

Our ref: HMS ID 13835

Rita Hatem
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure
Rita.Hatem@planning.nsw.gov.au
Letter uploaded to the Major Projects Planning Portal

Advice on Environmental Impact Statement – State Significant Development

Proposal: Garoo Solar Farm and BESS

Major Project reference: SSD-79747209

Received: 3 March 2026

Dear Rita,

Thank you for your referral seeking advice on the above State Significant Development (SSD) proposal.

In preparing this advice Heritage NSW has reviewed the following documents:

- Environmental Impact Statement (EIS) - prepared by Environmental Resource Management (ERM), dated 30 January 2026
- Appendix H: Aboriginal Cultural Heritage Assessment Report - prepared by ERM, dated 5 November 2025

Following the review of the above documents, Heritage NSW requests additional information to inform its advice to the Department on whether the Aboriginal Cultural Heritage Assessment Report (ACHAR) adequately addresses the Secretary's Environmental Assessment Requirements (SEARs) for the project, including the associated recommendations for the management of Aboriginal cultural heritage. Additional information is required in relation to the matters included in **Attachment A**.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact Corey O'Driscoll, Practice Lead at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Alison Lamond

Alison Lamond
A/Manager – Major Projects
Heritage NSW - Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*

Attachment A – Detailed Aboriginal cultural heritage advice

Prior to any determination, Heritage NSW recommends that the Department request additional information from the proponent in relation to the matters outlined below. This information is requested to ensure that the ACHAR demonstrates compliance with relevant assessment guidelines, including the *Aboriginal cultural heritage consultation requirements for proponents* (DECCW 2010), *Code of practice for archaeological investigation of Aboriginal objects in NSW* (DECCW 2010), and the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011).

Consultation

1. The consultation information provided in the ACHAR includes incoming emails and a consultation log. Please provide Heritage NSW with evidence that each Aboriginal stakeholder was contacted as part of all stages of consultation, including, but not limited to, Stage 1 notifications. This can comprise of copies of dated email records with all relevant email addresses shown and/or delivery / read receipts of the correspondence.
2. Please provide Heritage NSW with any correspondence with the RAPs following finalisation of the ACHAR as the last consultation in the ACHAR is dated May 2025. Heritage NSW requires that consultation with RAPs is continuous. Under our policy and guidelines, breaks in consultation of over six months may not constitute continuous consultation.

Aboriginal Cultural Heritage Assessment Report (ACHAR)

3. Heritage NSW notes that the Aboriginal Heritage Information Management System (AHIMS) search is greater than 12 months old at the time of submission. Heritage NSW generally requires, as per Requirement 1b of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (Code of Practice; DECCW 2010), that AHIMS searches are less than 12 months old. Please update the AHIMS search to ensure currency.
4. Heritage NSW recommends that the regional background is expanded to include the range of region assessments undertaken. Figure F2-5 of the EIS outlines a number of regional SSD projects (i.e., Middlebrook Solar Farm, Chaffey Dam Upgrade, Hills of Gold Wind Farm) that have not been included in the regional background, which has hampered the predictive model presented. Please update the regional background and predictive model to better represent a regional synthesis. This is pertinent as Section 8 of the ACHAR denotes 100 m from Sugarloaf and Tamarang Creeks as being of high sensitivity, however the rationale behind this has not been clearly explained and additional regional studies may aid this conclusion.
5. Please provide additional information on any potential historic significance and/or contact archaeology associated with AHIMS site #29-2-0499 (GSF AS 04) as it noted as near an old hut and potentially knapped glass.
6. Heritage NSW acknowledges the efforts undertaken by the applicant to avoid impact to Aboriginal cultural heritage; however, further explication is required in Section 10 of the ACHAR to clarify why low potential for impact is proposed rather than no impact. Heritage NSW recommends that management measures are changed to no impact and avoid ensuring that these sites are protected from any future design modifications. Further, this avoidance and conservation of sites should be clearer in Section 11 of the ACHAR.

7. Please update the unexpected finds procedure include all RAPs not just LALCs and remove mention of permits as management will be covered by a project Aboriginal Cultural Heritage Management Plan (ACHMP).
8. Please clarify the number of sites within the project area as Section 8.4 notes 16 sites rather than 13 through most of the report.
9. Further explication is required on the likelihood of potential archaeological deposit (PAD) across the project area. The ACHAR outlines that Sugarloaf and Tamarang Creeks are areas of high sensitivity and that geological information indicates potential for subsurface material. Heritage NSW recommends a section that clearly outlines the possibility of PADs across the project area and in association with surface sites, especially larger surface scatters like GSF AS2.

Survey Coverage

10. Further information and details are required on how survey units have been defined based on landforms as both SU1 and SU2 are characterised as having the same landforms, however Table 7-4 describes SU1 as an undulating slope landscape. Further to this, the visibility is stated as low, but Table 7-2 has visibility at 69% and effective survey coverage at 21%.
11. Heritage NSW recommends Table 7-3 is accompanied by a figure that outlines the landforms elements for each survey unit and the survey tracklogs to provide additional context.
12. Heritage NSW notes that survey did not occur along Sugarloaf Creek and that this area is currently excluded from impact. It is recommended that additional assessment, including survey and potentially test excavations, is conducted in this area design changes trigger direct impacts being proposed in this area.

Disturbance footprint

13. Please clarify where the temporary concrete batching plants will be located within the project area and whether these areas were assessed as part of the ACHAR.

Additional comments

14. Please clarify whether sites across the project area require continued management and protection for the current landholder to continuing using sections of the property not covered by the solar farm.