

Bomen Solar Farm

Aboriginal Cultural Heritage Management Plan

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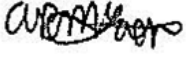



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1.0 Introduction

1.1 Background

Renew Estate Pty Ltd is the developer of Bomen Solar Farm which occupies an irregularly shaped c.256 ha parcel of land located c. 7 km to the northeast of the Wagga Wagga CBD, in Bomen, in New South Wales. Registered as Lot 11 DP1130519 (part), Lot 2 DP590756 (part), part Lots 174 and 108 DP751405, Lots 109 and 110 DP751405, Lots 2 and 3 DP594679 (part), Lot 2 DP1228221 (part) and Lot 22 DP1085826 (part), land within the solar farm site was historically used for cattle grazing and cropping. Surrounding suburbs include Shepherds to the north, North Wagga Wagga to the south, Eunonoreenya to the east and Cartwrights Hill to the west (Figure 1).

Bomen Solar Farm was granted Development Consent for State Significant Development (SSD) SSD 17_8835 on 8 October 2018 by the Secretary of the Department of Planning and the Environment (DP&E) for the development of the 120 megawatt (MWdc) Bomen Solar Farm.

This Aboriginal Cultural Heritage Management Plan (ACHMP) has been developed in accordance with the requirements of SSD-17-8835 Schedule 3, Conditions 15,16 and 17 to provide a framework for the management of Aboriginal heritage objects and values across the solar farm Project Site. A complete list of all known Aboriginal heritage sites within the Project Site is provided in Table 2.

1.2 Solar Farm Details

The Bomen Solar Farm consists of a 120 MWdc solar farm including the following components:

- approximately 400,000 photovoltaic solar modules;
- approximately 4,500 trackers comprising single-axis tracking framing systems mounted on steel piles;
- up to 44 containerised power conversion stations containing electrical switchgear, inverters and medium voltage transformers (power conversion stations);
- new on-site electrical switchyard and substation;
- connection into the National Electricity Market via about 3.5 km of 132 kV transmission line between the proposed on-site substation and the existing TransGrid Wagga North Substation. The transmission line will be overhead or underground between the on-site substation and the southern boundary of the southern development area, subject to detailed design. The transmission line will be underground from the southern boundary of the southern development area to the Wagga North Substation.
- battery storage system;
- control building including office, supervisory control and data acquisition (SCADA) systems, operation and maintenance facilities, spare parts and staff amenities serviced by septic systems and rainwater tanks;
- car park;
- internal DC and AC cabling for electrical reticulation;
- minor upgrade of the unsealed section of Trahairs Road, east of Byrnes Road, for site access (to be maintained as a single lane unsealed road);
- internal all-weather access tracks;
- internal fire trail and bushfire asset protection zones;
- security fencing around the solar farm;
- vegetation screening – plantings along the site boundaries where required;
- meteorological stations; and

- subdivision of the following lots to allow the purchase of the required land for the proposal site:
 - Lot 11 DP1130519
 - Lot 2 DP590756
 - Lot 174 DP751405
 - Lot 108 DP751405.
- The single-axis tracking structures would orient the solar modules to follow the sun from east to west each day. The structures would be mounted on piles driven into the ground.

Groundcover vegetation would be managed by sheep grazing where possible.

The on-site substation would be in the north-western corner of the southern solar farm development area.

The connection to the electricity network would be through the existing TransGrid Wagga North Substation via a proposed 132kV transmission line about 3.5 km long. To allow for design flexibility during detailed design, the transmission line corridor represents a wider corridor within which narrow disturbance footprint will be sited for the construction of the transmission line and easement (see Transmission Line Corridor in Figure 1). For instance, the corridor width is up to 150 metres wide through Lot 2 DP594679, and up to 40 metres wide through Lot 22 DP1085826, however in these areas the easement will be between 7 and 11 metres wide, and the disturbance width would be up to 6 metres wide.

The operational lifetime of the solar farm is about 30 years.

Decommissioning at the end of the operational life of the solar farm would involve removing all above ground infrastructure and rehabilitating the site to allow it to be used for other purposes.

1.3 Objectives

This ACHMP sets out the procedures for the care and salvage of Aboriginal objects within the Bomen Solar Farm Project Site during construction, operations and decommissioning. This ACHMP has been developed in accordance with the requirements of DA SSD-8835 Schedule 3, Condition 17 and the commitments in relation Aboriginal heritage in its supporting document including the Aboriginal Archaeological and Cultural Heritage Impact Assessment (AACHIA) (AECOM REV G 2018). The AACHIA management recommendations, EIS Statement of Commitments and SSD-8835 Schedule 3, Conditions 15-17 are provided in Table 1 and addressed within this ACHMP.

Table 1: ACHMP Requirements and Where Addressed

Condition	Recommendation/Commitment/Condition	ACHMP Section
Development Consent Conditions		
Protection of Heritage Items		
Sch. 3 #15	Prior to the commencement of construction, the Applicant must salvage and relocate all Aboriginal heritage items identified in Table 2 in Appendix 4 to suitable alternative locations on site, in accordance with the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW 2010), or its latest version.	Section 7.0
Sch. 3 #16	The Applicant must ensure the development does not cause any direct or indirect impacts on Aboriginal heritage items identified in Table 1 in Appendix 4 or located outside the approved development footprint. Note: The location of the Aboriginal heritage items are shown in the figure in Appendix 3.	Section 6.0
Heritage Management Plan		
Sch. 3	Prior to the commencement of construction, the Applicant must prepare a	

Condition	Recommendation/Commitment/Condition	ACHMP Section
#17	<p>Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <ol style="list-style-type: none"> a. be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary; b. be prepared in consultation with OEH and Aboriginal Stakeholders; c. include a description of the measures that would be implemented for: <ul style="list-style-type: none"> - protecting the Aboriginal heritage items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction and/or preconstruction minor works; - salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 in Appendix 4; - a contingency plan and reporting procedure if: <ul style="list-style-type: none"> • previously unidentified Aboriginal heritage items are found; or • Aboriginal skeletal material is discovered; - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and - ongoing consultation with Aboriginal stakeholders during the implementation of the plan; d. include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project. <p>Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.</p>	<p>Section 5.2</p> <p>Section 6.0</p> <p>Section 7.0</p> <p>Section 8.0</p> <p>Section 11.0</p> <p>Section 5.2.5</p> <p>Section 10.0</p>
EIS Statement of Commitments (these are the AACHIA management recommendations)		
Impacts on Aboriginal heritage items		
Section 11 of AACHIA	An Aboriginal Cultural Heritage Management Plan would be developed for the proposal. The plan is to be developed in consultation with RAPs, and to the satisfaction of OEH and DP&E. The plan would contain procedures for consultation and involvement of the RAPs in the management of Aboriginal cultural heritage values. The plan would include details of all the mitigation measures detailed in the final AACHIA, as summarised below.	This document
Section 11 of AACHIA	An archaeological salvage program should be undertaken for the Project prior to the commencement of any ground disturbance works within the proposal site. This would include surface collection of all impacted open artefact sites. Collected artefacts to be relocated adjacent to the potential scarred tree (BS-STI-18). A detailed research design to be developed for the components of the salvage program.	Section 7.0
Section 11 of AACHIA	An Aboriginal cultural heritage awareness training package should be developed for use throughout the life of the Project. This package should be developed in consultation with RAPs and completed prior to the commencement any ground disturbance works within the proposal site. A register of all persons having completed the training package should be maintained throughout the life of the Project.	Section 11.0
Section 11 of AACHIA	Provisions regarding the appropriate management action(s) for previously unrecorded Aboriginal archaeological evidence identified within the study area throughout the operational life of the Project should be incorporated into the ACHMP.	Section 8.0

Condition	Recommendation/Commitment/Condition	ACHMP Section
Section 11 of AACHIA	<p>The unanticipated finds protocol will include the following steps if an Aboriginal object is identified or harmed:</p> <ol style="list-style-type: none"> 1. Not further harm the object; 2. Immediately cease all work at the particular location; 3. Secure the area to avoid further harm to the Aboriginal object; 4. Notify OEH as soon as practical on 131555, providing any details of the Aboriginal object and its location; and 5. Not recommence any work at the particular location unless authorised in writing by OEH. 	Refer to Section 8.0 for a refined protocol
Salvaged items		
Section 11 of AACHIA	All Aboriginal objects salvaged as part of the excavation program should be curated in an appropriate manner, as determined through consultation with RAPs, OEH and DP&E during preparation of the ACHMP. Temporary off-site storage of salvaged objects should be allowed for the purposes of analysis and recording.	Section 7.0
Section 11 of AACHIA	Aboriginal Site Impact Recording (ASIR) forms for all salvaged sites should be submitted to OEH at the completion of the salvage program.	Section 7.0
Protection of items not within impact area		
Section 11 of AACHIA	All Aboriginal sites not impacted by the Project but within the proposal site should be conserved in-situ. The potential scarred tree site should be protected via permanent stock-proof fencing and appropriate associated signage. Site fencing is to be erected after consultation with a qualified archaeologist and RAP representatives.	Section 6.1
Section 11 of AACHIA	All relevant staff and contractors are to be made aware of the nature and locations of all sites as well as Renew Estate's legal obligations with respect to them. Protected sites will need to be identified on all relevant site plans. Details for the care of protected sites should be incorporated into the ACHMP.	Section 6.0
Identification of potential human remains		
Section 11 of AACHIA	<p>In the event that potential human skeletal remains are identified within the study area at any point during the life of the Project, the following standard procedure should be followed.</p> <ol style="list-style-type: none"> 1. All work in the vicinity of the remains should cease immediately; 2. The location should be cordoned off and the NSW Police notified. 3. If the Police suspect the remains are Aboriginal, they will contact the Office of Environment and Heritage and arrange for a forensic anthropologist or archaeological expert to examine the site. <p>Subsequent management actions will be dependent on the findings of the inspection undertaken under Point 3.</p> <ul style="list-style-type: none"> — If the remains are identified as modern and human, the area will become a crime scene under the jurisdiction of the NSW Police; — If the remains are identified as pre-contact or historic Aboriginal, OEH and all RAPs are to be formally notified in writing. Where impacts to exposed Aboriginal skeletal remains cannot be avoided an appropriate management mitigation strategy will be developed in consultation with OEH and RAPs; — If the remains are identified as historic non-Aboriginal, the site is to be secured and the NSW Heritage Division contacted; and <p>If the remains are identified as non-human, work can recommence immediately.</p>	Refer to Section 8.0 for a refined protocol
Identification of previous unrecorded sites		

Condition	Recommendation/Commitment/Condition	ACHMP Section
Section 11 of AACHIA	<p>AHIMS sites cards will be completed and submitted to OEH for all newly recorded sites within the study area at the completion of the assessment.</p> <p>In the event that a previously unidentified Aboriginal site is discovered within the study area at any point during the operational life of the Project, an AHIMS site card for that site should be submitted to OEH as promptly as possible. Timing protocols for the submission of AHIMS site cards should be included in the ACHMP for the Project.</p>	Section 8.0
Aboriginal Site Database		
Section 11 of AACHIA	<p>A comprehensive Aboriginal Site Database for the study area and its immediate environs should be established upon commencement of the Project. Renew Estate would be responsible for the creation and maintenance of this database which will, at a minimum, contain the name, type, size (where applicable), MGA coordinates and status of all Aboriginal sites within and directly adjacent to the study area. The database should be regularly updated throughout the operational life of Project. Printed site lists and maps should be made available to RAPs upon request.</p>	Appendix C

1.4 Document Structure

This document is structured as follows:

- **Section 2** provides the legislative framework for the management of Aboriginal heritage items;
- **Section 3** outlines the existing environment relevant to Aboriginal cultural heritage within the Project Site;
- **Section 4** confirms the responsibilities of key site personnel for all actions as identified in this ACHMP;
- **Section 5** provides a summary of the stakeholder engagement undertaken in the development of this ACHMP;
- **Section 6** details the management of Aboriginal objects not predicted to be impacted by construction or operational activities at the solar farm;
- **Section 7** details the archaeological salvage program for impacted sites within the Project Site;
- **Section 8** outlines the procedures which are to be implemented in the event of the discovery of an unrecorded Aboriginal object;
- **Section 9** outlines the processes which are to be implemented in the event of a non-compliance or complaint;
- **Section 10** provides the monitoring and auditing process;
- **Section 11** provides details for heritage inductions for site contractors/employees
- **Section 12** provides references cited in text.

Figure 1 Project Layout



2.0 Legislative and Planning Context

2.1 Commonwealth Legislation

2.1.1 Aboriginal and Torres Strait Islander Heritage Protection Act 1984

The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (the ATSIHP Act) provides for the preservation and protection of places, areas and objects of particular significance to Indigenous Australians. The stated purpose of the ATSIHP Act is the “*preservation and protection from injury or desecration of areas and objects in Australia and in Australian waters, being areas and objects that are of particular significance to Aboriginals in accordance with Aboriginal tradition*” (Part I, Section 4).

Under the Act, ‘*Aboriginal tradition*’ is defined as “*the body of traditions, observances, customs and beliefs of Aboriginals generally or of a particular community or group of Aboriginals, and includes any such traditions, observances, customs or beliefs relating to particular persons, areas, objects or relationships*” (Part I, Section 3). A ‘*significant Aboriginal area*’ is an area of land or water in Australia that is of “*particular significance to Aboriginals in accordance with Aboriginal tradition*” (Part I, Section 3). A ‘*significant Aboriginal object*’, on the other hand, refers to an object (including Aboriginal remains) of like significance.

For the purposes of the Act, an area or object is considered to have been be injured or desecrated if:

- a. In the case of an area:
 - i. it is used or treated in a manner inconsistent with Aboriginal tradition;
 - ii. the use or significance of the area in accordance with Aboriginal tradition is adversely affected; and
 - iii. passage through, or over, or entry upon, the area by any person occurs in a manner inconsistent with Aboriginal tradition
- b. in the case of an object:
 - i. it is used or treated in a manner inconsistent with Aboriginal tradition.

The ATSIHP Act can override state and territory laws in situations where a state or territory has approved an activity, but the Commonwealth Minister prevents the activity from occurring by making a declaration to protect an area or object. However, the Minister can only make a decision after receiving a legally valid application under the ATSIHP Act and, in the case of long term protection, after considering a report on the matter. Before making a declaration to protect an area or object in a state or territory, the Commonwealth Minister must consult the appropriate minister of that state or territory (Part 2, Section 13).

No declarations relevant to the Project Site have been made under the ATSIHP Act.

2.1.2 Native Title Act 1993

The *Native Title Act 1993* (NTA) provides for the recognition and protection of native title for Aboriginal peoples and Torres Strait Islanders. The NTA recognises native title for land over which native title has not been extinguished and where persons able to establish native title are able to prove continuous use, occupation or other classes of behaviour and actions consistent with a traditional cultural possession of those lands. It also makes provision for Indigenous Land Use Agreements (ILUA) to be formed as well as a framework for notification of native title Stakeholders for certain future acts on land where native title has not been extinguished.

Searches of the *Schedule of Applications (unregistered claimant applications)*, *Register of Native Title Claims*, *National Native Title Register*, *Register of Indigenous Land Use Agreements* and *Notified Indigenous Land Use Agreements* were undertaken in January 2018, with no relevant listings identified for the Project Site.

2.1.3 Environment Protection and Biodiversity Act 1999

The Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) took effect on 16 July 2000. Under Part 9 of the EPBC Act, any action that is likely to have a significant impact on a matter of National Environmental Significance may only progress with approval of the Commonwealth Minister for Sustainability, Environment, Water, Population and Communities (SEWPAC). An action is defined as a project, development, undertaking, activity, series of activities, or alteration. An action will also require approval if:

- It is undertaken on Commonwealth land and will have or is likely to have a significant impact;
- It is undertaken outside Commonwealth land and will have or is likely to have a significant impact on the environment on Commonwealth land; and
- It is undertaken by the Commonwealth and will have or is likely to have a significant impact.

The EPBC Act defines 'environment' as incorporating both natural and cultural environments and therefore includes Aboriginal heritage. Under the Act, protected heritage items are listed on the National Heritage List (items of significance to the nation) or the Commonwealth Heritage List (items belonging to the Commonwealth or its agencies). These two lists replaced the Register of the National Estate (RNE), which was closed in 2007 and is no longer a statutory list. Statutory references to the RNE in the EPBC Act were removed on 19 February 2012. However, the RNE remains an archive of over 13,000 heritage places throughout Australia.

Searches of the National Heritage List, Commonwealth Heritage List and RNE were undertaken in January 2018, with no relevant listings identified for the Project Site.

2.2 State Legislation

2.2.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act), administered by DP&E, requires that consideration be given to environmental impacts as part of the land use planning process in NSW. In NSW, environmental impacts are interpreted as including impacts to Aboriginal and non-Aboriginal (i.e., European) cultural heritage.

Upon repeal of Part 3A of the EP&A Act on 1 October 2011, the *Environmental Planning and Assessment Amendment (Part 3A Repeal) Act 2011* inserted a new Division 4.1 into Part 4 of the EP&A Act. Division 4.1 provides a determination regime for State Significant Development (SSD). Section 89C of the EP&A Act stipulates that a development will be considered SSD if it declared to be such by the new *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD).

Under Clause 8(1) of SEPP SRD, a development is declared to be State Significant Development if:

- a. the development on the land concerned is, by the operation of an environmental planning instrument, permissible with development consent under Part 4 of the EP&A Act; and
- b. the development is specified in Schedule 1 or 2 of SEPP SRD.

The Project is SSD as it meets both of these criteria, namely:

- it is permissible with development consent on the land on which it is located; and
- it is development that is specified in Schedule 1 of SEPP SRD.

Pursuant to Section 89J of the EP&A Act, Aboriginal Heritage Impact Permits (AHIPs) are not required for projects approved under Division 4.1 of Part 4 of the EP&A Act. Impacts to Aboriginal heritage values associated with approved SSD projects are typically managed under Aboriginal Cultural Heritage Management Plans (ACHMPs). ACHMPs are statutorily binding once approved by DP&E.

2.2.2 The Heritage Act 1977

The Heritage Act 1977 (as amended) was enacted to conserve the environmental heritage of NSW. Under Section 32, places, buildings, works, relics, moveable objects or precincts of heritage significance are protected by means of either Interim Heritage Orders (IHO) or by listing on the NSW

State Heritage Register (SHR). Sites that are assessed as having State heritage significance can be listed on the SHR by the Minister on the recommendation of the NSW Heritage Council.

Archaeological relics (any relics that are buried) are protected by the provisions of Section 139. Under this section it is illegal to disturb or excavate any land knowing or suspecting that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed. In such cases an excavation permit under Section 140 is required. Note that no formal listing is required for archaeological relics; they are automatically protected if they are of local significance or higher.

Proposals to alter, damage, move or destroy places, buildings, works, relics, moveable objects or precincts protected by an IHO or listed on the SHR require an approval under Section 60. Demolition of whole buildings will not normally be approved except under certain conditions (Section 63). Some of the sites listed on the SHR or on LEPs may either be 'relics' or have relics associated with them. In such cases, a Section 60 approval is also required for any disturbance to relics associated with a listed site.

Under Section 170 of the Heritage Act 1977, NSW Government agencies are required to maintain a register of heritage assets. The Register places obligations on the agencies, but not on non-government proponents, beyond their responsibility to assess the impact on surrounding heritage sites.

AECOM searched the SHR to determine whether there are listed heritage sites within the Project Site. None are located within the Project Site.

2.2.3 Aboriginal Land Rights Act 1983

The Aboriginal Land Rights Act 1983 (ALR Act) was established to return land in NSW to Aboriginal peoples through a process of lodging claims for certain Crown lands. The Act, administered by the NSW Department of Aboriginal Affairs, is a compensatory regime which recognises that land is of spiritual, social, cultural and economic importance to Aboriginal people. The ALR Act establishes the NSW Aboriginal Land Council (NSWALC) and a network of over 120 autonomous Local Aboriginal Land Councils (LALCs) and requires these bodies to:

- a. to take action to protect the culture and heritage of Aboriginal persons in the LALC's area, subject to any other law; and
- b. to promote awareness in the community of the culture and heritage of Aboriginal persons in the LALC's area.

LALCs constituted under the ALR Act can make claims. The Registrar of the ALR Act has responsibility for maintaining the Register of Aboriginal Land Claims under section 166 of the Act. All land claims that have been made since the Act came into force in 1983 have been recorded in the Register.

Consultation with the Registrar of the ALR Act in November 2017 has indicated that the Project Site does not have any Registered Aboriginal Owners pursuant to Division 3 of the ALR Act.

2.2.4 National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NPW Act), administered by OEHL, is the primary legislation for the protection of Aboriginal cultural heritage in NSW. The NPW Act gives the Secretary of OEHL responsibility for the proper care, preservation and protection of 'Aboriginal objects' and 'Aboriginal places', defined under the Act as follows:

- An *Aboriginal object* is any deposit, object or material evidence (that is not a handicraft made for sale) relating to Aboriginal habitation of NSW, before or during the occupation of that area by persons of non-Aboriginal extraction (and includes Aboriginal remains).
- An *Aboriginal place* is a place declared so by the Minister administering the NPW Act because the place is or was of special significance to Aboriginal culture. It may or may not contain Aboriginal objects.

Part 6 of the NPW Act provides specific protection for Aboriginal objects and places by making it an offence to harm them and includes a 'strict liability offence' for such harm. A 'strict liability offence'

does not require someone to know that it is an Aboriginal object or place they are causing harm to in order to be prosecuted. Defences against the 'strict liability offence' in the NPW Act include the carrying out of certain 'Low Impact Activities', prescribed in Clause 80B of the *National Parks and Wildlife Amendment Regulation 2010* (NPW Regulation), and the demonstration of due diligence.

An AHIP issued under Section 90 of the NPW Act is required if impacts to Aboriginal objects and/or places cannot be avoided. An AHIP is a defence to a prosecution for harming Aboriginal objects and places if the harm was authorised by the AHIP and the conditions of that AHIP were not contravened. Consultation with Aboriginal communities is required under OEH policy when an application for an AHIP is considered and is an integral part of the process. AHIPs may be issued in relation to a specified Aboriginal object, Aboriginal place, land, activity or person or specified types or classes of Aboriginal objects, Aboriginal places, land, activities or persons.

As indicated in Section 2.2.1, pursuant to Section 89J of the EP&A Act, AHIPs are not required for projects approved under Division 4.1 of Part 4 of the EP&A Act, with impacts typically managed under ACHMPs. ACHMPs are statutorily binding once approved by DP&E.

Section 89A of the NPW Act requires notification of the location of Aboriginal sites within a reasonable time, with penalties for non-notification. Section 89A is binding in all instances, including Division 4.1 projects.

It is noted, that the Bomen Axe Quarry located immediately adjacent to the Project Site is listed as protected under the Act (database #5062851) as an Aboriginal Place.

2.3 Local Government

2.3.1 Wagga Wagga Local Environmental Plan 2010

Clause 5.10 of the *Wagga Wagga Local Environmental Plan 2010* (WWLEP 2010) provides specific provisions for the protection of heritage items, heritage conservation areas, archaeological relics, Aboriginal objects and Aboriginal places of heritage significance within the Wagga Wagga LGA.

Under Section 2 of Clause 5.10 of the WWLEP 2010, development consent is required for any of the following:

- a. demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):
 - (i) a heritage item,
 - (ii) an Aboriginal object,
 - (iii) a building, work, relic or tree within a heritage conservation area,
- b. (b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,
- c. (c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,
- d. (d) disturbing or excavating an Aboriginal place of heritage significance,
- e. (e) erecting a building on land:
 - (i) on which a heritage item is located or that is within a heritage conservation area, or
 - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,
- f. (f) subdividing land:
 - (i) on which a heritage item is located or that is within a heritage conservation area, or
 - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.

In relation to Aboriginal heritage, Section 8 of the WWLEP 2010 states the consent authority must, before granting consent under this clause to the carrying out of development in an Aboriginal place of heritage significance:

- a. consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and
- b. notify the local Aboriginal communities, in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent.

Schedule 5 of the WWLEP 2010 provides a list of heritage items, conservation areas and archaeological sites within the Wagga Wagga LGA. A review of the list indicates there are no Aboriginal objects or places of heritage significance located within the Project Site.

Subject to development consent under Division 4.1 of Part 4 of the EP&A Act, the planning controls required by the WWLEP 2010 will not apply to the Project.

3.0 Existing Environment

3.1 Bomen Solar Farm Aboriginal Heritage Values

3.1.1 Aboriginal Archaeological Sites

A total of 11 Aboriginal archaeological sites, comprising 10 open artefact sites (i.e., artefact scatters and isolated artefacts) and one potential scarred tree have been identified within the Project Site (Figure 2). Table 2 provides a list of all registered Aboriginal archaeological sites within the Project Site.

Table 2 Aboriginal archaeological sites

AHIMS ID	Site name	AHIMS Centroid Coordinates (zone 55)		Site type	Management
		MGAE	MGAN		
56-1-0109	BIF1	540719	6120812	Isolated artefact	Surface collection
56-1-0437	Bomen Solar IS01	540564	6120660	Isolated artefact	Surface collection
56-1-0536	Bomen 539015	539015	6119445	Open artefact site	Surface collection
56-1-0543	Bomen 540568	540568	6120270	Open artefact site	Surface collection
56-1-0550	BSF-AS2-18	540681	6120545	Artefact scatter	Surface collection
56-1-0551	BSF-AS1-18	540261	6120725	Artefact scatter	Surface collection
56-1-0552	BSF-IA6-18	538832	6118773	Isolated artefact	Surface collection
56-1-0555	BSF-IA3-18	539719	6120405	Isolated artefact	Surface collection
56-1-0556	BSF-IA2-18	540296	6120389	Isolated artefact	Surface collection
56-1-0557	BSF-IA1-18	540540	6120503	Isolated artefact	Surface collection
N/A	BSF-ST1-18	540947	6122877	Possible scarred tree	Conservation

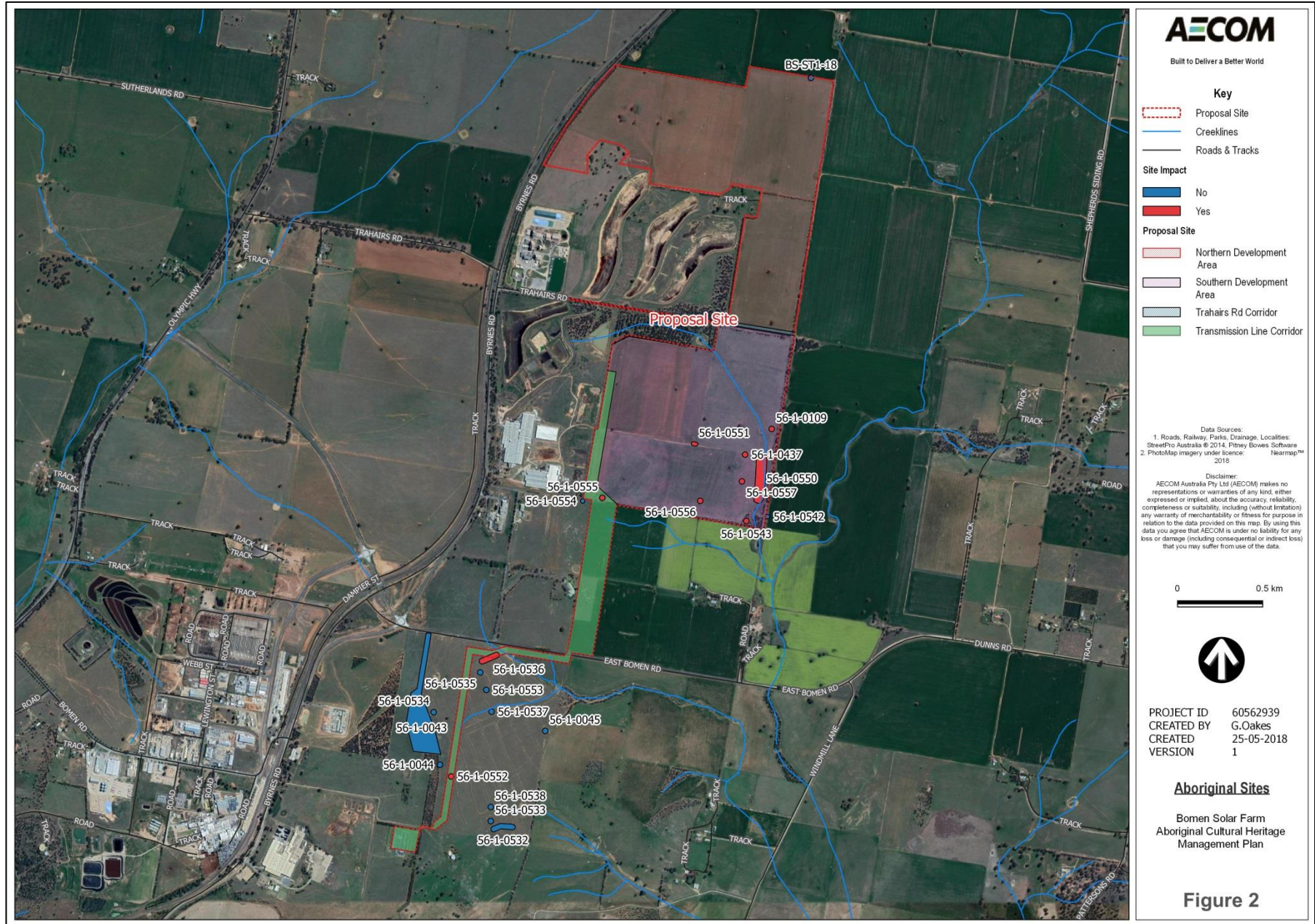
3.1.2 Aboriginal Cultural Heritage Values

Social or cultural value refers to the spiritual, traditional, historic and contemporary associations and attachments a place or area has for Aboriginal people and can only be identified through consultation with Aboriginal people (OEH 2011: 8).

Verbal and written advice received from the RAPs involved in this assessment has identified the following social or cultural values for the region:

- The Bomen Axe Quarry is a regionally significant cultural site;
- Crests with granite outcrops would have been utilised for camping and as raw material sources by Aboriginal people travelling through the study area;
- Quartz is an important raw material utilised by Aboriginal people for the production of stone tools; and
- All sites within the Proposal Site are significant with impacts to any site considered inappropriate and reckless.

Figure 2 Aboriginal Sites



4.0 Roles and Responsibilities

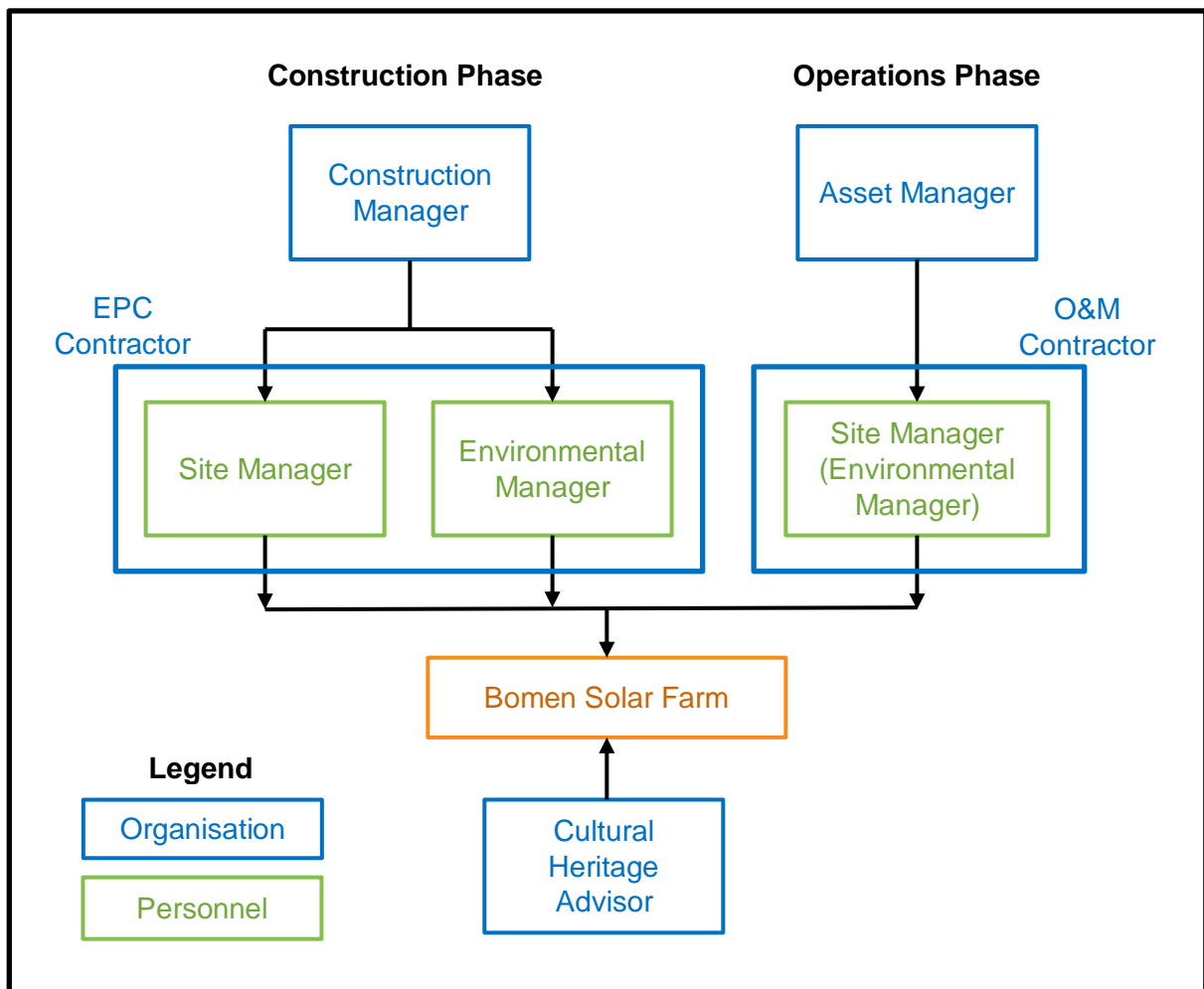
The different organisations and personnel responsible for the implementation and monitoring of this ACHMP are shown on Figure 3.

The Engineer, Procure, Construct (EPC) Contractor is responsible for the overall design and construction of Bomen Solar Farm and will have a Site Manager and Environmental Manager based onsite during this period. The Site Manager will be ultimately responsible for delivery of the solar farm with the Environmental Manager employed to ensure compliance with the conditions of consent, management plans and all other environmental requirements.

The Operations and Maintenance (O&M) Contractor will be responsible for operating the solar farm over its 30 year lifetime. There will be a much smaller team based onsite during this phase and the Site Manager will perform the function of the Environmental Manager, as well as overall responsibility for operations.

The Construction Manager will oversee the construction of the solar farm on behalf of the Project owner while the Asset Manager will oversee operations. These organisations will be responsible for monitoring environmental compliance during these two phases, respectively.

Figure 3 Roles and responsibilities



Specific roles and responsibilities for the implementation of this ACHMP and associated actions are presented in Table 3.

Table 3 Roles and responsibilities

Action	Timing	Responsibility	
		Design & Construction	Operations
Implementation of this ACHMP	Ongoing	EPC Contractor (Environmental Manager)	O&M Contractor (Site Manager)
Maintain Aboriginal sites database	Ongoing	EPC Contractor (Environmental Manager)	O&M Contractor (Site Manager)
Install protective fencing and signage	Prior to construction commencing	EPC Contractor (Environmental Manager) & Cultural Heritage Advisor	
Surface collection	Post-Project and ACHMP approval and prior to construction commencing	Cultural Heritage Advisor	
Salvage reporting	Following salvage	Cultural Heritage Advisor	
Care and Control of Aboriginal Objects	Ongoing	EPC Contractor (Environmental Manager) & Cultural Heritage Advisor	
Management of previously unrecorded Aboriginal objects	As required	EPC Contractor (Environmental Manager)	O&M Contractor (Site Manager)
Aboriginal heritage awareness training	As required	EPC Contractor (Environmental Manager)	O&M Contractor (Site Manager)
Monitoring	Monthly (construction) & 6-monthly (operations)	Construction Manager	Asset Manager
Independent Environmental Audit	Within 6 months of construction commencing	Independent Environmental Consultant	

5.0 Stakeholder Consultation

This section provides a summary of consultation with regulators and RAPs undertaken as part of the development of this ACHMP. Additionally, this section provides a list of RAPs and consultation protocols for engagement with the Aboriginal community.

5.1 Regulatory Consultation

5.1.1 Department of Planning and Environment

Schedule 3, Condition 17 of SSD-17_8835 states that an ACHMP must be prepared to the satisfaction of the Secretary.

The draft ACHMP was submitted to DP&E for review on 23 October 2018 and subsequent referral to OEH. A copy of this correspondence is provided in Appendix A. This draft ACHMP includes OEH and RAP correspondence and consultation as described below.

On 28 November 2018 DP&E provided the following comments on the draft ACHMP (AECOM's response provided in *italics*).

Section 6.2 states that a number of Aboriginal sites are located outside the Project Site, but within close proximity to the Project Site (listed in Table 5 and shown on Figure 2). Consider including a more detailed description on how these sites will be protected. For example, fencing off the Aboriginal heritage items prior to commencing construction and or preconstruction.

- *Refer to response to section 6.0 comment below.*

Section 7.1 Impacts to known Aboriginal sites. Consider stating that the archaeological salvage program will be undertaken following project approval and prior to construction.

- *Noted and updated.*

Section 7.3 RAP Participation in Fieldwork Section 7.3 states that it is anticipated that the fieldwork required to complete the surface collection will occur following approval of this ACHMP and prior to construction. Consider amending this section to state that the fieldwork required to complete the surface collection will occur following approval of the Project and ACHMP.

- *Noted and updated.*

Section 6.0 OEH advice stated to consider fencing and/or signage of sites in addition to the potential scarred tree site (BS-ST1-18) to avoid harm to and protect sites in Table 1 Appendix 4 and to meet schedule 3 Condition 17c.

- *All sites in Table 1 Appendix 4, except for BS-ST1-18, are located on land outside of the project site and therefore outside the land used for construction. However, as a further precaution, we have updated the ACHMP such that sites designated as not to be impacted that are located within lots where construction is to occur should be protected via temporary bunting and signage installed prior to commencement of construction in those lots. The sites this applies to are described in Section 6.2. The non-impacted sites that are outside the project site and in separate lots to the project site are all separated from the project site by existing fencing.*

The ACHMP advises that these sites are located outside of the project site. Consider including a description of whether the construction contractor will be entering the land parcels where these sites are located for construction work.

- *Refer above response.*

5.1.2 Office of Environment and Heritage

On 6 November 2018 OEH provided the following comments on the draft ACHMP (AECOM's response provided in *italics*):

Section 2.2.2 – Bomen Axe Quarry is not protected under the *Heritage Act 1977*. It is protected as an Aboriginal Place under the *National Parks and Wildlife Act 1974* (NPW Act). Refer to subheading

'Listings' under Bomen Axe Quarry NSW heritage database number 5062851

- *Noted and updated.*

Section 4, Table 3 – should state the timing of the surface collection may only occur following project approval (note this has occurred, with development consent issued 8 October 2018) in addition to post ACHMP approval and prior to construction commencing.

- *Noted and updated.*

Section 6.0 – the proponent should consider fencing and/or signage of sites in addition to potential scarred tree site (BS-ST1-18) to avoid harm to and protect sites in Table 1 Appendix 4 and to meet Schedule 3 Condition 17c.

- *All sites in Table 1 Appendix 4, except for BS-ST1-18, are located on land outside of the project site and therefore outside the land used for construction. However, as a further precaution, sites designated as not to be impacted that are located within lots where construction is to occur should be protected via temporary bunting and signage installed prior to commencement of construction in those lots. The sites this applies to are described in Section 6.2.*

Section 6.2, Table 6 and footnote 1 – Site 56-1-0542 does exist, and this was not identified in the assessment report. The site was recorded on 7 February 2018. The site is a scarred tree immediately east of the project boundary fence and east of site 56-1-0543. Site 56-1-0542 is listed in Table 1 Appendix 4 of the development consent as it is located next to the boundary of the development and must be avoided by works.

- *It is noted that this site was registered by an Aboriginal stakeholder after completion of the draft assessment. This site will not be impacted, as it is located on land outside the project site and in a separate land parcel (in the Crown road reserve east of Lot 174 DP751405) which will not be accessed during construction. It is also separated from the project site by existing fencing.*

Section 7.4 – states an ASIR will be submitted to OEH within 12 months of the completion of the salvage. Any changes to an ASIR are required to be submitted to OEH within 4 months of the completion of the salvage.

- *Noted and updated.*

Section 7.5 – salvaged artefacts are to be relocated adjacent to potential scarred tree BS-ST1-18 in accordance with requirement 26 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. The temporary storage of salvaged artefacts/objects may occur on site in a secure location. The location of the cataloguing and analysis of artefacts is not stated. We recommend the cataloguing and analysis is to be undertaken within Wagga Wagga LGA and preferably on site. Salvaged Aboriginal objects/artefacts may not be removed from Wagga Wagga LGA. The cataloguing and analysis location should be stated in the final ACHMP.

- *Artefacts will be analysed and catalogued on site prior to being relocated adjacent to potential scarred tree BS-ST1-18 in accordance with the requirements 26 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales.*

Section 9 – include a procedure for potential breaches of the NPW Act. This procedure must include notifying the OEH as soon as practicable after becoming aware of any contravention of s.86 of the NPW Act by contacting Environment Line on 131 555 This would include actions such as harm to Aboriginal heritage items not covered by conditions of consent, such as if harm was to occur to Aboriginal heritage items in Appendix 4 Table 1.

- *Noted and updated.*

Section 11– the Aboriginal heritage induction should include the location of access tracks that would avoid the location of Aboriginal sites that must not be harmed (see Conditions of Consent Appendix 4, Table 1).

- *Noted and updated.*

Section 12 – Include 'DECCW 2010. Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales' for reference to section 7.5.

- *Noted and updated.*

5.2 Registered Aboriginal Party Consultation (RAP)

5.2.1 Principles of RAP engagement

Renew Estate Pty Ltd recognises the importance of cultural protocols in the engagement of RAPs and the Aboriginal community more broadly. As such, Renew Estate Pty Ltd has adopted the principals outlined in the Australian Heritage Commission's guidelines Ask First: A guide to respecting Indigenous heritage places and values (Australian Heritage Commission 2002). These principals require that all parties concerned with identifying, conserving, and managing Aboriginal heritage should acknowledge, accept and act on the principles that Aboriginal people:

- Are the primary source of information on the value of their heritage and how this is best conserved;
- Must have an active role in any Aboriginal heritage planning process;
- Must have input into primary decision-making in relation to Aboriginal heritage so they can continue to fulfil their obligations towards this heritage; and
- Have a right to retain control of their cultural knowledge, including intellectual property and other information relating specifically to their heritage.

5.2.2 Welcome to Country & Acknowledging Traditional Owners

A Welcome to country is a formal welcome to Aboriginal land given by an Elder or person from the Country the meeting/event is taking place on. It is commonly in the form of a short speech, but also may include a performance.

An Acknowledgement of Country can be given by an Indigenous or non-Indigenous person and is a way of paying respect to the Traditional Owners of the Country the meeting/event is taking place on. An example of an Acknowledgement of Country may include:

"Before we begin proceedings, I would like to acknowledge the Traditional Owners of the land on which we meet today the Wonnarua people. I would like to pay my respects to the Elders past, present and future and pay my respects to all Aboriginal People here today, wherever you may come from."

Welcome to Country and Acknowledgement of Country are important practices because they continue the longstanding tradition of formally recognising Aboriginal (and Torres Strait Islander) Traditional Ownership and Connection to Country (NTSCORP Limited 2013).

Renew Estate Pty Ltd proposes that any meetings and events associated with the preparation of this ACHMP and with the ongoing management of Aboriginal Heritage associated with this ACHMP within the Project Site begin with the opportunity for an Elder or Traditional Owner to undertake a Welcome to Country and/or Acknowledgement of Country.

5.2.3 AACHIA Consultation

Consultation with RAPs during the preparation of the AACHIA was undertaken in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (NSW Department of Environment Climate Change & Water 2010a). A total of three Aboriginal parties registered their interest. These three RAPs are listed in Table 4 and will continue to be consulted with regards to Aboriginal archaeology and cultural heritage relevant to the solar farm.

Table 4: Registered Aboriginal Parties

Ref	Group Name	Primary Contact
1	Bundy Aboriginal Cultural Knowledge	Mark Saddler
2	Warrabinya Cultural Heritage and Assessment Group	Eddie Whyman
3	Yalmambirra	Yalmambirra

5.2.4 RAP ACHMP Consultation

Consultation with RAPs for this ACHMP will include the following:

- Provision of the draft ACHMP to all RAPs for comment with a minimum 28 day comment period; and
- RAP participation in the archaeological salvage of sites impacted by the Project.

The draft ACHMP was distributed to all RAPs listed in Table 4 on 22 October 2018 for consultation and comment. One written response to the draft ACHMP was provided by Yalmambirra on 16 November 2018 with the following comments:

- Table 3: Management of previously unrecorded Aboriginal objects. This is confusing. Does this mean that any objects found during development will be managed by the Environmental Manager and Site Manager? Will they know what an artefact looks like?
 - *The Environmental Manager and Site Manager would be responsible for ensuring any Aboriginal objects unidentified will be managed appropriately in accordance with the procedure in Section 8.3. All staff will be trained as part of the induction to identify artefacts and if unsure will be told to contact the Environmental Manager and Site Manager.*
- 7.5: Care and control of Salvaged Objects. How will artefacts be relocated?
 - *The artefacts will be bagged by RAPs and carried to potential scarred tree site (BS-ST1-18) where they will analysed, catalogued and placed adjacent to the tree by RAPs.*
- 8.1: Open Artefact Sites. How will previously unidentified artefacts be identified? By whom will they be identified? Workers digging up the ground etc for example, will not know what to look for.
 - *All staff will be trained as part of the induction to identify artefacts and if unsure will be told to contact the Environmental Manager and Site Manager.*

A copy of the RAP correspondence including written responses are provided in Appendix B.

5.2.5 Ongoing RAP Consultation

Notification Triggers

Notification will be provided to RAPs in the following instances:

- Significant changes to operations at Bomen Solar Farm where there are potential implications for Aboriginal heritage management; or
- There is a discovery of a significant Aboriginal site (e.g., burial, grinding groove or scar trees).

Notification of the above will be provided in writing to all RAPs, as listed in Table 4, within 14 days.

5.2.6 Participation of RAPs in Aboriginal Heritage Works

As outlined in Section 5.2 all RAPs, as listed in Table 4, will be provided the opportunity to participate in the archaeological salvage works detailed within this ACHMP.

6.0 Management of Non-Impacted Aboriginal Sites

6.1 Non-Impacted Site Within Project Site

One site will be conserved within the Project Site: potential scarred tree site (BS-ST1-18) should be protected via permanent stock-proof fencing and appropriate associated signage, as detailed below. Site fencing is to be erected prior to construction and encompass the tree's dripline that is within the Project Site.

Artefacts that would be impacted by Project construction are to be relocated to the fenced off area around the scarred tree (see Section 7.5).

Where vegetation/weeds have built up within the fenced boundary and require removal, clearing should be undertaken in a manner that does not cause ground disturbance to the site. Preferred methods of hazard reduction include cutting and grass slashing at a suitable height to avoid impacting surface Aboriginal stone artefacts.

Metal signage attached to the fencing is to state:

<p style="text-align: center;">ENVIRONMENTALLY SENSITIVE AREA NO UNAUTHORISED ENTRY For Information Contact Site Manager</p>

6.2 Non-Impacted Sites Outside of Project Site

A number of Aboriginal sites are located outside the Project Site, and therefore also outside the land used for construction, but within close proximity to it. These sites are not to be impacted during the life of the project. These sites are listed in Table 5 and shown on Figure 2 so that inadvertent impacts are avoided, particularly during construction.

As a further precaution, sites designated as not to be impacted that are located within lots where construction is to occur should be protected via temporary bunting and signage installed prior to commencement of construction in those lots. Consideration of the location of non-impacted sites in lots where construction is to occur indicates that Lot 22 DP1085826, where construction of the transmission line is to be completed, is the only lot where this is the case. As such sites 56-1-0535, 56-1-0553, 56-1-0537, 56-1-0045, 56-1-0534, 56-1-0044, 56-1-0538, 56-1-0533, and 56-1-0532 would be protected by temporary bunting and signage. This should be completed prior to commencement of construction of the transmission line and maintained until construction works are complete in Lot 22.

It is noted that the Bomen Axe Quarry ('East Bomen 1', #56-1-0043) is within a separate lot (Lot 23 DP1085826) and currently fenced separately outside the Project Site and would not be accessed as part of the works. In addition, sites 56-1-0554 and 56-1-0542 are also located in separate lots outside the Project Site which would not be accessed as part of the works (Lot 3 DP594679 and the Crown road reserve east of Lot 174 DP751405 respectively), and are separated from the Project Site by existing fencing.

All relevant staff and contractors are to be made aware of the nature and locations of all sites as well as Bomen Solar Farm's legal obligations with respect to these sites. Non-impacted sites located outside the Project Site should be identified on all relevant site plans. Table 5 provides a list of Aboriginal sites outside the Project Site that are to not to be impacted.

Table 5 Aboriginal sites located outside the Project site

AHIMS ID	Site name	AHIMS Centroid Coordinates (zone 55)		Site type	Management
		MGAE	MGAN		
56-1-0043	East Bomen 1	538635	6119129	Axe quarry	Not impacted; no further action. Currently fenced
56-1-0044	East Bomen IF2	538670	6118650	Isolated artefact	Not impacted; install temporary bunting and signage
56-1-0045	East Bomen IF1	539405	6119039	Isolated artefact	Not impacted; install temporary bunting and signage
56-1-0532	Bomen 539085	539085	6118460	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0533	Bomen 539070	539070	6118506	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0534	Bomen 538732	638732	6119148	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0535	Bomen 539004	539004	6119382	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0537	Bomen 539072	539072	6119150	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0542	Bomen 540684	540684	6120301	Scarred tree	Not impacted; no further action. Separated by existing fence
56-1-0538	Bomen 539071	539071	6118591	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0553	BSF-IA5-18	539038	6119280	Isolated artefact	Not impacted; install temporary bunting and signage
56-1-0554	BSF-IA4-18	539610	6120399	Isolated artefact	Not impacted; no further action. Separated by existing fence

7.0 Archaeological Salvage Program

7.1 Impacts to Known Aboriginal Sites

In order to mitigate the impact of the solar farm on the known Aboriginal archaeological resource of land within the Project Site, an archaeological salvage program will be undertaken incorporating surface collection of impacted sites following Project approval and prior to construction. Table 6 lists the 10 Aboriginal sites that are within the Project Site that will be impacted by the Project and require surface collection. These sites are also shown on Figure 2.

Table 6 Sites requiring salvage

AHIMS ID	Site name	AHIMS Centroid Coordinates (zone 55)		Site type	Management
		MGAE	MGAN		
56-1-0109	BIF1	540719	6120812	Isolated artefact	Surface collection
56-1-0437	Bomen Solar IS01	540564	6120660	Isolated artefact	Surface collection
56-1-0536	Bomen 539015	539015	6119445	Open artefact site	Surface collection
56-1-0543	Bomen 540568	540568	6120270	Open artefact site	Surface collection
56-1-0550	BSF-AS2-18	540681	6120545	Artefact scatter	Surface collection
56-1-0551	BSF-AS1-18	540261	6120725	Artefact scatter	Surface collection
56-1-0552	BSF-IA6-18	538832	6118773	Isolated artefact	Surface collection
56-1-0555	BSF-IA3-18	539719	6120405	Isolated artefact	Surface collection
56-1-0556	BSF-IA2-18	540296	6120389	Isolated artefact	Surface collection
56-1-0557	BSF-IA1-18	540540	6120503	Isolated artefact	Surface collection

7.2 Surface Collection

The objective of the surface collection component of the salvage program is to systematically record and recover all visible surface artefacts within the 10 impacted open artefact sites. Surface collection will be undertaken by a combined field team of archaeologists and RAP representatives and will involve:

- Flagging of all visible artefacts at each site;
- Recording of individual artefact locations using a hand-held differential GPS. All artefacts will be assigned a unique numerical identifier for data accessioning and analysis purposes; and
- Individual bagging of artefacts with appropriate labelling.

7.3 RAP Participation in Fieldwork

It is anticipated that fieldwork required to complete the surface collection will occur following Project and ACHMP approval, and prior to construction. All RAPs will be provided the opportunity to provide a field representative to participate in the archaeological salvage program. Prior to commencement of the salvage program a request will be made to each RAP to identify a representative who will participate in the salvage program, noting a maximum of one representative from each RAP may be required on any one day. A fieldwork roster, which ensures fairness, will be developed to complete the salvage.

7.4 ASIR Cards

Aboriginal Site Impact Recording (ASIR) cards for all salvaged sites will be submitted to OEH within four months of the completion of the salvage.

7.5 Care and Control of Salvaged Objects

Artefacts will be analysed and catalogued within the proposal site prior to be relocated adjacent to potential scarred tree BS-ST1-18 within the Northern Development Area in accordance with the requirements 26 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. An AHIMS site card should be prepared and submitted to OEH for the location. The site will be fenced and signposted as per detailed in Section 6.0. Aboriginal community members may wish to access sites for appropriate cultural purposes (e.g. education and ceremony). Bomen Solar Farm Pty Ltd will facilitate reasonable access upon request and reasonable access will be subject to Bomen Solar Farm operational requirements.

8.0 Management Procedure for Previously Unrecorded Aboriginal Objects

This section outlines the procedure to be implemented in the event that a previously unrecorded site is discovered during construction or operational activities within the Project Site.

8.1 Open Artefact Sites

In the event that previously unidentified Aboriginal objects are identified through the construction and operational phases of the solar farm, the following procedure will apply:

1. Works will cease in the area to prevent further impact to the object(s);
2. The Site Manager will be notified;
3. A qualified archaeologist must be engaged to determine the nature, extent and scientific significance of the object(s);
4. Should it be determined that the site is within the area to be disturbed and
 - a. the nature and significance of the site is consistent with sites assessed as of low or moderate significance within the ACHMP and recommended for salvage by the appropriate archaeologist, it will be subject to surface collection and relocated to scarred tree site potential scarred tree BS-ST1-18 (refer to procedure in Section 7.2 prior to impacts). As soon as practicable the site database will be updated.
 - b. the nature and significance of the site is consistent with sites assessed as of high significance, it will be subject to surface collection and potentially other mitigation measures such as excavation, as determined by discussions with Bomen Solar Farm Management, OEH, an archaeologist and RAPs. As soon as practicable, the site database will be updated.
5. Should it be determined that the site is outside the area to be disturbed but within the Project Site it is to be managed (where possible) in accordance with the procedures outlined in Section 6.0. In addition, the site database is to be updated and an AHIMS site card completed and submitted to OEH.

8.2 Scarred Trees

In the event that a potential Aboriginal scarred tree is identified within the Project Site, the following procedure will be implemented:

1. Works will cease in the area to prevent any further impacts to the tree.
2. The Site Manager will be notified;
3. A qualified archaeologist, RAP representative and arborist must be engaged to determine the validity of the scarred tree;
4. Should it be determined that the scarring is not Aboriginal in origin, works can recommence.
5. Should it be determined that the scarring is likely Aboriginal in origin it is to be assessed and managed accordingly. Protective measures may include permanent fencing.

8.3 Human Skeletal Remains

In the event that human skeletal remains are identified, the following procedure will be adopted:

1. When suspected human remains are identified, all work in the near vicinity will cease;
2. The Site Manager will be notified;
3. The Site Manager is to notify the Police;

4. The Site Manager is to contact OEH's Environment line on 131 555 to identify that possible skeletal remains have been discovered and that the police have been notified. OEH will provide details on the current processes involved for managing archaeological skeletal remains (both Aboriginal & historic);
5. Under the instructions of the Police, an appropriate area is to be cordoned off using temporary fencing (or similar) around the exposed suspected human remains site. On agreement between the Police and Bowen Solar Farm Management, work can continue outside of this area;
6. If the remains are determined to be Aboriginal remains, then under the advice of OEH, consult with the RAPs; and
7. Do not recommence work at the location until requirements of the Police, OEH and the RAPs have been adequately addressed.

9.0 Non-Compliance & Complaints Management

9.1 Non Compliance

Should there be a concern that conditions of this ACHMP are not being met and unauthorised impacts are occurring to Aboriginal objects, the following steps will be undertaken:

- a. Bomen Solar Farm Management notified;
- b. Bomen Solar Farm will notify DP&E and OEH of the incident as soon as possible;
- c. The Contractor will engage a suitably qualified and experienced person(s) to:
 - Investigate the complaints/claims; and
 - Review the environmental performance of Bomen Solar Farm.
- d. Provide DP&E, OEH and RAPs with a written report as soon as practicable that describes:
 - The nature of the non-compliance concern;
 - The date and time of the incident;
 - The likely cause of the incident;
 - Actions that have been taken; and
 - Proposed measures to address the incident.

9.2 Breach of the NPW Act

Should there be a breach of the NPW Act and unauthorised harm occur to an Aboriginal object/site the within or adjacent to the proposal site the following steps will be undertaken:

- a. Bomen Solar Farm Management notified;
- b. Bomen Solar Farm will notify DP&E and OEH (131 555) of the incident as soon as possible;
- c. The Contractor will engage a suitably qualified and experienced person(s) to:
 - Investigate the complaints/claims; and
 - Review the environmental performance of Bomen Solar Farm.
- d. Provide DP&E, OEH and RAPs with a written report as soon as practicable that describes:
 - The nature of the breach;
 - The date and time of the breach;
 - The likely cause of the breach;
 - Actions that have been taken; and
 - Proposed measures to address the breach.

9.3 Complaints

Bomen Solar Farm are required as part of their conditions of consent to prepare complaints management procedure within the Environmental Management Strategy which details how to receive, respond to, record and address community complaints. Bomen Solar Farm should utilise this

procedure for Aboriginal heritage issues. It is recommended that as part of that procedure records of all community complaints and subsequent actions be kept.

The following details should be recorded:

- Date and time of the complaint;
- Complainant name and contact details;
- The nature of the complaint;
- How the complaint was made;
- Actions (if appropriate); and
- Consultation undertaken.
- Status (i.e. open/closed); and
- Any further action required.

Complaints and enquiries regarding Aboriginal heritage issues and any other environmental matters can be received from a number of sources including:

- Via the project website (www.bomensolarfarm.com.au)
- Via the complaints 24hr phone line to be setup prior to construction and advertised on the project website, newsletters and contact cards distributed within the community.
- Via email.

10.0 Monitoring and Auditing

This section outlines the monitoring and auditing requirements relevant to this ACHMP.

10.1 Monitoring

Compliance with this ACHMP will be monitored monthly during construction and six-monthly during operation. This will be the responsibility of the Construction Manager and Asset Manager respectively.

10.2 Independent Environmental Audit

This ACHMP will be audited, as part of the Independent Environmental Audit, within six months of the commencement of construction in accordance with Schedule 4, Condition 5 of SSD-8835. The audit must:

- a. be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
- b. be carried out in consultation with the relevant agencies;
- c. assess whether the development complies with the relevant requirements in this consent, and any strategy, plan or program required under this consent; and
- d. recommend appropriate measures or actions to improve the environmental performance of the development and any strategy, plan or program required under this consent.

Any recommendations from the audit will be detailed in a report and will be implemented to the satisfaction of the Department of Planning and Environment.

11.0 Aboriginal Heritage Induction

Subsequent to the approval of this ACHMP, relevant employees and contractors should undertake the Aboriginal Heritage Induction. The induction should consist of a brief information sheet and short presentation to be delivered as part of contractor's safety induction and utilised throughout the life of the Project. A register of all persons having completed the training package should be maintained throughout the life of the Project.

The induction should be mandatory for all staff and contractors whose roles may reasonably bring them into contact with Aboriginal sites and/or involve consultation with local Aboriginal community members. At a minimum, this should outline current protocols and responsibilities with respect to the management of Aboriginal cultural heritage within the proposal site, provide an overview of the potential scarred tree site conserved within the Project Site, diagnostic features of potential Aboriginal site types (e.g., scarred trees) and procedures for reporting the identification of Aboriginal archaeological sites. The Aboriginal heritage induction should also include the location of access tracks that would need to be utilised to avoid the location of Aboriginal sites that must not be harmed.

12.0 References

Australian Heritage Commission. 2002. *Ask First: a guide to respecting Indigenous heritage places and values*. Canberra: Australian Government Publishing Service. Available at: <http://www.environment.gov.au/heritage/ahc/publications/commission/books/pubs/ask-first.pdf>.

NSW Department of Environment Climate Change & Water. 2010a. *Aboriginal Cultural Heritage Consultation Requirements for Proponents*. Department of Environment, Climate Change and Water.

NSW Department of Environment Climate Change & Water. 2010b. *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. Department of Environment, Climate Change and Water.

NTSCORP Limited. 2013. Welcome to Country. : p.1. Available at: <http://www.ntscorp.com.au/our-services/welcome-to-country/> [Accessed June 27, 2013].

Appendix A – Regulator Consultation

Lauren | Renew Estate

From: Stephen Shoemith <Stephen.Shoemith@planning.nsw.gov.au>
Sent: Wednesday, 24 October 2018 10:56 AM
To: Lauren | Renew Estate
Cc: Will Stone; Tom | Renew Estate
Subject: RE: Bomen Solar Farm - post approval meeting

Thanks Lauren

I can confirm that the ACHMP has been referred to OEH.

Cheers
Steve

Stephen Shoemith
Post Approvals | Resource and Energy Assessments | Planning Services
320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 02 9274 6164 E stephen.shoemith@planning.nsw.gov.au



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From: Lauren | Renew Estate <Lauren@renewestate.com.au>
Sent: Tuesday, 23 October 2018 5:10 PM
To: Stephen Shoemith <Stephen.Shoemith@planning.nsw.gov.au>
Cc: Will Stone <will.stone@wirsol.com.au>; Tom | Renew Estate <Tom@renewestate.com.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Hi Steve

Thank you for your responses.

Please find attached the Draft Heritage Management Plan for OEH review. This was distributed to the RAPs for their review yesterday.

Kind regards

Lauren

Lauren Lambert
Environmental Planner

Renew Estate
M: +61 (0) 422689604

Lauren | Renew Estate

From: Stephen Shoemith <Stephen.Shoemith@planning.nsw.gov.au>
Sent: Monday, 12 November 2018 2:37 PM
To: Lauren | Renew Estate
Cc: Will Stone; Tom | Renew Estate; Leesa Johnston
Subject: RE: Bomen Solar Farm - post approval meeting
Attachments: DOC18-812746 OEH response_Bomen SF draft ACHMP.PDF

Hi Lauren

Please see attached, OEH comments on the Bomen ACHMP.

Cheers
Stece

Stephen Shoemith
Post Approvals | Resource and Energy Assessments | Planning Services
320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 02 9274 6164 E stephen.shoemith@planning.nsw.gov.au



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Level 22, 320 Pitt St, Sydney, 2000

From: Lauren | Renew Estate <Lauren@renewestate.com.au>
Sent: Tuesday, 23 October 2018 5:10 PM
To: Stephen Shoemith <Stephen.Shoemith@planning.nsw.gov.au>
Cc: Will Stone <will.stone@wirsol.com.au>; Tom | Renew Estate <Tom@renewestate.com.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Hi Steve

Thank you for your responses.

Please find attached the Draft Heritage Management Plan for OEH review. This was distributed to the RAPs for their review yesterday.

Kind regards

Lauren

Lauren Lambert
Environmental Planner

Renew Estate
M: +61 (0) 422689604



Stephen Shoesmith
Post Approvals, Resource and Energy Assessments, Planning Services
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Via email: stephen.shoesmith@planning.nsw.gov.au

Dear Mr Shoesmith,

RE: Comments on Bomen Solar Farm Aboriginal Cultural Heritage Management Plan

I refer to above report prepared by AECOM to satisfy conditions 17 Schedule 3 of Development Consent SSD 8835. OEHL has reviewed the Draft Bomen Solar Farm Aboriginal Cultural Heritage Management Plan (ACHMP) prepared by AECOM on 22 October 2018. We provide the following comments:

Section 2.2.2 – Bomen Axe Quarry is not protected under the *Heritage Act 1977*. It is protected as an Aboriginal Place under the *National Parks and Wildlife Act 1974* (NPW Act). Refer to subheading 'Listings' under Bomen Axe Quarry NSW heritage database number 5062851.

Section 4, Table 3 – should state the timing of the surface collection may only occur following project approval (note this has occurred, with development consent issued 8 October 2018) in addition to post ACHMP approval and prior to construction commencing.

Section 6.0 – the proponent should consider fencing and/or signage of sites in addition to potential scarred tree site (BS-ST1-18) to avoid harm to and protect sites in Table 1 Appendix 4 and to meet Schedule 3 Condition 17c.

Section 6.2, Table 6 and footnote 1 – Site 56-1-0542 does exist, and this was not identified in the assessment report. The site was recorded on 7 February 2018. The site is a scarred tree immediately east of the project boundary fence and east of site 56-1-0543. Site 56-1-0542 is listed in Table 1 Appendix 4 of the development consent as it is located next to the boundary of the development and must be avoided by works.

Section 7.4 – states an ASIR will be submitted to OEHL within 12 months of the completion of the salvage. Any changes this to an ASIR are required to be submitted to OEHL within 4 months of the completion of the salvage.

Section 7.5 – salvaged artefacts are to be relocated adjacent to potential scarred tree BS-ST1-18 in accordance with requirement 26 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. The temporary storage of salvaged artefacts/objects may occur on site in a secure location. The location of the cataloguing and analysis of artefacts is not stated. We recommend the cataloguing and analysis is to be undertaken within Wagga Wagga LGA and preferably on site. Salvaged Aboriginal objects/artefacts may not be removed from Wagga Wagga LGA. The cataloguing and analysis location should be stated in the final ACHMP.

Section 9 – include a procedure for potential breaches of the NPW Act. This procedure must include notifying the OEHL as soon as practicable after becoming aware of any contravention of s.86 of the NPW Act by contacting Environment Line on 131 555. This would include actions such as harm to

Aboriginal heritage items not covered by conditions of consent, such as if harm was to occur to Aboriginal heritage items in Appendix 4 Table 1.

Section 11– the Aboriginal heritage induction should include the location of access tracks that would avoid the location of Aboriginal sites that must not be harmed (see Conditions of Consent Appendix 4, Table 1).

Section 12 – Include 'DECCW 2010. Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales' for reference to section 7.5.

If you require further information about this matter please contact Lyndon Patterson on 0436 676 791 or at lyndon.patterson@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Fisher', with a stylized flourish at the end.

ANDREW FISHER
Senior Team Leader Planning
South West Branch
Conservation and Regional Delivery
Office of Environment and Heritage

From: Leesa Johnston <Leesa.Johnston@planning.nsw.gov.au>
Sent: Wednesday, 28 November 2018 4:39 PM
To: Lauren | Renew Estate
Cc: Stephen Shoosmith; Diana Mitchell
Subject: RE: Bomen Solar Farm - post approval meeting

Hi Lauren,

Please find below DPE comments on the ACHMP.

General

Please confirm that the ACHMP was prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary;

Section 6.2

Section 6.2 states that a number of Aboriginal sites are located outside the Project Site, but within close proximity to the Project Site (listed in Table 5 and shown on Figure 2).

Consider including a more detailed description on how these sites will be protected. For example, fencing off the Aboriginal heritage items prior to commencing construction and or preconstruction.

Section 7.1 Impacts to known Aboriginal sites.

Consider stating that the archaeological salvage program will be undertaken following project approval and prior to construction.
Section 7.3 RAP Participation in Fieldwork

Section 7.3 states that it is anticipated that the fieldwork required to complete the surface collection will occur following approval of this ACHMP and prior to construction. Consider amending this section to state that the fieldwork required to complete the surface collection will occur following approval of the Project and ACHMP.

Section 6.0

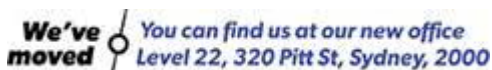
OEH advice stated to consider fencing and/or signage of sites in addition to the potential scarred tree site (BS-ST1-18) to avoid harm to and protect sites in Table 1 Appendix 4 and to meet schedule 3 Condition 17c.

The ACHMP advises that these sites are located outside of the project site. Consider including a description of whether the construction contractor will be entering the land parcels where these sites are located for construction work.

Kind Regards,

Leesa Johnston

Post Approvals | Resource and Energy Assessments | Planning Services
320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 02 82896861 E leesa.johnston@planning.nsw.gov.au



From: Lauren | Renew Estate <Lauren@renewestate.com.au>
Sent: Monday, 26 November 2018 10:07 AM
To: Stephen Shoemsmith <Stephen.Shoemsmith@planning.nsw.gov.au>
Cc: Will Stone <will.stone@wirsol.com.au>; Tom | Renew Estate <Tom@renewestate.com.au>; Leesa Johnston <Leesa.Johnston@planning.nsw.gov.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Good afternoon Steve,

Please find attached the updated ACHMP for Secretary approval. The responses to OEH and RAP comments are provided in Section 5.1.2 and 5.2.4 respectively. Let me know if you would like me to extract these responses and put them in a separate table in an email.

Kind regards

Lauren

Lauren Lambert
Environmental Planner

Renew Estate
M: +61 (0) 422689604



From: Stephen Shoemsmith <Stephen.Shoemsmith@planning.nsw.gov.au>
Sent: Monday, 12 November 2018 2:37 PM
To: Lauren | Renew Estate <Lauren@renewestate.com.au>
Cc: Will Stone <will.stone@wirsol.com.au>; Tom | Renew Estate <Tom@renewestate.com.au>; Leesa Johnston <Leesa.Johnston@planning.nsw.gov.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Hi Lauren

Please see attached, OEH comments on the Bomen ACHMP.

Cheers
Stece

Stephen Shoemsmith
Post Approvals | Resource and Energy Assessments | Planning Services
320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 02 9274 6164 E stephen.shoemsmith@planning.nsw.gov.au



From: Lauren | Renew Estate <Lauren@renewestate.com.au>
Sent: Tuesday, 23 October 2018 5:10 PM
To: Stephen Shoesmith <Stephen.Shoesmith@planning.nsw.gov.au>
Cc: Will Stone <will.stone@wirsol.com.au>; Tom | Renew Estate <Tom@renewestate.com.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Hi Steve

Thank you for your responses.

Please find attached the Draft Heritage Management Plan for OEH review. This was distributed to the RAPs for their review yesterday.

Kind regards

Lauren

Lauren Lambert
Environmental Planner

Renew Estate
M: +61 (0) 422689604

Re.

From: Stephen Shoesmith <Stephen.Shoesmith@planning.nsw.gov.au>
Sent: Tuesday, 23 October 2018 12:31 PM
To: Lauren | Renew Estate <Lauren@renewestate.com.au>
Cc: Anthony Ko <Anthony.Ko@planning.nsw.gov.au>; Will Stone <will.stone@wirsol.com.au>; Tom | Renew Estate <Tom@renewestate.com.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Hi Lauren

A response to your questions is provided in red below.

Cheers
Steve

Stephen Shoemsmith

Post Approvals | Resource and Energy Assessments | Planning Services

320 Pitt Street | GPO Box 39 | Sydney NSW 2001


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From: Lauren | Renew Estate <Lauren@renewestate.com.au>

Sent: Monday, 22 October 2018 1:15 PM

To: Stephen Shoemsmith <Stephen.Shoemsmith@planning.nsw.gov.au>

Cc: Anthony Ko <Anthony.Ko@planning.nsw.gov.au>; Will Stone <will.stone@wirsol.com.au>; Tom | Renew Estate <Tom@renewestate.com.au>

Subject: RE: Bomen Solar Farm - post approval meeting

Hi Stephen

Thank you for meeting with us last week to discuss the Bomen Solar Farm management plans, it was very helpful.

I am just following up on a couple of actions that we left with you. Any update would be greatly appreciated.

- Provision of additional landscaping plan requirements (we have now engaged Biosis to produce this plan).
Elements of the Landscaping Plan include
 - It is recommend that the monitoring section be updated to include:
 - o Further description of the inspection and monitoring program to define the parameters and frequency of monitoring programs (mortality, soil testing, soil moisture, overall plant health / growth), as well as triggers and criteria for measuring success of landscape plantings.
 - o Triggers and Criteria would then be used to determine success and if necessary revised methodologies.
 - o Consider incorporating photograph monitoring.
 - It is recommend that the section be updated to include further description of interventions to be undertaken where growth is not progressing towards triggers and criteria.
 - In Regard to Planting Methodology: Given the specific requirement to establish a visual screen in 3 years and located near Gulgong, consider adopting enhanced restoration practises (ongoing watering, soil testing, site specific fertilisers / micro nutrients and use of organics, etc).
 - Consider differentiating inspections (qualitative) and monitoring (quantitative) methods using defined parameters.
 - In Regard to Evaluation:
 - o 6 monthly evaluation reports be prepared and submitted to DPE throughout the first 2 years of the screen's life.
 - o Consider introducing short-term evaluation stages (immediately after planting), linked to monitoring and triggers.
 - o Consider including expected growth rates for 1, 2 and 3 Years to be used as part of evaluation process.

- Consider nominating the height of the tree screen required to manage visuals at specific locations along the 3kms, including photo monitoring (before, during and after).
 - Include descriptions of managing performance in ongoing adverse weather conditions.
- Define how management of ongoing effectiveness after 3 years would be undertaken (eucalypts grow slowly and acacias die), responsibilities, monitoring, supplementary plants of shrubs, etc would be undertaken during the life of the solar project.

- Speak to OEH (Miranda Kerr, Andrew Fischer, Lindsey) to see if they would be happy to review the Heritage Management plan in parallel to the RAPs' review (the draft plan was distributed to the RAPs this morning, commencing the 28 day review period). In consultation with OEH, the Department is prepared to, in this instance to refer the Heritage MP to OEH prior to completing consultation with the RAPs.

- Speak to Lilia to see if a spreadsheet/compliance tracker format would suffice for addressing Condition 21 Sch 3 (hazards management implementation program). **Advice on this matter will be provided shortly.**

We hope to have a program from our EPC contractor in the coming days so that we can refine the schedule for preparation management plans and confirm if the Christmas shutdown period will present an issue.

Kind regards

Lauren

Lauren Lambert
Environmental Planner

Renew Estate
M: +61 (0) 422689604



From: Stephen Shoemith <Stephen.Shoemith@planning.nsw.gov.au>
Sent: Wednesday, 17 October 2018 11:39 AM
To: Lauren | Renew Estate <Lauren@renewestate.com.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Thanks Lauren

I have pre-registered the meeting at the front desk in the lobby, so the door person will call me when you sign-in.

Cheers
Steve

Stephen Shoemith
Post Approvals | Resource and Energy Assessments | Planning Services
320 Pitt Street | GPO Box 39 | Sydney NSW 2001
T 02 9274 6164 E stephen.shoemith@planning.nsw.gov.au



From: Lauren | Renew Estate <Lauren@renewestate.com.au>
Sent: Wednesday, 17 October 2018 10:55 AM
To: Stephen Shoesmith <Stephen.Shoesmith@planning.nsw.gov.au>
Cc: Anthony Ko <Anthony.Ko@planning.nsw.gov.au>; Tom | Renew Estate <Tom@renewestate.com.au>; Will Stone <will.stone@wirsol.com.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Hi Stephen,

Please see attached our proposed framework for the management plans that we would like to discuss this afternoon.

Shall we just give you a call when we arrive at DPE offices at 2pm?

Kind regards

Lauren Lambert
Environmental Planner

Renew Estate
M: +61 (0) 422689604

Re.

From: Stephen Shoesmith <Stephen.Shoesmith@planning.nsw.gov.au>
Sent: Wednesday, 17 October 2018 7:44 AM
To: Lauren | Renew Estate <Lauren@renewestate.com.au>
Cc: Anthony Ko <Anthony.Ko@planning.nsw.gov.au>; Tom | Renew Estate <Tom@renewestate.com.au>; Will Stone <will.stone@wirsol.com.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Thanks Lauren.

Very happy to meet with you this afternoon. Is it possible to move the meeting forward by 30 mins.

Cheers
Steve

From: Lauren | Renew Estate <Lauren@renewestate.com.au>
Sent: Tuesday, 16 October 2018 5:37 PM
To: Stephen Shoemith <Stephen.Shoemith@planning.nsw.gov.au>
Cc: Anthony Ko <Anthony.Ko@planning.nsw.gov.au>; Tom | Renew Estate <Tom@renewestate.com.au>; Will Stone <will.stone@wirsol.com.au>
Subject: RE: Bomen Solar Farm - post approval meeting

Hi Stephen

Thank you for your time on the phone earlier. If it still suits you, we would like to meet at your offices tomorrow at 2.30pm.

There would be 3 of us attending from Renew Estate (myself and Tom and Will, who are copied in).

Let me know if that time suits.

Kind regards

Lauren

Lauren Lambert
Environmental Planner

Renew Estate
M: +61 (0) 422689604



From: Lauren | Renew Estate
Sent: Tuesday, 16 October 2018 3:20 PM
To: stephen.shoemith@planning.nsw.gov.au
Cc: Anthony.Ko@planning.nsw.gov.au; Tom | Renew Estate <Tom@renewestate.com.au>; Will Stone <will.stone@wirsol.com.au>
Subject: Bomen Solar Farm - post approval meeting

Hi Stephen

I am from Renew Estate, the applicant for the approved Bomen Solar Farm (SSD 8835). I understand you are the person to contact to arrange a meeting to discuss DP&E's expectations for the conditions of consent that require the Secretary's sign-off, including various environmental management plans.

Please advise when you would you be available to meet at your offices. A meeting sometime in the next week would be great as the EPC contractor is kicking off the plans now in order to ensure there are no delays to our tight construction program. We are based in Sydney so are flexible with the time of day etc.

Look forward to hearing back.

Kind regards

Lauren

Lauren Lambert
Environmental Planner

Renew Estate
M: +61 (0) 422689604

Re.

Appendix B – RAP Responses to ACHMP

Oakes, Georgie

From: Oakes, Georgie
Sent: Friday, 23 November 2018 9:23 AM
To: 'yalmambirra yalmambirra'
Subject: RE: Bomen Solar Farm - ACHMP

Hi Yal,

Thanks for the response. Training would include contractors being shown pictures of artefacts, scarred trees etc during the induction and told if they see anything similar they are to contact the environmental manager. This is a fairly common approach and often effective.

In terms of monitoring, construction will be ongoing over nine months with different portions of the site cleared over that time, so it wouldn't be practicable to have someone on site the entire time. We would be on-call if anything was identified that required investigation.

Hope all is well.

All the best,
Geordie

Geordie Oakes
Senior Heritage Specialist
D +61 2 8934 0610
Geordie.Oakes@aecom.com

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From: yalmambirra yalmambirra [mailto:yalmambirra@outlook.com]
Sent: Tuesday, 20 November 2018 2:11 PM
To: Oakes, Georgie
Subject: RE: Bomen Solar Farm - ACHMP

Hullo Geordie

Sounds good in principle...who 'trains' the staff etc?

Would be great to have a monitor on site when development begins though.

Thanks for your response and catch up later. Take care.

Yal

Sent from [Mail](#) for Windows 10

From: Oakes, Geordie <Geordie.Oakes@aecom.com>

Sent: Tuesday, November 20, 2018 1:51:09 PM

To: yalmambirra yalmambirra

Subject: RE: Bomen Solar Farm - ACHMP

Hi Yal,

Thanks for the response. Hope all is going well. Below is a response to your questions. If you have any further question, please don't hesitate to contact me.

- Table 3: Management of previously unrecorded Aboriginal objects. This is confusing. Does this mean that any objects found during development will be managed by the Environmental Manager and Site Manager? Will they know what an artefact looks like?
 - *The Environmental Manager and Site Manager would be responsible for ensuring any Aboriginal objects unidentified will be managed appropriately in accordance with the procedure in Section 8.3. All staff will be trained as part of the induction to identify artefacts and if unsure will be told to contact the Environmental Manager and Site Manager.*
- 7.5: Care and control of Salvaged Objects How will artefacts be relocated?
 - *The artefacts will be bagged by RAPs and carried to potential scarred tree site (BS-ST1-18) where they will be analysed, catalogued and placed adjacent to the tree by RAPs.*
- 8.1: Open Artefact Sites How will previously unidentified artefacts be identified? By whom will they be identified? Workers digging up the ground etc for example, will not know what to look for.
 - *All staff will be trained as part of the induction to identify artefacts and if unsure will be told to contact the Environmental Manager and Site Manager.*

Cheers,

Geordie

Geordie Oakes

Senior Heritage Specialist

D +61 2 8934 0610

Geordie.Oakes@aecom.com

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From: yalmambirra yalmambirra [mailto:yalmambirra@outlook.com]

Sent: Friday, 16 November 2018 8:54 PM

To: Oakes, Georgie

Subject: RE: Bomen Solar Farm - ACHMP

Hullo Georgie

My comments are as follows...

Table 3: Management of previously unrecorded Aboriginal objects.

This is confusing. Does this mean that any objects found during development will be managed by the Environmental Manager and Site Manager? Will they know what an artefact looks like?

7.5: Care and control of Salvaged Objects

How will artefacts be relocated?

8.1: Open Artefact Sites

How will previously unidentified artefacts be identified? By whom will they be identified? Workers digging up the ground etc for example, will not know what to look for.

Thanks for the opportunity to comment Georgie. If you need any clarification of my comments please let me know...

Take care.

Yal

Sent from [Mail](#) for Windows 10

From: [Oakes, Georgie](#)

Sent: Monday, 22 October 2018 8:43 AM

Subject: Bomen Solar Farm - ACHMP

Hi Yal,

Hope you're well. Please find attached the draft Bomen Solar Farm Aboriginal Cultural Heritage Management Plan for review.

If you have any comments on the draft, please provide these within 28 days from the date of this email.

Cheers,
Geordie

Geordie Oakes
Senior Heritage Specialist
D +61 2 8934 0610
Geordie.Oakes@aecom.com

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Appendix C – Aboriginal Sites Database

AHIMS ID	Site name	AHIMS Centroid Coordinates (zone 55)		Inside or outside Project Site	Site type	Management
		MGAE	MGAN			
N/A	BSF-AS2-18	540681	6120545	Inside ¹	Possible scarred tree	Conservation (refer Section 6.1 of the ACHMP)
56-1-0043	East Bomen 1	538635	6119129	Outside	Axe quarry	Not impacted; no further action. Currently fenced.
56-1-0044	East Bomen IF2	538670	6118650	Outside	Isolated artefact	Not impacted; install temporary bunting and signage
56-1-0045	East Bomen IF1	539405	6119039	Outside	Isolated artefact	Not impacted; install temporary bunting and signage
56-1-0532	Bomen 539085	539085	6118460	Outside	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0533	Bomen 539070	539070	6118506	Outside	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0534	Bomen 538732	638732	6119148	Outside	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0535	Bomen 539004	539004	6119382	Outside	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0537	Bomen 539072	539072	6119150	Outside	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0542	Bomen 540684	640684	6120301	Outside	Scarred tree	Not impacted; no further action. Separated by existing fence.
56-1-0538	Bomen 539071	539071	6118591	Outside	Open artefact site	Not impacted; install temporary bunting and signage
56-1-0553	BSF-IA5-18	539038	6119280	Outside	Isolated artefact	Not impacted; install temporary bunting and signage
56-1-0554	BSF-IA4-18	539610	6120399	Outside	Isolated artefact	Not impacted; no further action. Separated by existing fencing.
56-1-0109	BIF1	540719	6120812	Inside	Isolated artefact	Surface collection

¹ Note the tree trunk is inside the Project Site, however part of the canopy and dripline extends outside the Project Site.

AHIMS ID	Site name	AHIMS Centroid Coordinates (zone 55)		Inside or outside Project Site	Site type	Management
		MGAE	MGAN			
56-1-0437	Bomen Solar IS01	540564	6120660	Inside	Isolated artefact	Surface collection
56-1-0536	Bomen 539015	539015	6119445	Inside	Open artefact site	Surface collection
56-1-0543	Bomen 540568	540568	6120270	Inside	Open artefact site	Surface collection
56-1-0550	BSF-AS2-18	540681	6120545	Inside	Artefact scatter	Surface collection
56-1-0551	BSF-AS1-18	540261	6120725	Inside	Artefact scatter	Surface collection
56-1-0552	BSF-IA6-18	538832	6118773	Inside	Isolated artefact	Surface collection
56-1-0555	BSF-IA3-18	539719	6120405	Inside	Isolated artefact	Surface collection
56-1-0556	BSF-IA2-18	540296	6120389	Inside	Isolated artefact	Surface collection
56-1-0557	BSF-IA1-18	540540	6120503	Inside	Isolated artefact	Surface collection