

Attention: iwan.davies@planning.nsw.gov.au

Dear Mr. Davies

Heritage NSW - Aboriginal Cultural Heritage - EnergyConnect (NSW - Eastern Section) - State Significant Infrastructure (SSI 9172452) proposal - Environmental Impact Statement (EIS) - (Wentworth Shire, Balranald Shire, Murray River, Edward River, Hay Shire, Murrumbidgee, Federation, Lockhart Shire, Wagga Wagga)

Thank you for your referral dated 17 January 2022, inviting comments on the EIS for the above SSI proposal, with respect to Aboriginal cultural heritage. Heritage NSW has reviewed the *Environmental Impact Statement EnergyConnect (NSW - Eastern Section) Technical Paper 2 - Aboriginal Cultural Heritage Assessment (ACHAR), Buronga to Wagga Wagga, NSW - Navin Officer Heritage Consultants Pty Ltd, December 2021*, and make the following comments and recommendations.

Heritage NSW understands that Transgrid (NSW) and ElectraNet (SA) are seeking approval for the construction of a new High Voltage (HV) interconnector between NSW and SA, with an additional connection to north west Victoria. Collectively, the proposed interconnector is known as EnergyConnect. This proposal is focusing on the eastern section of EnergyConnect in NSW, that comprises of a 1 km wide corridor between the Buronga substation and the Wagga Wagga substation, approximately 540 kms in length.

Predicated Impacts to Aboriginal Cultural Heritage

Heritage NSW understands that 131 Aboriginal sites and 28 Potential Archaeological Deposits (PADs) were identified during a series of archaeological field surveys for the proposal, and that 78 Aboriginal sites will likely be impacted to varying degrees.

The ACHAR identifies that there have been impact avoidance and mitigation measures applied throughout the design process, and the refinement of the construction methodology has resulted in reduced impacts to certain Aboriginal cultural heritage sites and PADs.

Heritage NSW notes that:

- Avoidance of impacts to 5 sites including PEC-E-PAD15 and PEC-E-19 (Cobb Highway camp option), PEC-E PAD44 (Boooroorban compound option location) and PEC-E-PAD34 and PEC-EPAD64 - has been achieved.
- The proposal is predicated to result in a range of indirect and direct impacts to 94 Aboriginal sites that are documented in the ACHAR to be of low, moderate, and high scientific significance.
- The ACHAR concludes that the predicted cumulative impacts on Aboriginal cultural heritage sites and values across the broader region will be low.

Limitations of the ACHAR

Heritage NSW understands that access to certain sections of the proposed development footprint were restricted by some landowners, which resulted in an incomplete archaeological survey. Heritage NSW recommends that a complete archaeological survey of the entire



development footprint is best practise and should be undertaken by all proponents, irrespective of the approval pathway and any associated constraints.

- Heritage NSW recommends that the unsurveyed sections of the proposed development footprint be prioritised for survey and assessment with respect to Aboriginal cultural heritage.

The ACHAR notes that the significance of the PADs is to be confirmed during test excavations, where landowner access is made available, occurring in parallel with the planning process. This approach is not supported by Heritage NSW. Test excavations are undertaken to determine significance, which needs to occur first, to inform the project design and to minimise any associated impacts.

- Heritage NSW recommends that any proposed test excavations must occur prior to any associated development works commencing.

Community Consultation Process

Heritage NSW understands that the community consultation process has included representation and participation in fieldwork and archaeological surveys, by members of the following Aboriginal organisations - Balranald Local Aboriginal Land Council, Dareton Local Aboriginal Land Council, Deniliquin Local Aboriginal Land Council, Griffith Local Aboriginal Land Council, Hay Local Aboriginal Land Council, Ngumbaay Indigenous Corp and Wagga Wagga Local Aboriginal Land Council.

- Heritage NSW recommends that the established community consultation process be maintained for the throughout all stages of the proposed development.

Recommendations with respect to Aboriginal Cultural Heritage

Heritage NSW notes that the ACHAR recommends a range of mitigation measures in relation to Aboriginal Cultural Heritage. Heritage NSW concurs with the recommendations and supports the implementation of those mitigation measures throughout all stages of the proposed development.

Should you require any further information, please contact Nicole Davis, Manager Assessments, Heritage NSW on 4927 3156 or nicole.davis@environment.nsw.gov.au

Yours sincerely

Nicole Y Davis

Manager Assessments

Community Engagement

Heritage NSW

Department of Premier and Cabinet

14 February 2022