



Crookwell 3 Windfarm

Heritage Management Plan

7 July 2021

Project No.: 0578567

Document details	
Document title	Crookwell 3 Windfarm
Document subtitle	Heritage Management Plan
Project No.	0578567
Date	7 July 2021
Version	2.1
Author	Elspeth Mackenzie
Client Name	Crookwell 3 Development Pty Ltd

Document history

Version	Revision	Author	Reviewed by	ERM approval to issue		Comments
				Name	Date	
Draft	00	E. Mackenzie	E. Finnegan	K. Bradfield	14.04.2021	Draft for Client Review
Draft	01	E. Mackenzie	E. Finnegan	K. Bradfield	14.04.2021	Draft for RAP Review
Final Draft	02	E. Mackenzie		K. Bradfield	21.05.2021	Final Draft for Client to Submit
Final	03	A. Murden	E. Mackenzie	K. Bradfield	07.07.2021	Final for Client to Submit

Signature Page

7 July 2021

Crookwell 3 Windfarm

Heritage Management Plan



Elspeth Mackenzie
Senior Heritage Consultant



Karie Bradfield
Partner

Environmental Resources Management Australia Pty Ltd
Level 15, 309 Kent Street
Sydney NSW 2000

© Copyright 2021 by ERM Worldwide Group Ltd and/or its affiliates ("ERM").
All rights reserved. No part of this work may be reproduced or transmitted in any form,
or by any means, without the prior written permission of ERM.

CONTENTS

1.	INTRODUCTION	1
1.1	Purpose and Scope	1
1.2	Conditions of Consent	1
1.3	Approved Project Components	4
1.4	Environmental Management Systems Overview	6
1.5	Approved Authors	6
2.	OBJECTIVES AND PERFORMANCE TARGETS.....	7
2.1	Objectives of the HMP	7
2.2	Performance Targets	7
3.	CONSULTATION	8
3.1	Department of Planning, Industry and Environment	8
3.2	Heritage NSW	8
3.3	Aboriginal Stakeholders	8
3.3.1	Workshop and Draft HMP Review	9
3.4	Ongoing Aboriginal Consultation	9
4.	KNOWN ARCHAEOLOGICAL RESOURCES	10
4.1	Summary Environmental Context and Landforms	10
4.2	Recorded Aboriginal Heritage Sites	10
5.	ENVIRONMENTAL ASPECTS AND IMPACTS	34
6.	ARCHAEOLOGICAL TEST EXCAVATION AND SALVAGE PROGRAM	40
6.1	Survey of Additional Impact Areas	41
6.2	Surface Collection (Salvage) of Aboriginal Objects	41
6.2.1	Interpretative Context.....	41
6.2.2	Surface Collection	41
6.3	Test Excavation and Salvage	42
6.3.1	Interpretative Context.....	42
6.3.2	Test Excavation	42
6.3.3	Stone Artefact (Lithic) Analysis	43
6.3.4	Reburial of Artefacts	44
6.3.5	Excavation Report.....	44
6.4	Salvage Excavation	44
7.	CULTURAL HERITAGE MANAGEMENT AND MITIGATION MEASURES.....	46
7.1	Heritage Induction and Training.....	46
7.2	Unexpected Finds Procedure	46
7.3	Temporary Storage Location	55
8.	COMPLIANCE MANAGEMENT	56
8.1	Roles and Responsibilities.....	56
8.2	Monitoring and Inspection.....	56
8.3	Record Keeping and Auditing	57
8.4	Review and Continuous Improvement of HMP	57
9.	REFERENCES	59
APPENDIX A	DPIE ENDORSEMENT LETTER	
APPENDIX B	ONGOING CONSULTATION	
APPENDIX C	STANDARD OPERATING PROCEDURE	

List of Tables

Table 1.1	CoC Relating to Heritage during Construction.....	2
Table 4.1	Aboriginal Heritage Sites Recorded within the Project Site	12
Table 5.1	Summary of Potential Impact to Aboriginal Heritage Sites	35
Table 7.1	Cultural Heritage Management and Mitigation Measures	47
Table 8.1	Schedule for Monitoring, Reporting and Inspections	56

List of Figures

Figure 1.1	Project Site Infrastructure Layout.....	5
Figure 4.1	Heritage Sites Identified and Areas of Archaeological Potential	11
Figure 6.1	Process for the Salvage and Excavation of Aboriginal Objects.....	40
Figure 7.1	Unexpected Finds Protocol.....	53
Figure 7.2	Protocol for Discovery of Skeletal Remains.....	54

Acronyms and Abbreviations

Name	Description
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit. As a State Significant Development (SSD), AHIPs are not required for impacts to Aboriginal heritage objects or places. Consent approval is obtained from DP&E through approval of this ACHMP. ASIR Forms are still applicable.
ASIR	The Aboriginal Site Impact Recording (ASIR) form must be completed after authorised impacts to AHIMS sites occur. Once completed, the form must be sent to the AHIMS Registrar. Authorised impacts include those undertaken for the purpose of complying with the Secretaries requirements issued by the Department of Planning and Environment for State Significant Development (SSD – Part 4) or State Significant Infrastructure (SSI – Part 5.1) under the <i>Environmental Planning and Assessment Act 1979</i> .
CoC	Conditions of Consent
DP&E	Department of Planning and Environment (former)
DPIE	NSW Department of Planning, Industry and Environment
EMS	Environmental Management Strategy
ERM	Environmental Resources Management Australia Pty Ltd
Heritage item	An item as defined under the Heritage Act and/or an Aboriginal object or Aboriginal place as defined under the <i>National Parks and Wildlife Act 1974</i>
High-density artefact concentration	The occurrence of stone artefacts at densities greater than 8 artefacts per 50 cm ²
HMP	Heritage Management Plan
Micro-siting	Minor relocation of the WTG in the field based on site specific requirements provided that the revised location would not result in any non-compliance with the CoC and is not located greater than 100 m from the approved location as shown in Appendix 2 of the CoC.
PAD	Potential Archaeological Deposit
PLALC	Pejar Local Aboriginal Land Council
SSD	'State significant development' (SSD) requires development consent from the Minister for Planning and Infrastructure, their delegate or the Planning Assessment Commission under Division 4.1 of Part 4 of the Environmental Planning and Assessment Act 1979. Involves the preparation of an Environmental Impact Statement.
WTG	Wind turbine generators

1. INTRODUCTION

Environmental Resources Management Australia Pty Ltd (ERM) has been commissioned by Crookwell 3 Development Pty Ltd to prepare a Supplementary Aboriginal Cultural Heritage Assessment Report (SACHAR) and a Heritage Management Plan (HMP) associated with the proposed Crookwell 3 Wind Farm (the 'Project'). The proposed site is located approximately 17 km south-east of the township of Crookwell, NSW, and approximately 20 km north-west of Goulburn.

The Project, assessed as a State Significant Development (SSD 6695), was approved by the Land and Environmental Court on 14 October 2020 (Appeal No. 2020/123021). Conditions of development consent (CoC) require the preparation of a range of environmental management plans, including a HMP (Schedule 3, Condition 29 of SSD 6695) which must include up to date information regarding heritage items (Condition 29(c)).

The Project is located approximately 17 km south-east of the township of Crookwell, NSW, and approximately 20 km north-west of Goulburn. It is within the Upper Lachlan Local Government Area (LGA), and within the boundaries of the Pejar Local Aboriginal Council (PLALC).

A Cultural Heritage Assessment was prepared by Anderson Environmental Consultants (2010) and two supplementary assessments were prepared by ERM (2014 and 2021) to ensure up to date information regarding heritage items within the Project, and the potential impacts of the construction and operation of the Project on heritage. No non-Aboriginal heritage values were identified in these assessments, so this HMP addresses Aboriginal heritage values only.

1.1 Purpose and Scope

The HMP applies to the construction phase of the Project, and its primary purpose is to detail how potential impacts to heritage values will be minimised and managed during construction of the wind farm. It presents a set of mitigation measures, monitoring procedures and protocols that:

- describe how the Project will manage and control potential risks associated with heritage during construction activities;
- address the requirements of applicable legislation; and
- meet the CoC issued for the Project.

1.2 Conditions of Consent

The CoC include a number of conditions relating to heritage as presented in *Table 1.1*.

Table 1.1 CoC Relating to Heritage during Construction

CoC	Condition (Schedule 3 Environmental Conditions)	This HMP
25	The Applicant must ensure the development does not cause any direct or indirect impact on the Aboriginal heritage items identified in Table 1* of Appendix 3 or any Aboriginal heritage items located outside the approved development footprint.	Whole of HMP. Avoidance is the preferred option for all sites. Only those sites that cannot be avoided will be subject to test excavations and /or salvage in accordance with this HMP.
26	The Applicant must minimise impacts to heritage items identified in Table 2# and Table 3^ of Appendix 3.	Whole of HMP. Avoidance is the preferred option for all sites. Only those sites that cannot be avoided will be subject to test excavations and /or salvage in accordance with this HMP.
27	If impacts to the heritage items identified in Table 2 or Appendix 3 cannot be avoided, prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 3, the Applicant must conduct subsurface testing to determine appropriate management measures, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW, 2010), or its latest version.	Sections 6.3.
28	If impacts to the heritage items identified in Table 3 of Appendix 3, prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 3 of Appendix 3, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location. <i>Note: The locations of the Aboriginal heritage items referred to in this condition are shown in the figure in Appendix 3.</i>	Section 6.2.
29	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:	Whole of HMP. Endorsement provided in Appendix A.
	a) be prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary;	
	b) be prepared in consultation with Heritage NSW and Aboriginal stakeholders;	Section 3.
	c) include up to date baseline mapping of the heritage items within and adjoining the development disturbance area;	Section 4.2.
d) include a description of the measures that would be implemented for:		
■ avoiding the impacts of the development on heritage items identified in Table 1 in Appendix 3;	Table 7.1.	

CoC	Condition (Schedule 3 Environmental Conditions)	This HMP
	<ul style="list-style-type: none"> ■ subsurface testing methodology for items identified in Table 2 in Appendix 3; 	<p>Section 6.3.</p> <p>Avoidance is the preferred option for all sites. Only those sites that cannot be avoided will be subject to subsurface testing as outlined in Table 7.1.</p> <p>Based on the current project design, impacts to Crookwell WF PAD3 (51-6-0885) can now be avoided and no subsurface testing or salvage would be required.</p>
	<ul style="list-style-type: none"> ■ managing impacts on items in Table 3 in Appendix 3; 	<p>Sections 6 & 7.</p> <p>Avoidance is the preferred option for all sites. Only those sites that cannot be avoided will be subject to salvage as outlined in Table 7.1.</p> <p>Based on the current project design, impacts to Crookwell WF13 (51-6-0878) can now be avoided and no salvage would be required.</p>
	<ul style="list-style-type: none"> ■ subsurface testing and salvage methodologies prepared in accordance with <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> (DECCW, 2010) and testing and salvage to involve the Aboriginal stakeholders; 	<p>Section 6.3.</p>
	<ul style="list-style-type: none"> ■ process for salvage of items that are unable to be avoided including protection (short and long term), storage and management of salvaged Aboriginal objects; and maintaining and managing reasonable access for Aboriginal stakeholders to cultural heritage items on site; 	<p>Section 7.3 & Table 7.1.</p>
	<ul style="list-style-type: none"> ■ a contingency plan and reporting procedure if: <ul style="list-style-type: none"> - Aboriginal heritage items outside the approved disturbance area are damaged; - previously unidentified Aboriginal heritage items are found; or - Aboriginal skeletal material is discovered; 	<p>Section 7.2.</p>
	<ul style="list-style-type: none"> ■ ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and 	<p>Section 7.1.</p>
	<p>e) ongoing consultation with Aboriginal stakeholders during the implementation of the plan; a program to monitor and report on the results of investigations and effectiveness of these measures and any heritage impacts of the project.</p>	<p>Section 3.4 & 8.</p>
	<p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	<p>Whole of HMP. Section 8.</p>

CoC	Condition (Schedule 3 Environmental Conditions)	This HMP
		<p>* Note: The Aboriginal heritage items referred to are included in Table 1 of Appendix 3 of the CoC and include Crookwell WF12 (51-6-0879), Crookwell WF16 (51-6-0875), Hillview Park 4 (51-6-0718), Hillview Park 5 (51-6-0717).</p>
		<p># Note: The Aboriginal heritage items referred to are included in Table 2 of Appendix 3 of the CoC and include Hillview Park (51-6-0714), Hillview Park 2 (51-6-0715), Hillview Park 8 (51-6-0721), Crookwell WF14 (51-6-0877), Crookwell WF PAD 3 (51-6-0885), Crookwell WF15 (51-6-0876).</p>
		<p>^ Note: The Aboriginal heritage items referred to are included in Table 3 of Appendix 3 of the CoC and include Hillview Park 3 (51-6-0716), Hillview Park 6 (51-6-0719), Hillview Park 7 (51-6-0720), Crookwell WF6 (51-6-0872), Crookwell WF7 (51-6-0871), Crookwell WF8 (51-6-0888), Crookwell WF9 (51-6-0889), Crookwell WF10 (51-6-0881), Crookwell WF11 (51-6-0880), Crookwell WF13 (51-6-0878).</p>

1.3 Approved Project Components

The Project consists of the following components:

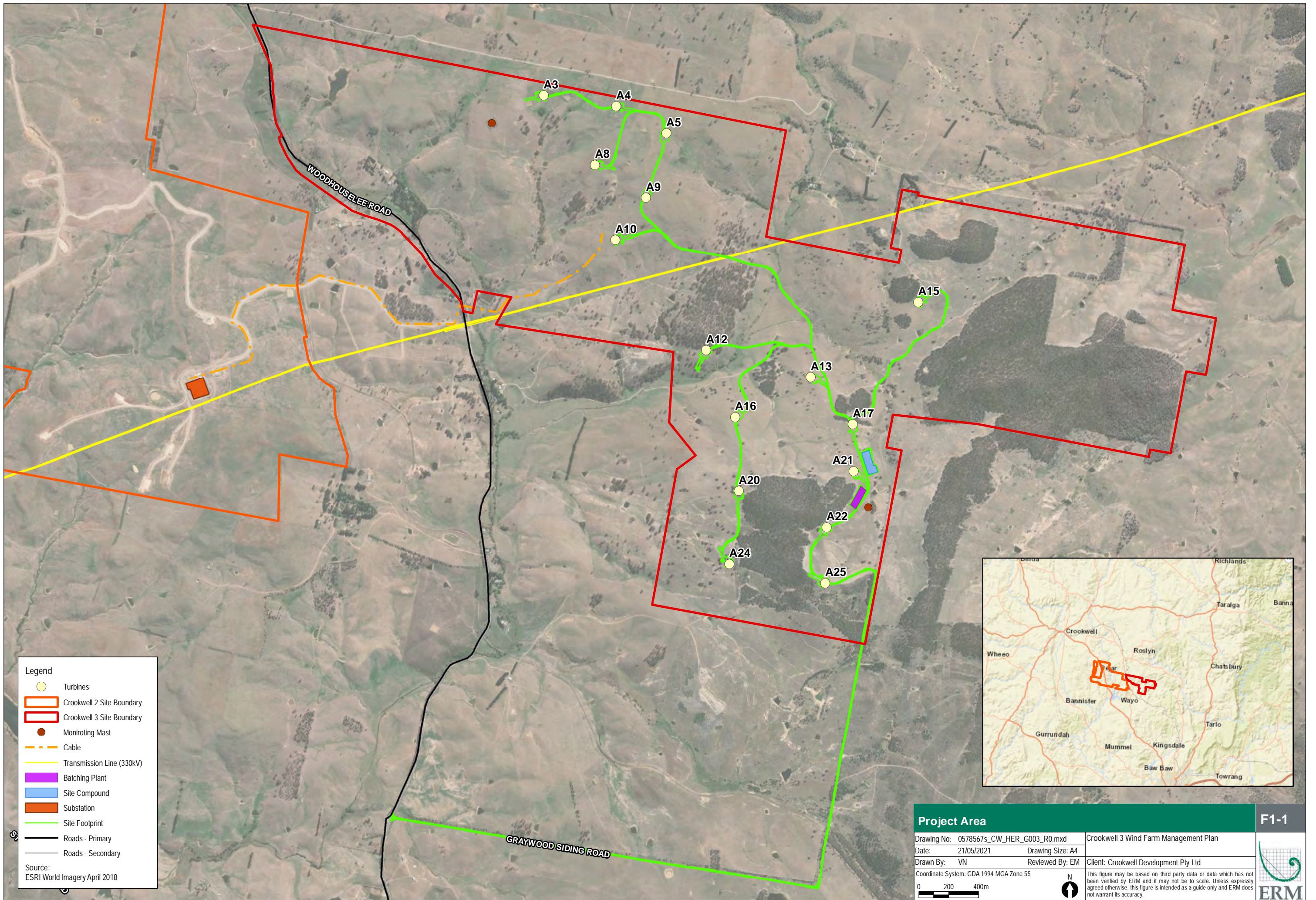
- 16 Wind Turbine Generator (WTGs) with a maximum tip height of 157 m above ground level and hardstand areas for use as crane pads and assembly areas;
- an internal private access road network utilising mostly existing farm tracks widened to approximately 5 m connecting the WTGs and other proposed infrastructure;
- obstacle lighting;
- two meteorological monitoring masts; and
- underground 33kV cable and fibre optic network.

As the Project will share most of the major infrastructure with Crookwell 2 Wind Farm, a separate substation, control room and facilities building is not required. Grid connection will be achieved from a connection to the existing 330kV electricity transmission line which runs through the Project Site.

The following elements would also be required during construction of the Project:

- temporary concrete batching plant;
- earthworks (i.e. digging, stripping, grading and landform shaping) for WTG platforms and foundations;
- widening of existing farm tracks to approximately 8 to 10m in width to support the extra load of trucks carrying equipment and cranes for the erection of the towers; this width would then be reduced during the operation phase of the Project;
- external water supply for concrete batching and construction activities;
- cleared hardstand areas for construction equipment and storage (construction laydown areas);
- temporary site offices, storage and car parking facilities; and
- the use and storage of hazardous substances within designated site facilities.

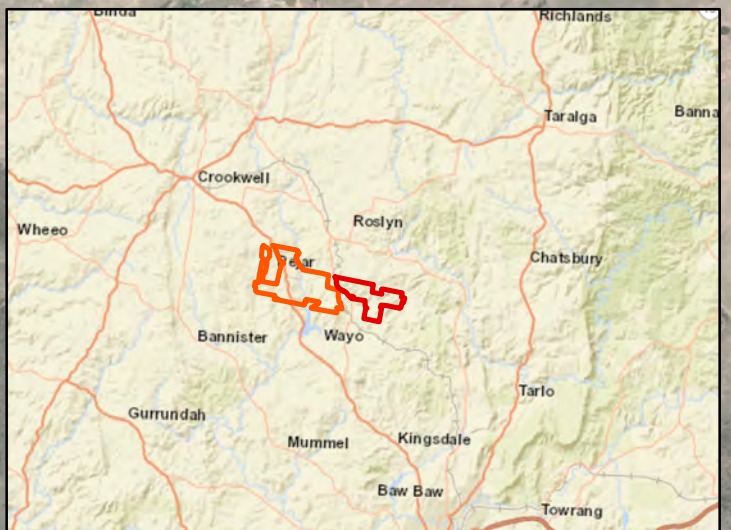
The detailed design of the above infrastructure and final layout plans (the final design) would be determined via onsite visits by Crookwell 3 Development Pty Ltd and contractors. The final design would be prepared according to the environmental management measures detailed within this HMP. The final design will be submitted to DPIE.



Legend

- Turbines
- Crookwell 2 Site Boundary
- Crookwell 3 Site Boundary
- Monitoring Mast
- Cable
- Transmission Line (330kV)
- Batching Plant
- Site Compound
- Substation
- Site Footprint
- Roads - Primary
- Roads - Secondary

Source:
ESRI World Imagery April 2018



Project Area		F1-1
Drawing No: 0578567s_CW_HER_G003_R0.mxd		Crookwell 3 Wind Farm Management Plan
Date: 21/05/2021	Drawn By: VN	Reviewed By: EM
Client: Crookwell Development Pty Ltd		
Coordinate System: GDA 1994 MGA Zone 55 0 200 400m 		
This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.		

1.4 Environmental Management Systems Overview

This HMP forms a part of the environmental management framework for the Project which includes a number of Management Plans governed by the Environmental Management Strategy (EMS), and required under Schedule 4 of the CoC. These sub-plans also include a Noise Management Plan, Stormwater Management Plan, Biodiversity Management Plan, Bird and Bat Adaptive Management Plan, Traffic Management Plan, and Emergency Plan.

The interaction between these plans is detailed in the EMS, and of particular relevance to this HMP is the inclusion of heritage information in the site induction and other training, identification and protection of avoidance areas, and the performance monitoring schedule. The Project Management structure and specific roles and responsibilities of personnel working within the Project Area during the construction and operation stages are further detailed in the EMS.

1.5 Approved Authors

In accordance with the requirements of CoC Condition 29(a), this HMP has been prepared by suitably qualified and experienced persons whose appointment was endorsed by the Secretary of the NSW Department of Planning, Industry and Environment (DPIE). A copy of the endorsement letter is provided in *Appendix A*.

2. OBJECTIVES AND PERFORMANCE TARGETS

2.1 Objectives of the HMP

Objectives for heritage management of the construction works include:

- identify relevant obligations and legislative requirements to be addressed during the construction phase of the Project;
- describe the specific construction heritage requirements and identify the best practice methods to be implemented;
- retain an area that preserves archaeological material in its natural context and provides an example of the type of environment occupied by Aboriginal people in the region;
- detail a program for the recording, salvage and surface collection of Sites that may not be avoided. Based on the current Project design, of the 27 sites recorded, 14 sites will be impacted:
 - Hillview Park (51-6-0714), Hillview Park 2 (51-6-0715), Hillview Park 3 (51-6-0716), Hillview Park 6 (51-6-0719), Hillview Park 7 (51-6-0720), Hillview Park 8 (51-6-0721), Crookwell WF6 (51-6-0872), Crookwell WF7 (51-6-0871), Crookwell WF8 (51-6-0888), Crookwell WF9 (51-6-0889), Crookwell WF10 (51-6-0881), Crookwell WF11 (51-6-0880), Crookwell WF14 (51-6-0877) and Crookwell WF15 (51-6-0876);
- detail a program for the recording and sub-surface testing of sites recorded as having the potential to contain subsurface deposits that cannot be avoided. Based on the current Project design, a program of subsurface testing will be required for:
 - Hillview Park (51-6-0714), Hillview Park 2 (51-6-0715), Hillview Park 8 (51-6-0721), Crookwell WF14 (51-6-0877), Crookwell WF15 (51-6-0876) and the Crookwell WF16 (51-6-0875) to Crookwell WF22 (51-6-0898) PAD.
- describe the measures that would be implemented if any unexpected finds or Aboriginal skeletal remains are discovered during the Project;
- describe the protocol for ongoing consultation and involvement of the Aboriginal community in the conservation and management of the Aboriginal heritage objects/sites;
- outline record keeping and management plan monitoring requirements; and
- define key roles and responsibilities.

2.2 Performance Targets

Targets for heritage management issues associated with the construction of the Project are:

- full compliance with the CoC and relevant legislation, regulations, and licenses that relate to the Project;
- consistency with standard industry environmental management practices implemented for construction to protect known heritage sites and manage chance finds;
- follow correct procedure and ensure notification of any Aboriginal heritage objects or sites discovered during ground disturbance activities; and
- ensure training on Aboriginal cultural heritage management is provided to relevant personnel.

3. CONSULTATION

Key aspects of correspondence and guidance sought by Crookwell 3 Development Pty Ltd from relevant stakeholders during the preparation of this HMP are summarised below.

3.1 Department of Planning, Industry and Environment

Correspondence between DPIE and Crookwell 3 Development Pty Ltd relevant to the preparation of this HMP has included the following key points:

- The draft HMP was submitted for review on 2 June 2021.
- Comments from Heritage NSW were received on 30 June 2021.

3.2 Heritage NSW

In accordance with the requirements of CoC Condition 29(b), Heritage NSW are required to be consulted about this HMP. To this end a draft copy of the HMP was submitted to the Secretary of the DPIE for referral to Heritage NSW on 2 June 2021. Heritage NSW provided formal comments and suggested amendments to the draft management plan on 30 June 2021. A copy of all correspondence has been provided in *Appendix B* and has been taken into consideration during the preparation of this management plan. *Table B.1* in *Appendix B* identifies how each of the Heritage NSW comments have been addressed within the management plan.

3.3 Aboriginal Stakeholders

In accordance with the requirements of CoC Condition 29(b), the HMP is required to be developed in consultation with Aboriginal stakeholders defined in the CoC as '*Aboriginal stakeholders registered for cultural heritage consultation for the development*'.

Consultation commenced in 2010 at the Project planning stage and will extend beyond the development of the HMP throughout Project construction as required. As detailed in the *Supplementary Aboriginal and Historical Cultural Heritage Assessment* (ERM 2014) and the *Supplementary Cultural Heritage Assessment* (ERM 2021), consultation was undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010) and resulted in the establishment of a stakeholder register for each assessment. The registered Aboriginal stakeholders for this Project include representatives from:

Supplementary Assessment 2014	Supplementary Assessment & HMP 2021
Peter Falk Consultancy	Gundungurra Tribal Council
Pejar Local Aboriginal Land Council	Freeman & Marx Pty Ltd
Buru Ngunawal Aboriginal Corporation	Kalari Ngunnawal Pajong Wallabalooa Descendants
Koomurri Ngunawal Aboriginal Corporation	Kalari Nunawal Descendants
	Yurwang Gundana Cultural Heritage Services
	Thunderstone Aboriginal Cultural Services Pty Ltd
	Buru Ngunawal Aboriginal Corporation

3.3.1 Workshop and Draft HMP Review

Following the supplementary cultural heritage assessment on Wednesday 7 April 2021, registered Aboriginal stakeholders discussed the impacts to each cultural heritage site, as well as appropriate mitigation measures and ongoing management strategies.

The draft HMP was developed based on the results of this discussion and then forwarded on 19 April 2021 to these registered Aboriginal stakeholders with a request for comment on the recommended mitigation and management strategies, as well as any additional information on culturally sensitive areas of local traditional knowledge relating to the site.

Yurwang Gundana Cultural Heritage Services and Thunderstone Aboriginal Cultural Services Pty Ltd provided the only responses and confirmed their acceptance of the draft with no comments.

3.4 Ongoing Aboriginal Consultation

Crookwell 3 Development Pty Ltd are committed to the continuing Aboriginal involvement in the Crookwell 3 Windfarm Project. Ongoing consultation with the Aboriginal community and registered Aboriginal stakeholders for the Project will occur during the construction of the Project. The triggers for consultation with the community during construction include:

- any additional heritage assessments for changes in Project scope;
- the implementation of the Unexpected Finds Procedure; and
- endorsement of the heritage information to be contained in the Project induction material.

Following approval, this HMP (and any updated versions) are to be provided to all stakeholders for their records.

4. KNOWN ARCHAEOLOGICAL RESOURCES

Interactions between people and their surroundings are of integral importance in both the initial formation and the subsequent preservation of the archaeological record. The nature and availability of resources including water, flora and fauna and suitable raw materials for the manufacture of stone tools and other items had (and continues to have) a significant influence over the way in which people utilise the landscape. Alterations to the natural environment also impact upon the preservation and integrity of any cultural materials that may have been deposited whilst current vegetation and erosional regimes affect the visibility and detectability of sites and relics. For these reasons, it is essential to consider the environmental context of the Project Site as a component of the heritage management process.

4.1 Summary Environmental Context and Landforms

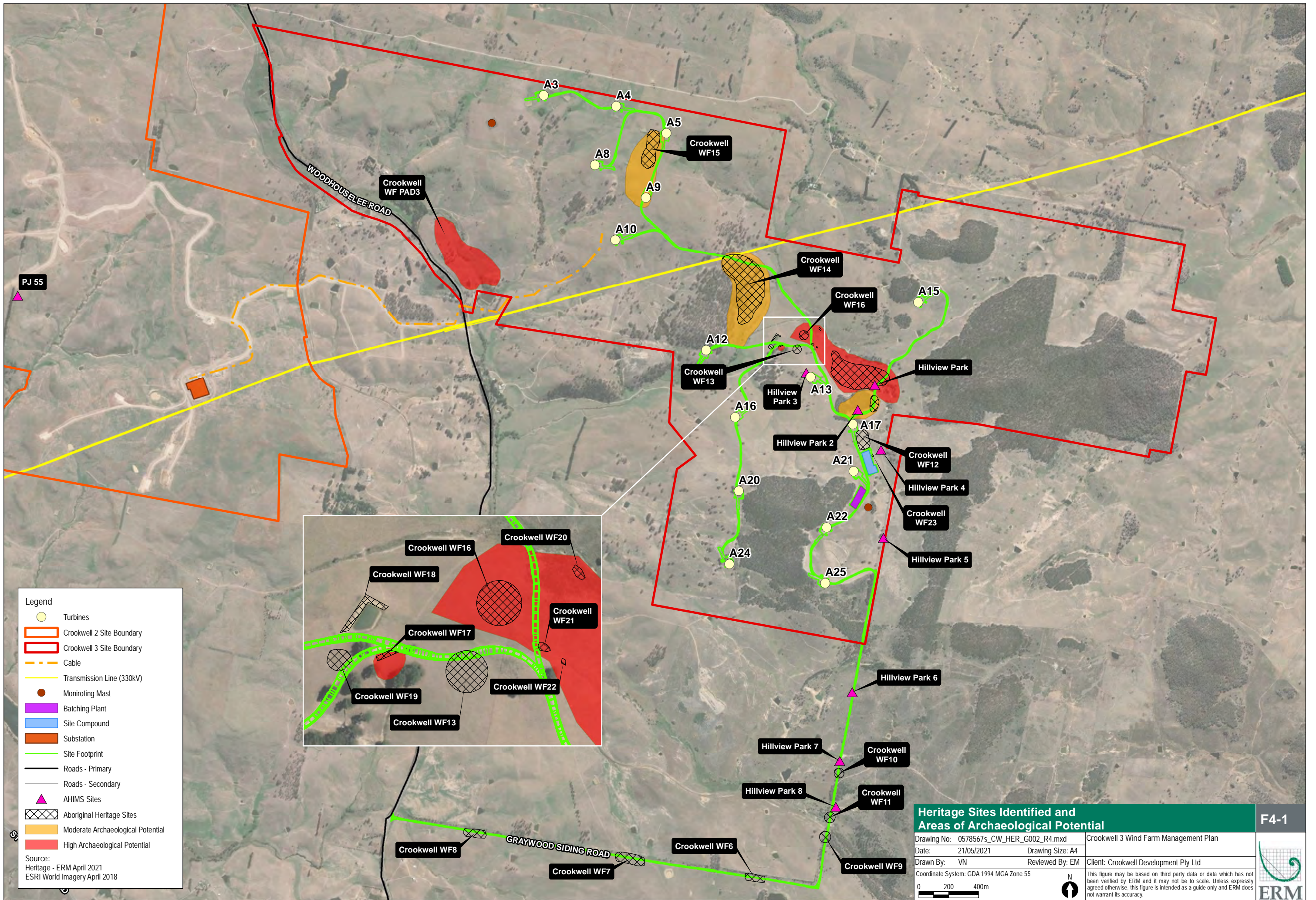
The Project Site is located within the South Eastern Highlands bioregion, which is characterised by Palaeozoic granites, metamorphosed sedimentary rocks and Tertiary basalts. It is situated within the sub-region of Crookwell, which has an underlying geology of fine grained sedimentary rocks with some granites, and tertiary basalts with buried river gravels along ridges well above present streams. This geology would have provided various lithic resources that would have been suitable for the manufacture of stone tools.

The location of the Project Site is within a hilly region with some rugged areas and deep valleys. Hill tops may be small plateaus or capped by basalt and showing inverted relief.

Soil deposits within the Project Site's valley depressions, flats and basal slopes – especially those adjacent to creek lines – would have provided a primary focus for past Aboriginal subsistence activities. A further focus would have been elevated crests and ridges affording views of the surrounding landscape, and areas of localised provisions such as stone resources and shelter from the wind.

4.2 Recorded Aboriginal Heritage Sites

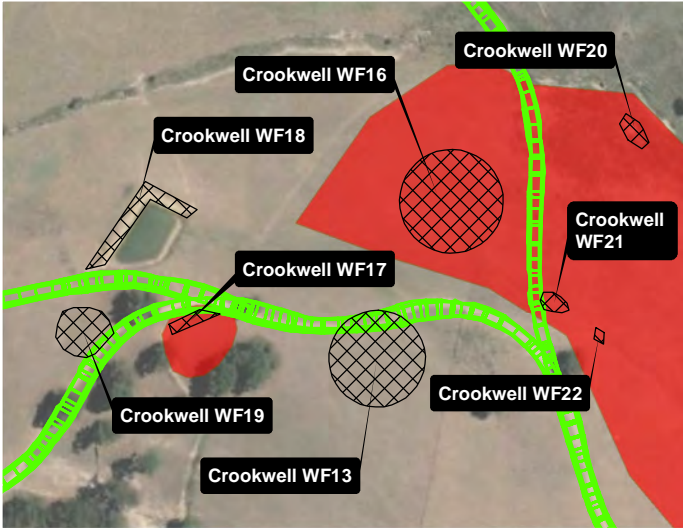
Refer to *Table 4.1* below for updated site descriptions and *Figure 4.1* for site locations.



Legend

- Turbines
- Crookwell 2 Site Boundary
- Crookwell 3 Site Boundary
- Cable
- Transmission Line (330KV)
- Monitoring Mast
- Batching Plant
- Site Compound
- Substation
- Site Footprint
- Roads - Primary
- Roads - Secondary
- AHIMS Sites
- Aboriginal Heritage Sites
- Moderate Archaeological Potential
- High Archaeological Potential



Source:
Heritage - ERM April 2021
ESRI World Imagery April 2018



Heritage Sites Identified and Areas of Archaeological Potential		F4-1
Drawing No: 0578567s_CW_HER_G002_R4.mxd	Crookwell 3 Wind Farm Management Plan	
Date: 21/05/2021	Drawing Size: A4	
Drawn By: VN	Reviewed By: EM	Client: Crookwell Development Pty Ltd
Coordinate System: GDA 1994 MGA Zone 55		
0 200 400m	N ↑	This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.


Table 4.1 Aboriginal Heritage Sites Recorded within the Project Site


Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
Hillview Park (51-6-0714)	<p>This site was originally recorded by Anderson (2010) and re-recorded by ERM (2014). It is a stone artefact scatter of quartz and silcrete artefacts, including flakes, cores and a hammerstone. The site is adjacent to a dam and a natural drainage line, which is a tributary of Steeves Creek.</p> <p>The soft sandy soils are considered to have a high potential to contain sub-surface archaeological deposits.</p>	E 743957 N 6173026	 <p><i>Hillview Park (ERM 2014)</i></p>  <p><i>Sample of artefacts (ERM 2014)</i></p>  <p><i>Sample of artefacts (ERM 2014)</i></p>	Due to its wide range of material and artefact type, its high density of artefacts and sub-surface archaeological potential this site is considered to be of moderate scientific significance.



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Hillview Park 2 (51-6-0715)</p>	<p>This site was originally recorded by Anderson (2010) and re-recorded by ERM (2014). It is positioned within a crest landform unit located above a drainage line. The site contains 10+ artefacts including a grey silcrete proximal flake (20mm x 25mm x 3mm), a silcrete medial flake (25mm x 20mm x 4mm), a silcrete core (43mm x 30mm x 34mm), and a proximal silcrete flake (20mm x 12mm x 7mm).</p> <p>Due to the high density of artefacts and proximity to water and the extensive (in terms of size and artefact density) Hillview Park site, Hillview Park 2 is considered to have sub-surface archaeological potential.</p>	<p>E 743842 N 6172861</p>	 <p><i>Hillview Park 2 looking east (ERM 2014)</i></p>  <p><i>Sample of artefacts at Hillview Park 2 (ERM 2014)</i></p>	<p>Moderate archaeological significance.</p>



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
Hillview Park 3 (51-6-0716)	This site was originally recorded by Anderson (2010) as one brown silcrete flake. It could not be relocated by ERM (2014).	E 743498 N 6173108	 <p data-bbox="992 810 1435 836"><i>Hillview Park 3 looking south (ERM 2014)</i></p>	Low archaeological significance.
Hillview Park 4 (51-6-0718)	This site was originally recorded by Anderson (2010) as two grey silcrete flakes with a maximum size of 40mm. Neither artefact could be relocated by ERM (2014).	E 743997 N 6172593		Low archaeological significance.



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
			<i>Hillview Park 4 looking north-east (ERM 2014)</i>	
Hillview Park 5 (51-6-0717)	This site was originally recorded by Anderson (2010) as two grey silcrete flakes with a maximum size of 31mm. Neither artefact could be relocated by ERM (2014).	E 744013 N 6172005	 <p><i>Hillview Park 5 looking north (ERM 2014)</i></p>	Low archaeological significance.


Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
Hillview Park 6 (51-6-0719)	This site was originally recorded by Anderson (2010) as one silcrete core located on Greywood Siding Road. It could not be relocated by ERM (2014).	E 743805 N 6170977	 <p data-bbox="992 805 1429 834"><i>Hillview Park 6 looking north (ERM 2014)</i></p>	Low archaeological significance.
Hillview Park 7 (51-6-0720)	This site was originally recorded by Anderson (2010) as one brown silcrete flake (30mm x 25mm x 14mm) located near a fence line on the existing Greywood Siding Road track. It could not be relocated by ERM (2014), however a grey silcrete core (42mm x 40mm x 12mm) was recorded at this location.	E 743722 N 6170517		The site is not considered to be rare in terms of its content within a local and regional context, and due to its low density and disturbed context it is considered to have a low potential to yield further archaeological material. The site is considered to be of a low archaeological significance.



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
			<p data-bbox="992 309 1429 336"><i>Hillview Park 7 looking north (ERM 2014)</i></p>  <p data-bbox="992 842 1263 869"><i>Silcrete core (ERM 2014)</i></p>	



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
Hillview Park 8 (51-6-0721)	<p>This site was originally recorded by Anderson (2010) and re-recorded by ERM (2014). It is an artefact scatter containing a large variety of lithic materials and stone artefact types including silcrete, quartz and quartzite. The site is a high artefact density site with artefacts encountered predominantly within an area of erosion formed through an ephemeral drainage line. The site is located adjacent to an ephemeral drainage line and is within a flat landform unit within a wider landscape of rolling hills. Soils at the site were noted to be a fine soft light brown loam to yellow sandy deposit, and it is considered that artefacts could have easily been redeposited into sub-surface stratigraphic layers, and this location is considered to have a potential to yield sub-surface archaeological deposits.</p>	<p>E 743695 N 6170209</p>	 <p><i>View of Hillview Park 8 looking south-east (ERM 2014)</i></p>  <p><i>Sample of artefacts found at Hillview Park 8 (ERM 2014)</i></p>	<p>Due to its wide range of material and artefact types, its high density of artefacts, and sub-surface archaeological potential this site is considered to be of moderate scientific significance.</p>



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF6 (51-6-0872)</p>	<p>This site was recorded by ERM (2014) and consists of four pieces of silcrete. The site is located on a simple slope/lower slope landform above a flat terrain landform within a wider landscape of rolling hills. It is within a disturbed context of a well-used vehicle track which contained imported material including crushed quartz. Heavy soil erosion occurs along the side of the track.</p> <p>Due to the disturbance caused by the construction of the track and the observed erosion it is not likely that these artefacts are in their original location. The site is considered to have a low potential to contain sub-surface archaeological deposits.</p>	<p>E 743260 N 6169715</p>	 <p><i>Crookwell WF6 looking east (ERM 2014)</i></p>  <p><i>Artefacts found (ERM 2014)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF7 (51-6-0871)</p>	<p>This site was recorded by ERM (2014) and consists of four broken quartz flakes. The site is located on a simple slope/lower slope landform above a flat terrain landform within rolling hills. It is within a disturbed context of a well-used vehicle track which contained imported material including crushed quartz. Heavy soil erosion occurs along the side of the track.</p> <p>Due to the disturbance caused by the construction of the track and the observed erosion it is not likely that these artefacts are in their original location. The site is considered to have a low potential to contain sub-surface archaeological deposits.</p>	<p>E 742295 N 6169869</p>	 <p><i>Crookwell 7 looking east (ERM 2014)</i></p>  <p><i>Artefacts found (ERM 2014)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF8 (51-6-0888)</p>	<p>This site was recorded by ERM (2014) and consists of three pieces of quartz and a silcrete core. The site is located on a gently sloping terrain within a lower slope landform, within a wider context of rolling hills. It is within a disturbed context of a well-used vehicle track. Heavy soil erosion occurs along the track. Other disturbances such as vehicle use, ploughing, land clearance, and fence construction were also observed.</p> <p>Due to these disturbances and the low number of artefacts found, the site is considered to have a low potential to contain sub-surface archaeological deposits.</p>	<p>E 741279 N 6170042</p>	 <p><i>Crookwell WF8 looking west (ERM 2014)</i></p>  <p><i>Sample of artefacts found (ERM 2014)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF9 (51-6-0889)</p>	<p>This site was recorded by ERM (2014) and consists of five silcrete artefacts. The site was found on a vehicle access track at a gateway within an elevated hill top landform in a wider landscape of rolling hills. Heavy soil erosion occurs along the track. Other disturbances such as vehicle use, ploughing, land clearance, and fence construction were also observed.</p> <p>Due to these disturbances and the low number of artefacts found, the site is considered to have a low potential to contain sub-surface archaeological deposits.</p>	<p>E 743625 N 6170002</p>	 <p><i>Crookwell WF9 looking south-west (ERM 2014)</i></p>  <p><i>Artefacts found (ERM 2014)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF10 (51-6-0881)</p>	<p>This site was recorded by ERM (2014) and consists of a single silcrete core found on a vehicle access track at a gateway within an elevated hill top landform in a wider landscape of rolling hills. Heavy soil erosion occurs along the track. Other disturbances such as vehicle use, ploughing, land clearance, and fence construction were also observed.</p> <p>Due to these disturbances and the low number of artefacts found, the site is considered to have a low potential to contain sub-surface archaeological deposits.</p>	<p>E 743716 N 6170441</p>	 <p><i>Crookwell WF10 looking north (ERM 2014)</i></p>  <p><i>Silcrete core (ERM 2014)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF11 (51-6-0880)</p>	<p>This site was recorded by ERM (2014) and consists of a single silcrete flake found on a vehicle access track within a flat terrain across a wider landscape of rolling hills. Heavy soil erosion occurs along the track. Other disturbances such as vehicle use, ploughing, land clearance, and fence construction were also observed.</p> <p>Due to these disturbances and the low number of artefacts found, the site is considered to have a low potential to contain sub-surface archaeological deposits.</p>	<p>E 743656 N 6170143</p>	 <p><i>Crookwell WF 11 looking south (ERM 2014)</i></p>  <p><i>Silcrete flake (ERM 2014)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>



Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF12 (51-6-0879)</p>	<p>This site was recorded by ERM (2014) and consists of two silcrete proximal flakes, a silcrete medial flake, and a silcrete core found on an eroded sheep track within a gently sloping terrain across a wider landscape of rolling hills. The site is located approximately 30 0m south of an ephemeral drainage line in a ploughed paddock with the upper soil horizon heavily disturbed. Other disturbances such as vehicle use, land clearance, and fence construction were also observed.</p> <p>ERM (2021) observed a number of additional artefacts in the vicinity which increased the site extent further to the south.</p> <p>Due to these disturbances and the low number of artefacts found, the site is considered to have a low potential to contain sub-surface archaeological deposits.</p>	<p>E 743873 N 6172689</p>	 <p><i>Crookwell WF12 looking west (ERM 2014)</i></p>  <p><i>Sample of artefacts found (ERM 2014)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>

Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF13 (51-6-0878)</p>	<p>This site was recorded by ERM (2014) and consists of a single grey silcrete flake found within a gently sloping terrain near an ephemeral drainage line. Several disturbances such as vehicle use, land clearance, and fence construction were observed. Due to these disturbances and the low number of artefacts found, the site is considered to have a low potential to contain sub-surface archaeological deposits.</p>	<p>E 743445 N 6173283</p>	 <p><i>Crookwell WF13 looking west (ERM 2014)</i></p>  <p><i>Silcrete flake (ERM 2014)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>

Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF14 (51-6-0877)</p>	<p>This site was recorded by ERM (2014) and consists of a large stone artefact scatter within a crest and upper/mid slope landform adjacent to a drainage line. It is extensive in terms of size and artefact density. The site contains 50+ stone artefacts including quartz and silcrete material.</p> <p>Due to the high density of artefacts and proximity to water, this site is considered to have sub-surface archaeological potential.</p>	<p>E 742992 N 6173868</p>	 <p><i>Crookwell WF14 looking east (ERM 2014)</i></p>  <p><i>Sample of artefacts found (ERM 2014)</i></p>	<p>Due to the variety and high density of artefacts this site is considered to be of moderate archaeological significance.</p>

Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF15 (51-6-0876)</p>	<p>This site was recorded by ERM (2014) and consists of five silcrete artefacts in an area approximately 250 m by 70 m with a surrounding area of moderate archaeological potential of 500 m by 200 m, running north-south parallel to the drainage line. The soils are soft, dark brown and alluvial in nature. It is likely that further artefacts have been deposited or relocated to lower stratigraphic layers, and so it is considered that this area has a moderate archaeological potential.</p>	<p>E 742464 N 6174698</p>	 <p><i>Crookwell WF 15 looking south (ERM 2014)</i></p>  <p><i>Silcrete artefacts (ERM 2014)</i></p>	<p>This site is considered to be of moderate archaeological significance.</p>

Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF16 (51-6-0875)</p>	<p>This site was recorded by ERM (2014) and consists of three grey silcrete flakes found on a gentle slope near an ephemeral drainage line. The site is located within a wider context of rolling hills. Several disturbances such as vehicle use, land clearance, and fence construction were observed.</p> <p>This site is located within the same landform as Hillview Park, Crookwell WF10, Crookwell WF21, and Crookwell WF22 and is considered to have high archaeological potential.</p>	<p>E 742972 N 6173864</p>	 <p><i>Crookwell WF16 looking north-west (ERM 2014)</i></p>  <p><i>Silcrete flakes (ERM 2014)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>

Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
Crookwell WF PAD3 (51-6- 0885)	This site was recorded by ERM (2014) entirely due to its landscape context, with no archaeological surface manifestation. It consists of flat terrain in proximity to water with a sheltered nature.	E 741300 N 6173792		High archaeological significance.
Crookwell WF17 (51-6- 0896)	This site was recorded by ERM (2021) and consists of a stone artefact scatter on an erosion patch of flat terrain above the construction contour of a well-used vehicle track. 10+ artefacts were observed which included silcrete, quartzite and quartz flakes. Immediately above the erosion patch is a well-grassed rounded hill top within a wider context of rolling hills. Due to the presence of artefacts eroding immediately below this hilltop, and the proximity of the site to water, it is considered that this area has a moderate archaeological potential.	E 743326 N 6173288	 <p data-bbox="994 751 1290 778"><i>Artefacts found (ERM 2021)</i></p>	This site is considered to be of moderate archaeological significance.
Crookwell WF18 (51-6- 0897)	This site was recorded by ERM (2021) and consists of several silcrete, quartzite and quartz pieces located on a dam wall. Other fragments of similar material were found but were likely to be caused by machinery damage during construction of the dam. The dam is located on gently sloping terrain above Steeves Creek. Due to the disturbance and damage caused by the construction of the dam, the site is considered to have a low potential to contain sub-surface archaeological deposits.	E 743294 N 6173349	 <p data-bbox="994 1358 1290 1385"><i>Artefacts found (ERM 2021)</i></p>	Due to the low number of artefacts found, the damage they have sustained, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.

Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF19 (51-6-0900)</p>	<p>This site was recorded by ERM (2021) and consists of a single large silcrete flake found on a well-use vehicle track within a gentle sloping terrain above Steeves Creek.</p> <p>Due to the disturbance caused by the construction of the track and the low number of artefacts found, the site is considered to have a low potential to contain sub-surface archaeological deposits.</p>	<p>E 743261 N 6173282</p>	 <p><i>Silcrete flake (ERM 2021)</i></p>	<p>Due to the low number of artefacts found, and disturbed nature of the context, it is considered that this site has a low archaeological significance.</p>
<p>Crookwell WF20 (51-6-0901)</p>	<p>This site was recorded by ERM (2021) and consists of a quartz flake and a granular silcrete piece found in the eroded bank of a tributary of Steeves Creek.</p> <p>This site is located within the same landform as Hillview Park, Crookwell WF16, Crookwell WF21, and Crookwell WF22 and is considered to have high archaeological potential.</p>	<p>E 743590 N 6173401</p>	 <p><i>Artefacts found (ERM 2021)</i></p>	<p>Due to the low number of artefacts found and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>

Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
<p>Crookwell WF21 (51-6-0902)</p>	<p>This site was recorded by ERM (2021) and consists of six silcrete flakes and cores found on gently sloping terrain above a tributary of Steeves Creek within a wider context of rolling hills.</p> <p>This site is located within the same landform as Hillview Park, Crookwell WF16, Crookwell WF20, and Crookwell WF22 and is considered to have high archaeological potential.</p>	<p>E 743542 N 6173299</p>	 <p><i>Artefacts found (ERM 2021)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>
<p>Crookwell WF22 (51-6-0898)</p>	<p>This site was recorded by ERM (2021) and consists of five quartz flakes found at a gate on gently sloping terrain above a tributary of Steeves Creek within a wider context of rolling hills.</p> <p>This site is located within the same landform as Hillview Park, Crookwell WF16, Crookwell WF20, and Crookwell WF21 and is considered to have high archaeological potential.</p>	<p>E 743569 N 6173279</p>	 <p><i>Artefacts found (ERM 2021)</i></p>	<p>Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.</p>

Site Name/ AHIMS ID	Site Description	Coordinates (GDA94 Z55)	Images	Archaeological Significance*
Crookwell WF23 (51-6- 0899)	This site was recorded by ERM (2021) and consists of a quartz flake, quartzite core and silcrete flake found on an eroded sheep track within a gently sloping terrain across a wider landscape of rolling hills. The site is located approximately 300 m south of an ephemeral drainage line in a ploughed paddock with the upper soil horizon heavily disturbed. Other disturbances such as vehicle use, land clearance, and fence construction were also observed. Due to these disturbances and the low number of artefacts found, the site is considered to have a low potential to contain sub-surface archaeological deposits.	E 743942 N 6172554	 <p data-bbox="994 847 1290 874">Artefacts found (ERM 2021)</p>	Due to the low number of artefacts found, and the regular occurrence of the material and artefact type identified in the local and wider region, it is considered that this site has a low archaeological significance.

* Archaeological Significance as assessed in the Crookwell 3 Wind Farm Supplementary Cultural Heritage Assessment reports (ERM 2014; 2021)

5. ENVIRONMENTAL ASPECTS AND IMPACTS

Potential impacts on Aboriginal cultural heritage are predominantly attributed to ground disturbance works and may occur as a result of:

- the construction of 16 WTGs including the towers, nacelles, blades and footings;
- the grading of roads and upgrading of existing access roads;
- vehicle movement across eroded tracks;
- the development of new access roads;
- trenching for the underground electrical reticulation network;
- clearance of vegetation;
- the construction of hardstands and laydown areas;
- for the construction period, an on-site concrete batching plant and equipment storage areas; and
- wind monitoring masts and communications equipment.

Impacts as a result of the physical infrastructure proposed within the Project Site will be discreet in nature and will occupy a relatively small footprint. Hillview Park 3 (51-6-0716), Hillview Park 6 (51-6-0719), Hillview Park 7 (51-6-0720), Crookwell WF6 (51-6-0872), Crookwell WF7 (51-6-0871), Crookwell WF8 (51-6-0888), Crookwell WF9 (51-6-0889), Crookwell WF10 (51-6-0881), and Crookwell WF11 (51-6-0880), will be impacted and require salvage.

Based on current project designs, as partial impacts to Hillview Park (51-6-0714), Hillview Park 2 (51-6-0715), Hillview Park 8 (51-6-0721), Crookwell WF15 (51-6-0876), and the Crookwell WF16 (51-6-0875) to Crookwell WF22 (51-6-0898) PAD cannot be avoided, partial salvage (i.e. collection of surface artefacts) and subsurface testing (i.e. test excavations) will be required. Where test excavation confirms significant cultural deposits with greater research potential and the site cannot be avoided through micro-siting of WTG and/or revised access track design, detailed salvage excavation will be carried out (refer to *Section 6.4*). As indicated in Table 5.1, impacts to the remaining six sites will be avoided by Project design. Exclusion fencing and signage has been completed for a number of these sites where the infrastructure is located in close proximity. Where further design work can ensure that there is no infrastructure within 100m of a site, fencing and signage is deemed unnecessary to ensure avoidance and the “no go zones” indicated on design drawings shall suffice.

Respect for unfenced sites shall be the subject of site inductions and toolbox meetings. Crookwell WF13 (51-6-0878) and Crookwell WF PAD 3 (51-6-0885) are listed in the CoC as potentially requiring salvage however impacts to these sites has been avoided by the Project design. Crookwell WF17 (51-6-0896) – Crookwell WF23 (51-6-0899), recorded in the supplementary survey (ERM 2021), are also outside the Project impact area.

Impact reduction and mitigation measures for each site have been developed to ensure a sound heritage outcome for the Project Site and a reduction in damage to heritage values. This information is based on best-case design as of April 2021. Subject to further detailed design, only those sites that cannot be avoided will be subject to test excavations and /or salvage in accordance with this HMP.

Table 5.1 Summary of Potential Impact to Aboriginal Heritage Sites

Site Name/ AHIMS ID	Archaeological Significance	Will the site be impacted?	Management Measure*	Description of Management Measure# (see Section 6 for detailed methodology and timing)
Hillview Park (51-6-0714)	Moderate	This site will be impacted by access road that will be used during construction and operation of the wind farm.	Subsurface testing and salvage where avoidance is not possible.	Salvage of surface artefacts impacted by the access track should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP. Test Excavation should be undertaken in accordance with the methodology set out in Section 6.3 of this HMP. The remainder of the site should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Hillview Park 2 (51-6-0715)	Moderate	This site will be impacted by an access road that will be used during construction and operation of the wind farm, and could not be avoided by micro-siting of turbine A17.	Subsurface testing and salvage where avoidance is not possible.	Salvage of surface artefacts impacted by the access track and turbine hardstand should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP. Test Excavation should be undertaken in accordance with the methodology set out in Section 6.3 of this HMP. The remainder of the site should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Hillview Park 3 (51-6-0716)	Low	This isolated find is located on an access road that will be used during construction and operation of the wind farm.	Surface collection /salvage	Salvage of the site should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP.
Hillview Park 4 (51-6-0718)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Hillview Park 5 (51-6-0717)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.

Site Name/ AHIMS ID	Archaeological Significance	Will the site be impacted?	Management Measure*	Description of Management Measure# (see Section 6 for detailed methodology and timing)
Hillview Park 6 (51-6-0719)	Low	This isolated find is located on an access road that will be used during construction and operation of the wind farm.	Surface collection /salvage	Salvage of the site should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP.
Hillview Park 7 (51-6-0720)	Low	This isolated find is located on an access road that will be used during construction and operation of the wind farm.	Surface collection /salvage	Salvage of the site should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP.
Hillview Park 8 (51-6-0721)	Moderate	This scatter is located immediately adjacent to an access road that will be used during construction and operation of the wind farm. A small portion may be impacted.	Subsurface testing and salvage where avoidance is not possible.	Salvage of surface artefacts impacted by the access track should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP. Test Excavation should be undertaken in accordance with the methodology set out in Section 6.3 of this HMP. The remainder of the site should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF6 (51-6-0872)	Low	These isolated finds are located on an access road that will be used during construction and operation of the wind farm.	Surface collection /salvage	Salvage of the site should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP.
Crookwell WF7 (51-6-0871)	Low	These isolated finds are located on an access road that will be used during construction and operation of the wind farm.	Surface collection /salvage	Salvage of the site should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP.
Crookwell WF8 (51-6-0888)	Low	These isolated finds are located on an access road that will be used during	Surface collection /salvage	Salvage of the site should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP.

Site Name/ AHIMS ID	Archaeological Significance	Will the site be impacted?	Management Measure*	Description of Management Measure# (see Section 6 for detailed methodology and timing)
		construction and operation of the wind farm.	Surface collection /salvage	
Crookwell WF9 (51-6-0889)	Low	These isolated finds are located on an access road that will be used during construction and operation of the wind farm.		Salvage of the site should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP.
Crookwell WF10 (51-6-0881)	Low	This isolated find is located on an access road that will be used during construction and operation of the wind farm.		Salvage of the site should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP.
Crookwell WF11 (51-6-0880)	Low	This isolated find is located on an access road that will be used during construction and operation of the wind farm.	Surface collection /salvage	Salvage of the site should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP.
Crookwell WF12 (51-6-0879)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF13 (51-6-0878)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF14 (51-6-0877)	Moderate	This site will be impacted by two access roads that will be used during construction and operation of the wind farm.	Subsurface testing and salvage where avoidance is not possible.	Salvage of surface artefacts impacted by the access track should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP. Test Excavation should be undertaken in accordance with the methodology set out in Section 6.3 of this HMP. The remainder of the site should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion

Site Name/ AHIMS ID	Archaeological Significance	Will the site be impacted?	Management Measure*	Description of Management Measure# (see Section 6 for detailed methodology and timing)
				fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF15 (51-6-0876)	Moderate	This site will be impacted by an access road that will be used during construction and operation of the wind farm, and could not be avoided by micro-siting of turbine A9.	Subsurface testing and salvage where avoidance is not possible.	Salvage of surface artefacts impacted by the access track and turbine hardstand should be undertaken in accordance with the methodology set out in Section 6.2 of this HMP. Test Excavation should be undertaken in accordance with the methodology set out in Section 6.3 of this HMP. The remainder of the site should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF16 (51-6-0875)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF17 (51-6-0896)	Moderate	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF18 (51-6-0897)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF19 (51-6-0900)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF20 (51-6-0901)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.

Site Name/ AHIMS ID	Archaeological Significance	Will the site be impacted?	Management Measure*	Description of Management Measure# (see Section 6 for detailed methodology and timing)
Crookwell WF21 (51-6-0902)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF22 (51-6-0898)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF23 (51-6-0899)	Low	No	Avoidance*	A 10 m wide buffer zone will be maintained around the site. This area should be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. Exclusion fencing and exclusion signage should be erected around the site by Aboriginal stakeholder groups and an archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF PAD3 (51-6-0885)	High	No	Avoidance*	This site is located over 100m from any construction activities. This area will marked on all design drawings as a 'no go zone'. In the event that any construction activities are proposed within 100m of this site, exclusion fencing and exclusion signage will be erected around the site by Aboriginal stakeholder groups and an appropriately qualified archaeologist. At the completion of construction exclusion zone fencing will be removed.
Crookwell WF16 to Crookwell WF22 PAD	Low	The area between Crookwell WF16 and Crookwell WF20/Crookwell WF21/Crookwell WF22 will be impacted by an access road that will be used during construction and operation of the wind farm.	Subsurface testing and salvage where avoidance is not possible.	Test Excavation should be undertaken in accordance with the methodology set out in Section 6.3 of this HMP.

* Avoidance and ongoing protection of these sites is to be maintained throughout the duration of the construction, maintenance and operation of the windfarm. All vehicle movements and maintenance activities will be limited to defined access tracks and hardstand areas. No additional impact, including during operation and/or maintenance is approved unless authorised by the Secretary of DPIE in writing or via an updated and approved HMP.

Where further design work can ensure that there is no infrastructure within 100m of a site, fencing and signage is deemed unnecessary to ensure avoidance and the "no go zones" indicated on design drawings shall suffice. Respect for unfenced sites shall be the subject of site inductions and toolbox meetings.

6. ARCHAEOLOGICAL TEST EXCAVATION AND SALVAGE PROGRAM

In circumstances where Aboriginal cultural heritage objects/sites would be impacted by development or ground disturbing works and cannot be avoided by micro-siting, test excavation and salvage programs are required to mitigate damage to the Aboriginal object/site and to ensure compliance with the CoC.

The management and mitigation statements have been developed in consultation with Heritage NSW and the relevant Aboriginal parties. This HMP has been sent to the registered Aboriginal stakeholders for their review, comment and endorsement.

A simplified flow chart of the archaeological test excavation and salvage program is also shown below in *Figure 6.1*. The chart is based on the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010).

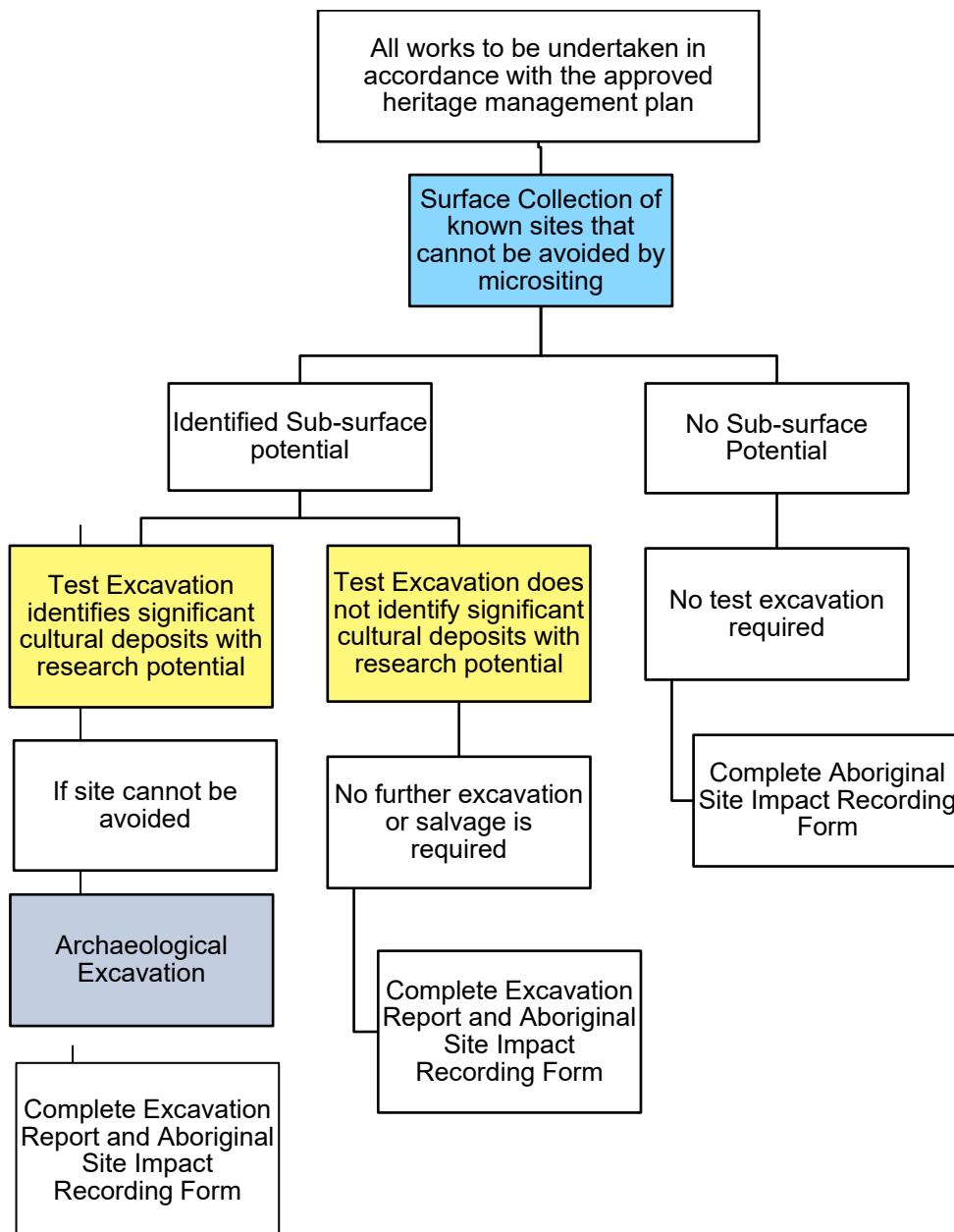


Figure 6.1 Process for the Salvage and Excavation of Aboriginal Objects

6.1 Survey of Additional Impact Areas

During the 2021 supplementary survey, the realignment of the underground cable route was not able to be inspected due to recent rainfall events. During detailed design and prior to the commencement of construction, this alignment and any additional impact areas or any areas not previously archaeologically surveyed will be surveyed by a qualified archaeologist and registered Aboriginal stakeholders.

Any new Aboriginal heritage sites identified within proposed impact areas as part of these surveys may be avoided as part of detailed design, fenced off and protected, or subjected to a sub-surface testing program and salvaged (if required). Detailed strategies for protection of Aboriginal heritage values identified in future survey work are provided in this HMP.

6.2 Surface Collection (Salvage) of Aboriginal Objects

The following draft methodology has been applied to sites Hillview Park (51-6-0714), Hillview Park 2 (51-6-0715), Hillview Park 3 (51-6-0716), Hillview Park 6 (51-6-0719), Hillview Park 7 (51-6-0720), Hillview Park 8 (51-6-0721), Crookwell WF6 (51-6-0872), Crookwell WF7 (51-6-0871), Crookwell WF8 (51-6-0888), Crookwell WF9 (51-6-0889), Crookwell WF10 (51-6-0881), Crookwell WF11 (51-6-0880), Crookwell WF14 (51-6-0877) and Crookwell WF15 (51-6-0876) as impacts to these sites cannot be avoided through micro-siting of WTG and/or revised access track design. The same methodology will also be applied to any additional sites that cannot be avoided.

All of these activities will be undertaken by qualified archaeologists and in consultation (and participation) with the registered Aboriginal stakeholders. These registered stakeholders may be employed on the Project team each day or on a rostered basis.

6.2.1 Interpretative Context

Research provides one means of mitigation against the loss of Aboriginal heritage through this project. Research questions will be addressed in the salvage reporting. The following research question will give context to the analysis of the sites salvaged. The sample salvage methodology below may be modified as the salvage progresses, although any major changes in methodology will require consultation with Heritage NSW and Aboriginal stakeholders.

- What is the relationship between the soil type and the visibility/density of artefacts on the surface?
- Stone reduction technology. How was the stone worked and used? Can the function of the site be inferred from the artefact assemblage? What does this tell us about Aboriginal occupation, use, settlement and activities undertaken through time in this region?
- Finished Implements. What were the finished implements used for and what can that tell us about site function(s)?
- What raw material resources were used; where did they come from; and what does this tell us about Aboriginal use of the region in the past?
- Landforms. Is it possible to differentiate between occupation of different landforms?

6.2.2 Surface Collection

Avoidance is the preferred option for all sites. Based on the current Project design, of the 27 Site records, 14 Sites – Hillview Park (51-6-0714), Hillview Park 2 (51-6-0715), Hillview Park 3 (51-6-0716), Hillview Park 6 (51-6-0719), Hillview Park 7 (51-6-0720), Hillview Park 8 (51-6-0721), Crookwell WF6 (51-6-0872), Crookwell WF7 (51-6-0871), Crookwell WF8 (51-6-0888), Crookwell WF9 (51-6-0889), Crookwell WF10 (51-6-0881), Crookwell WF11 (51-6-0880), Crookwell WF14 (51-6-0877) and Crookwell WF15 (51-6-0876) - may be fully or partially impacted and as such should be subject to surface collection as they cannot be avoided through micro-siting of WTG and/or revised access track design as follows:

- flagging of artefacts prior to collection;

- taking photographs of site area and artefact distribution prior to and after surface collection;
- recording artefact positioning with GPS co-ordinates;
- collected artefacts will be bagged and labelled individually;
- all surface objects recorded at each of these sites will be collected; and
- recording of site context/condition at time of collection will be undertaken.

The analysis of artefacts recovered during the salvage program is undertaken in a transparent and replicable fashion, so as to allow for an interpretation of the Project Site's archaeological significance.

Artefacts recovered are initially analysed on-site to enable evidence based decisions regarding the quantity of artefacts at each archaeological site and immediate input from Aboriginal stakeholders.

Detailed (laboratory) analysis is undertaken off site and entails recording a larger number of characteristics for each individual artefact as outlined in *Section 6.3.3*.

An Aboriginal Site Impact Recording (ASIR) form will be completed and submitted to the Aboriginal Heritage Information Management System (AHIMS) Registrar as soon as practicable.

6.3 Test Excavation and Salvage

Subsurface potential has been identified at sites Hillview Park (51-6-0714), Hillview Park 2 (51-6-0715), Hillview Park 8 (51-6-0721), Crookwell WF14 (51-6-0877), Crookwell WF15 (51-6-0876), and Crookwell WF16 (51-6-0875) to Crookwell WF22 (51-6-0898) PAD. Only where impacts cannot be avoided through micro-siting of WTG and/or revised access track design, each of these sites will be subject to test excavation.

The purpose of this programme of test excavation is to provide a broad understanding of Aboriginal cultural heritage within the Project Site. If the test excavation identifies significant cultural deposits with research potential, further finer resolution excavation would be considered as outlined in *Section 6.3.2*.

6.3.1 Interpretative Context

Our understanding of the distribution, nature, age and integrity of Aboriginal cultural deposits in the Project Site is limited and largely based on the results of previous surveys (Anderson 2010; ERM 2014; ERM 2021). There are therefore a number of relevant research questions that the proposed archaeological test excavation program can explore to improve our understanding of the archaeological resource within the Project Site and will be addressed in the salvage reporting.

- What are the environmental characteristics associated with the distribution of Aboriginal cultural heritage within the Project Site?
- Can the stratigraphic profile provide information on the nature and/or survivability of the archaeological resources?
- Are there other key factors in the distribution and extent of the material culture within the Project Site?

6.3.2 Test Excavation

The test excavation methodology is developed to provide a robust level of archaeological information to inform the management of the site during construction. It aims to test those areas of PAD that have no archaeological exposure or visibility, and to confirm the boundaries of known sites.

The test excavation is undertaken under the supervision of a core team of archaeologists and Aboriginal representatives. An integral part of the project team is Aboriginal stakeholders skilled in the identification of Aboriginal artefacts. These registered stakeholders may be employed on the project team each day or on a rostered basis.

Should the test excavation confirm significant cultural deposits with greater research potential (i.e. deposits in excess of 8 artefacts per 50 cm square or cultural features, such as hearths), this will trigger a discussion with the proponent to determine if the area can be avoided through micro-siting of the infrastructure, and if not then the site/feature will be subject to salvage excavation (refer to *Section 6.4*).

The proposed test excavation program is completed prior to construction. Timeframes will be dependent on the site conditions and/or if the natural soil profile is considerably deeper than expected.

The following key tasks will be undertaken during any sub surface testing required:

- a series of 0.5 m by 0.5 m test pits will be excavated in transects at no more than 5 m intervals along the entirety of the impact area within areas of moderate and high archaeological potential;
- excavation will be undertaken by hand using trowels, mattocks and shovels;
- the grid will continue until no more artefacts are found in order to identify the extent of the deposit;
- the first excavation unit will be excavated and documented in 5 cm excavation units, or 'spits'. Subsequent test pits may be excavated in 10 cm spits or stratigraphical unit (whichever is smaller) and this would be at the discretion of the Supervising Archaeologist;
- all test pits will be excavated to at least the base of identified Aboriginal object bearing units and/or will cease at stiff clay or bedrock;
- all deposits will be sieved on-site using 5 mm and 8 mm nested sieves. Deposit will be sieved using dry sieving methods as appropriate to the soil type, access to PA and environmental context. Wet sieving will be used in response to damp and or heavy clay soil;
- all test pits will be documented using photographic records, written descriptions and scaled drawings. If cultural features, such as hearths are revealed during the test excavation, these will be also excavated beyond the 50 cm x 50 cm test pit to capture the entire feature. If discrete high-density artefact concentrations (in excess of 8 artefacts per 50 cm square) are revealed, this will trigger salvage excavation of the site (refer to *Section 6.4*);
- the sub-surface soils and sediments will be examined to identify whether the deposits are intact or disturbed or a combination of both. Soil samples will not be taken;
- artefacts recovered will be initially analysed onsite to enable evidence based decisions regarding the quantity of artefacts at each archaeological site and immediate input from Aboriginal stakeholders. Detailed (laboratory) analysis would be undertaken offsite and entail recording a greater number of characteristics for each individual artefact as outlined in *Section 6.3.3*;
- artefacts to be removed from site for further analysis will be individually bagged in snap-lock sample bags and labelled;
- test trenches/pits will be backfilled as soon as practicable; and
- following test excavation and analysis, an Aboriginal Site Impact Recording form will be completed and submitted to the AHIMS Registrar as soon as practicable (refer to *Section 6.3.4*).

6.3.3 Stone Artefact (Lithic) Analysis

For any subsurface testing that may be required, the post-excavation analysis would be designed to address the research objectives and specific research questions (refer to *Section 6.3.1*), along with other relevant questions that may arise based on the results of the test excavation. Results of analysis would be presented in relation to comparative site data and where useful in addressing the research questions. Specifically, the analysis of the salvaged artefacts would aim to determine the following (if possible):

- What raw material resources were used; where did they come from; and what does this tell us about Aboriginal use of the region in the past?

- Stone reduction technology. How was the stone worked and used? Can the function of the site be inferred from the artefact assemblage? What does this tell us about Aboriginal occupation, use, settlement and activities undertaken through time in this region?
- Finished Implements. What were the finished implements used for and what can that tell us about site function(s)?
- Post-depositional influences. What (if any) post-depositional influences have impacted on the assemblage, and what does this tell us about the integrity and significance of the site?
- Site chronology. When was the site occupied? Was the assemblage the product of repeated occupations or a single event? Is there spatial patterning in the assemblage, and what does this tell us about repeated use, activities and/or occupation of the region through time?
- Landforms. Is it possible to differentiate between occupation of different landforms?

Field analysis would record basic data, such as landform element, soil type, artefact type, material type, number and any significant technological characteristics, such as backing or bipolar techniques; added to this would be any provenance data such as pit ID and spit number.

Detailed (laboratory) analysis would be undertaken off site and will entail recording a larger number of characteristics for each individual artefact including dimensions, raw material, cortex type/percent, along with flake and core attributes, termination, platform and other characteristics. The full artefact catalogue would be included as an appendix to the excavation report and in excel spreadsheet format.

6.3.4 Reburial of Artefacts

Artefactual material will be collected, interpreted and catalogued then reburied within a portion of the Project Site that is to be conserved and not impacted during the development. The artefacts are to be reburied upon the completion of the test excavation and detailed (laboratory) analysis. As requested by the Aboriginal stakeholders, the artefacts would be placed in direct contact with the soil. An interpretive label within a ziplock bag would be buried immediately adjacent to the artefacts. The location of the reburied artefacts would be agreed with registered Aboriginal stakeholders and recorded with the information forwarded to Heritage NSW (refer to *Section 7.3*). Updated HMP mapping and all operational mapping will be required in order to identify the location of reburied Aboriginal objects so as to not inadvertently impact the reburial sites with any future activities.

6.3.5 Excavation Report

Following surface collection and test excavation, as described above, an excavation report will be completed in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. The report will include the following:

- details of ongoing consultation with registered Aboriginal stakeholders;
- details of the proposed development;
- excavation and salvage methodology, including the effectiveness of the chosen test pit spacing used, and the triggers for the excavation of additional test pits;
- results of the excavation and salvage;
- results of the analysis of recovered Aboriginal objects;
- future management strategies for the Aboriginal objects; and
- ASIR forms will be completed for each site impacted by salvage and excavation works and will be submitted to the AHIMS Registrar.

6.4 Salvage Excavation

Only where test excavation confirms significant cultural deposits with greater research potential (i.e. deposits in excess of 8 artefacts per 50 cm square or cultural features, such as hearths) and the site

cannot be avoided through micro-siting of WTG and/or revised access track design, detailed excavation will be carried out as follows:

- the central area of the impacted area of the site will be expanded until sterile deposit is reached or artefact numbers have diminished to a level that indicates that the majority of the impacted area of the site has been salvaged (and a statistically valid sample has been retrieved);
- deposit will be excavated by hand in arbitrary 100 mm spits or in stratigraphic sequence as appropriate (as per Requirement 16a, *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*);
- evidence of bioturbation and taphonomic processes will be recorded in detail;
- spoil will be dry sieved in 5 mm sieves. Wet sieving will be used in response to damp and or heavy clay soil. Where a reduction event is suspected 3 mm sieves will be used;
- samples of charcoal in stratified deposits will be retained for dating purposes; and
- artefacts collected will be handled, stored and recorded as outlined in (refer to *Section 6.3.3*).

7. CULTURAL HERITAGE MANAGEMENT AND MITIGATION MEASURES

The management and mitigation measures have been developed in consultation with the relevant Aboriginal parties and are made in light of the results of the various field surveys, background research, predictive modelling, heritage significance assessment and relevant NSW legislation protecting Aboriginal heritage and provide due consideration to:

- the Minister's CoC; and
- the outcomes of the stakeholder workshop.

Table 7.1 below provides management and mitigation measures to manage impacts and potential impacts on Aboriginal heritage items.

7.1 Heritage Induction and Training

All employees and subcontractors will undergo environmental awareness training as part of the site induction to ensure they understand their obligations and responsibilities. This training will include basic Aboriginal heritage awareness across the following topics:

- legal responsibilities;
- summary of significant sites, including possible site types and significant landforms;
- Aboriginal and archaeological significance of the Project Site;
- procedures for the discovery of previously unrecorded Aboriginal objects;
- procedures for the discovery of human remains; and
- site access requirements.

It is important to note that **only information endorsed for sharing by the Aboriginal stakeholders should be included within the induction material**. Alternatively a representative of one of the RAPs that provide the service could be employed to undertake an induction session for the key managers of all major contractors prior to works commencing.

7.2 Unexpected Finds Procedure

Protocols for chance finds are detailed in *Figures 7.1* and *7.2*.

If previously unrecorded Aboriginal heritage evidence is identified within the Project Site, this evidence will be subject to temporary protection, recorded and appropriate management strategies implemented, in consultation with registered Aboriginal stakeholders as follows:

- all activity in the immediate area should cease;
- and an archaeologist should be consulted;
- Heritage NSW should be immediately contacted;
- registered Aboriginal Parties should be notified; and
- an appropriately qualified heritage professional should record the location and attributes of the site and determine the significance of the find.

In the event of the discovery of human skeletal material (or suspected human skeletal material) during project activities in the Project Site the protocol outlined in *Figure 7.2* must be followed.

Table 7.1 Cultural Heritage Management and Mitigation Measures

Measure	Resources needed	Responsible Party	Timing/Frequency	Performance criteria
Administrative measures				
<p>Training will be provided to all personnel involved in construction and management phases of the Project, including relevant sub-contractors and visitors on heritage requirements of this plan through inductions, toolboxes and targeted training. This training will include basic Aboriginal heritage awareness across the following topics:</p> <ul style="list-style-type: none"> ■ legal responsibilities; ■ summary of significant sites, including possible site types and significant landforms; ■ Aboriginal and archaeological significance of the Project Site; ■ procedures for the discovery of previously unrecorded Aboriginal objects; ■ procedures for the discovery of human remains; and ■ site access requirements. <p>A refresher component for induction training will be provided following any incident or future revision of the HMP.</p>	<p>Induction material Toolbox training material Standard Operating Procedure (<i>Appendix C</i>) Targeted training material</p>	<p>Balance of Plant (BoP) Contractor Project Manager (PM) and BoP Compliance Manager (CM)</p>	<p>Prior to construction and as required</p>	<ul style="list-style-type: none"> ■ Ensure all site contractors and visitors receive suitable heritage inductions prior to carrying out any development on site ■ Training and pre-start meeting records are maintained
<p>Only information endorsed for sharing by the registered Aboriginal stakeholders should be included within the induction package for all workers, alternatively a representative of one of the RAPs that provide the service could be employed to undertake an induction session for the management teams of all major contractors prior to works commencing.</p>	<p>Induction material Toolbox training material Standard Operating Procedure (<i>Appendix C</i>) Targeted training material</p>	<p>BoP PM and CM Registered Aboriginal stakeholders</p>	<p>Prior to construction and as required</p>	<ul style="list-style-type: none"> ■ Cultural heritage information contained within the induction material has been endorsed
<p>Notify regulatory authorities of any incidents relating to Aboriginal heritage management.</p>	<p>Incident notification forms. Evidence of consultation with</p>	<p>BoP PM and CM</p>	<p>As required</p>	<ul style="list-style-type: none"> ■ Copies of all notifications and evidence of consultation are retained

Measure	Resources needed	Responsible Party	Timing/Frequency	Performance criteria
	registered Aboriginal stakeholders			

Design to avoid impact of recorded heritage site

Where possible, impacts to will be avoided through micro-siting of WTG and/or revised access track design. Micro-siting of the wind turbines is approved without consent provided that it is no more than 100 m from the relevant GPS coordinates shown in Appendix 2 of the CoC.	Design drawings Exclusion zone plans for all work sites	BoP PM and CM	Final design and micro-siting prior to construction	<ul style="list-style-type: none"> ■ Impact to heritage sites avoided ■ Final detailed design submitted to DPIE
In the unlikely event that micro-siting and/or revised access track will result in additional impacts to heritage sites, or any new Aboriginal heritage sites area identified within proposed impact areas they will be managed in accordance with the requirements of this HMP and the results provided as an addendum to the HMP.	Addendum to the HMP	BoP PM and CM	Final design and micro-siting prior to construction	<ul style="list-style-type: none"> ■ Final detailed design submitted to DPIE

Pre-construction

Prior to and for the duration of the construction activities, all known heritage sites within 100 m from any proposed infrastructure or construction activity will be fenced (plus minimum 10 m buffer area) by the registered Aboriginal stakeholders and an archaeologist to protect them against accidental damage. At the request of the registered Aboriginal stakeholders, the signage will clearly identify the area as a cultural heritage site and that under the <i>National Parks and Wildlife Act</i> it is an offence to harm (destroy, deface, or damage) or desecrate an Aboriginal object or Aboriginal place, or in relation to an object, move the object from the land on which is has been situated.	Design drawings Exclusion zone plans for all work sites	BoP PM and CM Archaeologist Registered Aboriginal stakeholders	Prior to construction	<ul style="list-style-type: none"> ■ Exclusion zones maintained around heritage sites ■ Impact to heritage sites avoided
Of the 27 site records, nine surface sites – Hillview Park 3 (51-6-0716, Hillview Park 6 (51-6-0719), Hillview Park 7 (51-6-0720), Crookwell WF6 (51-6-0872), Crookwell WF7 (51-6-0871), Crookwell WF8 (51-6-0888), Crookwell WF9 (51-6-0889), Crookwell WF10 (51-6-0881), Crookwell WF11 (51-6-0880) - will be potentially impacted and will need to be subject to surface collection <u>if they cannot be avoided by micro-siting of WTG and/or revised access track design</u> . During the surface collection:	Design drawings Exclusion zone plans for all work sites	Archaeologist Registered Aboriginal stakeholders	Prior to construction	<ul style="list-style-type: none"> ■ Only those sites that cannot be avoided are subject to surface collection ■ ASIR forms are submitted to AHMIS Registrar

Measure	Resources needed	Responsible Party	Timing/Frequency	Performance criteria
<ul style="list-style-type: none"> ■ all surface objects recorded at each of these sites will be collected; ■ the analysis of artefacts recovered during the salvage program would be undertaken in a transparent and replicable fashion so as to allow for an interpretation of the Project Site's archaeological significance; ■ artefacts recovered will be initially analysed onsite; ■ detailed (laboratory) analysis would be undertaken offsite; and ■ artefactual material will be collected, interpreted and catalogued then reburied within a portion of the Project Site that is to be conserved and not impacted during the development. 				
<p>Hillview Park (51-6-0714), Hillview Park 2 (51-6-0715), Hillview Park 8 (51-6-0721), Crookwell WF14 (51-6-0877), Crookwell WF15 (51-6-0876), and Crookwell WF16 (51-6-0875) to Crookwell WF22 (51-6-0898) PAD will be potentially impacted and as subsurface potential has been identified they will need to be subject to surface collection and test excavation in the impacted area of the site. The purpose of test excavation is to provide a broad understanding of Aboriginal cultural heritage within the Project Site. If the test excavation identifies significant cultural deposits with research potential, further finer resolution excavation would be considered.</p>	<p>Design drawings Exclusion zone plans for all work sites</p>	<p>Archaeologist Registered Aboriginal stakeholders</p>	<p>Prior to construction</p>	<ul style="list-style-type: none"> ■ Only those sites that cannot be avoided are subject to test excavation ■ ASIR forms and excavation report are completed as soon as possible
<p>ASIR forms will be completed for each site impacted by salvage and excavation works and will be submitted to the AHIMS Registrar.</p>		<p>Archaeologist</p>	<p>As soon as possible following site impact</p>	<ul style="list-style-type: none"> ■ Only those sites that cannot be avoided are subject to surface collection/test excavation ■ ASIR forms are submitted to the AHIMS Registrar
<p>All collected artefacts will be temporarily stored securely at an agreed offsite location. Following completion of artefact analysis, the artefacts will be reburied within a portion of the Project Site that is to be conserved and not impacted during the development. The reburial location will be agreed upon with the registered Aboriginal stakeholders in the field (during the salvage and test excavation) and its location shared with Heritage NSW. An AHIMS site card will be submitted to the AHIMS Registrar.</p>	<p>Design drawings</p>	<p>Archaeologist Registered Aboriginal stakeholders</p>	<p>Where possible, the artefacts will be reburied within six months of collection, or as agreed with the registered</p>	<ul style="list-style-type: none"> ■ Reburial location agreed with the registered Aboriginal stakeholders ■ An AHIMS site card submitted to the AHIMS registrar

Measure	Resources needed	Responsible Party	Timing/Frequency	Performance criteria
			Aboriginal stakeholders	
During construction				
During works, the location of all previously recorded heritage sites will be clearly marked on all construction plans for the Project Site and BoP Site Manager informed of their presence and the need to avoid disturbance.	Clearly marked construction plans	BoP CM	Ongoing and as required	<ul style="list-style-type: none"> ■ Exclusion zones maintained around heritage sites ■ Impact to heritage sites avoided
Exclusion zone fencing and signage will be inspected on a regular basis by construction staff. The results will be recorded in the weekly inspection reports. Any damaged exclusion zone fencing and signage will be repaired as soon as practicable. At the completion of construction exclusion zone fencing will be removed.	Exclusion zone plans for all work sites	BoP CM	Weekly site inspections	<ul style="list-style-type: none"> ■ Exclusion zones maintained around heritage sites ■ Impact to heritage sites avoided
<p>Ongoing consultation with RAPs for the project will occur during the construction of the Project. The triggers for consultation with the RAPs during construction include:</p> <ul style="list-style-type: none"> ■ inspection of the realigned underground cable route prior to construction; ■ any additional heritage assessments for changes in project scope; ■ Unexpected Finds Protocol being implemented during works; ■ endorsement of the heritage information to be contained in the induction package; and ■ representatives of one of the RAPs that provide the service may be employed to undertake an induction session for all major contractors prior to works commencing. 		BoP CM	Ongoing and as required	<ul style="list-style-type: none"> ■ Maintain consultation with Aboriginal stakeholders
Management of previously unrecorded Aboriginal heritage				
In accordance with the Unexpected Finds Protocol, if previously unrecorded Aboriginal heritage evidence is identified within the Project Site, this evidence will be subject to temporary protection, recorded and appropriate management strategies implemented, in consultation with registered Aboriginal stakeholders as follows:		BoP PM and CM	As required	<ul style="list-style-type: none"> ■ Unexpected Finds Protocol is followed (<i>Figure 7.1</i>) ■ Only those sites that cannot be avoided are subject to surface collection/test excavation

Measure	Resources needed	Responsible Party	Timing/Frequency	Performance criteria
<ul style="list-style-type: none"> ■ if during clearing or construction works Aboriginal artefacts are recovered a qualified archaeologist should at this time be contacted and the site recorded and assessed in consultation with the RAPs; ■ once recording has occurred to the satisfaction of the RAPs, the BoP PM and CM can authorise that salvage can be undertaken and works (with minimal disruption) can continue; ■ all collected artefacts will temporarily be stored securely at an agreed offsite location. Following completion of artefact analysis, the artefacts will be reburied within the Project Site (or nearby area) that will not be impacted by the Project or any future development; and ■ AHIMS sites cards and/or ASIR form will be completed and submitted to the AHIMS Registrar as soon as practicable. 				<ul style="list-style-type: none"> ■ An AHIMS site card submitted to the AHIMS registrar ■ Maintain consultation with Aboriginal stakeholders
Should any human skeletal remains be identified, Crookwell 3 Development Pty Ltd and the landowner will comply with statutory obligations and will consider the special needs of the Aboriginal community should those remains be identified as Aboriginal.		BoP PM Landowner	As required	<ul style="list-style-type: none"> ■ Unexpected Finds Protocol is followed (<i>Figure 7.2</i>)
<p>If human remains are suspected the site supervisor is to notify the NSW Police immediately. If the human remains are potentially Aboriginal Ancestral remains Heritage NSW must be notified on 131 555 as soon as practicable and provide available details of the remains and their location.</p> <p>An Aboriginal community representative must be present where it is reasonably suspected burials or human remains may be encountered.</p> <p>Works should not resume until the Police and/or Heritage NSW have given authority in writing and approved a management plan.</p>		BoP PM Landowner	As required	<ul style="list-style-type: none"> ■ Unexpected Finds Protocol is followed (<i>Figure 7.2</i>) ■ Only those sites that cannot be avoided are subject to surface collection/test excavation ■ An AHIMS site card submitted to the AHIMS registrar ■ Maintain consultation with Aboriginal stakeholders

Measure	Resources needed	Responsible Party	Timing/Frequency	Performance criteria
<p>Audit and review</p> <p>This HMP should be considered a living document, with addendums to be prepared to ensure that all sites are reported and managed in accordance with this plan.</p> <p>Figures 1.1 and 4.1 are to be updated following final design or any future design changes to insure indicative turbine locations etc. are current and up to date.</p> <p>Continued updating of HMP mapping and all operational mapping will be required in order to identify the location/s of any unexpected finds that are confirmed to be Aboriginal objects so as to not inadvertently impact the Aboriginal objects with any future activities.</p> <p>In addition to the above, an internal review of this HMP may be conducted in response to:</p> <ul style="list-style-type: none"> ■ an incident recorded as a result of the operations that potentially affects any known cultural heritage site; ■ a significant change in concept plan that may affect the implementation of this management plan; ■ statutory requirements or directions/conditions of approvals requiring such action; or ■ recommendations as a result of internal or external audits. 		BoP PM	As required	

Figure 7.1 Unexpected Finds Protocol

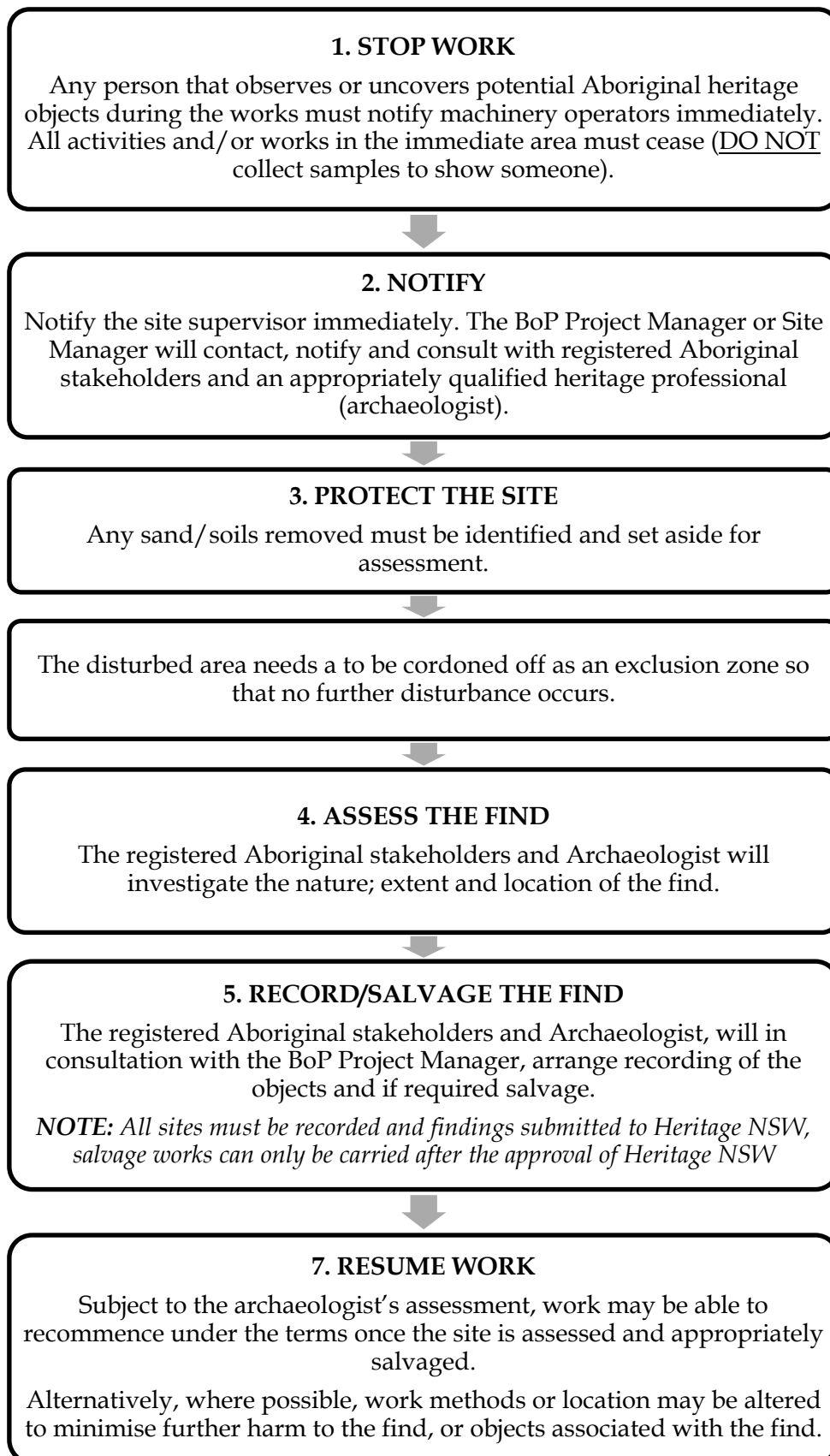
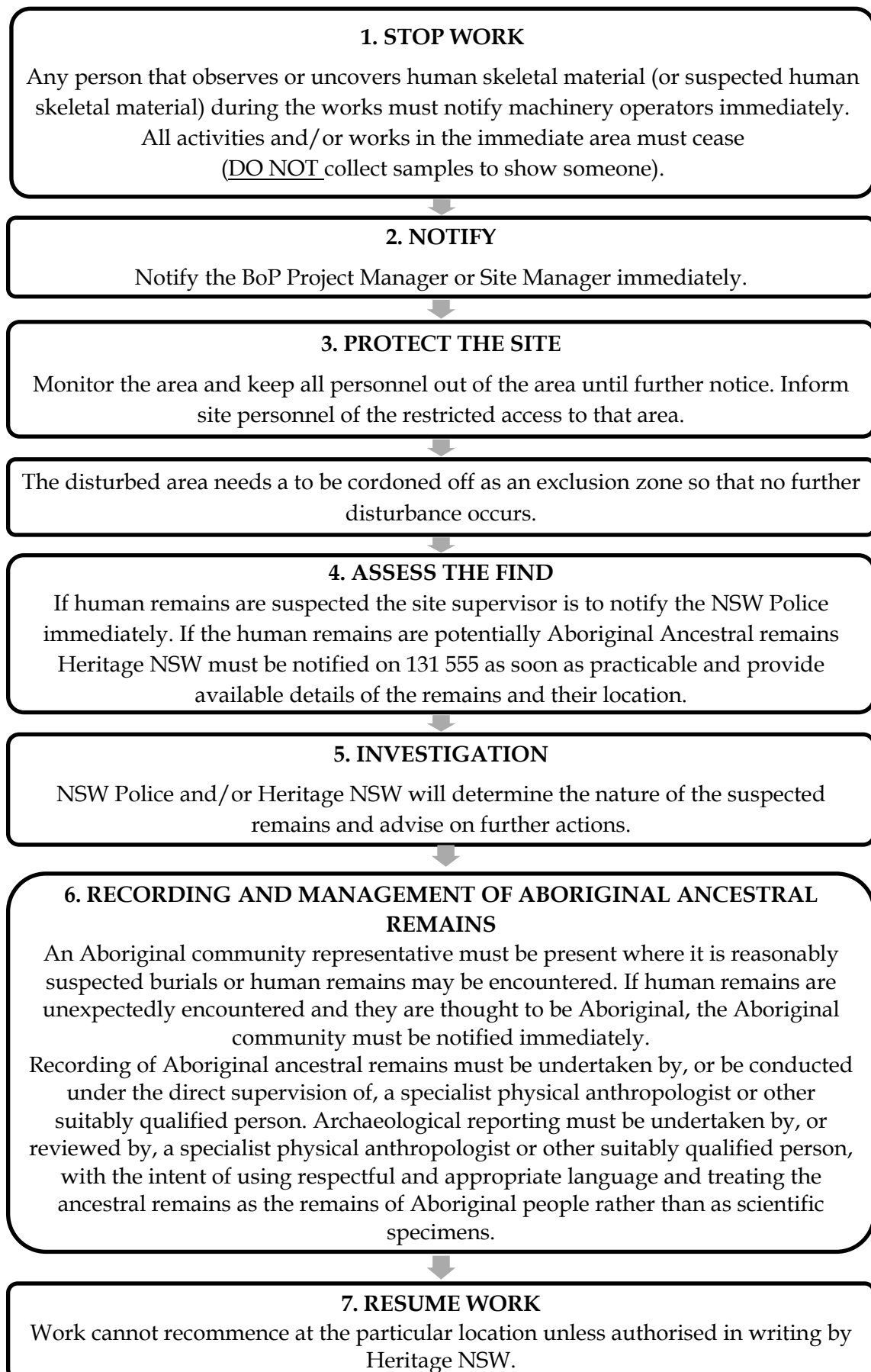


Figure 7.2 Protocol for Discovery of Skeletal Remains



7.3 Temporary Storage Location

All collected artefacts will be temporarily stored securely at an agreed off-site location. Following completion of artefact analysis, the artefacts will be reburied within a portion of the Project Site that is to be conserved and not impacted during the development. The reburial location will be agreed upon with the registered Aboriginal stakeholders and its location shared with Heritage NSW.

Artefacts recovered during salvage and excavation should be returned to country within a reasonable timeframe (i.e. within six months of completion of construction) that is agreed amongst the registered Aboriginal stakeholders, if circumstances require that this be extended, registered Aboriginal stakeholders must be consulted and a new timeframe agreed upon.

8. COMPLIANCE MANAGEMENT

8.1 Roles and Responsibilities

The Project Management organisational structure and overall roles and responsibilities are detailed in the Client's Environmental Management Strategy (EMS).

8.2 Monitoring and Inspection

Inspections of sensitive areas, exclusion fencing and activities with the potential to impact Aboriginal heritage will occur for the duration of construction.

Monitoring and inspections of all heritage measures implemented during the design and construction phase would continue throughout the life of the Project as detailed in *Table 8.1* below.

Table 8.1 Schedule for Monitoring, Reporting and Inspections

Heritage Management Measure	Monitoring Method	Frequency	Responsible Party	Performance Criteria
Heritage Induction and Training	Environmental performance audits	As scheduled in Section 5.1 of the EMS	BoP PM and CM	<ul style="list-style-type: none"> ■ ensure all site contractors and visitors receive suitable heritage inductions prior to carrying out any development on site ■ training and pre-start meeting records are maintained ■ cultural heritage information contained within the induction material has been endorsed for sharing by the registered Aboriginal stakeholders
Notify regulatory authorities of any incidents	Environmental performance audits	As scheduled in Section 5.1 of the EMS	BoP PM and CM	<ul style="list-style-type: none"> ■ copies of all notifications and evidence of consultation are retained
Define known heritage sites and areas of constraint	Environmental performance audits	As scheduled in Section 5.1 of the EMS	BoP PM and CM	<ul style="list-style-type: none"> ■ design drawings ■ exclusion zone plans for all work sites ■ impact to heritage sites avoided ■ final detailed design submitted to DPIE
Micro-siting of WTG	Environmental performance audits	As scheduled in Section 5.1 of the EMS	BoP PM and CM	<ul style="list-style-type: none"> ■ design drawings ■ impact to heritage sites avoided ■ final detailed design submitted to DPIE
Prior to construction activities, all known heritage sites and any newly recorded sites within 100 m from any proposed infrastructure or construction activity will be fenced (plus	Environmental performance audits	As scheduled in Section 5.1 of the EMS	BoP PM and CM	<ul style="list-style-type: none"> ■ exclusion zones maintained around heritage sites ■ impact to heritage sites avoided

Heritage Management Measure	Monitoring Method	Frequency	Responsible Party	Performance Criteria
minimum 10 m buffer area).				
Monitoring of fencing during construction.	Weekly inspections	Weekly	BoP CM	<ul style="list-style-type: none"> ■ exclusion zones maintained around heritage sites ■ impact to heritage sites avoided
ASIR forms will be completed for each site impacted by salvage and excavation works.	Environmental performance audits	As scheduled in Section 5.1 of the EMS	Archaeologist	<ul style="list-style-type: none"> ■ only those sites that cannot be avoided are subject to surface collection/test excavation ■ ASIR forms are submitted to the AHIMS Registrar (each site impacted) ■ an AHIMS site card submitted to the AHIMS registrar (reburial location)
Discovery of unknown sites	Environmental performance audits	As scheduled in Section 5.1 of the EMS	BoP PM and CM	<ul style="list-style-type: none"> ■ Unexpected Finds Protocol is followed ■ only those sites that cannot be avoided are subject to surface collection/test excavation ■ an AHIMS site card submitted to the AHIMS registrar ■ maintain consultation with Aboriginal stakeholders

8.3 Record Keeping and Auditing

All records would be stored safely and be readily accessible for auditing. The BoP Compliance Manager is responsible for maintaining all environmental management documents as current at the point of use.

Types of records relevant to this HMP include:

- monitoring, inspection and compliance reports/records;
- correspondence with public authorities and registered Aboriginal stakeholders;
- induction and training records;
- reports on unexpected finds and any unexpected impacts to heritage; and
- records of complaints and follow-up action.

8.4 Review and Continuous Improvement of HMP

This HMP should be considered a living document, with addendums to be prepared to ensure that all sites are reported and managed in accordance with this plan. The HMP will be updated following any design changes, after the completion of the construction test excavations and salvage, or when any new Aboriginal sites are recorded under the unexpected finds procedure or during any future development.

Continuous improvement of this plan will be achieved by the ongoing evaluation of heritage management performance against heritage policies, objectives and targets to identify opportunities for improvement. This HMP may be audited (if required) under the scope of any external environmental compliance audits.

In addition to the above, an internal review of this HMP may be conducted in response to:

- an incident recorded as a result of the operations that potentially affects any known cultural heritage site;
- a significant change in concept plan that may affect the implementation of this management plan;
- statutory requirements or directions/conditions of approvals requiring such action; or
- recommendations as a result of internal or external audits.

Any revisions to the HMP will not be implemented until the registered Aboriginal stakeholders have been provided notification of and a minimum 15 working days to comment on the proposed amendments.

Continued updating of HMP mapping and all operational mapping will be required in order to identify the location/s of any unexpected finds that are confirmed to be Aboriginal objects so as to not inadvertently impact the Aboriginal objects with any future activities.

9. REFERENCES

Anderson Environmental Consultants (2010) *Indigenous and Non-Indigenous Archaeological Heritage for Proposed Crookwell 3 Wind Farm*. Report for Union Fenosa.

DECCW (2010) *Aboriginal Cultural Heritage Consultation Requirements for Proponents*.

DECCW (2010) *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*.

ERM (2014) *Crookwell 3 Wind Farm: Supplementary Aboriginal and Historical Cultural Heritage Assessment*. Report for Crookwell Development Pty Ltd.

ERM (2021) *Crookwell 3 Wind Farm: Supplementary Aboriginal and Historical Cultural Heritage Assessment*. Report for Crookwell 3 Development Pty Ltd.

ERM (2021) *Environmental Management Strategy: Crookwell 3 Wind Farm*. Report for Crookwell 3 Development Pty Ltd.

Appendix A DPIE ENDORSEMENT LETTER



Guillermo Alonso
Director
Crookwell 3 Developments Pty Ltd
24 Marcus Clark Street
Canberra, ACT, 2601

30/04/2021

Dear Mr. Alonso

**Crookwell 3 Wind Farm (SSD-6695)
Heritage Management Plan Specialist Endorsement**

I refer to your request (SSD-6695-PA-1) for the Planning Secretary's approval of suitably qualified and experienced persons to prepare the Heritage Management Plan for the Crookwell 3 Wind Farm (SSD-6695).

The Department has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Planning Secretary approves the appointment of Elspeth Mackenzie, Erin Finnegan and Karie Bradfield to prepare the Heritage Management Plan.

If you wish to discuss the matter further, please contact Wayne Jones on 6575 3406.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Nicole Brewer', with a horizontal line extending to the right.

Nicole Brewer
Director
Energy Assessments

As nominee of the Planning Secretary

Appendix B ONGOING CONSULTATION

Date	Consultation type	Heritage NSW requirement	Consult stage	RAP/Agency	Contact person	Description
27/01/21	Letter	4.1.2	1	ERM contacted Heritage NSW		Letter to identify Aboriginal parties. Requested response no later C.O.B. 16/02/2021
27/01/21	Letter	4.1.2	1	ERM contacted Pejar Local Aboriginal Land Council (PLALC)		Letter to identify Aboriginal parties. Requested response no later C.O.B. 16/02/2021
27/01/21	Letter	4.1.2	1	ERM contacted Office of the Registrar		Letter to identify Aboriginal parties. Requested response no later C.O.B. 16/02/2021
27/01/21	Letter	4.1.2	1	ERM contacted Upper Lachlan Shire Council (ULSC)		Letter to identify Aboriginal parties. Requested response no later C.O.B. 16/02/2021
27/01/21	Letter	4.1.2	1	ERM contacted Native Title Tribunal (NNTT)		Letter to identify Aboriginal parties. Requested response no later C.O.B. 16/02/2021
27/01/21	Letter	4.1.2	1	ERM contacted NTSCORP Ltd		Letter to identify Aboriginal parties. Requested response no later C.O.B. 16/02/2021
27/01/21	Letter	4.1.2	1	ERM contacted South East Local Land Services (SELLS)		Letter to identify Aboriginal parties. Requested response no later C.O.B. 16/02/2021
28/01/21	e-mail	4.1.2	1	ULSC	Tina Dodson	Identified Aboriginal parties: 1 (PLALC)
01/02/21	Letter/e-mail	4.1.2	1	Heritage NSW	Barry Gunther	Identified Aboriginal parties: 18
01/02/21	e-mail	4.1.2	1	NNTT		Directed to Geospatial Search Form
02/02/21	e-mail	4.1.2	1	SELLS	Kerrie Friend	Identified Aboriginal parties: 1 (PLALC)
03/02/21	e-mail	4.1.2	1	Gundungurra Tribal Council	Sharon Brown	Registered for the project
03/02/21	Letter/e-mail	4.1.2	1	Office of the Registrar	Rachel Rewiri	No Registered Aboriginal Owners Identified Aboriginal parties: 1 (PLALC)
08/02/21	e-mail	4.1.2	1	NNTT		Geospatial search request form
10/02/21	e-mail	4.1.2	1	NNTT		Geospatial search results: no Native Title applications; Gundungurra Area Agreement ILUA (NI2014/001)
NA		4.1.2	1	PLALC		Did not respond.
NA		4.1.2	1	NTSCORP		Do not provide lists of possible stakeholders
16th February 2021 C.O.B. Request for groups to consult with closed						
16/02/21	Public notice	4.1.3	1	All registered Aboriginal parties (RAPs)		Public notice in Crookwell Gazette and requested registration no later than 03/03/2021
17/02/21	Public notice	4.1.3	1	All registered Aboriginal parties (RAPs)		Public notice in Goulburn Post and requested registration no later than 03/03/2021
17/02/21	Letter & email	4.1.3, 4.1.4, 4.1.5, 4.2.1	1	All RAPs	Those provided from sources above	Formal letter to identified RAPs. Letter requested registration of interest in the project, project outline, and map. Required registration by C.O.B. 03/03/2021
17/02/21	e-mail	4.1.7, 4.1.8	1	Freeman & Marx Pty Ltd	Clive Freeman	Registered for the project
17/02/21	Phone	4.1.7, 4.1.8	1	Kalari Ngunnawal Pajong Wallabalooa Descendants	Rebecca Ingram	Registered for the project
17/02/21	Phone	4.1.7, 4.1.8	1	Kalari Nunawal Descendants	Lavinus Ingram	Registered for the project
19/02/21	Letter & email	4.1.7, 4.1.8	1	Yurwang Gundana Cultural Heritage Services	Dean Bell	Registered for the project

Date	Consultation type	Heritage NSW requirement	Consult stage	RAP/Agency	Contact person	Description
20/02/21	email	4.1.7, 4.1.8	1	Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell	Registered for the project – does not want details forwarded to NSW Heritage or PLALC
1/03/21	email	4.1.7, 4.1.8	1	Buru Ngunawal Aboriginal Corporation	Wally Bell	Registered for the project – does not want details forwarded to PLALC
3th March 2021 C.O.B. Registration for project closed						
4/03/21	email & letter	1; s 4.1.6	1	Heritage NSW	Barry Gunther	Letter notifying Heritage NSW of RAPs
4/03/21	email & letter	1; s 4.1.6	1	PLALC		Letter notifying PLALC of RAPs
4/03/21	e-mail	4.2.1, 4.2.2, 4.2.3, 4.3.1, 4.3.2, 4.3.3, 4.3.4, 4.3.5, 4.3.6, 4.3.7	2 & 3	All RAPs		Proposed methodology sent to 7 identified RAPs. A response the proposed methodology was required by C.O.B. 1/04/21.
22/03/21	e-mail	4.2.1, 4.2.2, 4.2.3, 4.3.1, 4.3.2, 4.3.3, 4.3.4, 4.3.5, 4.3.6, 4.3.7	2 & 3	Yurwang Gundana Cultural Heritage Services	Merekai Bell	Methodology accepted and availability for April confirmed.
25/03/21	e-mail	4.2.1, 4.2.2, 4.2.3, 4.3.1, 4.3.2, 4.3.3, 4.3.4, 4.3.5, 4.3.6, 4.3.7	2 & 3	Freeman & Marx Pty Ltd	Clive Freeman	Confirmed availability for April.
26/03/21	e-mail		3	All RAPs		All RAPs sent invitation to attend and participate in the survey and HMP workshop.
26/03/21	e-mail		3	Freeman & Marx Pty Ltd	Clive Freeman	Confirmation of details for survey team requirements.
29/03/21	e-mail		3	Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell	Confirmation of attendance at survey, provided insurances, rates, and confirmation that their own vehicle would be used.
29/03/21	Phone		3	Kalari Ngunawal Pajong Wallabaloa Descendants	Rebecca Ingram	Confirmation of representative to attend survey and provided rates. Further discussion regarding arrangements.
29/03/21	Phone		3	Kalari Nunawal Descendants	Lavinus Ingram	Confirmation of representative to attend survey. Further discussion regarding arrangements.
29/03/21	e-mail		3	Yurwang Gundana Cultural Heritage Services	Merekai Bell	Confirmation of attendance at survey, provided insurances and rates.
30/03/21	e-mail		3	Freeman & Marx Pty Ltd	Clive Freeman	Confirmation of details for survey team requirements, provided insurances.
1 April 2021 C.O.B. Response to methodology closed						
1/04/21	e-mail		3	All RAPs		All RAPs supplied with meeting details and survey requirements.
3/04/21	e-mail		3	Yurwang Gundana Cultural Heritage Services	Merekai Bell	Additional information regarding survey requested and supplied on 6/4/21.
4/04/21	e-mail		3	Buru Ngunawal Aboriginal Corporation	Wally Bell	Confirmation of details for survey team requirements and advice that Karen Denny will attend.

Date	Consultation type	Heritage NSW requirement	Consult stage	RAP/Agency	Contact person	Description
6/04/21	Phone		3	Kalari Ngunnawal Pajong Wallabalooa Descendants & Kalari Nunawal Descendants	Rebecca Ingram & Lavinus Ingram	Multiple calls to confirm survey arrangements.
6/04/21	e-mail		3	Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell	Confirmation of attendance.
7 April 2021 Field work						
8/04/21	e-mail		3	All RAPs who attended the fieldwork		All RAPs thanked for attending fieldwork and provided with details for invoicing.
19/04/21	e-mail	4.3.5; 4.3.6; 4.3.7 4.4.1; 4.4.2; 4.4.3	3 & 4	All RAPs		Draft supplementary assessment report and HMP sent to all RAPs for review. Any comments were required by C.O.B. 17/05/2021.
10/05/21	e-mail	4.3.5; 4.3.6; 4.3.7 4.4.1; 4.4.2; 4.4.3	3 & 4	Yurwang Gundana Cultural Heritage Services	Merekai Bell	Confirmed acceptance of draft HMP.
13/05/21	e-mail	4.3.5; 4.3.6; 4.3.7 4.4.1; 4.4.2; 4.4.3	3 & 4	All RAPs		Reminder that any comments were required by 17/05/2021.
17 May 2021 C.O.B. Response to Draft Report Closed						
18/05/21	e-mail	4.3.5; 4.3.6; 4.3.7 4.4.1; 4.4.2; 4.4.3	3 & 4	Thunderstone Aboriginal Cultural Services Pty Ltd	Tyronne Bell	Confirmed that had no comments on draft supplementary assessment report or HMP.
21/05/21	e-mail	4.4.4; 4.4.5	4	All RAPs		Final report sent to all RAPs
21 May 2021 C.O.B. Assessment Complete						



Our ref: DOC21/450249-2

Mr Guillermo Alonso
Director
Crookwell 3 Developments Pty Ltd
Suite 4, Level 3
24 Marcus Clarke Street
Canberra, ACT, 2601
via email: galonsoc@globalpower-generation.com

Dear Mr Alonso,

SSD 6695 Crookwell 3 Wind Farm – draft Heritage Management Plan

Thank you for providing Heritage NSW with the opportunity to comment on the draft Heritage Management Plan (HMP) for the Crookwell 3 Wind Farm on 2 June 2021. Schedule 3 Condition 29 of the Development Consent for SSD 6695, dated 14 October 2020, requires Heritage NSW to be consulted as part of the preparation of the HMP.

Heritage NSW has reviewed the draft HMP (marked version 2.0 and dated 21 May 2021) and provides detailed comments in **Attachment A** in relation to Aboriginal cultural heritage matters only. Based on our review, we recommend a number of revisions to the HMP. We also recommend the HMP consider and describe opportunities to reassess impacts to Aboriginal sites and objects after the completion of test excavations. A clear commitment is needed to consider footprint redesign and/ or micrositing of infrastructure to avoid any significant sites that may be uncovered following completion of the assessment process.

Heritage NSW is available to discuss our comments and HMP process further if required. If you have any questions regarding the above advice please contact Sarah Robertson, Archaeologist, Aboriginal Cultural Heritage Regulation – South, Heritage NSW on (02) 6229 7088 or via email at sarah.robertson@environment.nsw.gov.au.

Yours sincerely

Jackie Taylor
Senior Team Leader, Aboriginal Cultural Heritage Regulation - South
Heritage NSW
30 June 2021

Attachment A: Detailed Heritage NSW comments on draft Heritage Management Plan for SSD 6695 Crookwell 3 Wind Farm – Version 2.0, dated 21 May 2021

HMP section	Issue/ Comment	Recommended Action
Whole of report	The site names throughout the report do not have corresponding AHIMS numbers.	Please include AHIMS numbers for all sites discussed in the report.
1.	Heritage NSW has not been provided with a copy of the Supplementary ACHA completed in 2021.	To note.
1.1	The consent conditions require minimisation of impacts to Aboriginal cultural heritage sites.	Define what is meant by 'minimise impacts'.
2.1	The SSD 6695 Development Consent conditions includes requirements for a number of other environmental plans to be prepared. It is not clear from this section how the HMP may interact with other plans required under the Consent.	Outline how the HMP interacts with other environmental plans to ensure that Aboriginal cultural heritage is considered.
5, Table 5.1	The consent conditions require test excavation and salvage of various Aboriginal cultural heritage sites.	Clarify the difference between test excavation and salvage.
6.3 Subsurface Testing and salvage	<p>The HMP would benefit from a section providing a general outline of the reasoning and need for test excavation/ salvage and surface collection and relating this to the methodology.</p> <p>What opportunity is there to avoid impacts to sites based on the results of the test excavations? This section or the text in the HMP itself needs to include criteria for considering the results of the test excavations prior to impact by the project.</p> <p>This section must explain the circumstances under which the results of the test excavations will trigger the requirement for salvage excavations.</p>	<p>Include an additional section to provide a general outline of why test excavation/ salvage and surface collection are required.</p> <p>Update this section to consider avoidance and/ or redesign of the project footprint if the results of the test excavations is considered significant.</p> <p>Update this section to define when salvage excavations will be required.</p>
6.3.2. – test excavation	<p>Test pit transects must occur along the entirety of the impact area within areas of moderate and high potential.</p> <p>Archaeological investigations at Crookwell 2 wind farm identified that intervals between test pits</p>	<p>Update this section as required.</p> <p>Change test pit interval to 5m.</p>

HMP section	Issue/ Comment	Recommended Action
	<p>must be small interval in order to identify sites in this landscape (Past Traces 2018:63).</p> <p>Dot point 6 – 5mm was the minimum sieve size used at Crookwell 2 wind farm.</p> <p>Dot point 7 – Where additional squares are required, how will an appropriate number of additional squares be determined?</p> <p>What is the trigger for salvage excavation?</p>	<p>Change minimum sieve size to 5mm to ensure results are comparable with those at Crookwell 2 wind farm.</p> <p>Update section to specify how many additional squares will be test excavated around high artefact concentrations/significant features.</p> <p>Update section to define salvage excavation would be more appropriate than test pits.</p>
6.3.4	This section should be updated to include the need for updating the HMP mapping, and all operational maps, with the location of reburied Aboriginal objects to ensure they are not inadvertently impacted by any other activities.	Update this section to require updated mapping of the artefact reburial location.
6.3.5 – Excavation report	The report should comment on the effectiveness of the test pit spacing used as well as any other mechanisms used such as the trigger for excavating additional pits.	Update section as required.
6.4 – Archaeological excavation	<p>Please rename this ‘salvage excavation’ to avoid confusion.</p> <p>Please define ‘significant cultural deposits’ and ‘greater research potential’.</p> <p>We do not believe that salvage should cease when a statistically valid sample has been retrieved as salvage is the only mitigation measure being applied. It is therefore appropriate to retrieve as large a sample as possible within the impact area.</p>	<p>Update section as required.</p> <p>Update section as required.</p> <p>Consider proposed methodology and update section as required.</p>
7.3 – Temporary storage	Consider including a timeframe for reburial.	Provide a timeframe for when reburial needs to occur by.
Table 7.1 page 49 Management of previously	This section would benefit by clarifying who makes the final decision about approving impacts to new finds.	Clarify approval role.

HMP section	Issue/ Comment	Recommended Action
unrecorded Aboriginal heritage	Will new Aboriginal sites be added to the Development Consent if more are found during works?	Clarify whether new sites will be added to the Development Consent.
Table 7.1 – page 46, administrative measures	Consider including a refresher component for induction training if needed following any incident or future revision of the HMP. Heritage NSW supports the involvement of RAPs in any inductions.	Update this section as required.
8.4	This section should provide additional detail on when the HMP would be updated – such as if new sites are found, following completion of final design etc.	Update this section to provide additional detail and timing for updates.
8.4 and Table 7.1	This section should be updated to include the need for updating the HMP mapping, and all operational maps, with the location of any unexpected finds of Aboriginal objects to ensure the location/s is not inadvertently by any other activities.	Update this section to require updated mapping of unexpected finds that are confirmed as Aboriginal objects.
Figures F1-1 and F4-1 and table 7.1	The mapping in these sections is based on indicative locations for turbines. These sections should outline a process for updating the maps following final design to ensure indicative turbine locations are up to date.	Revise these sections to recommend Figures F1-1 and F4-1 are updated following final design to ensure indicative turbine locations etc. are up to date.

References

Past Traces Heritage Consultants (2018) *Crookwell 2 Wind Farm Monitoring and Salvage Program Compliance Report*. Report prepared for Crookwell Development Pty Ltd and dated 19 March 2018.

Table B.1 Heritage NSW Comments of the Draft HMP

HMP Section	Heritage NSW Comment	Recommended Action	Response
Whole of report	The site names throughout the report do not have corresponding AHIMS numbers.	Please include AHIMS numbers for all sites discussed in the report.	AHIMS numbers have been added to the HMP wherever site names are included.
1.	Heritage NSW has not been provided with a copy of the Supplementary ACHA completed in 2021.	To note.	This was provided to DPIE through the Major Projects portal to be shared with Heritage NSW, however has now also been supplied directly to Heritage NSW.
1.1	The consent conditions require minimisation of impacts to Aboriginal cultural heritage sites.	Define what is meant by 'minimise impacts'.	This definition is provided in Table 1.1 against the relevant condition (26).
2.1	The SSD 6695 Development Consent conditions includes requirements for a number of other environmental plans to be prepared. It is not clear from this section how the HMP may interact with other plans required under the Consent.	Outline how the HMP interacts with other environmental plans to ensure that Aboriginal cultural heritage is considered.	This information has been added as Section 1.4.
5, Table 5.1	The consent conditions require test excavation and salvage of various Aboriginal cultural heritage sites.	Clarify the difference between test excavation and salvage.	Additional wording has been added to Section 5 to clarify the difference.
6.3 Subsurface Testing and Salvage	<p>The HMP would benefit from a section providing a general outline of the reasoning and need for test excavation/ salvage and surface collection and relating this to the methodology.</p> <p>What opportunity is there to avoid impacts to sites based on the results of the test excavations? This section or the text in the HMP itself needs to include criteria for considering the results of the test excavations prior to impact by the project.</p> <p>This section must explain the circumstances under which the results of the test excavations will trigger the requirement for salvage excavations.</p>	<p>Include an additional section to provide a general outline of why test excavation/ salvage and surface collection are required.</p> <p>Update this section to consider avoidance and/ or redesign of the project footprint if the results of the test excavations is considered significant.</p> <p>Update this section to define when salvage excavations will be required.</p>	<p>A new paragraph added at the beginning of Section 6 to outline the reason for these activities.</p> <p>Section 6.3.2 has been updated to clarify the process for micro-siting of infrastructure in this circumstance.</p> <p>Section 6.3.2 and 6.4 have been updated to clarify the triggers for salvage excavation.</p>
6.3.2 Test Excavation	Test pit transects must occur along the entirety of the impact area within areas of moderate and high potential.	Update this section as required.	Section 6.3.2 has been updated accordingly.

HMP Section	Heritage NSW Comment	Recommended Action	Response
	<p>Archaeological investigations at Crookwell 2 wind farm identified that intervals between test pits must be small interval in order to identify sites in this landscape (Past Traces 2018:63).</p> <p>Dot point 6 – 5mm was the minimum sieve size used at Crookwell 2 wind farm.</p> <p>Dot point 7 – Where additional squares are required, how will an appropriate number of additional squares be determined?</p> <p>What is the trigger for salvage excavation?</p>	<p>Change test pit interval to 5m.</p> <p>Change minimum sieve size to 5mm to ensure results are comparable with those at Crookwell 2 wind farm.</p> <p>Update section to specify how many additional squares will be test excavated around high artefact concentrations/significant features.</p> <p>Update section to define salvage excavation would be more appropriate than test pits.</p>	<p>The test pit intervals changed from a maximum of 10 m to a maximum of 5 m.</p> <p>The 3mm stipulation has been removed, and the minimum sieve size now 5mm.</p> <p>The exact number of additional squares will be determined by the size/extent of site. This point has been updated to stipulate that the entire feature will be excavated or if a significant artefact site, salvage excavation will be triggered.</p> <p>Section 6.3.2 updated to define what triggers salvage excavation.</p>
6.3.4	This section should be updated to include the need for updating the HMP mapping, and all operational maps, with the location of reburied Aboriginal objects to ensure they are not inadvertently impacted by any other activities.	Update this section to require updated mapping of the artefact reburial location.	The requirement for updated mapping has been added to Section 6.3.4.
6.3.5 – Excavation Report	The report should comment on the effectiveness of the test pit spacing used as well as any other mechanisms used such as the trigger for excavating additional pits.	Update section as required.	Section 6.3.5 has been updated accordingly.
6.4 – Archaeological Excavation	<p>Please rename this ‘salvage excavation’ to avoid confusion.</p> <p>Please define ‘significant cultural deposits’ and ‘greater research potential’.</p>	<p>Update section as required.</p> <p>Update section as required.</p>	<p>Section 6.4 title has been updated to ‘6.4 Salvage Excavation’.</p> <p>Definitions have been included in Section 6.4.</p>

HMP Section	Heritage NSW Comment	Recommended Action	Response
	We do not believe that salvage should cease when a statistically valid sample has been retrieved as salvage is the only mitigation measure being applied. It is therefore appropriate to retrieve as large a sample as possible within the impact area.	Consider proposed methodology and update section as required.	Section 6.4 has been updated to clarify that entire cultural features will be excavated, and excavation of significant artefact sites will continue in the impacted area until the majority of the site has been uncovered.
7.3 – Temporary Storage	Consider including a timeframe for reburial.	Provide a timeframe for when reburial needs to occur by.	Section 7.3 has been updated to state that the date of reburial will be agreed with the RAPs with the aim to occur within 6 months of the completion of construction.
Table 7.1 – page 49, Management of previously unrecorded Aboriginal Heritage	<p>This section would benefit by clarifying who makes the final decision about approving impacts to new finds.</p> <p>Will new Aboriginal sites be added to the Development Consent if more are found during works?</p>	<p>Clarify approval role.</p> <p>Clarify whether new sites will be added to the Development Consent.</p>	<p>Table 7.1 updated to clarify roles and responsibilities.</p> <p>This is not the standard procedure as the Development Consent considers that any new Aboriginal sites will be managed in accordance with the HMP and therefore do not need to be added.</p>
Table 7.1 – page 46, administrative measures	Consider including a refresher component for induction training if needed following any incident or future revision of the HMP. Heritage NSW supports the involvement of RAPs in any inductions.	Update this section as required.	Table 7.1 has been updated to include the need for refresher training.
8.4	This section should provide additional detail on when the HMP would be updated – such as if new sites are found, following completion of final design etc.	Update this section to provide additional detail and timing for updates.	Section 8.4 has been updated accordingly.
8.4 and Table 7.1	This section should be updated to include the need for updating the HMP mapping, and all operational maps, with the location of any unexpected finds of Aboriginal objects to ensure the location/s is	Update this section to require updated mapping of unexpected finds that are confirmed as Aboriginal objects.	Table 7.1 and Section 8.4 have been updated to include continued mapping update requirements.

HMP Section	Heritage NSW Comment	Recommended Action	Response
	not inadvertently by any other activities.		
Figures F1-1 and F4-1 and Table 7.1	The mapping in these sections is based on indicative locations for turbines. These sections should outline a process for updating the maps following final design to ensure indicative turbine locations are up to date.	Revise these sections to recommend Figures F1-1 and F4-1 are updated following final design to ensure indicative turbine locations etc. are up to date.	Table 7.1-audit and review has been updated to include requirements for updating figures.

Appendix C STANDARD OPERATING PROCEDURE

Crookwell 3 Windfarm Project

CULTURAL HERITAGE PROTECTION

Standard Operating Procedure

PURPOSE AND SCOPE

Cultural heritage items are places which contribute to an understanding of who we are and where we came from. They contribute to our sense of identity as individuals and our sense of continuity as a community. Aboriginal sites are a very important part of Australia's cultural heritage. To Aboriginal people, the sites provide a direct link with their traditional culture. It is important to preserve as many of them as possible. They are places which Crookwell 3 Development Pty Ltd is committed to protecting.

Aboriginal cultural heritage is primarily protected by the *National Parks and Wildlife Act 1974* (NPW Act) and consists of places and items that are of significance to Aboriginal people because of their traditions, observances, lore, customs, beliefs and history. It provides evidence of the lives and existence of Aboriginal people before European settlement through to the present. Aboriginal cultural heritage is dynamic and may comprise physical (tangible) or non-physical (intangible) elements.

Aboriginal cultural heritage includes things made and used in traditional societies, such as stone tools, art sites and ceremonial or burial grounds. It also includes more contemporary and/or historical elements such as old mission buildings, massacre sites and cemeteries. Tangible heritage is situated in a broader cultural landscape and needs to be considered in that context and in a holistic manner.

It also relates to the connection and sense of belonging that people have with the landscape and each other. It recognises that Aboriginal people understand cultural heritage and cultural practices as being part of both the past and the present and that cultural heritage is kept alive and strong by being part of everyday life.

Cultural heritage is not confined to physical sites; it also includes peoples' memories, storylines, ceremonies, language and 'ways of doing things' that continue to enrich local knowledge about the cultural landscape. It involves teaching and educating younger generations. It is also about learning and looking after cultural traditions and places, and passing on knowledge. It is enduring but also changing. It is ancient but also new. Aboriginal cultural knowledge provides crucial links between the past and present and therefore represents an essential part of the identities of Aboriginal people and all Australians.

This Standard Operating Procedure (SOP) is essentially an unexpected finds procedure which sets out the key steps that will apply to works undertaken within the Crookwell 3 Windfarm Project Area should a suspected cultural heritage place, site or item, be encountered during works. It forms part of the Crookwell 3 Windfarm detailed Heritage Management Plan and is designed to prevent any damage or loss to heritage or cultural places and objects which would result in loss of cultural, historic and educational value to the site and to the community. This SOP applies to all Crookwell 3 Development personnel, staff and contractors, including site visitors.

PROCEDURE

<p>Avoidance Procedure</p>	<p>Twenty-seven Aboriginal heritage sites and one Potential Archaeological Deposit (PAD) site were recorded during the field surveys (Anderson 2010; ERM 2014; ERM 2021). These sites mostly comprised of stone artefacts including isolated finds or stone artefact scatters. Avoidance of these heritage sites is the ideal outcome. The design of facilities and work must be sited to avoid known heritage sites where possible. Subject to further detailed design, only those sites that cannot be avoided will be subject to test excavations and /or salvage in accordance with the Crookwell 3 Windfarm detailed Heritage Management Plan.</p> <p>Prior to construction activities, all known heritage sites and any newly recorded sites that will not be directly impacted by the works will be fenced (plus minimum 10 m buffer area). This area will be fenced off for the duration of the construction works and marked in the field and on all design drawings as a 'no go zone'. At the completion of construction exclusion zone fencing will be removed.</p>
<p>Unexpected (chance) Finds Procedure</p>	<p>An unexpected (chance) finds procedure will be implemented for any locations subject to soil disturbance activities, including vegetation clearing. In the event that site workers identify any potential Aboriginal heritage sites, the unexpected finds procedure shall be implemented in compliance with s89 of NP&W Act. The procedure is as follows:</p> <ol style="list-style-type: none"> 1. STOP WORK IMMEDIATELY. Any person that observes or uncovers potential Aboriginal heritage objects during the works must notify machinery operators immediately. All activities and/or works in the immediate area must cease (DO NOT collect samples to show someone); 2. NOTIFY. Notify the site supervisor immediately. The BoP Project Manager or Site Manager will contact, notify and consult with registered Aboriginal stakeholders (RAPs) and an appropriately qualified heritage professional (archaeologist); 3. AVOID DISTURBANCE of the area at and adjacent to the cultural finds; 4. PROTECT THE SITE. Any sand/soils removed must be identified and set aside for assessment. The disturbed area needs a to be cordoned off as an exclusion zone so that no further disturbance occurs (include an adequate buffer area); 5. ASSESS THE FIND. The RAPs and Archaeologist will investigate the nature; extent and location of

	<p>the find;</p> <ol style="list-style-type: none"> 6. RECORD/SALVAGE THE FIND. The RAPs and Archaeologist, will in consultation with the BoP Project Manager, arrange recording of the objects and if required salvage; and 7. RESUME WORK. Subject to the archaeologist's assessment, work may be able to recommence under the terms once the site is assessed and appropriately salvaged. Alternatively, where possible, work methods or location may be altered to minimise further harm to the find, or objects associated with the find.
<p>Discovery of Human Remains Procedure</p>	<p>In the event of the discovery of human skeletal material (or suspected human skeletal material) during Project activities, the following steps will be followed:</p> <ol style="list-style-type: none"> 1. STOP WORK IMMEDIATELY. Any person that observes or uncovers human skeletal material (or suspected human skeletal material) during the works must notify machinery operators immediately. All activities and/or works in the immediate area must cease (DO NOT collect samples to show someone); 2. NOTIFY. Notify the BoP Project Manager or Site Manager immediately; 3. PROTECT THE SITE. Monitor the area and keep all personal out of the area until further notice. Inform site personnel of the restricted access to that area. The disturbed area needs a to be cordoned off as an exclusion zone so that no further disturbance occurs (include an adequate buffer area); 4. ASSESS THE FIND. If human remains are suspected the site supervisor is to notify the NSW Police immediately. If the human remains are potentially Aboriginal Ancestral remains Heritage NSW must be notified on 131 555 as soon as practicable and provide available details of the remains and their location; 5. INVESTIGATION. NSW Police and/or Heritage NSW will determine the nature of the suspected remains and advise on further actions; 6. RECORDING AND MANAGEMENT OF ABORIGINAL ANCESTRAL REMAINS. An Aboriginal community representative must be present where it is reasonably suspected burials or human remains may be encountered. If human remains are unexpectedly encountered and they are thought to be Aboriginal, the Aboriginal community must be notified immediately. Recording of Aboriginal ancestral remains must be undertaken by, or be conducted under the direct supervision of, a specialist physical anthropologist or other suitably qualified person. Archaeological reporting must be undertaken by, or reviewed by, a specialist physical anthropologist or other suitably qualified person, with the intent of using respectful and appropriate language and treating the ancestral remains as the remains of Aboriginal people rather than as scientific specimens; and 7. RESUME WORK. Work cannot recommence at the particular location unless authorised in writing by Heritage NSW.
<p>Cultural Awareness Training</p>	<p>In order to comply with best practice principles, all employees and subcontractors will undergo environmental awareness training as part of the site induction to ensure they understand their obligations and responsibilities. This training will include basic Aboriginal heritage awareness across the following topics:</p> <ul style="list-style-type: none"> • legal responsibilities and statutory obligations for heritage under the NPW Act and the Heritage Act; • outline the location and type of archaeological sites within the Project Area and give instructions not to disturb these sites; • provide the detailed locations of all known Aboriginal objects within the Project Area to all relevant personnel; • outline the procedures for the discovery of previously unrecorded Aboriginal objects; and • provide training on how to identify stone artefacts and other Aboriginal heritage sites. <p>Only information endorsed for sharing by the RAPs should be included within the induction package for all workers, alternatively a representative of one of the RAPs who perform this activity could be employed to undertake an induction session for the management teams of all major contractors prior to works commencing.</p>

ERM has over 160 offices across the following countries and territories worldwide

Argentina	The Netherlands
Australia	New Zealand
Belgium	Norway
Brazil	Panama
Canada	Peru
Chile	Poland
China	Portugal
Colombia	Puerto Rico
France	Romania
Germany	Russia
Ghana	Senegal
Guyana	Singapore
Hong Kong	South Africa
India	South Korea
Indonesia	Spain
Ireland	Sweden
Italy	Switzerland
Japan	Taiwan
Kazakhstan	Tanzania
Kenya	Thailand
Malaysia	UAE
Mexico	UK
Mozambique	US
Myanmar	Vietnam

ERM's Sydney Office

Level 15 309 Kent Street
Sydney NSW 2000

T: +612 8584 8888

F: +612 8585 8800

www.erm.com