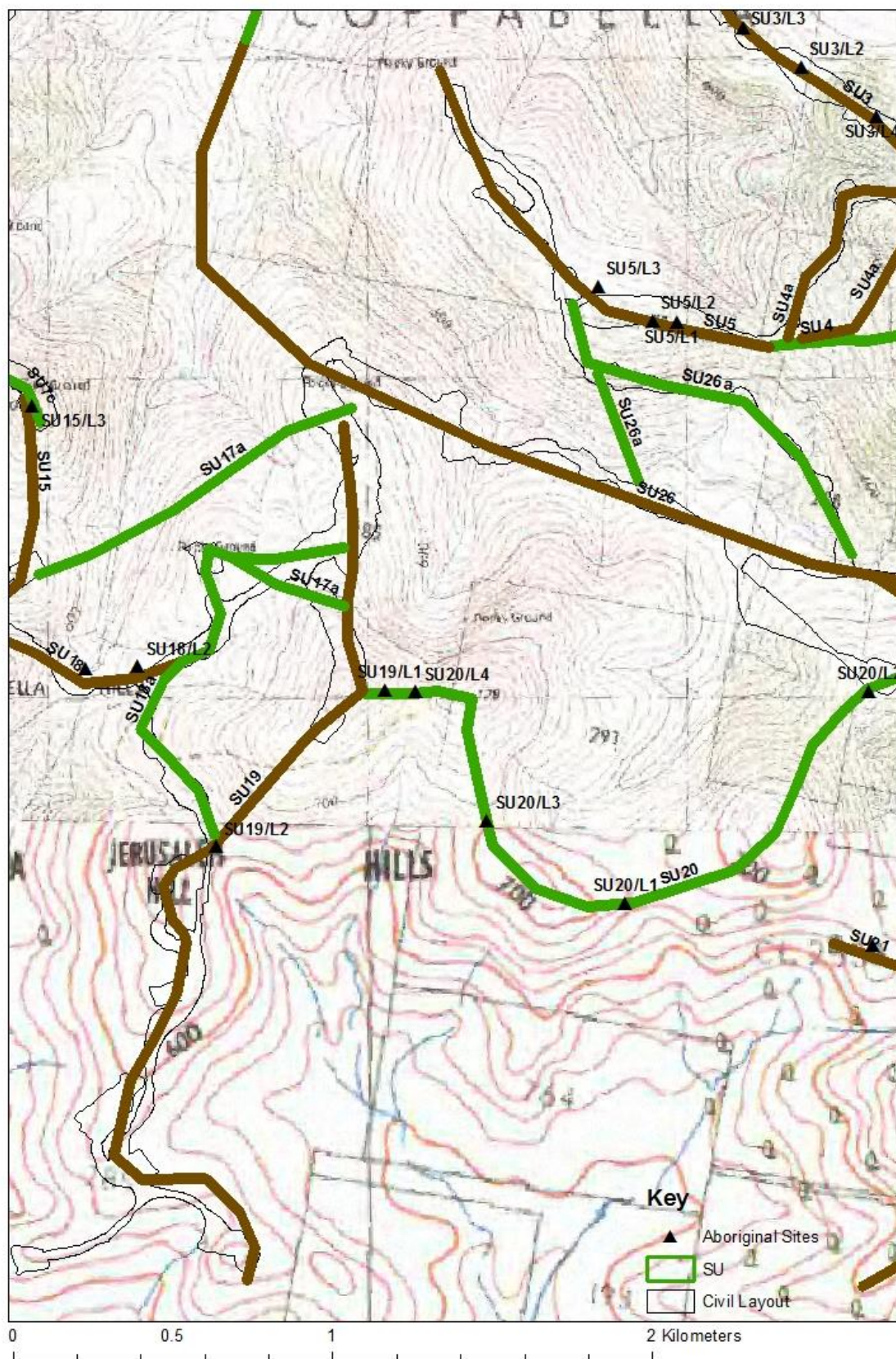


Figure 7 Location of Aboriginal object sites and Survey Units - mid south.



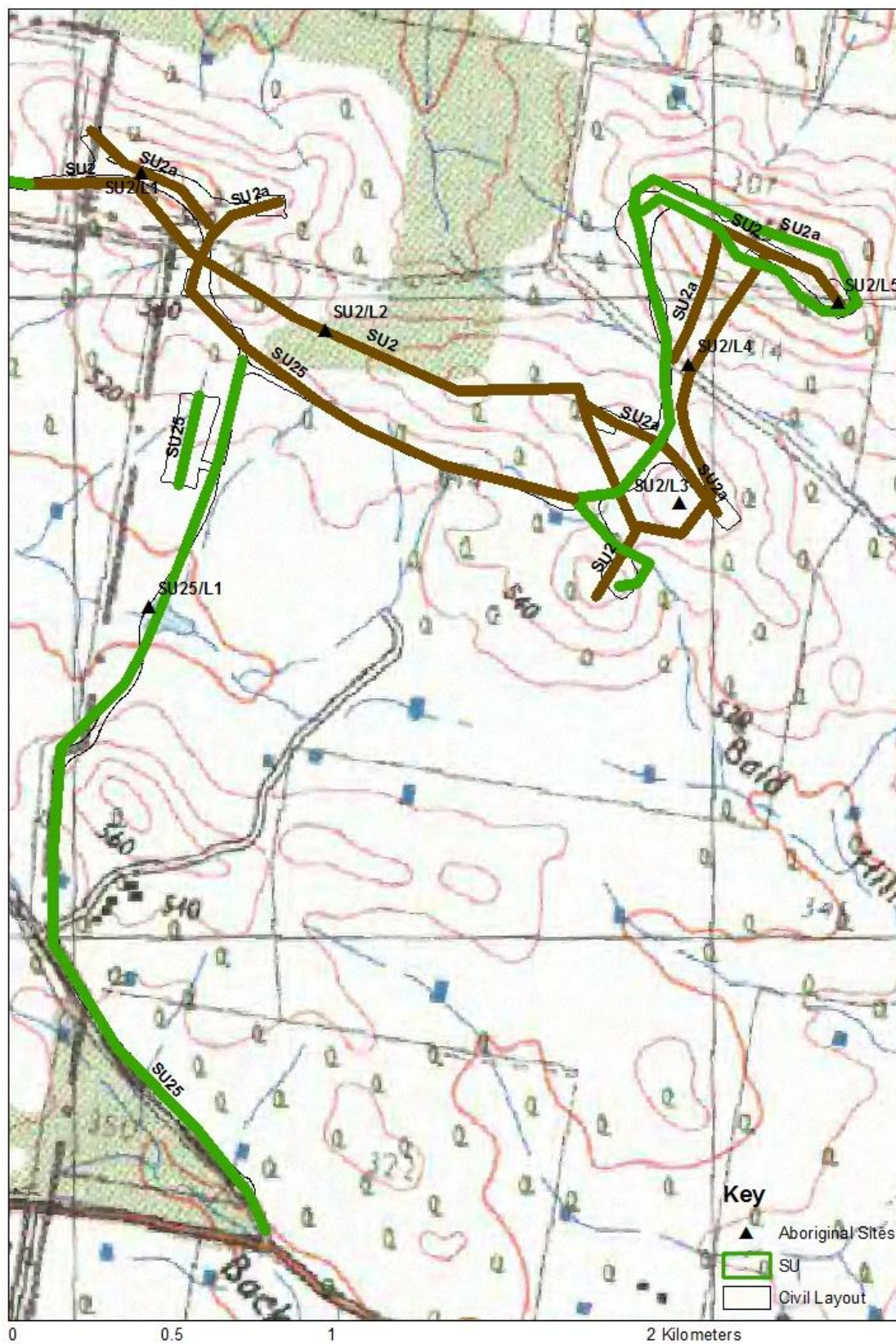


Figure 8 Location of Aboriginal object sites and Survey Units - southeast.



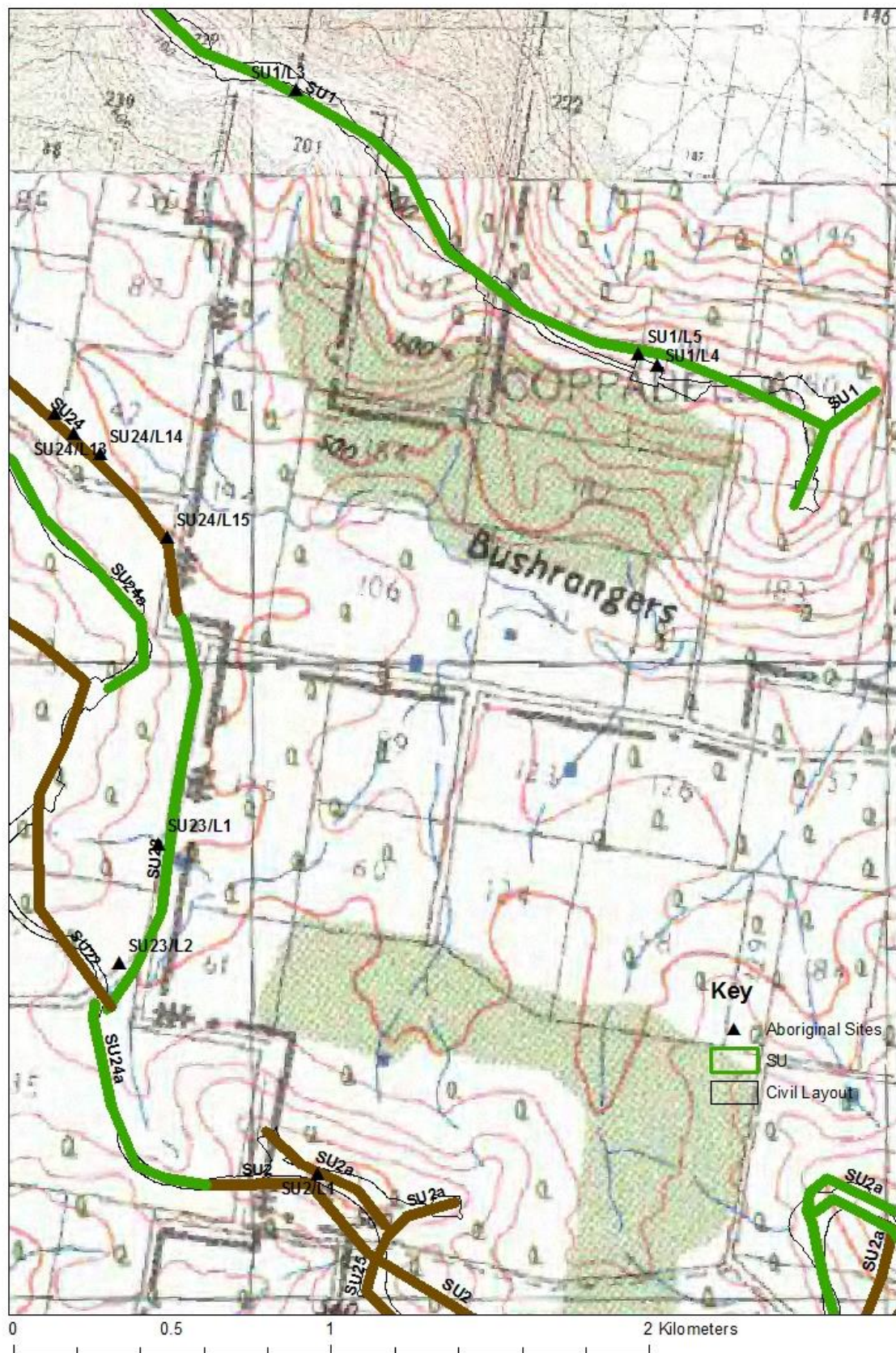
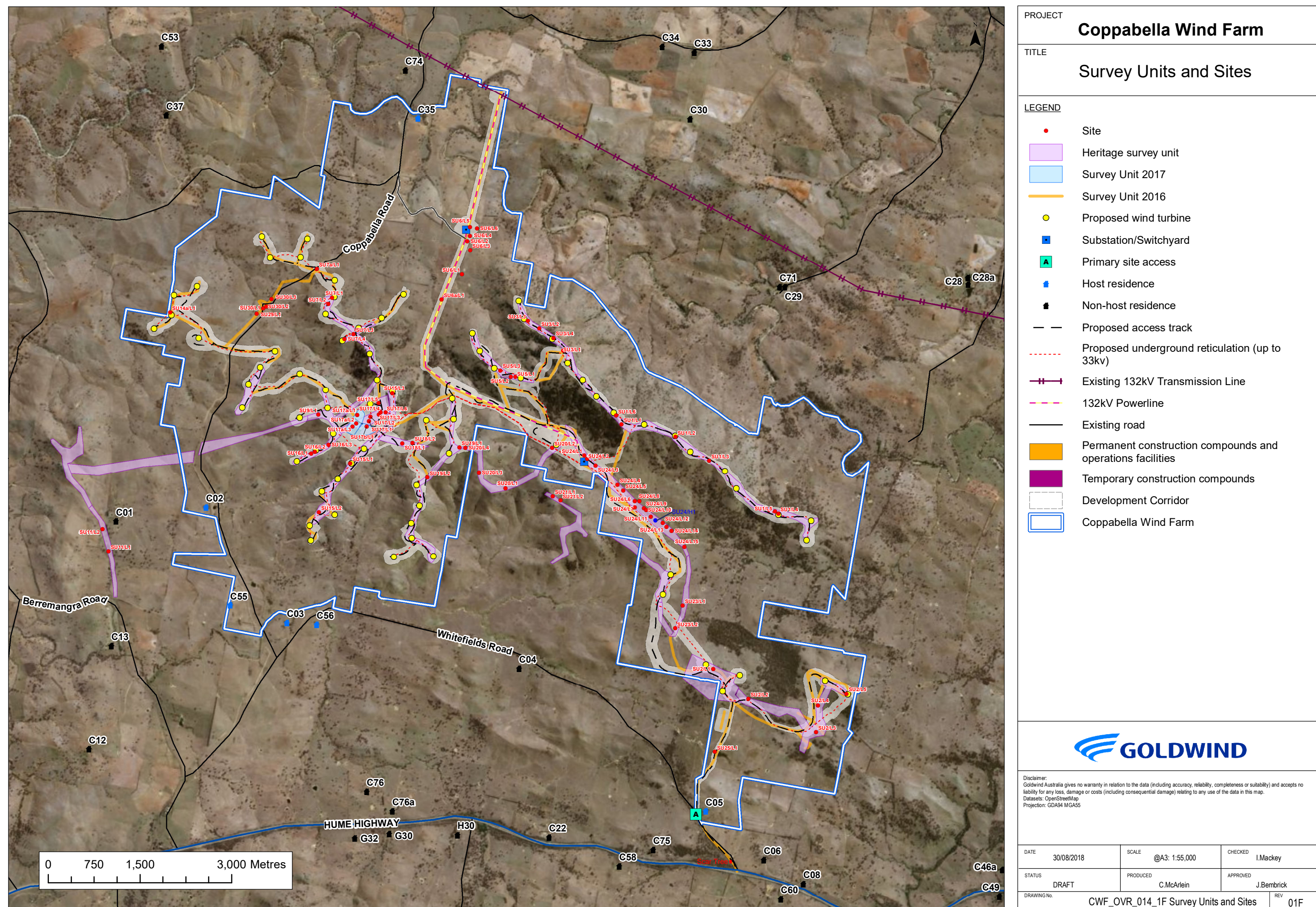


Figure 9 Location of Aboriginal object sites and Survey Units - northeast.







### 3.2 Aboriginal Cultural Heritage Assessment Report Recommendations

New South Wales Archaeology Pty Ltd conducted the Aboriginal cultural heritage assessment for the project in 2008/2009 (Dibden 2009). The report recommended that an Heritage Management Plan (HMP) be developed which would describe management and mitigation measures for Aboriginal objects during construction and operation.

In particular, the heritage report recommended that:

- As a form of mitigation of overall construction impact to the archaeological resource within the proposal area, a salvage program of archaeological excavation and analysis should be undertaken in a sample of impact areas prior to construction.
- The majority of the Aboriginal object locales recorded are very low or low density distributions of stone artefacts. The archaeological significance of these locales is assessed to be low. Accordingly a management strategy of unmitigated impact is considered to be appropriate for a number of Aboriginal object locales.
- A number of the Aboriginal object locales and/or discrete areas within Survey Units are assessed to be of low/moderate or moderate archaeological significance. Accordingly, limiting the extent of impacts to these locales, if at all feasible, should be given consideration. In regard to these, it is recommended that a salvage program of subsurface excavation be undertaken as a form of Impact Mitigation.
- Additional archaeological assessment should be conducted in any areas which are proposed for impacts that have not been surveyed during the current assessment. It is predicted that significant Aboriginal objects can occur anywhere in the landscape and, accordingly, if present they need to be identified and impact mitigation strategies implemented prior to impacts.
- A Heritage Management Plan should be developed which documents the procedures to be followed for impact mitigation in consultation with an archaeologist, the relevant Aboriginal communities and the NSW Office of Environment and Heritage (OEH).
- Personnel involved in the construction and management phases of the project should be trained in procedures to implement recommendations relating to cultural heritage where necessary.
- Cultural heritage should be included within any environmental audit of impacts proposed to be undertaken during the construction phase of the development.

### 3.3 Planning Consent Conditions

The conditions of consent relating to heritage which were recommended to the Independent Planning Commission by NSW Department of Planning and Environment for Modification 1 have been strengthened as shown below:

#### HERITAGE

##### Protection of Aboriginal Heritage Items

23. The Applicant must:
- ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items located outside the approved disturbance area; and
  - avoid (as far as practicable) and otherwise minimise any impacts on Aboriginal heritage items identified in Table 1 in Appendix 5; and
  - undertake a salvage program for the Aboriginal heritage items identified in Table 1 in Appendix 5, if impacts to them cannot be avoided.

*Note: The locations of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 5.*

##### Protection of Historic Heritage Items

24. The Applicant shall ensure that the development does not cause any direct or indirect impact on any historic heritage items located outside the approved disturbance area.

##### Heritage Management Plan

25. Prior to the commencement of construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:
- be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary;
  - be prepared in consultation with OEH and Aboriginal stakeholders;
  - include up to date baseline mapping of the heritage items within and adjoining the development disturbance area; and
  - include a description of the measures that would be implemented for:
    - minimising ground disturbance within the project area during construction and decommissioning works;
    - protecting the Aboriginal heritage items located outside the approved development corridor;
    - minimising and managing impacts to Aboriginal heritage items identified in Table 1 in Appendix 5, including:
      - undertaking salvage excavations and collections where impacts cannot be avoided; and
      - a strategy for the long-term management of any Aboriginal heritage items or material collected during the salvage activities;
    - a contingency plan and reporting procedure if:
      - Aboriginal heritage items outside the approved disturbance area are harmed;
      - previously unidentified Aboriginal heritage items are found; or
      - Aboriginal skeletal material is discovered;
    - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that suitable records are kept of these inductions; and
    - ongoing consultation with Aboriginal stakeholders during the implementation of the plan;
  - a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.
26. Following approval, the Applicant must implement the measures described in the Heritage Management Plan.

Table 2 List of Aboriginal object locales within the Development Corridor specified in the Development Conditions (Table 1) to be salvaged if they cannot be avoided (as far as practicable) through the detailed design.

Survey Unit	Locale
SU1	SU1/L1, SU1/L2, SU1/L3, SU1/L4, SU1/L5, SU1/L6
SU2	SU2/L2, SU2/L5
SU3	SU3/L1, SU3/L2, SU3/L3, SU3/L4
SU5	SU5/L1
SU6	SU6/L2, SU6/L4, SU6/L5, SU6/L6
SU6a	SU6a/L1
SU7	SU7/L1, SU7/L2, SU7/L3, SU7/L4
SU7a	SU7a/L1
SU9	SU9/L1
SU14a	SU14a/L1
SU15	SU15/L1, SU15/L3
SU16	SU16/L1, SU16/L2, SU16/L3
SU17	SU17/L1, SU17/L2, SU17/L3, SU17/L4, SU17/L5,
SU17a	SU17a/L1, SU17a/L2
SU17b	SU17b/L1
SU18	SU18/L2
SU19	SU19/L1, SU19/L2
SU20	SU20/L2, SU20/L4
SU23	SU23/L2
SU23	SU23/L2
SU24	SU24/L1, SU24/L2, SU24/L3
SU25	Area NE of SU25/L1
SU29	SU29/L1
SU30	SU30/L1, SU30/L3

The HMP seeks to ensure that the requirements, as outlined above, are set out clearly so that they are readily complied with during the development, construction and operation of the wind farm. Table 3 summarises where each Condition of Consent and Statement of Commitment has been addressed in this HMP.

Table 3 Conditions of Consent and Statement of Commitments in relation to HMP

<b>SSD-6698 Heritage Protection of Aboriginal Items Condition 23 of Schedule 3</b>	<b>HMP Reference</b>
(a) ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items located outside the approved disturbance area; and	Section 6
(b) avoid (as far as practicable) and otherwise minimise any impacts on Aboriginal heritage items identified in Table 1 in Appendix 5; and	Section 6.2
(c) undertake a salvage program for the Aboriginal heritage items identified in Table 1 in Appendix 5, if impacts to them cannot be avoided.	Appendix 4
<b>Condition 24 of Schedule 3</b>	
The Applicant shall ensure that the development does not cause any direct or indirect impact on any historic heritage items located outside the approved disturbance area.	Section 5
<b>Condition 25 of Schedule 3</b>	
(a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary;	Section 4 & Appendix 3
(b) be prepared in consultation with OEH and Aboriginal stakeholders;	Section 4 & Appendix 3
(c) include up to date baseline mapping of the heritage items within and adjoining the development disturbance area; and	Figure 2- Figure10
(d) include a description of the measures that would be implemented for:	
• minimising ground disturbance within the project area during construction and decommissioning works;	Section 6; Table 4
• protecting the Aboriginal heritage items located outside the approved development corridor;	Section 6.2
• minimising and managing impacts to Aboriginal heritage items identified in Table 1 in Appendix 5, including: - undertaking salvage excavations and collections where impacts cannot be avoided; and - a strategy for the long-term management of any Aboriginal heritage items or material collected during the salvage activities;	Section 6; Appendix 4
• a contingency plan and reporting procedure if: - Aboriginal heritage items outside the approved disturbance area are harmed; - previously unidentified Aboriginal heritage items are found; or - Aboriginal skeletal material is discovered;	Section 6.2 & 6.3
• ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that suitable records are kept of these inductions; and	Section 6.4
• ongoing consultation with Aboriginal stakeholders during the implementation of the plan;	Section 4
(e) a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.	Section 6.5
<b>Condition 26 of Schedule 3</b>	
Following approval, the Applicant must implement the measures described in the Heritage Management Plan.	Section 7
<b>Statement of Commitments</b>	
#26 Salvage Program of excavation in sample of impact areas prior to disturbance	Appendix 4
#26 Research project undertaken in consultation with Archaeologist, RAPs and DECC	Appendix 4
#27 Minimise the extent of impacts assessed to be low/moderate or moderate archaeological significance, where possible	Table 4
#27 Undertake program of subsurface excavation in impact areas. See tables 19,20 and 21 of Section 12 of Archaeological Assessment	Appendix 4
#28 Conduct additional archaeological assessment in areas not surveyed during current assessment	Section 6.1
#29Develop and Cultural Heritage Management Protocol undertaken in consultation with Archaeologist, RAPs and DECC	Appendix 3
#86 The Proponent would limit the extent of impacts to the three identified heritage items.	Section 5



### 3.4 The Purpose of the HMP

This HMP aims to outline the appropriate responsibilities and actions that the proponent shall undertake for the purposes of managing impacts to Aboriginal and historic heritage.

The HMP describes:

- a) The procedures for the management of identified objects within the development site.
- b) A contingency plan and reporting procedure to be followed if any unidentified objects and/or human remains are identified during the development works.
- c) The process for how the HMP procedures will be managed and adhered to during the construction and operation of the project.
- d) The process that will be followed for continuing consultation with the Aboriginal stakeholders and the NSW OEH, where required.

This HMP seeks to provide the proponent with an appropriate means of meeting its obligations in regard to the requirements as outlined above.

#### 4. CONSULTATION PROCESS

Consultation for this project commenced in 2008 and was undertaken in accordance with the NSW DECC Interim Guidelines for Aboriginal Community Consultation - Requirements for Applicants (IGACC) (NSW DEC 2004). The NSW DECC requires proponents to undertake consultation with the Aboriginal community "...as an integral part of the impact assessment" process (NSW DEC 2004). While it is recognised that under Part 3A and Part 4 (SSD) of the Environmental Planning and Assessment Act, National Parks and Wildlife Act 1974 Part 6 approvals are not required, the consultation process as outlined in the IGACC policy document has nevertheless been implemented for this project.

The NSW Department of Planning (DPE) endorsed Dr. Julie Dibden of NSW Archaeology as suitably qualified and experienced on 9 January 2019. This was required to satisfy Condition 25 (a) of the project consent. The endorsement letter is provided at Appendix 3.

Buru Ngunawal Aboriginal Corporation, Ngunawal Heritage Aboriginal Corporation and Onerwal Local Aboriginal Land Council (LALC) registered an interest in this project.

A draft HMP (ver. #3) was provided to the RAPs for their perusal, views and concurrence on 21 September 2017. No responses were received. Following the Mod 1 Recommended Conditions of Consent and the inclusion of the broader Development Corridor, an updated HMP (ver. #5) and draft salvage methodology was provided to the RAPs for their perusal, views and concurrence on 4 February 2019.

A draft HMP and draft salvage methodology was provided to OEH for their review, comments and concurrence on 1 February 2019.

Comments were received from the Buru Ngunawal Aboriginal Corporation, Ngunawal Heritage Aboriginal Corporation and from OEH. No comments were received from the Onerwal LALC. Comments are provided at Appendix 3. Comments have been addressed in this report. DPE provided additional comment on 12 June 2019 (included at Appendix 3), which have been addressed in this HMP.

Once the relevant Aboriginal heritage items have been salvaged and associated reporting completed (in accordance with the Salvage Methodology at Appendix 4) ongoing consultation with the RAPs (and regulatory authorities) would continue throughout the project on an as needs basis. Triggers for further consultation during construction or operation include:

- Discovery of unexpected finds (as determined appropriate by project archaeologist and relevant regulatory agency)
- Modification to the project development which require further assessment
- Material updates to the HMP which warrant further consultation..

## 5. NON-INDIGENOUS HERITAGE MANAGEMENT

One potential Non-Indigenous heritage item was identified outside the development corridor, but within the project area. This item is an area of ploughland (Coppabella SU24/H1 – see Figure 5 and Figure 10) which consists of old ploughlines extending in a north/south orientation over an area measuring c. 4 hectares. SU24/H1 was assessed to be of insufficient significance to warrant heritage listing.

The item will be avoided as it is located outside the development corridor which will be a ‘no go area’.

In the event that any suspected non-Indigenous heritage items are discovered during the works, the activity in the vicinity of the find will be ceased immediately and the site management notified. The proponent will contact the project archaeologist for further guidance. Works shall not recommence in the area until the all clear has been given by the project archaeologist (which may require consultation with OEH and DPE).

## 6. ABORIGINAL HERITAGE MANAGEMENT PROCEDURES

The Aboriginal object locales which would be subject to the HMP are listed in Tables 1 and 2 and shown on Figures 2 - 10.

### 6.1 Further Archaeological Investigations

Further archaeological investigations would be required for any areas situated outside the project layout assessed to date. Previously surveyed areas (Survey Units) in respect of the current layout are shown in Figures 2 - 9. These have been provided to the proponent in a gis format.

### 6.2 Management of Identified Aboriginal Heritage

A development corridor has been established for the project (refer to Figure 10) within which the final design would be optimised in consideration of a number of factors including heritage constraints. The impact and relevant management for Aboriginal object locales in accordance with the current (Modification 1) layout is set out in Table 4.

Table 4 The impact and management strategy for each Aboriginal object locale.

SU	Locale	Significance	Recommended management strategy
SU1	L1	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU1	L2	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>

SU	Locale	Significance	Recommended management strategy
SU1	L3	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU1	L4	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU1	L5	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU1	L6	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU1a	-	Low	No constraints <b>Unmitigated impacts</b>
SU2	L1	Low	Nil impacts proposed
SU2	L2	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU2	L3	Low	Nil impacts proposed
SU2	L4	Low	Nil impacts proposed
SU2	L5	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU2a	-	Low	No constraints <b>Unmitigated impacts</b>
SU3	L1	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU3	L2	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU3	L3	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU3	L4	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU4	Nil	Low	No constraints <b>Unmitigated impacts</b>
SU4a	-	Low	No constraints <b>Unmitigated impacts</b>
SU5	L1	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU5	L2	Low	No constraints <b>Unmitigated impacts</b>
SU5	L3	Low	No constraints <b>Unmitigated impacts</b>
SU6	L1	Low	Nil impacts proposed
SU6	L2	Low	<b>Within Development Corridor. Mitigated impacts:</b>

SU	Locale	Significance	Recommended management strategy
			<b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU6	L3	Low	<b>Nil impacts proposed</b>
SU6	L4	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU6	L5	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU6	L6	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU6a	L1	Possible Moderate	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU7	L1	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU7	L2	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU7	L3	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU7	L4	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU7a	L1	Possible Moderate	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU7b	-	Low	No constraints <b>Unmitigated impacts</b>
SU8	Nil	Low	No constraints <b>Unmitigated impacts</b>
SU9	L1	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU10	Nil	Low	No constraints <b>Unmitigated impacts</b>
SU11	L1	Low	<b>Nil impacts proposed</b>
SU11	L2	Low	<b>Nil impacts proposed</b>
SU12	Nil	Low	No constraints <b>Unmitigated impacts</b>
SU13	Nil	Low	No constraints <b>Unmitigated impacts</b>
SU14	Nil	Low	No constraints <b>Unmitigated impacts</b>
SU14a	L1	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU15	L1	Low	<b>Within Development Corridor. Mitigated impacts:</b>

SU	Locale	Significance	Recommended management strategy
			<b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU15	L2	Low	No constraints <b>Unmitigated impacts</b>
SU15	L3	Low	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU15a	-	Low	No constraints <b>Unmitigated impacts</b>
SU16	L1	Low	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU16	L2	Low	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU16	L3	Low	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU17	L1	Possible Moderate	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU17	L2	Possible Moderate	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU17	L3	Possible Moderate	No constraints <b>Unmitigated impacts</b>
SU17	L4	Possible Moderate	No constraints <b>Unmitigated impacts</b>
SU17	L5	Possible Moderate	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU17	L6	Possible Moderate	No constraints <b>Unmitigated impacts</b>
SU17a	L1	Low	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU17a	L2	Low	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU17a	L3	Low	No constraints <b>Unmitigated impacts</b>
SU17b	L1	Low	No constraints <b>Unmitigated impacts</b>
SU18	L1	Low	Nil impacts proposed
SU18	L2	Low	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>
SU18a	-		No constraints <b>Unmitigated impacts</b>
SU19	L1	Low	<b>Within Development Corridor. Mitigated impacts:</b> <b>Incorporate within research program including salvage if within final disturbance footprint</b>

SU	Locale	Significance	Recommended management strategy
SU19	L2	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU19a	-		No constraints <b>Unmitigated impacts</b>
SU20	L1	Low / Moderate	Nil Impacts Proposed
SU20	L2	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU20	L3	Low / Moderate	Nil impacts proposed
SU20	L4	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU21	L1	Low / Moderate	Nil impacts proposed
SU21	L2	Low / Moderate	Nil impacts proposed
SU22	Nil	Low	No constraints <b>Unmitigated impacts</b>
SU23	L1	Low	Nil impacts proposed
SU23	L2	Low	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU24	L1	Possible Moderate	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU24	L2	Possible Moderate	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU24	L3	Possible Moderate	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU24	L4	Possible Moderate	Nil Impacts Proposed
SU24	L5	Possible Moderate	Nil Impacts Proposed
SU24	L6	Possible Moderate	Nil Impacts Proposed
SU24	L7	Possible Moderate	Nil Impacts Proposed
SU24	L8	Possible Moderate	Nil Impacts Proposed
SU24	L9	Possible Moderate	Nil Impacts Proposed
SU24	L10	Possible Moderate	Nil Impacts Proposed
SU24	L11	Possible Moderate	Nil Impacts Proposed
SU24	L12	Possible Moderate	Nil Impacts Proposed

SU	Locale	Significance	Recommended management strategy
SU24	L13	Possible Moderate	Nil Impacts Proposed
SU24	L14	Possible Moderate	Nil Impacts Proposed
SU24	L15	Possible Moderate	Nil Impacts Proposed
SU24a	-	-	No constraints <b>Unmitigated impacts</b>
SU25	L1	Low	<b>Within Development Corridor. Mitigated impacts Incorporate area NE of SU25/L1 within research program including salvage if within final disturbance footprint</b>
SU26	-	-	No constraints <b>Unmitigated impacts</b>
SU26a	-	-	No constraints <b>Unmitigated impacts</b>
SU27	-	-	No constraints <b>Unmitigated impacts</b>
SU28	-	-	No constraints <b>Unmitigated impacts</b>
SU29	L1	Possible Moderate	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU30	L1	Possible Moderate	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU30	L2	Possible Moderate	No constraints <b>Unmitigated impacts</b>
SU30	L3	Possible Moderate	<b>Within Development Corridor. Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint</b>
SU31	-	-	No constraints <b>Unmitigated impacts</b>
SU32	-	-	No constraints <b>Unmitigated impacts</b>
Scar Tree			Avoid impact

The Aboriginal object locales listed in Table 2 (i.e. specified in the Development Consent for avoidance or limited impact) are situated within the Development Corridor and may be subject to impacts. Where impacts would occur, a program of salvage should be undertaken to mitigate development impact, including excavation. The salvage program and excavation would seek to salvage a representative sample of the archaeological resource of each of the relevant Aboriginal artefact locales which would need to be determined in consultation with OEH and the RAPS. The work should be conducted in accordance with conventional archaeological methods, such as those set out the NSW OEH Code of Practice (NSW DECCW 2010).

During the detailed design, the proponent should seek to optimise the design to avoid or minimise impact to Aboriginal object locales and to generally minimise ground disturbance throughout the life of the project. If works occur within 30m of an Aboriginal object locale, protection measures shall be put in place (such as temporary fencing and signage) around



the locale so as to ensure inadvertent impacts do not occur. Any breach of a heritage no go area will be addressed as an incident, with appropriate incident reporting and investigation undertaken to avoid such incident occurring again.

Members of each RAP would need to be engaged to assist the archaeological team with salvage excavations. RAPs should be given one months' notice in regard to the salvage and should be invited to apply to work with the archaeological team. The number of RAPs required would be determined in accordance with the scope and extent of works.

The long-term management for excavated objects would be developed during the salvage excavation and analysis process. This would be conducted in consultation with the RAPS. Subject to RAP agreement, the preferred approach would be that all salvaged artefacts be reburied at an agreed location in proximity to the site but outside of the development footprint. The location would be identified by a new AHIMS site card submitted to ensure the location of the material is located. The recording and reburial of artefacts will be compliant with the Code of Practice for Archaeological Investigations

<http://www.environment.nsw.gov.au/resources/cultureheritage/10783FinalArchCoP.pdf>

It is noted here, that monitoring by RAPS during construction is not a requirement and is explicitly not recommended in respect of the project.

Site protection works to be implemented for Aboriginal object sites situated outside the construction footprint (that warrant that level of protection) could entail the erection of temporary fencing and *no go* zone signage. Site protection works should be undertaken for Aboriginal object sites assessed to be more than low significance and within 30m from the project disturbance footprint. This would be determined once the detailed design and disturbance footprint has been finalised.

Aboriginal Site Impact Recording Forms will be submitted to NSW OEH by the project archaeologist following the impacts.

### 6.3 Management of Unidentified Aboriginal Objects and/or Burials

Should unexpected Aboriginal objects or values be encountered, the Goldwind Site HSE Representative and project archaeologist, should be notified. Thereafter, the NSW OEH and RAPS should be consulted.

Should suspected ancestral human remains or unexpected Aboriginal object/s be encountered, the following process should be adhered to:

- Do not further disturb or move the object or remains;
- Immediately cease work in the vicinity and cordon area off;
- Notify the NSW Police (if the find is suspected human remains);
- Notify the project archaeologist and the NSW OEH Environment Line on 131 555 as soon as practicable and provide available details of the remains and their location; and

- Do not re-commence work in the area unless authorised in writing by NSW OEH.

#### 6.4 Aboriginal Heritage Induction

In order for site workers and contractors to be able to know what processes to follow in regard to this HMP, they would be provided with mandatory induction training.

The construction contractor would need to provide induction training on the following matters:

1. The identification of Aboriginal objects and skeletal material;
2. Aboriginal cultural awareness, e.g. information about the history of the Aboriginal people in the area;
3. The HMP procedures to be followed for the project, including:
  - a. The project/company's commitment to respecting heritage values
  - b. The establishment of no-go areas that must not be entered into
  - c. Procedure in the event of the discovery of unexpected artefacts or human bones

Induction records for all workers must be kept on site and also recorded in the electronic project register. Any hardcopies would be kept for a minimum of 5 years and electronic files stored for the life of the project.

#### 6.5 Protocol for Continued Aboriginal Community Consultation

A copy of this HMP will be provided to RAPs for their review, input and concurrence (now completed).

In the event that any of the following incidents, the proponent will contact the project archaeologist, NSW OEH, DPE and the RAPs within 24 hours:

1. If any breaches to the procedures as set out in this HMP occur;
2. If any unexpected Aboriginal objects and/or Aboriginal skeletal remains are found;  
or
3. If any areas are to be impacted that have not as yet been assessed for the presence of Aboriginal sites.

Contact names and details for these groups are presented in Appendix 1.

#### 6.6 Monitoring Program

The proponent shall implement a monitoring program to evaluate the effectiveness of the measures outlined in this HMP. This will include:

##### Prior to Construction commencing

- Ensure that all areas where impacts are proposed (through the detailed design) have been adequately assessed for heritage

- Review data to ensure salvage has occurred at all relevant Aboriginal Heritage locales where impact cannot be avoided
- Determine which Aboriginal Heritage locales located close to the disturbance footprint require protection (e.g. 'no go' fencing).

The proponent will only release the construction hold point once the above points have been adequately satisfied.

#### During Construction

- Undertake regular site inspections (as part of the weekly environmental inspections during peak construction) to evaluate:
  - whether protection measures around nearby Aboriginal Heritage locales are maintained and not compromised
  - whether work activities are limited to within the approved work/disturbance areas
  - any heritage impacts

Site inspections would be reduced to 3-monthly once the bulk of ground disturbing works are completed on site.

Project audits will be completed on a typical 4-monthly basis as an additional method of monitoring the above. Site inspections and audits will be documented with records kept on the project file.

#### Operations

- Site inspections as part of the annual environmental auditing program to:
  - ensure that no additional impacts to Aboriginal Heritage locales have occurred
  - consult with the site manager to ensure they are aware of their environmental and heritage requirements

It is noted that during operations, project activities should be contained to the hardstand areas developed throughout construction so the risk to Aboriginal Heritage locales outside the disturbed area is very much reduced.

#### Decommissioning

- Review planned decommissioning activities and assess the risk these pose to remaining Aboriginal Heritage locales
- Reinstate protection measures around relevant Aboriginal Heritage locales
- Undertake 3-monthly inspections until decommissioning is completed to ensure protection measures are maintained and to ensure works remain within allocated areas without impacts to heritage items.

The monitoring program actions and results must be recorded.

## 7. RECOMMENDATIONS

The recommendations outlined in the Cultural Heritage Assessment report (see Section 3.2) and the conditions of Development Consent issued by NSW Department of Planning and Environment must be complied with.

The following specific recommendations are outlined:

1. No-go zones should be defined around Aboriginal object locales where impacts are not proposed but are close to the final disturbance footprint (i.e. within 30m). The project archaeologist should be engaged to define these areas in the field with the project manager.

These no-go zones should be marked as such on construction plans and Environmental Work Method Statements (as relevant) and clearly marked in the field with temporary fencing or the like and signage.

2. Management and mitigation strategies required in respect of each Aboriginal object locale are set out in Table 4. Limiting the extent of impacts and a salvage excavation program for the purposes of mitigation development impacts are described for certain sites. The salvage methodology has been prepared by NGH Environmental (2019) in consultation with the RAPs and OEH and is provided at Appendix 4.
3. Aboriginal Site Impact Recording Forms must be completed after authorised impacts to AHIMS sites commence. Once completed, the forms must be sent to the AHIMS Registrar, NSW OEH.
4. This HMP shall be implemented in full.

## 8. REFERENCES

Dibden, J. 2009 Proposed Yass Valley Wind Farm Archaeological and Cultural Heritage Assessment. A report to Epuron.

Dibden, J. 2017 Revised Yass Valley Wind Farm Aboriginal Cultural Heritage Assessment Report.

New South Wales Department of Environment, Climate Change and Water 2010b  
*Aboriginal cultural heritage consultation requirements for proponents 2010.*

## APPENDIX 1 CONTACT DETAILS FOR REGISTERED ABORIGINAL PARTIES

Onerwal LALC  
02 62265349  
onerwall@gmail.com

Buru Ngunawal Aboriginal Corporation,  
wally@buru-ngunawal.com

Ngunawal Heritage Aboriginal Corporation  
ngunawalhac@gmail.com

Office of Environment and Heritage (OEH)

Jackie Taylor  
Team Leader Aboriginal Heritage  
South East Branch  
Conservation and Regional Delivery Division  
Jackie.taylor@environment.nsw.gov.au

## APPENDIX 2 LINKS RELATING TO ABORIGINAL HERITAGE REGULATION IN NSW

### General Aboriginal Heritage regulation

- General info about the changes to Aboriginal Heritage regulation can be found at:  
<http://www.environment.nsw.gov.au/licences/achregulation.htm>

### Amendment Act and Regulations

- The *National Parks and Wildlife Act 1974* is the primary act that manages Aboriginal heritage in NSW. The Aboriginal heritage provisions of the Act were amended in October 2010. Full details of the Act can be found at:  
<http://www.legislation.nsw.gov.au/maintop/view/inforce/act+80+1974+cd+0+N>
- The *National Parks and Wildlife Regulation 2009* also contains regulations dealing with Aboriginal cultural heritage in NSW. See:  
<http://www.legislation.nsw.gov.au/maintop/view/inforce/subordleg+427+2009+cd+0+N>

### Aboriginal Heritage Information Management System (AHIMS)

- The following link provides general information about the types of information you can obtain from the Aboriginal Heritage Information Management System (AHIMS) and also provides a table on the service fees:  
<http://www.environment.nsw.gov.au/licences/WhatInformationCanYouObtainFromAHIMS.htm>
- If you wish to undertake a free basic search using the internet yourself, you can access AHIMS through the following link:  
<http://www.environment.nsw.gov.au/awssapp/login.aspx>. If you are a first time user you will need to register using an email address. You will be asked to fill in some details and a password. If you have previously used the system you will need to enter your email address and password. You will then need to enter the details of the search or service you want to request.
- If you require assistance with the AHIMS database the AHIMS Registrar can be contacted on:  
**Phone:** 02 9585 6345  
**Fax:** 02 9585 6094  
**Email:** [ahims@environment.nsw.gov.au](mailto:ahims@environment.nsw.gov.au)  
**Street address:** Level 6, 43 Bridge Street, Hurstville NSW  
**Postal address:** PO Box 1967, Hurstville NSW 2220
- The AHIMS Basic Search will tell you whether there are any Aboriginal sites recorded in the search area.
- If the results of your AHIMS Basic Search indicate that there is an Aboriginal site in the area of your proposed activity, you will need to seek further information in order to determine the precise nature of the Aboriginal site. This would involve conducting

an Extensive Search; a fee may apply. Further details of this search are available on the same website.

- If the results of your AHIMS Basic Search indicate that there are no Aboriginal sites in the area of any proposed activity, you would do not need to carry out an Extensive Search.

#### Declared Aboriginal Places

- General information about declared Aboriginal Places can be found at:  
<http://www.environment.nsw.gov.au/conservation/AboriginalPlacesNSW.htm>
- The Atlas of declared Aboriginal Places comprises a map and table of declared Aboriginal Places in NSW. For each Aboriginal place you will find information describing the place and a summary of why it is important to Aboriginal people. See:  
<http://www.environment.nsw.gov.au/AboriginalPlaces/>

#### Aboriginal Sites Decision Support Tool (ASDST)

- The Aboriginal sites decision support tool (ASDST) has been developed to support the assessment of Aboriginal sites issues in NSW at the landscape-scale:  
<http://www.environment.nsw.gov.au/licences/AboriginalSitesDecisionSupportTool.htm>
- A direct link to the maps can be found at:  
<http://mapdata1.environment.nsw.gov.au/asdst/default.aspx>
- For further information and support in interpreting the ASDST products, please contact: [asds.tool@environment.nsw.gov.au](mailto:asds.tool@environment.nsw.gov.au)

#### Due Diligence

- The *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010) can be used by individuals or organisations who are contemplating undertaking activities which could harm Aboriginal objects. This Due Diligence Code provides a process whereby a reasonable determination can be made whether or not Aboriginal objects will be harmed by an activity, whether further investigation is warranted and whether the activity requires an AHIP application. A copy of this Due Diligence Code can be found at:  
<http://www.environment.nsw.gov.au/resources/cultureheritage/ddcop/10798ddcop.pdf>

#### Industry Specific Due Diligence Codes:

- Other industry specific codes of practice adopted by the NPW Regulation. The industry specific codes of practice must meet minimum standards which have been set by the Director General. These standards were published in the Government Gazette on 10 September 2010. (The Plantations and Reafforestation Code and the Private Native Forestry Code of Practice are existing statutory codes and currently do not need to meet these minimum standards).



- These codes are:
  1. the [Plantations and Reafforestation Code \(being the Appendix to the Plantations and Reafforestation \(Code\) Regulation 2001\)](#)  as in force on 15 June 2010,
  2. the [Private Native Forestry Code of Practice](#) approved by the Minister for Climate Change, Environment and Water and published in the Gazette on 8 February 2008,
  3. the [NSW Minerals Industry Due Diligence Code of Practice for the Protection of Aboriginal Objects](#) published by NSW Minerals Council Ltd and dated 13 September 2010,
  4. the [Aboriginal Objects Due Diligence Code for Plantation Officers Administering the Plantations and Reafforestation \(Code\) Regulation 2001](#) published by the Department of Industry and Investment and dated 13 September 2010,
  5. the [Operational Guidelines for Aboriginal Cultural Heritage Management](#) published by Forests NSW and dated 13 September 2010.

#### Archaeological surveys and assessments

- Anyone proposing to carry out an activity that may harm an Aboriginal object or a declared Aboriginal place must investigate, assess and report on the harm that may be caused by that activity. An Aboriginal cultural heritage assessment report is the written report detailing the results of the assessment and recommendations for actions to be taken before, during and after an activity to manage and protect any identified Aboriginal objects or declared Aboriginal places. The Aboriginal cultural heritage assessment report is required to support any application made to OEH for an Aboriginal Heritage Impact Permit (AHIP) where harm cannot be avoided. The *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* outlines the requirements of an Aboriginal cultural heritage assessment report. See: <http://www.environment.nsw.gov.au/resources/cultureheritage/20110263ACHguide.pdf>
- Some test excavations can be carried out without the requirement for an AHIP provided they are done in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal objects in NSW*. This Code sets out the minimum standards for archaeological investigation undertaken in NSW under the National Parks and Wildlife Act 1974 (NPW Act). See: <http://www.environment.nsw.gov.au/resources/cultureheritage/10783FinalArchCoP.pdf>

#### Aboriginal community consultation

- OEH has produced some background information that sets out the requirements for consulting with those Aboriginal people who can provide information about the significance of Aboriginal cultural heritage as part of the heritage assessment process that informs any application for an Aboriginal Heritage Impact Permit (AHIP). See: <http://www.environment.nsw.gov.au/licences/consultation.htm>
- The OEH policy for Aboriginal community consultation, *Aboriginal Cultural Heritage Consultation Requirements for proponents*, can be found at: <http://www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09781ACHconsultreq.pdf>.

#### Local Aboriginal land Councils

- Information relating to boundaries of Local Aboriginal Land Councils can be obtained via State Land Council at: <http://www.alc.org.au/land-councils/lalc-regions-boundaries.aspx>
- Information relating to contact details for Local Aboriginal Land Councils can also be obtained via State Land Council at: <http://www.alc.org.au/land-councils/lalc-contact-details.aspx>

#### Aboriginal Site Recording Forms (site cards):

- General information in relation to recording Aboriginal objects and sites can be found at:  
[http://www.environment.nsw.gov.au/licences/DECCA\\_HIMSSiteRecordingForm.htm](http://www.environment.nsw.gov.au/licences/DECCA_HIMSSiteRecordingForm.htm)
- Access to the Aboriginal Site Recording Form itself (also known as a site card) can be found at:  
[http://www.environment.nsw.gov.au/resources/parks/SiteCardMainV1\\_1.pdf](http://www.environment.nsw.gov.au/resources/parks/SiteCardMainV1_1.pdf)
- Information on how to fill in an Aboriginal site recording form can be found at:  
<http://www.environment.nsw.gov.au/resources/parks/20121008SiteRecordGuide.pdf>

#### Aboriginal Heritage Impact Permits (AHIPs):

- Recent changes to the NPW Act allow a single permit (referred to as an Aboriginal Heritage Impact Permit or AHIP) to be issued in relation to impacts to Aboriginal objects and Aboriginal places, or types or classes of Aboriginal objects and Aboriginal places. See: <http://www.environment.nsw.gov.au/licences/Section87Section90.htm>
- There is also a Guide titled “*Applying for an Aboriginal Heritage Impact Permit: Guide for applicants*” on the OEH website that may assist in the process for applying for an AHIP if one is required for your project. See:  
<http://www.environment.nsw.gov.au/resources/cultureheritage/20110280AHIPguideforapplicants.pdf>
- Aboriginal Heritage Impact Permit (AHIP) application form.  
See: <http://www.environment.nsw.gov.au/resources/cultureheritage/20110734AHIPapplication.pdf>
- AHIPs may also be varied or transferred. Application forms to vary transfer an AHIP can be found at:  
<http://www.environment.nsw.gov.au/licences/AHIPforms.htm>

#### Care Agreements

- Many Aboriginal communities wish to have care of Aboriginal objects which have been excavated, disturbed or moved by development activities, erosion or other processes.
- The NPW Act allows the transfer of Aboriginal objects to an Aboriginal person or Aboriginal organisation for safekeeping. The person or organisation must enter into a care agreement with OEH.
- A care agreement is a document that sets out the obligations of OEH and the Aboriginal person or Aboriginal organisation for the long-term safekeeping of the

transferred Aboriginal object(s). The Aboriginal person or organisation does not become the owner of the Aboriginal objects.

- A person or organisation wanting to be a custodian for objects can apply for a transfer of those objects to themselves using the application form below. There is no cost to do this.
- If you are applying to be custodian of Aboriginal objects that are also subject to an Aboriginal Heritage Impact Permit (AHIP) or an application for an AHIP, it is important that you discuss the management of the objects with the Registered Aboriginal Parties for that application.
- Link to further information on Care Agreements:  
<http://www.environment.nsw.gov.au/licences/CareAgreements.htm>

#### Public Register

- The Public Register under the National Parks and Wildlife Act (NPW Act) provides the public with information related to Aboriginal heritage and other regulatory functions under the NPW Act and the Threatened Species Conservation Act (TSC Act). This register supports OEH's broad principle of ensuring that where possible, the department's decisions are publicly available and transparent. It contains:
  1. [applications for Aboriginal heritage impact permits \(AHIPs\)](#) and other decisions made by the Director General of the Department of Premier and Cabinet regarding AHIPs.
  2. [convictions in prosecutions under the NPW Act or the TSC Act](#) initiated by OEH
  3. [the results of civil proceedings before the Land and Environment Court](#) under the NPW Act or the TSC Act by or against OEH
  4. Aboriginal Places <http://www.environment.nsw.gov.au/AboriginalPlaces/>
  5. remediation directions issued by the Director General

#### OEH internal guidance material

- OEH staff use internal policy and guidance to assist them in regulating Aboriginal cultural heritage, including assessing applications for Aboriginal heritage impact permits (AHIPs).
- These documents are intended as internal OEH policy documents only and should not be used for any other purpose.
  1. [Operational Policy: Protecting Aboriginal cultural heritage](#) (110396oppolach.pdf; 239 KB): This document provides an operational framework for OEH staff regulating Aboriginal cultural heritage, which is practical, legally appropriate and consistent across the state.
  2. [Guide to Aboriginal Heritage Impact Permit Processes and Decision-making](#) (110397guideahipprocess.pdf; 577 KB): This guide aims to ensure OEH decisions on Aboriginal heritage impact permits (AHIPs) are transparent and defensible and that any AHIPs issued are appropriate, reasonable and enforceable.

#### Aboriginal Cultural Heritage Fact Sheets

- **Fact sheet 1 - New Aboriginal heritage provisions**  
(<http://www.environment.nsw.gov.au/resources/cultureheritage/NPWAct/10701npwfacts1.pdf>)

- **Fact sheet 2 - Providing certainty for the protection of Aboriginal heritage through due diligence**  
(<http://www.environment.nsw.gov.au/resources/cultureheritage/NPWAct/10702npwfacts2.pdf>)
- **Fact sheet 3 - Better law enforcement for the protection of Aboriginal heritage, national parks and threatened species in New South Wales**  
(<http://www.environment.nsw.gov.au/resources/cultureheritage/NPWAct/10703npwfacts3.pdf>)
- **Fact sheet 4 - New procedures for boards of management for Aboriginal - owned parks**  
(<http://www.environment.nsw.gov.au/resources/cultureheritage/NPWAct/10704npwfacts4.pdf>)
- **Fact sheet 5 - Summary of miscellaneous provisions**  
(<http://www.environment.nsw.gov.au/resources/cultureheritage/NPWAct/10705npwfacts5.pdf>)
- **Fact sheet 6 – The Low Impact Activity Defence**  
(<http://www.environment.nsw.gov.au/resources/cultureheritage/NPWAct/110103npwfacts6.pdf>)
- **Fact sheet 7 – Aboriginal Heritage Impact Permits**  
(<http://www.environment.nsw.gov.au/resources/cultureheritage/NPWAct/110104npwfacts7.pdf>)
- **Fact sheet 8 – The Aboriginal Heritage Information Management System**  
(<http://www.environment.nsw.gov.au/resources/cultureheritage/NPWAct/110105npwfacts8.pdf>)

## **APPENDIX 3 RECORD OF STAKEHOLDER CONSULTATION**

## **APPENDIX 4 SALVAGE METHODOLOGY**



Mr Medard Boutry  
Coppabella Wind Farm Pty Ltd  
Suite 2, Level 23, 201 Elizabeth Street  
SYDNEY NSW 2000

Dear Mr Boutry

**SSD 6698 - Coppabella Wind Farm  
Endorsement of Heritage Expert**

I refer to your letter dated 21 December 2018 seeking the Secretary's endorsement of an expert to prepare the Heritage Management Plan for the Coppabella Wind Farm Project (SSD 6698).

The Department has reviewed the information you provided. The Department is satisfied that Dr Julie Dibden is suitably qualified and experienced. In accordance with condition 25a) of Schedule 3 of SSD 6698, the Secretary endorses Dr Dibden to prepare the Heritage Management Plan for the Copabella Wind Farm.

The Department also notes that NGH Environmental will lead the salvage program for the project.

Should you have any enquiries in relation to the above, please contact Michael Themis on (02) 8289 6967.

Yours sincerely



9/1/19.

Steve O'Donoghue  
**A/Director**  
**Resource and Energy Assessments**  
as nominee of the Secretary

## OEH comments on draft salvage methodology and HMP for the Coppabella Wind Farm

**From:** Jackie Taylor [REDACTED]  
**Sent:** Friday, 29 March 2019 4:12 PM  
**To:** Kirsten Bradley [REDACTED]  
**Cc:** Matthew Barber [REDACTED]  
**Subject:** RE: Salvage methodology \_Draft\_ Coppabella Wind Farm

Hi Kirsten,

Thanks for providing OEH with an opportunity to review and comment on the draft salvage methodology for the Coppabella Wind Farm. As discussed earlier this week, OEH support the draft methodology overall and provide a number of comments below:

OEH understand that the draft methodology is still awaiting the design for the development footprint to be finalised. As such, the methodology for the surface collection and salvage of Aboriginal sites will remain flexible to ensure only those areas of sites that are to be impacted by the project will be salvaged. All other areas of Aboriginal sites will be avoided and conserved.

In relation to the proposal to keep collected cultural material in temporary storage under section 4.1 – OEH suggest that you consider providing a timeframe for when the reburial of objects may occur and whether representatives of the Aboriginal community will be involved in the on-site reburial.

OEH support the expanding of test pits, under Section 4.2, into more open area excavations in order to provide a more complete and accurate record of the archaeological resource of the area.

Under Section 4.2.1 Test Excavation Method - OEH note that you intend to undertake excavations in line with the OEH *Code of Practice*. Given this project already has a Major Project approval from DPE there is an opportunity for test excavations to be more flexible where needed. We note that flexibility will also be needed in the placement of test pits.

If you require any further assistance in relation to this project please let me know.

Regards,

Jackie

**Jackie Taylor**

Team Leader Aboriginal Heritage  
South East Branch

Conservation and Regional Delivery Division  
**Office of Environment & Heritage**

11 Farrer Place, Queanbeyan 2620  
PO Box 733, Queanbeyan 2620

[REDACTED]  
[REDACTED]

The OEH South East Branch Planning Team has a group email address: [rog.southeast@environment.nsw.gov.au](mailto:rog.southeast@environment.nsw.gov.au). Please address all further email correspondence in relation to Planning and Aboriginal cultural heritage regulation matters to this address. If appropriate, emails can be marked to the attention of your usual contact in the Team.



## **RAP comments on draft salvage methodology and HMP for the Coppabella Wind Farm**

**From:** Wally Bell [REDACTED]

**Sent:** Tuesday, 5 March 2019 4:54 PM

**To:** Kirsten Bradley [REDACTED]

**Subject:** RE: Coppabella Wind Farm - Draft HMP and Salvage Methodology

Hi Kirsten,

Thanks for the documentation on the salvage methodology and HMP. I understand that this is a live document and consider that this is a wise approach. This will enable unforeseen circumstances to be taken into consideration and following discussion enacted upon following that consultation. Past experience dictates that modification of layout and access issues may contribute to a change in management plans and to able to accommodate those changes does require consultation and agreement. The ultimate aim is the protection and preservation of our Aboriginal cultural practice that has occurred over thousands of years

We fully appreciate any actions such as those proposed for the design that will be forthcoming to be fully consulted so that those arrangements are incorporated as part of the process to protect our cultural heritage for posterity.

Accordingly, we wish to state that we consider all Aboriginal sites to be of significance to us as the Traditional Custodians for this area. We also consider all sites to be of value to us socially, culturally and spiritually due to the occupation and use of these areas by our ancestors.

BNACC therefore consent to the application of the proposed salvage methodology and the Heritage Management Plan for the Aboriginal cultural component outlined in this document. Any variations need to be advised in a timely manner to allow adequate consultation to take place.

Cheers,

**Wally Bell**



**Traditional Custodian Group**

**PO Box 255 Kippax ACT 2615**



[www.buru-ngunawal.com](http://www.buru-ngunawal.com)

**From:** Ngunawal Heritage Aboriginal Corporation [REDACTED]

**Sent:** Thursday, 28 February 2019 1:54 PM

**To:** Kirsten Bradley [REDACTED]

**Subject:** Coppabella Wind Farm

Hi Kirsten

The Ngunawal Heritage Aboriginal Corporation support the Draft HMP and Salvage Methodology.

Also please find attached a copy of our insurances.

Kind Regards

Graeme Dobson

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<b>SSD-6698 Heritage Protection of Aboriginal Items Condition 23 of Schedule 3</b>	<b>Satisfactory (Yes/No/Partial)</b>	<b>Comment</b>	<b>Action Required</b>	<b>Company Response</b>
The Applicant must:				
(a) ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items located outside the approved disturbance area; and	Yes	Section 5.2 details site protection (temporary fencing and No-Go Zone signage for Aboriginal object sites outside the construction footprint.  During operations, project activities should be contained to the hardstand areas developed throughout construction so the risk to Aboriginal Heritage locales outside the disturbed area is very much reduced	-	
(b) avoid (as far as practicable) and otherwise minimise any impacts on Aboriginal heritage items identified in Table 1 in Appendix 5; and	Yes	Table 3 details which sites are non-impacted, part of the salvage program and unmitigated impacts.	-	
(c) undertake a salvage program for the Aboriginal heritage items identified in Table 1 in Appendix 5, if impacts to them cannot be avoided.	Yes	Appendix 4 details the salvage methodology.	-	
<b>Condition 24 of Schedule 3</b>	<b>Satisfactory (Yes/No/Partial)</b>	<b>Comment</b>	<b>Action Required</b>	
The Applicant shall ensure that the development does not cause any direct or indirect impact on any historic heritage items located outside the approved disturbance area.	No	No details of historic heritage items in HMP.  The HMP should cover and Aboriginal and Historic Heritage issues and items.	Including details shall ensure that the development does not cause any direct or indirect impact on any historic heritage items located on or outside the approved disturbance area.	

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<b>Condition 25 of Schedule 3</b>	<b>Satisfactory (Yes/No/Partial)</b>	<b>Comment</b>	<b>Action Required</b>	
Prior to the commencement of construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:				
(a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary;	Partial	Julie Dibden was approved to prepare the plan in January 2019. The plan should reference the appointment and include the Secretary's approval as an Appendix.	Reference the expert's appointment and include the Secretary's approval in an Appendix to the plan.	
(b) be prepared in consultation with OEH and Aboriginal stakeholders;	Yes	Appendix 3 contains feedback from both OEH and RAPs	-	
(c) include up to date baseline mapping of the heritage items within and adjoining the development disturbance area; and	Partial	Figures 2-9 provide great detail of the location of sites.  Figure 10 is not clear.  Non-Aboriginal heritage items were not identified on these figures.	Include a better resolution background to make Figure 10 clearer.  Include non - Aboriginal Heritage items on Figures 12 to 10.	
(d) include a description of the measures that would be implemented for:				
<ul style="list-style-type: none"> <li>minimising ground disturbance within the project area during construction and decommissioning works;</li> </ul>	Yes	Table 3 details which sites are non-impacted, part of the salvage program and unmitigated impacts.	-	
<ul style="list-style-type: none"> <li>protecting the Aboriginal heritage items located outside the approved development corridor;</li> </ul>	Yes	Section 5.2 details site protection (temporary fencing and No-Go Zone signage for Aboriginal object sites outside the construction footprint.	-	

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		During operations, project activities should be contained to the hardstand areas developed throughout construction so the risk to Aboriginal Heritage locales outside the disturbed area is very much reduced		
<ul style="list-style-type: none"> <li>minimising and managing impacts to Aboriginal heritage items identified in Table 1 in Appendix 5, including: <ul style="list-style-type: none"> <li>undertaking salvage excavations and collections where impacts cannot be avoided; and</li> <li>a strategy for the long-term management of any Aboriginal heritage items or material collected during the salvage activities;</li> </ul> </li> </ul>	Yes	<p>Appendix 4 details the salvage methodology.</p> <p>Section 4.1 of the Salvage methodology discusses storage or artefacts until they can be reburied on site</p>	-	
<ul style="list-style-type: none"> <li>a contingency plan and reporting procedure if: <ul style="list-style-type: none"> <li>Aboriginal heritage items outside the approved disturbance area are harmed;</li> <li>previously unidentified Aboriginal heritage items are found; or</li> <li>Aboriginal skeletal material is discovered;</li> </ul> </li> </ul>	Partial	<p>No formal contingency plan included in HMP.</p> <p>Section 5.5 details that the proponent will contact the project archaeologist, NSW OEH and the RAPs within 24 hours of incident.</p>	Include DPE in this notification.	
<ul style="list-style-type: none"> <li>ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that suitable records are kept of these inductions; and</li> </ul>	Partial	<p>Section 5.4 provides a very basic summary of induction.</p> <p>Requires more commitment to the level of detail provided during the induction - for example which procedures in Appendix 2.</p> <p>Compliance is the proponent's responsibility, while the contractor may deliver the induction it requires commitment from the proponent.</p> <p>Section 5.4 does not detail where induction details are held and for how long.</p>	<p>Include details on the level of heritage contained in the induction.</p> <p>Include commitment from proponent in induction.</p> <p>Include details of where inducts data</p>	

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			is recorded and for how long.	
<ul style="list-style-type: none"> <li>ongoing consultation with Aboriginal stakeholders during the implementation of the plan;</li> </ul>	Partial	Section 4 – commits to ongoing consultation with RAPs throughout the project but does not provide a frequency or trigger for consultation.	Include a trigger or nominate a schedule for ongoing consultation with RAPs.	
(e) a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.	Partial	Section 5.6 – Contains a scope and frequency of monitoring the effectiveness of implementing measures outlines in the HMP. This section does not provide details of reporting to and frequency	Include details of reporting to and frequency	
<b>Condition 26 of Schedule 3</b>	<b>Satisfactory (Yes/No/Partial)</b>	<b>Comment</b>	<b>Action Required</b>	
Following approval, the Applicant must implement the measures described in the Heritage Management Plan.	Partial	<p>Commitments to implement components of the HMP are contained in the HMP e.g. Site protection works to be implemented for Aboriginal object sites situated outside the construction footprint.</p> <p>There is no real commitment to implement all mitigating measures in the HMP.</p>	Include a commitment to implement all mitigating measures	
<b>Statement of Commitments</b>	<b>Satisfactory (Yes/No/Partial)</b>	<b>Comment</b>	<b>Action Required</b>	
#26 Salvage Program of excavation in sample of impact areas prior to disturbance	Yes	Appendix 4 contains Salvage Methodology/Program	-	
#26 Research project undertaken in consultation with Archaeologist, RAPs and DECC	Yes	Appendix 4 contains research project (test excavation)	-	
#27 Minimise the extent of impacts assessed to be low/moderate or moderate archaeological significance, where possible	Yes	Table 3 illustrates that only two 'Possible Moderate' site will have unmitigated impacts.	-	
#27 Undertake program of subsurface excavation in impact areas. See tables 19,20	Yes	Table 3 incorporate Tables 19,20 and 21 from Appendix 4 of EIS	-	

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and 21 of Section 12 of Archaeological Assessment				
#28 Conduct additional archaeological assessment in areas not surveyed during current assessment	Yes	Section 5.1 details further archaeological investigations would be required for any areas situated outside the project layout assessed to date	-	
#29 Develop and Cultural Heritage Management Protocol undertaken in consultation with Archaeologist, RAPs and DECC	Yes	Appendix 3 contains feedback from both OEH and RAPs	-	
#86 The Proponent would limit the extent of impacts to the three identified heritage items.	No	Neither this commitment nor the three identified heritage items SU4/H1, SU28/H1 and SU24/h1 are detailed in the HMP	-	
<b>OEH Comments</b>	<b>Satisfactory (Yes/No/Partial)</b>	<b>Comment</b>	<b>Action Required</b>	
OEH suggest that you consider providing a timeframe for when the reburial of objects may occur and whether representatives of the Aboriginal community will be involved in the on-site reburial	Yes	Section 4.2 of Salvage Methodology specific less than two years before burial	-	
OEH support the expanding of test pits, under Section 4.2, into more open area excavations in order to provide a more complete and accurate record of the archaeological resource of the area.	Yes	Section 4.2 of Salvage Methodology	--	
Under Section 4.2.1 Test Excavation Method - OEH note that you intend to undertake excavations in line with the OEH Code of Practice. Given this project already has a Major Project approval from DPE there is an opportunity for test excavations to be more flexible where needed. We note that flexibility will also be needed in the placement of test pits.	Yes	Section 4.2.1 now includes 'some flexibility for the placement and size of test pits is required to ensure adequate assessment of the possible impact areas and the identification of archaeological features'.	-	

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Buru Ngunawal Aboriginal Corporation Comments	Satisfactory (Yes/No/Partial)	Comment	Action Required	
BNACC therefore consent to the application of the proposed salvage methodology and the Heritage Management Plan for the Aboriginal cultural component outlined in this document. Any variations need to be advised in a timely manner to allow adequate consultation to take place.	Yes	Ongoing consultation with the RAPs would continue throughout the project. This includes discussion with the groups of the salvage methodology and finalising a suitable program, engagement with the RAPs in the fieldwork and subsequent updates to reports.	-	
Ngunawal Heritage Aboriginal Corporation Comments	Satisfactory (Yes/No/Partial)	Comment	Action Required	
The Ngunawal Heritage Aboriginal Corporation support the Draft HMP and Salvage Methodology.	Yes	No revision required	-	
<b>General comments:</b>				
<ul style="list-style-type: none"> <li>Chapter title Section 3 Rationale for the AMP – please ensure consistently through the document it is referred to as an HMP, per the Conditions of Consent</li> <li>Section 3.1 notes One non-indigenous heritage item in and adjacent to proposed impacts. Include the three other sites identified in the Assessment</li> <li>Section 3.3 Planning Consent Considerations – include a table identifying each applicable CoC and SoC and where each element of each requirement is addressed in the HMP</li> <li>Last sentence prior to Table 2 is confusing as table is in relation to sites to be avoided and the last sentence text is discussing salvage.</li> <li>Section 4 - add text regarding consultation with stakeholders for further revision of the HMP.</li> <li>General comment – Tables repeat the same information</li> <li>Section 5.2 – multiple text on mitigation within 30m – incorporate into one text</li> <li>Section 5.3 – text is all related to skeletal remains, include text on Heritage items</li> <li>Section 5.4 include more details on content of induction – maybe cross reference some of the documents in Appendix 2 for inclusion</li> <li>Section 5.5. - add text regarding consultation with stakeholders for further revision of the HMP.</li> <li>Section 5.6 – How long does the monitoring continue after de-commissioning – nominate either timeframe or trigger.</li> <li>Appendix 2 – First time I have seen such an extensive list of links – well done!</li> <li>Appendix 4 Salvage Methodology – Section 4.2. Section would benefit from including an estimate of the number of a minimum of XXX?? test pits per 10m<sup>2</sup> and referring to Table 2.2 of the Draft Code of Practice for Archaeological Investigation in NSW</li> </ul>				



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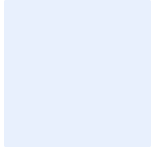


Heritage Management Plan

Wayne Jones

11 June 2019

- |  |  |
|--|--|
| <ul style="list-style-type: none"><li>• Appendix 4 Section 5 – Include a section on what other work will be undertaken on the artefacts (other than radiocarbon dating) and focus this scope on the research questions from Appendix 4 Section 3.</li><li>• Appendix 4 Section 5 - who does the report in dot point 3 go to and what timing?</li></ul> |  |
|--|--|



# Aboriginal Heritage Salvage Methodology

COPPABELLA WINDFARM MOD 1



JUNE 2019



## Document Verification



Project Title:

Coppabella Windfarm Mod 1

Project Number: 18-491

Project File Name: 18-491 Coppabella WF Salvage Methodology\_Final 1.1

Revision	Date	Prepared by (name)	Reviewed by (name)	Approved by (name)
Draft 1.0	24/01/19	Kirsten Bradley	Matthew Barber	Matthew Barber
Draft 1.1	1/02/19	Kirsten Bradley	Medard Boutry (Goldwind)	Matthew Barber
Final 1.0	16/04/19	Kirsten Bradley	OEH and RAPs	Matthew Barber
Final 1.1	19/06/19		DPE	Kirsten Bradley

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

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# 1 INTRODUCTION

Goldwind Australia Pty Ltd (Goldwind) has approval for up to 75 wind turbines, associated access tracks and infrastructure known as Coppabella Wind Farm (CWF), approximately 35 km west of Yass in the Southern Tablelands of NSW.

NGH Environmental has been contracted by Goldwind to undertake a salvage program for relevant Aboriginal objects within the final development corridor when mitigation measures are required prior to any impact. The salvage program must be undertaken to meet the conditions of consent issued by the NSW Department of Planning and Environment and be in line with Coppabella (formally Yass Valley) Wind Farm Heritage Management Plan (HMP) (Dibden 2018 v5).

The Registered Aboriginal Parties (RAPs) for the project are the Buru Ngunawal Aboriginal Corporation, Ngunawal Heritage Aboriginal Corporation and Onerwal Local Aboriginal Land Council.

This document is a proposed salvage methodology that provides an outline of the strategy and methods proposed to salvage the Aboriginal objects under the consent approval requirements. OEH and the RAPs have been provided with the opportunity to comment on this methodology.

# 2 CONDITIONS OF DEVELOPMENT CONSENT

The conditions of consent relating to heritage for the CWF are provided in full below. The red type represents the additional conditions of development consent for the 10 December 2018 modification approved by the NSW Department of Planning and Environment for the application number #SSD-6698.

## HERITAGE

### Protection of Aboriginal Heritage Items

23. The Applicant must:

- a) ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items located outside the approved disturbance area; and
- b) avoid (as far as practicable) and otherwise minimise any impacts on Aboriginal heritage items identified in Table 1 in Appendix 5; and
- c) undertake a salvage program for the Aboriginal heritage items identified in Table 1 in Appendix 5, if impacts to them cannot be avoided.

*Note: The locations of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 5.*

### Protection of Historic Heritage Items

24. The Applicant shall ensure that the development does not cause any direct or indirect impact on any historic heritage items located outside the approved disturbance area.

### Heritage Management Plan

25. Prior to the commencement of construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:

- a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary;
- b) be prepared in consultation with OEH and Aboriginal stakeholders;
- c) include up to date baseline mapping of the heritage items within and adjoining the development disturbance area; and
- d) include a description of the measures that would be implemented for:
  - minimising ground disturbance within the project area during construction and decommissioning works;
  - protecting the Aboriginal heritage items located outside the approved development corridor;
  - minimising and managing impacts to Aboriginal heritage items identified in Table 1 in Appendix 5, including:
    - undertaking salvage excavations and collections where impacts cannot be avoided; and
    - a strategy for the long-term management of any Aboriginal heritage items or material collected during the salvage activities;

- a contingency plan and reporting procedure if:
    - Aboriginal heritage items outside the approved disturbance area are harmed;
    - previously unidentified Aboriginal heritage items are found; or
    - Aboriginal skeletal material is discovered;
  - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that suitable records are kept of these inductions; and
  - ongoing consultation with Aboriginal stakeholders during the implementation of the plan;
- (e) a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.

26. Following approval, the Applicant must implement the measures described in the Heritage Management Plan.

The table and figure referenced in Appendix 5 of the heritage conditions of consent for the CWF project are provided below.

Table 1. Aboriginal Heritage Items listed in Appendix 5 (Table 1) of the heritage conditions of consent for the CWF project.

Survey Unit	Site
<b>SU1</b>	SU1/L1, SU1/L2, SU1/L3, SU1/L4, SU1/L5, SU1/L6
<b>SU2</b>	SU2/L2, SU2/L5
<b>SU3</b>	SU3/L1, SU3/L2, SU3/L3, SU3/L4
<b>SU5</b>	SU5/L1
<b>SU6</b>	SU6/L2, SU6/L4, SU6/L5, SU6/L6
<b>SU6a</b>	SU6a/L1
<b>SU7</b>	SU7/L1, SU7/L2, SU7/L3, SU7/L4
<b>SU7a</b>	SU7a/L1
<b>SU9</b>	SU9/L1
<b>SU14a</b>	SU14a/L1
<b>SU15</b>	SU15/L1, SU15/L3
<b>SU16</b>	SU16/L1, SU16/L2, SU16/L3
<b>SU17</b>	SU17/L1, SU17/L2, SU17/L3, SU17/L4, SU17/L5,
<b>SU17a</b>	SU17a/L1, SU17a/L2
<b>SU17b</b>	SU17b/L1
<b>SU18</b>	SU18/L2
<b>SU19</b>	SU19/L1, SU19/L2
<b>SU20</b>	SU20/L2, SU20/L4
<b>SU23</b>	SU23/L2
<b>SU23</b>	SU23/L2
<b>SU24</b>	SU24/L1, SU24/L2, SU24/L3
<b>SU25</b>	Area NE of SU25/L1
<b>SU29</b>	SU29/L1
<b>SU30</b>	SU30/L1, SU30/L3

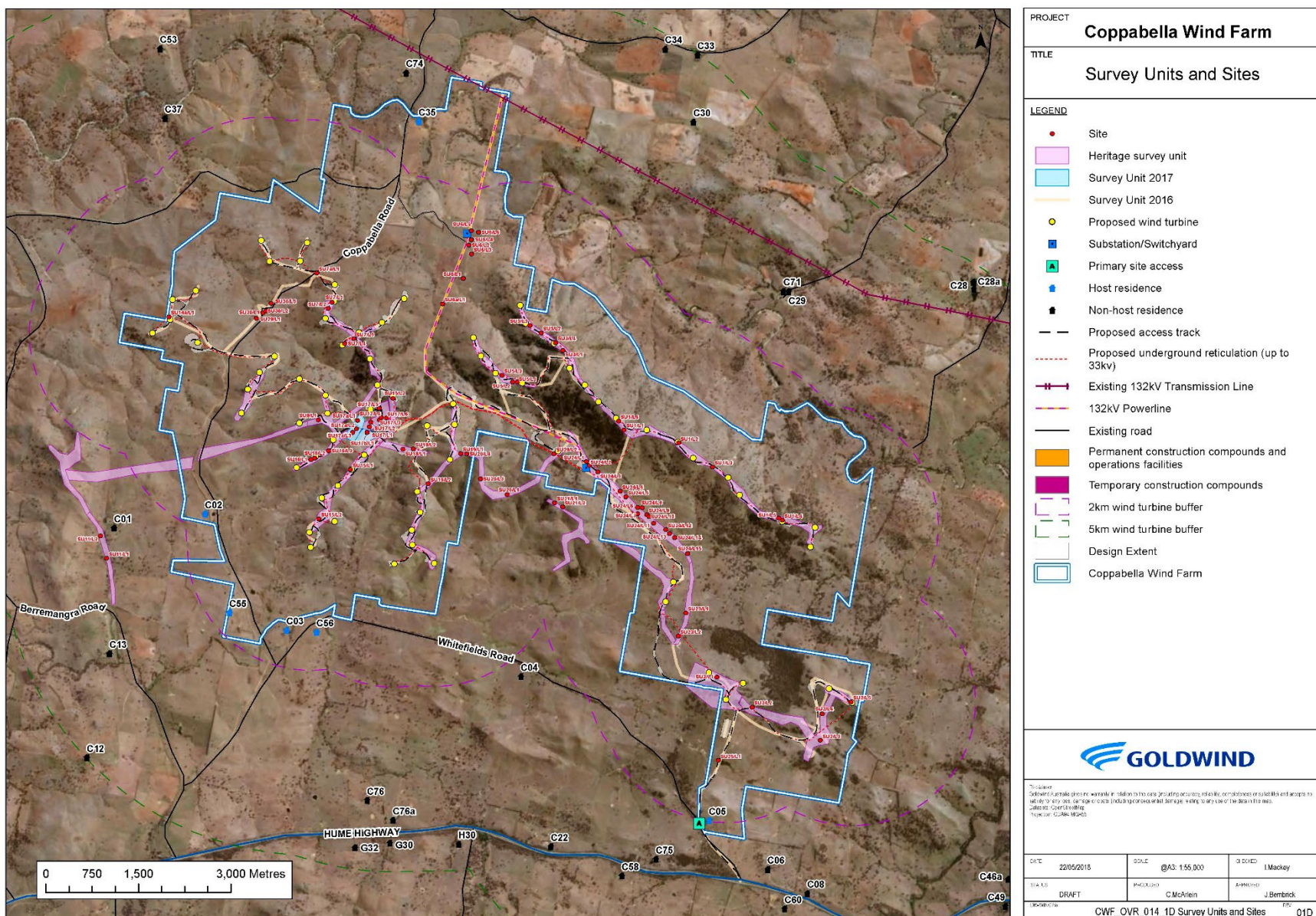


Figure 1. Figure provided in Appendix 5 of the heritage conditions of consent for the CWF project.



## 2.1 CONDITION 25 - HERITAGE MANGEMENT PLAN

The HMP was developed as a *live* document which can be responsive to changes to the wind farm layout and any other relevant considerations. It takes into consideration the recommendations of the archaeological assessments conducted for the CWF and the conditions of consent as outlined above in Section 2. Specifically, the HMP addresses Condition 25 which relates to the preparation of a HMP in consultation with OEH and Aboriginal Stakeholders that meets a number of requirements in the conditions of consent to the satisfaction of the Secretary. The HMP and salvage methodology combine to ensure compliance with the conditions of consent. The salvage methodology specifically addresses Conditions 23 c and 25 d which note the requirement to undertake a salvage program (salvage excavations and collections) for Aboriginal heritage items if impacts to them cannot be avoided.

The HMP specifically details the item listed below which have been incorporated into this salvage methodology:

- The management and mitigation strategies required in respect of each Aboriginal object locale.
- The long-term management for salvaged and excavated objects.
- That the recording and reburial of artefacts be compliant with the *Code of Practice for Archaeological Investigations*.
- That Aboriginal Site Impact Recording Forms be completed after authorised impacts to AHIMS sites.

The rationale for the salvage excavation for site locales in the CWF as per the archaeological assessment is replicated in the HMP. The recommendations for testing/excavation appear to be based on the fact that some locales either have a higher number of artefacts or there is potential, though admittedly low, that subsurface deposits may exist. NGH has based the salvage methodology on these recommendations. However, the final design for the CWF may require some alteration to these conclusions and therefore this document, like the HMP, has been developed as a *live* document that can be responsive to changes to the wind farm layout and any other relevant considerations.

## 3 SALVAGE AIMS

The purpose of this salvage program is to mitigate the impacts to Aboriginal object locales, as required, within the development corridor of the CWF and to meet the conditions of consent issued by the NSW Department of Planning and Environment for the CWF. This salvage program has also been designed to meet the requirements of the HMP which recommends the management and mitigation strategies required in respect of each Aboriginal object locale

The major overarching aims for the salvage program are:

- Salvage the archaeological material within the development corridor that require mitigation measures to be in compliance with the development consent conditions and the HMP;
- Retain as much information about the Aboriginal object locales requiring mitigation measures within the development corridor as possible prior to construction works commencing;
- Determine the presence, extent and character of any subsurface deposits in Aboriginal object locales requiring mitigation measures that will be impacted by the development of the CWF.
- Provide the Aboriginal community with culturally appropriate information and an archaeological interpretation of the salvaged sites.
- Ensure the information contained in the archaeological record for the sites requiring mitigation measures that will be impacted by the CWF is managed and recorded appropriately.

The results of the salvage program will be used to address the following research questions where applicable.

1. Characterise the archaeological site distribution of the region with reference to the subsurface deposits. Few broad scale archaeological subsurface investigations have been conducted in the region, most have



concentrated on surface sites. The archaeology and Aboriginal use of the broader landscape is not well known. We will therefore examine issues about the environmental context including:

- Landform, defining where sites are most likely to occur and the character of sites in particular landforms;
  - Any correlations between surface and subsurface results;
  - Proximity to water and other resources;
  - Landscape context;
  - Site modelling would then be refined to provide the Aboriginal community, future researchers, development proponents and regulators more accurate and detailed information.
2. Examine the character of the stone tool record. Stone tools were the everyday used item for Aboriginal people. They are a window into a range of aspects of material culture, land and resource use. We will therefore examine issues relating to stone tools including:
- Distribution of tool types;
  - Distribution of raw materials;
  - Technological character across the project area;
  - Any discernible changes in stone tool use, materials or technology through time.
3. It is important to the Aboriginal community and for the archaeological record that the age of the sites is determined. Determining the age of the sites examined by this project will provide an opportunity to more broadly examine the age and change through time of Aboriginal occupation in the region. We will therefore attempt to obtain dateable material to provide occupation sequences across the project area. This will be undertaken by:
- Excavating deep deposits where they are identified;
  - Extracting dateable material (eg. charcoal) in undisturbed contexts.

## 4 SALVAGE METHODOLOGY

The archaeological assessment report for the CWF (Dibden 2017; 2018) identified the presence of 82 locales containing Aboriginal heritage as detailed in the HMP (Dibden 2018; Table 1) and in Appendix A in this document. A management strategy for each of the 82 sites was identified as part of the archaeological assessments undertaken (Dibden 2017). The management strategy for each site within the CWF was defined as having either unmitigated or mitigated impacts. This salvage program incorporates the recommended management strategy for sites identified during the archaeological assessments of the CWF as requiring mitigated impacts. While a development corridor has been established for the CWF it should be noted that the final design would be optimised in consideration of a number of factors including heritage constraints. Where impacts to Aboriginal heritage cannot be avoided a salvage program will be undertaken for the sites requiring mitigated impacts prior to any development works commencing.

There are a number of Aboriginal object locales noted in the HMP to have mitigation measures. The salvage program would seek to salvage the stone assemblage and any other cultural material for each of the relevant Aboriginal artefact locales requiring mitigation measures prior to any impact occurring. The relevant management for Aboriginal object locales requiring mitigated impacts is set out in Table 2. The final development design will be reviewed prior to commencing the salvage program to ensure only Aboriginal artefact locales that will be impacted within the final design footprint are subject to the salvage program. Any Aboriginal artefact locales that will not be impacted by the final design footprint will remain *in situ* and be appropriately managed in accordance with the HMP.

Dibden (2017; 2018) has noted that much of the CWF area contains only shallow soils, subject to extensive erosion and that large sections of the CWF footprint is in fact of exposed bedrock or significantly deflated rocky surfaces with little subsurface deposit. Consequently, not all Aboriginal object locales within the final impact design will be subject to subsurface testing/excavation as a mitigation measure. The salvage of the Aboriginal object locales is therefore divided into two main procedures; surface collection and test excavation. The methodology for each are outlined below.

Table 2. Summary of site to be salvaged if they are within the Final disturbance footprint for the CWF.

AHIMS #	SU	Locale	Easting*	Northing*	Recommended management strategy	Initial recording summary	Site Area (m)	Potential site exposure area (m)	Landform	Salvage Program	Possible number of test pits (indicative only)
51-4-0134	SU1	L1	642819	6154584	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	7 artefacts; subsurface potential in saddle (low density)	40 x 40	70 x 70	Narrow and undulating crest	Collection and test excavation (if appropriate)	10
50-6-0080	SU1	L2	643703	6154378	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact; subsurface potential in saddle (low density)	1 x 1	50 x 40	Narrow and undulating crest	Collection and test excavation (if appropriate)	4
51-4-0135	SU1	L3	644253	6153990	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact	1 x 1	20 x 1	Narrow and undulating crest	Collection and test excavation (if appropriate)	4
51-4-0136	SU1	L4	645389	6153125	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact; subsurface potential (low density)	1 x 1	1 x 1	Narrow and undulating crest	Collection and test excavation (if appropriate)	4
51-4-0137	SU1	L5	645333	6153158	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	2 artefacts; subsurface potential (low density)	15 x 5	100 x 20	Narrow and undulating crest	Collection and test excavation (if appropriate)	8
51-4-0138	SU1	L6	642729	6154727	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact	1 x 1	100 x 20	Narrow and undulating crest	Collection and test excavation (if appropriate)	2

AHIMS #	SU	Locale	Easting*	Northing*	Recommended management strategy	Initial recording summary	Site Area (m)	Potential site exposure area (m)	Landform	Salvage Program	Possible number of test pits (indicative only)
51-4-0140	SU2	L2	644896	6150090	Mitigated impacts: Incorporate within research program including excavation; however avoid disturbance to as much of area as practicable	25 artefacts, subsurface potential in saddle	20 x 15	60 x 3	Undulating crest	Collection and test excavation (if appropriate)	6
51-4-0143	SU2	L5	646503	6150176	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	2 artefacts	2 x 2	20 x 20	Undulating crest	Collection and test excavation (if appropriate)	3
51-4-0144	SU3	L1	641827	6155876	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	2 artefacts; subsurface potential in saddle (low density)	20 x 20	40 x 40	Narrow undulating crest	Collection and test excavation (if appropriate)	6
51-4-0145	SU3	L2	641472	6156158	Mitigated impacts: Incorporate within research program including excavation; however avoid disturbance to as much of area as practicable	20 artefacts, subsurface potential in saddle	30 x 30	50 x 50	Narrow undulating crest	Collection and test excavation (if appropriate)	6
51-4-0146	SU3	L3	641288	6156280	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact; subsurface potential	1 x 1	50 x 50	Narrow undulating crest	Collection and test excavation (if appropriate)	6
51-4-0147	SU3	L4	641707	6156002	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact; subsurface potential	1 x 1	20 x 1	Narrow undulating crest	Collection and test excavation (if appropriate)	3

AHIMS #	SU	Locale	Easting*	Northing*	Recommended management strategy	Initial recording summary	Site Area (m)	Potential site exposure area (m)	Landform	Salvage Program	Possible number of test pits (indicative only)
51-4-0148	SU5	L1	641084	6155360	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	32 artefacts; subsurface potential	10 x 10	30 x 30	Narrow undulating crest	Collection and test excavation (if appropriate)	4
51-4-0152	SU6	L2	640294	6157581	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact; subsurface potential	1 x 1	100 x 50	Simple slope	Collection and test excavation (if appropriate)	8
51-4-0154	SU6	L4	640339	6157674	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	2 artefacts; subsurface potential	12 x 5	20 x 20	Simple slope	Collection and test excavation (if appropriate)	4
51-4-0155	SU6	L5	640339	6157816	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	7 artefacts; subsurface potential	15 x 5	50 x 20	Simple slope	Collection and test excavation (if appropriate)	6
51-4-0156	SU6	L6	640453	6157793	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	4 artefacts; subsurface potential	4 x 4	50 x 20	Simple slope	Collection and test excavation (if appropriate)	6
51-4-0415	SU6a	L1	639873	6156630	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	Sample 10; subsurface potential limited	c.100 x 100	25 x 10	Simple slope	Collection and test excavation (if appropriate)	10
51-4-0157	SU7	L1	638080	6156655	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact	1 x 1	50 x 10	Narrow undulating crest	Collection and test excavation (if appropriate)	6



AHIMS #	SU	Locale	Easting*	Northing*	Recommended management strategy	Initial recording summary	Site Area (m)	Potential site exposure area (m)	Landform	Salvage Program	Possible number of test pits (indicative only)
51-4-0158	SU7	L2	638017	6156556	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact	1 x 1	50 x 10	Narrow undulating crest	Collection and test excavation (if appropriate)	6
51-4-0159	SU7	L3	638434	6156064	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	3 artefacts	5 x 5	50 x 50	Narrow undulating crest	Collection and test excavation (if appropriate)	6
51-4-0160	SU7	L4	638282	6155984	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	3 artefacts	5 x 5	50 x 50	Narrow undulating crest	Collection and test excavation (if appropriate)	6
51-4-0414	SU7a	L1	637830	6157130	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	3 artefacts; subsurface potential	5 x 1	25 x 1	Narrow undulating crest	Collection and test excavation (if appropriate)	3
51-4-0161	SU9	L1	637855	6154746	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	6 artefacts	25 x 10	50 x 50	Narrow undulating crest	Collection	N/A
50-6-0215	SU14a	L1	635428	6156421	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact; subsurface potential	1 x 1	1 x 1	Undulating crest	Collection and test excavation (if appropriate)	1
51-4-0162	SU15	L1	638378	6153948	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	2 artefacts	10 x 5	50 x 50	Undulating crest	Collection and test excavation (if appropriate)	6

AHIMS #	SU	Locale	Easting*	Northing*	Recommended management strategy	Initial recording summary	Site Area (m)	Potential site exposure area (m)	Landform	Salvage Program	Possible number of test pits (indicative only)
51-4-0164	SU15	L3	639064	6155097	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact	1 x 1	10 x 10	Undulating crest	Collection and test excavation (if appropriate)	4
51-4-0165	SU16	L1	637737	6154110	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	2 artefacts	4 x 2	50 x 50	Undulating crest	Collection and test excavation (if appropriate)	6
51-4-0166	SU16	L2	637801	6154132	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	2 artefacts	15 x 4	50 x 50	Undulating crest	Collection and test excavation (if appropriate)	7
51-4-0167	SU16	L3	638024	6154255	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact	1 x 1	20 x 1	Undulating crest	Collection and test excavation (if appropriate)	3
51-4-0168	SU17	L1	638683	6154636	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	3 artefacts, subsurface potential	2 x 2	5 x 5	Crest 'basin'	Collection and test excavation (if appropriate)	2
51-4-0169	SU17	L2	638709	6154712	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact, subsurface potential	1 x 1	5 x 5	Crest 'basin'	Collection and test excavation (if appropriate)	2
51-4-0172	SU17	L5	638844	6154932	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	27 artefacts, subsurface potential	25 x 25	25 x 25	Crest 'basin'	Collection and test excavation (if appropriate)	3

AHIMS #	SU	Locale	Easting*	Northing*	Recommended management strategy	Initial recording summary	Site Area (m)	Potential site exposure area (m)	Landform	Salvage Program	Possible number of test pits (indicative only)
51-4-0413	SU17a	L1	638493	6154738	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	4 artefacts; subsurface potential limited	10 x 2	10 x 2	Crest "Basin"	Collection and test excavation (if appropriate)	2
51-4-0412	SU17a	L2	638473	6154601	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	2 artefacts; subsurface potential limited	9 x 1	20 x 1	Crest "Basin"	Collection and test excavation (if appropriate)	3
51-4-0410	SU17b	1	638645	6154549	No constraints, Unmitigated impacts	14 artefacts, very limited subsurface potential	20 x 5	40 x 10	Simple slope	Collection and test excavation (if appropriate)	2
51-4-0175	SU18	L2	639395	6154281	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	15 artefacts	10 x 10	50 x 20	Simple slope	Collection and test excavation (if appropriate)	6
51-4-0176	SU19	L1	640167	6154207	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact	1 x 1	20 x 10	Undulating crest	Collection and test excavation (if appropriate)	3
51-4-0177	SU19	L2	639639	6153716	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	17 artefacts	40 x 40	60 x 60	Undulating crest	Collection and test excavation (if appropriate)	4
51-4-0179	SU20	L2	639395	6154281	Mitigated impacts: Incorporate within research program including excavation; however avoid disturbance to as much of area as practicable	1 artefact, subsurface potential	1 x 1	50 x 50	Undulating crest	Collection and test excavation (if appropriate)	6

AHIMS #	SU	Locale	Easting*	Northing*	Recommended management strategy	Initial recording summary	Site Area (m)	Potential site exposure area (m)	Landform	Salvage Program	Possible number of test pits (indicative only)
51-4-0181	SU20	L4	641683	6154204	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact	1 x 1	20 x 20	Undulating crest	Collection and test excavation (if appropriate)	3
51-4-0185	SU23	L2	643698	6151244	Mitigated impacts: Incorporate within research program including excavation	15 artefacts, subsurface potential	50 x 10	30 x 10	Simple slope	Collection and test excavation (if appropriate)	4
51-4-0186	SU24	L1	642211	6154076	Mitigated impacts: Incorporate within research program including excavation; however avoid disturbance to as much of area as practicable	36 artefact, subsurface potential	80 x 20	80 x 20	Simple slope	Collection and test excavation (if appropriate)	8
51-4-0187	SU24	L2	642257	6154017	Mitigated impacts: Incorporate within research program including excavation; however avoid disturbance to as much of area as practicable	6 artefact, subsurface potential	50 x 5	70 x 5	Simple slope	Collection and test excavation (if appropriate)	8
51-4-0188	SU24	L3	642397	6153909	Mitigated impacts: Incorporate within research program including excavation; however avoid disturbance to as much of area as practicable	3 artefact, subsurface potential	2 x 2	50 x 3	Simple slope	Collection and test excavation (if appropriate)	6
51-4-0409	SU25	L1	644346	6149223	Mitigated impacts: Incorporate area NE of SU25/L1 within research program including salvage if within final disturbance footprint	11 artefact, subsurface potential only in NE section	100 x 40	100 x 40	Undulating lower simple slope	Collection and test excavation (if appropriate)	10
50-6-0214	SU29	L1	636844	6156398	Mitigated impacts: Incorporate within research program including	3 artefacts, subsurface potential	20 x 5	30 x 10	Basal slope/flat	Collection and test excavation (if appropriate)	4

AHIMS #	SU	Locale	Easting*	Northing*	Recommended management strategy	Initial recording summary	Site Area (m)	Potential site exposure area (m)	Landform	Salvage Program	Possible number of test pits (indicative only)
					salvage if within final disturbance footprint						
50-6-0213	SU30	L1	636953	6156483	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	4 artefacts, subsurface potential	10 x 5	10 x 5	Basal slope/terrace	Collection and test excavation (if appropriate)	2
20-6-0211	SU30	L3	637001	6156515	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint	1 artefact subsurface potential	1 x 1	10 x 1	Basal slope/terrace	Collection and test excavation (if appropriate)	2

\*Datum GDA Zone 55



## 4.1 SURFACE COLLECTION

Each Aboriginal artefact locale contains surface artefacts that need to be collected prior to construction. The surface collection of the stone assemblage for each Aboriginal artefact locale within the final development footprint would be undertaken through the following process.

- Walk across the site area (within the construction footprint), use 'pin' flags to identify and mark artefacts.
- Photograph site area to provide visual summary of the artefact distribution.
- GPS map site collection boundary (within the disturbance footprint, noting if site extends beyond).
- 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 will have this strategy.
- As an alternative GPS plot artefacts if required, this is suitable for smaller sites (~<10).
- Collect artefacts. At each collection site the artefacts will be bagged and labelled in accordance with their collection position, that is either individual number and/or their collection grid. The artefacts would then be removed from site and taken to the NGH Environmental office in Canberra for detailed recording.

Recording will be conducted in line with standard archaeological practice to include raw material, type, dimensions and any other characteristics considered relevant. Photos of particularly interesting items only would be taken.

The artefacts will be kept in temporary curation in bags and stored in a locked cupboard in Canberra at the NGH Environmental Office until the artefacts can be reburied in the vicinity of where they originated, outside any disturbance footprint of the CWF. The reburial location would need to be agreed with by Goldwind, the NGH archaeologists and the Aboriginal parties. The location of the reburied artefacts would be noted with AHIMS site cards as legally required. It is expected that the temporary curation of the artefacts in Canberra at the NGH Environmental Office will not exceed a two year period from the completion of the salvage program. A representative from each of the Registered Aboriginal Parties would be provided with the opportunity to assist the archaeologist with the reburial of the salvaged objects.

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

Artefact data will be collected for inclusion as an inventory and the data analysed as appropriate for inclusion in the salvage report.

It should be noted that given the intervening time since the Aboriginal artefact locales were initially recorded in 2009 it is highly unlikely that all previously recorded artefacts would be relocated during the collection salvage program. However, it is likely that previously unrecorded artefacts will be identified and recorded. NGH will endeavour to recover all surface artefacts visible within the agreed impact footprint of each site/locale.

## 4.2 EXCAVATION

The excavations would be undertaken in principle and broadly in line with the OEH *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (OEH 2010). The Code of Practice stipulates the way excavations, artefact recording and reporting is to be conducted which will be broadly followed.

The scope of the test excavation required for each Aboriginal artefact locale within the final development corridor is dependent upon a number of factors including:

- The number of surface artefacts identified - as an indication of the possible subsurface density;
- The degree of soil profile remaining at each locale – indicating the likelihood of subsurface material;
- The type and extent of the locale landform and the degree and extent it would be impacted by construction – indicating the area that may need to be excavated, and
- The potential to yield archaeological information that would be considered warranted for the salvage program to obtain.

Not all of these factors are known at the moment and therefore the scope of excavation work required to be undertaken must be considered preliminary and indicative in nature. The number of Aboriginal artefact locales that require excavation would be refined in the field for each site that will be impacted by the final development footprint.

This approach will ensure the scale of excavation required at each locale is sufficient and warranted. A flexible approach will therefore be required.

### **SMALLER SITES.**

Where the site contains less than 10 artefacts and is within a small defined area, we propose to undertake test excavation only when deemed to be warranted. The rationale for testing would be to quickly and accurately determine if the locale is likely to contain meaningful subsurface deposits and/or artefacts of a reasonable density. If either or both of these features were found to exist, test pits may be excavated to retrieve a more representative sample of the archaeological record.

The testing at these smaller sites could comprise of two scenarios:

1. Excavate a series of test pits at 10 m spacing as a transect along the landform, within the development footprint, each pit being 0.5 m x 0.5 m in area.
2. Excavate one test pit in the optimal location for deposits and artefacts, the test pits being either 1 m x 0.5 m or 1m x 1 m in area, depending on the variables outlined above.

In each scenario, test pits would be placed at the highest artefact density location where appropriate in a landform context. The spacing of pits would be determined by the topography and geomorphic unit and may therefore vary, from as little as 5 m up to 25 m.

### **LARGER ARTEFACT SCATTERS**

Where the locale was identified as containing more than 10 stone artefacts, the extent of testing would be determined by the following considerations.

- Extent of the visible artefacts.
- Extent of the landform unit on which the site is located and within the CWF footprint.
- The extent of erosion and presence of any potentially undisturbed or intact deposits.

Testing would be similar to that outlined above whereby a series of test pits would be excavated in the larger sites and across the landforms. Where those test pits identified substantial subsurface deposits containing artefactual material, additional test pits may be excavated, or the existing pit may be expanded.

The benefits of expanding test pits into more open area excavations (such as 1 m x 1 m or 2 m x 2 m) is that it provides a more complete and accurate snapshot of the archaeological site. It also allows for exploration of any notable features such as hearths or flaking events that are able to be more fully investigated and

salvaged prior to construction impacts. This is ultimately the aim of the salvage, to retrieve and retain some archaeological information about the location.

#### **4.2.1 Test Excavation method**

The depth of the pit would be determined during the excavation but would be to either sterile deposit or two spits (levels) below the last artefact, unless impervious clay or bedrock layers are reached. It should also be noted that where deposits exceed 70 cm in depth, the pits will need to be extended in area to access the deeper deposits safely. Where very deep deposits are encountered (below 1 m) then pits would be opened into an area excavation and stepped if necessary, for safe access and egress. However, it is likely the test excavation pits for the CWF will not exceed 45 cm in depth based on excavations of similar landforms in the region.

The following outlines the process for excavation when deemed required at an Aboriginal object locale within the CWF final development footprint.

- Establish a nominal grid for each testing area to provide a framework to position each test pit. We propose to use a 5 m to 25 m pit spacing with transects orientated along the construction impact corridor within each locale.
- Set up sieve station. Due to the often steep terrain and the wide distribution of the site locations, we intend to carry out dry sieving.
- Undertake excavations in line with the board principles of the OEH *Code of Practice*:
  - Hand excavation using shovels and trowels, pits to be a minimum of 0.5 m x 0.5 m in area, with variants of 1 m x 0.5 m or 1 m x 1 m in area also used depending on the conditions at the site.
  - Removal of initial deposit in 5 cm levels or 'spits' for each initial pit at each location with subsequent pits and spits at 10 cm unless features found requiring a different strategy.
  - Placement of excavated deposit in buckets labelled by spit and test square.
  - Transfer of buckets to sieve station, most likely at the location of the excavation pit.
  - Sieving of deposits (dry sieving will be undertaken) through 5 mm sieve mesh.
  - Removal of residue from sieves, bag and label for analysis.
  - Excavated material will be analysed at NGH office in Canberra.
  - Proceed with excavation until completed.
  - Continual photography of excavated sections and the excavation work in progress and section drawings and mapping of the pit locations will be completed.
- At completion of excavation, backfill test pits (with sieved material if possible or clean fill if required).

Some flexibility for the placement and size of test pits is required to ensure adequate assessment of the possible impact areas and the identification of archaeological features.

In the event that human bone is located, an *Unexpected Finds Procedure* as per Section 5.3 in the HMP would be followed. This includes stopping work at that location and making the area secure for further

assessment. The police and OEH would be notified. If the remains were determined to be Aboriginal, further discussion and assessment of options would be considered by all parties.

#### **4.2.2 Salvage excavation method**

Where the test excavation reveals artefacts or cultural material of particular interest, significance or high density, further excavation may be undertaken. This would likely include the expansion of the test pit into an open area excavation. These may vary in size from 1 m x 1 m in area to many square meters, depending on the following considerations.

- The nature of the cultural material identified.
- The density of the material.
- The potential to obtain dateable material.
- The likely depth and age of the cultural material.

Salvage excavation of larger areas would be undertaken using standard archaeological practice. This includes the same hand excavation techniques used for the test pitting method.

## **5 POST FIELDWORK**

Once the fieldwork component is complete, we would undertake the following.

- Send material, if suitable, for Radiocarbon dating (likely to be University of Waikato). If datable materials are recovered this will be analysed and discussed in relation to providing dates of occupation for the area.
- Analyse all data obtained including artefacts. Stone artefacts would be recorded in line with standard archaeological techniques including: type, raw material, dimensions, note of technical attributes. The archaeological assemblage salvaged would be analysed in line with the proposed aims to identify the landforms with subsurface deposit, any correlations between surface and subsurface results and to examine the character of the stone tools recorded.
- Prepare a report on the findings and conclusion of the collections and test excavations including addressing the research questions. A copy of the report will be provided to the RAPs, OEH and Goldwind. It is anticipated that the report will be completed within 12 months from the conclusion of the salvage program. This may be extended due to timeframes required for Radiocarbon dating processing.
- Aboriginal Site Impact Recording Forms for each site will be completed and submitted to OEH.
- All artefacts will be reburied at agreed locations in proximity to the sites but outside of the development footprint. The reburial locations will be identified by a new AHIMS site card submitted to AHIMS to ensure the location of the material is recorded.

## 6 REFERENCES

Dibden, J. 2009 Proposed Yass Valley Wind Farm Archaeological and Cultural Heritage Assessment. Report prepared for Epuron.

Dibden, J. 2017 Revised Yass Valley Wind Farm Aboriginal Cultural Heritage Assessment Report.

Dibden, J. 2018 Coppabella (formally Yass Valley) Wind Farm Heritage Management Plan (Draft version #5).



## **APPENDIX A ALL ABORIGINAL HERITAGE SITES WITHIN CWF**

AHIMS #	Site name	Datum	Zone	Easting	Northing	Recommended management strategy
51-4-0134	Coppabella Hills SU1/L1	GDA	55	642819	6154584	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
50-6-0080	Coppabella Hills SU1/L2	GDA	55	643703	6154378	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0135	Coppabella Hills SU1/L3	GDA	55	644253	6153990	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0136	Coppabella Hills SU1/L4	GDA	55	645389	6153125	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0137	Coppabella Hills SU1/L5	GDA	55	645333	6153158	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0138	Coppabella Hills SU1/L6	GDA	55	642729	6154727	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0139	Coppabella Hills SU2/L1	GDA	55	644323	6150581	Nil impacts proposed
51-4-0140	Coppabella Hills SU2/L2	GDA	55	644896	6150090	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0141	Coppabella Hills SU2/L3	GDA	55	646005	6149548	Nil impacts proposed
51-4-0142	Coppabella Hills SU2/L4	GDA	55	646036	6149982	Nil impacts proposed
51-4-0143	Coppabella Hills SU2/L5	GDA	55	646503	6150176	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0144	Coppabella Hills SU3/L1	GDA	55	641827	6155876	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint

AHIMS #	Site name	Datum	Zone	Easting	Northing	Recommended management strategy
51-4-0145	Coppabella Hills SU3/L2	GDA	55	641472	6156158	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0146	Coppabella Hills SU3/L3	GDA	55	641288	6156280	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0147	Coppabella Hills SU3/L4	GDA	55	641707	6156002	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0148	Coppabella Hills SU5/L1	GDA	55	641084	6155360	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0149	Coppabella Hills SU5/L2	GDA	55	641008	6155364	No constraints: Unmitigated impacts
51-4-0150	Coppabella Hills SU5/L3	GDA	55	640835	6155471	No constraints: Unmitigated impacts
51-4-0151	Coppabella Hills SU6/L1	GDA	55	640209	6157045	Nil impacts proposed
51-4-0152	Coppabella Hills SU6/L2	GDA	55	640294	6157581	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0153	Coppabella Hills SU6/L3	GDA	55	640342	6157439	Nil impacts proposed
51-4-0154	Coppabella Hills SU6/L4	GDA	55	640339	6157674	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0155	Coppabella Hills SU6/L5	GDA	55	640339	6157816	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0156	Coppabella Hills SU6/L6	GDA	55	640453	6157793	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint

AHIMS #	Site name	Datum	Zone	Easting	Northing	Recommended management strategy
51-4-0157	Coppabella Hills SU7/L1	GDA	55	638080	6156655	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0158	Coppabella Hills SU7/L2	GDA	55	638017	6156556	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0159	Coppabella Hills SU7/L3	GDA	55	638434	6156064	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0160	Coppabella Hills SU7/L4	GDA	55	638282	6155984	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0161	Coppabella Hills SU9/L1	GDA	55	637855	6154746	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
50-6-0081	Coppabella Hills SU11/L1	GDA	55	634419	6152505	Nil impacts proposed
50-6-0082	Coppabella Hills SU11/L2	GDA	55	634321	6152869	Nil impacts proposed
51-4-0162	Coppabella Hills SU15/L1	GDA	55	638378	6153948	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0163	Coppabella Hills SU15/L2	GDA	55	637864	6153147	No constraints: Unmitigated impacts
51-4-0164	Coppabella Hills SU15/L3	GDA	55	639064	6155097	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0165	Coppabella Hills SU16/L1	GDA	55	637737	6154110	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0166	Coppabella Hills SU16/L2	GDA	55	637801	6154132	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint

AHIMS #	Site name	Datum	Zone	Easting	Northing	Recommended management strategy
51-4-0167	Coppabella Hills SU16/L3	GDA	55	638024	6154255	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0168	Coppabella Hills SU17/L1	GDA	55	638683	6154636	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0169	Coppabella Hills SU17/L2	GDA	55	638709	6154712	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0170	Coppabella Hills SU17/L3	GDA	55	638847	6154749	No constraints: Unmitigated impacts
51-4-0171	Coppabella Hills SU17/L4	GDA	55	638874	6154783	No constraints: Unmitigated impacts
51-4-0172	Coppabella Hills SU17/L5	GDA	55	638844	6154932	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0173	Coppabella Hills SU17/L6	GDA	55	638959	6154781	No constraints: Unmitigated impacts
51-4-0174	Coppabella Hills SU18/L1	GDA	55	639229	6154275	Nil impacts proposed
51-4-0175	Coppabella Hills SU18/L2	GDA	55	639395	6154281	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0176	Coppabella Hills SU19/L1	GDA	55	640167	6154207	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0177	Coppabella Hills SU19/L2	GDA	55	639639	6153716	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0178	Coppabella Hills SU20/L1	GDA	55	640920	6153539	Nil Impacts Proposed
51-4-0179	Coppabella Hills SU20/L2	GDA	55	641683	6154204	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint



AHIMS #	Site name	Datum	Zone	Easting	Northing	Recommended management strategy
51-4-0180	Coppabella Hills SU20/L3	GDA	55	640486	6153798	Nil Impacts Proposed
51-4-0181	Coppabella Hills SU20/L4	GDA	55	640265	6154202	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0182	Coppabella Hills SU21/L1	GDA	55	641693	6153406	Nil Impacts Proposed
51-4-0183	Coppabella Hills SU21/L2	GDA	55	641821	6153340	Nil Impacts Proposed
51-4-0184	Coppabella Hills SU23/L1	GDA	55	643822	6151618	Nil Impacts Proposed
51-4-0185	Coppabella Hills SU23/L2	GDA	55	643698	6151244	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0186	Coppabella Hills SU24/L1	GDA	55	642211	6154076	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0187	Coppabella Hills SU24/L2	GDA	55	642257	6154017	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0188	Coppabella Hills SU24/L3	GDA	55	642397	6153909	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0189	Coppabella Hills SU24/L4	GDA	55	642754	6153595	Nil Impacts Proposed
51-4-0190	Coppabella Hills SU24/L5	GDA	55	642848	6153502	Nil Impacts Proposed
51-4-0191	Coppabella Hills SU24/L6	GDA	55	643036	6153332	Nil Impacts Proposed
51-4-0192	Coppabella Hills SU24/L7	GDA	55	643037	6153228	Nil Impacts Proposed
51-4-0193	Coppabella Hills SU24/L8	GDA	55	643111	6153329	Nil Impacts Proposed

AHIMS #	Site name	Datum	Zone	Easting	Northing	Recommended management strategy
51-4-0194	Coppabella Hills SU24/L9	GDA	55	643186	6153216	Nil Impacts Proposed
51-4-0195	Coppabella Hills SU24/L10	GDA	55	643226	6153181	Nil Impacts Proposed
51-4-0196	Coppabella Hills SU24/L11	GDA	55	643299	6153075	Nil Impacts Proposed
51-4-0197	Coppabella Hills SU24/L12	GDA	55	643495	6152972	Nil Impacts Proposed
51-4-0198	Coppabella Hills SU24/L13	GDA	55	643554	6152908	Nil Impacts Proposed
51-4-0199	Coppabella Hills SU24/L14	GDA	55	643640	6152844	Nil Impacts Proposed
51-4-0200	Coppabella Hills SU24/L15	GDA	55	643850	6152583	Nil Impacts Proposed
51-4-0409	Coppabella Hills SU25/L1	GDA	55	644346	6149223	Mitigated impacts: Incorporate area NE of SU25/L1 within research program including salvage if within final disturbance footprint
51-4-0415	Coppabella Hills SU6a/L1	GDA	55	639873	6156630	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0414	Coppabella Hills SU7a/L1	GDA	55	637830	6157130	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
50-6-0215	Coppabella Hills SU14a/L1	GDA	55	635428	6156421	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0413	Coppabella Hills SU17a/L1	GDA	55	638493	6154738	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0412	Coppabella Hills SU17a/L2	GDA	55	638473	6154601	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
51-4-0411	Coppabella Hills SU17a/L3	GDA	55	638416	6154549	No constraints, Unmitigated impacts

AHIMS #	Site name	Datum	Zone	Easting	Northing	Recommended management strategy
51-4-0410	Coppabella Hills SU17b/L1	GDA	55	638645	6154549	No constraints, Unmitigated impacts
50-6-0214	Coppabella Hills SU29/L1	GDA	55	636844	6156398	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
50-6-0213	Coppabella Hills SU30/L1	GDA	55	636953	6156483	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint
50-6-0212	Coppabella Hills SU30/L2	GDA	55	637089	6156639	No constraints, Unmitigated impacts
50-6-0211	Coppabella Hills SU30/L3	GDA	55	637001	6156515	Mitigated impacts: Incorporate within research program including salvage if within final disturbance footprint

## **APPENDIX B OEH AND ABORIGINAL CONSULTATION**

Organisation	Action	Date Sent	Reply Date	Replied by	Response
OEH	sent draft HM P and salvage methodology	1/02/2019			
Buru Ngunawal Aboriginal Corporation	sent draft HM P and salvage methodology	4/02/2019			
Ngunawal Heritage Aboriginal Corporation	sent draft HM P and salvage methodology	4/02/2019			
Onerwal LALC	sent draft HM P and salvage methodology	4/02/2019			
Follow up emails sent					
OEH	follow up email sent re comments	19/02/2019	19/02/2019	via email	will send comments at end of week
Buru Ngunawal Aboriginal Corporation	follow up email sent re comments	19/02/2019			
Ngunawal Heritage Aboriginal Corporation	follow up email sent re comments	19/02/2019	28/02/2019	via email	The Ngunawal Heritage Aboriginal Corporation support the Draft HMP and Salvage Methodology. Also sent copy of insurances for fieldwork participation.
Onerwal LALC	follow up email sent re comments	19/02/2019			
OEH	follow up email sent re comments	4/03/2019	18/03/2019	follow up email sent re comments	
Buru Ngunawal Aboriginal Corporation	follow up email sent re comments	4/03/2019	5/03/2019	via email	I understand that this is a live document and consider that this is a wise approach. BNACC therefore consent to the application of the proposed salvage methodology and the Heritage Management Plan for the Aboriginal cultural component outlined in this document. Any variations need to be advised in a timely manner to allow adequate consultation to take place.
Onerwal LALC	follow up email sent re comments	4/03/2019			
Onerwal LALC	follow up email sent re comments as 28 day timeframe now lapsed	7/03/2019	18/03/2019	kb sent follow up email sent re comments as 28 day timeframe now lapsed and spoke on phone to Bradley.	Bradley noted during phone conversation with KB that he will try and look at this week and provide comment
Onerwal LALC	email and phone call brad to KB	19/03/2019			unable to provide comment today on methodology KB has requested provided by 29th March



Organisation	Action	Date Sent	Reply Date	Replied by	Response
OEH	phone call	22/03/2019			provided comments over phone will follow up with email next week. No major issues noted and OEH will follow up missing AHIMS numbered. Noted possibility of micro site modification and ensuring heritage team have enough time to sufficiently undertake salvage and excavation as required. In regard to storage of artefacts would like a timeframe placed on reburial. in section 4.2 excavation would be happy to note broadly follow Code to insure not restricted by the Code . Happy with approach for larger artefact scatters.
OEH	email	29/03/2019			<p>Thanks for providing OEH with an opportunity to review and comment on the draft salvage methodology for the Coppabella Wind Farm. As discussed earlier this week, OEH support the draft methodology overall and provide a number of comments below:</p> <p>OEH understand that the draft methodology is still awaiting the design for the development footprint to be finalised. As such, the methodology for the surface collection and salvage of Aboriginal sites will remain flexible to ensure only those areas of sites that are to be impacted by the project will be salvaged. All other areas of Aboriginal sites will be avoided and conserved.</p> <p>In relation to the proposal to keep collected cultural material in temporary storage under section 4.1 – OEH suggest that you consider providing a timeframe for when the reburial of objects may occur and whether representatives of the Aboriginal community will be involved in the on-site reburial. OEH support the expanding of test pits, under Section 4.2, into more open area excavations in order to provide a more complete and accurate record of the archaeological resource of the area.</p> <p>Under Section 4.2.1 Test Excavation Method - OEH note that you intend to undertake excavations in line with the OEH Code of Practice. Given this project already has a Major Project approval from DPE there is an opportunity for test excavations to be more flexible where needed. We note that flexibility will also be needed in the placement of test pits.</p>
Onerwal LALC	follow up email sent re comments	3/04/2019			

Organisation	Action	Date Sent	Reply Date	Replied by	Response
Onerwal LALC	KB called re comments	4/04/2019			
Onerwal LALC	KB called re comments	8/04/2019			no comment provided to date

**OEH comments on draft salvage methodology for the Coppabella Wind Farm**

**From:** Jackie Taylor [REDACTED]  
**Sent:** Friday, 29 March 2019 4:12 PM  
**To:** Kirsten Bradley [REDACTED]  
**Cc:** Matthew Barber [REDACTED]  
**Subject:** RE: Salvage methodology \_Draft\_ Coppabella Wind Farm

Hi Kirsten,

Thanks for providing OEH with an opportunity to review and comment on the draft salvage methodology for the Coppabella Wind Farm. As discussed earlier this week, OEH support the draft methodology overall and provide a number of comments below:

OEH understand that the draft methodology is still awaiting the design for the development footprint to be finalised. As such, the methodology for the surface collection and salvage of Aboriginal sites will remain flexible to ensure only those areas of sites that are to be impacted by the project will be salvaged. All other areas of Aboriginal sites will be avoided and conserved.

In relation to the proposal to keep collected cultural material in temporary storage under section 4.1 – OEH suggest that you consider providing a timeframe for when the reburial of objects may occur and whether representatives of the Aboriginal community will be involved in the on-site reburial.

OEH support the expanding of test pits, under Section 4.2, into more open area excavations in order to provide a more complete and accurate record of the archaeological resource of the area.

Under Section 4.2.1 Test Excavation Method - OEH note that you intend to undertake excavations in line with the OEH *Code of Practice*. Given this project already has a Major Project approval from DPE there is an opportunity for test excavations to be more flexible where needed. We note that flexibility will also be needed in the placement of test pits.

If you require any further assistance in relation to this project please let me know.

Regards,

Jackie

**Jackie Taylor**

Team Leader Aboriginal Heritage  
South East Branch

Conservation and Regional Delivery Division  
**Office of Environment & Heritage**

11 Farrer Place, Queanbeyan 2620  
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The OEH South East Branch Planning Team has a group email address: [rog.southeast@environment.nsw.gov.au](mailto:rog.southeast@environment.nsw.gov.au). Please address all further email correspondence in relation to Planning and Aboriginal cultural heritage regulation matters to this address. If appropriate, emails can be marked to the attention of your usual contact in the Team.

**RAP comments on draft salvage methodology for the Coppabella Wind Farm**

**From:** Wally Bell [REDACTED]  
**Sent:** Tuesday, 5 March 2019 4:54 PM  
**To:** Kirsten Bradley [REDACTED]  
**Subject:** RE: Coppabella Wind Farm - Draft HMP and Salvage Methodology

Hi Kirsten,

Thanks for the documentation on the salvage methodology and HMP. I understand that this is a live document and consider that this is a wise approach. This will enable unforeseen circumstances to be taken into consideration and following discussion enacted upon following that consultation. Past experience dictates that modification of layout and access issues may contribute to a change in management plans and to able to accommodate those changes does require consultation and agreement. The ultimate aim is the protection and preservation of our Aboriginal cultural practice that has occurred over thousands of years

We fully appreciate any actions such as those proposed for the design that will be forthcoming to be fully consulted so that those arrangements are incorporated as part of the process to protect our cultural heritage for posterity.

Accordingly, we wish to state that we consider all Aboriginal sites to be of significance to us as the Traditional Custodians for this area. We also consider all sites to be of value to us socially, culturally and spiritually due to the occupation and use of these areas by our ancestors.

BNACC therefore consent to the application of the proposed salvage methodology and the Heritage Management Plan for the Aboriginal cultural component outlined in this document. Any variations need to be advised in a timely manner to allow adequate consultation to take place.

Cheers,

**Wally Bell**



**Traditional Custodian Group**

**PO Box 255 Kippax ACT 2615**



[www.buru-ngunawal.com](http://www.buru-ngunawal.com)

**From:** Ngunawal Heritage Aboriginal Corporation [REDACTED]

**Sent:** Thursday, 28 February 2019 1:54 PM

**To:** Kirsten Bradley [REDACTED]

**Subject:** Coppabella Wind Farm

Hi Kirsten

The Ngunawal Heritage Aboriginal Corporation support the Draft HMP and Salvage Methodology.

Also please find attached a copy of our insurances.

Kind Regards

Graeme Dobson