



Our ref: DOC20/1044793

Javier Canon  
Senior Environmental Assessment Officer  
Resources Assessments 1B  
Department of Planning Infrastructure and Environment  
By email: javier.Canon@planning.nsw.gov.au

Dear Javier

### **Notice of Exhibition of application for Stubbo Creek Solar Farm (SSD 10452)**

Thank you for the opportunity for Heritage NSW to review and comment on the above State Significant Development (SSD) proposal.

Heritage NSW have reviewed and considered the Aboriginal cultural heritage (ACH) assessment for the project prepared by OzArk Environment and Heritage (December 2020).

#### **Negligible harm to Aboriginal cultural heritage**

The Aboriginal cultural heritage (ACH) assessment shows that of the 25 Aboriginal sites located within the project boundary all will be avoided from development works except for an isolated stone artefact (Rosevale IF). The recommendation for the isolated find will further reduce the harm (OzArk 2020). HNSW is pleased with this outcome

#### **Access track options (1-3)**

HNSW recommend that the selection of access tracks from the 3 options described in the ACH assessment report (OzArk 2020:89) is based on minimising harm to Aboriginal objects. No objects were observed during the survey assessments for options 2 and 3 whilst option 1, is yet to be surveyed to determine presence or absence of objects. HNSW expect that the determination of the access track will be based on avoiding harm to objects and if necessary, have adequate management procedures in place to mitigate harm.

#### **Adequacy of ACH assessment**

Heritage NSW is satisfied with the ACH assessment of the proposed project area which has been undertaken in a manner consistent with the Secretary's Environmental Assessment Requirements (SEARs).

HNSW also note that the ACH assessment results indicate that the Stubbo Creek complex has interesting archaeology based on the dominance of high-grade quality quartz artefact material. Therefore, should the project proposal change and there is a need for excavating areas closer to the creek margins it is recommended that research inquiries relevant to quartz tool making technology are considered. Notwithstanding possible project changes HNSW is satisfied that no direct harm to the 24 Aboriginal sites will occur including areas of potential archaeological deposit.

### **Aboriginal consultation is adequate**

HNSW have identified that the Aboriginal consultation undertaken for the project is consistent with the requirements set down in the SEARs (as described in Ozark 2020:16-20).

### **Issues raised by Wellington Valley Wiradjuri Aboriginal Corporation (WVWAC) and Gallangabang Aboriginal Corporation (GAC)**

Two Registered Aboriginal Parties (WVWAC and GAC) raised several issues regarding the survey method and management strategies. In some instances, the proponent has accepted points raised by the RAPS on the draft assessment approach and subsequently, modified the survey method. HNSW is satisfied with the proponent's responses to all other issues raised by the 2 Registered Aboriginal Parties (OzArk 2020:17-20).

If you have any questions regarding the above advice, please contact Phil Purcell, Archaeologist at Heritage NSW on 68835341 or [phil.purcell@environment.nsw.gov.au](mailto:phil.purcell@environment.nsw.gov.au).

Yours sincerely



**DR SAMANTHA HIGGS**

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29 January 2021