



Our ref: DOC22/460391

Mr Kurtis Wathen
Environmental Assessment Officer– Energy Resource Industry Assessments
Planning and Assessment
Department of Planning & Environment
4PSQ, 12 Darcy Street,
PARRAMATTA NSW 2150

Email: Kurtis.Wathen@dpie.nsw.gov.au

Dear Kurtis

Request for Advice – Blind Creek Solar Farm (SSD-13166280) Environmental Impact Statement

Thank you for your referral dated 3 June 2022 requesting advice from Heritage NSW on the above State Significant Development (SSD).

In preparing this advice, Heritage NSW has considered the following reports: 'Environmental Impact Assessment Blind Creek Solar Farm' (NGH, May 2022) and 'Appendix H Aboriginal Cultural Heritage Assessment Blind Creek Solar Farm' (NGH, February 2022).

We understand from the reporting in the Environmental Impact Statement (EIS) that the Blind Creek Solar Farm project:

- includes the construction and operation of a solar photovoltaic (PV) energy generation facility with an estimated capacity of up to 350MWAC (420MWDC) near Lake George in the Queanbeyan-Palerang local government area.
- includes associated infrastructure, such as grid connection and battery storage of nominally 300MW / 600MWh.
- footprint is approximately 680-700 hectares.

We provide the following comments on Blind Creek Solar Farm EIS and Appendix H: Aboriginal Cultural Heritage Assessment Report (ACHAR):

- The ACHAR was prepared in accordance with the SEARs issued on 11 February 2021 and generally in accordance the agency specific SEARs Heritage NSW issued on 10 February 2021 (refer to DOC 21/49171-3). A considerable amount of assessment of Aboriginal cultural heritage and landform mapping has been presented in the ACHAR. The ACHAR presents the results of field survey and test excavation conducted in accordance with the 'Code of Practice for Archaeological Investigation of Aboriginal Object in New South Wales' (DECCW 2010) that was referred to in the DOC 21/49171-3 by Heritage NSW.
- Heritage NSW generally supports the measures proposed to protect, conserve, manage and mitigate Aboriginal cultural heritage in the ACHAR.
- Some areas of cultural and archaeological sensitivity, particularly mapped landform areas of high sensitivity have been removed from the project footprint to avoid harm to Aboriginal cultural heritage sites and values.
- Maps on pages 75 and 91 of the confidential version of the ACHAR are truncated and there is no heading or key.

- Regarding the proposal for archaeological salvage excavation, we recommend seeking the following information from the proponent, to be presented at the Response to Submissions stage:
 - What is the area in m² of the three landforms proposed for archaeological salvage excavation (elevated sand body, creek terrace and undulating plain) that will be impacted from the solar farm proposal?
 - What percentage of the three landforms (elevated sand body, creek terrace and undulating plain) that will be impacted from the solar farm is proposed to be subject to archaeological salvage excavation?
 - Test excavation results found the elevated sand body landform had an average of 43 artefacts/m² and the creek terrace landform 20 artefacts/m². We note that the ACHAR proposes archaeological salvage excavation of 5-10m² of the elevated sand body landform and 15-30m² of the creek terrace landform. Our agency specific SEARs recommended where impact are unavoidable, consideration be given to full-scale salvage activities. We recommend the proponent consider a greater area of salvage of these two landforms as mitigation against harm to Aboriginal cultural heritage from the solar farm proposal.
 - Heritage NSW recommends a detailed archaeological salvage excavation and community collection methodology be presented including maps showing the location of the proposal salvage areas.

Heritage NSW recommends that Blind Creek Solar Farm Pty Ltd and NGH continue to consult with the Registered Aboriginal Parties and Heritage NSW for the project including during the development of the Cultural Heritage Management Plan and proposed salvage activities post-approval.

If you have any questions regarding the above advice, please contact Lyndon Patterson, Senior Assessments Officer, at Heritage NSW, on 02 6022 0619 or Lyndon.Patterson@environment.nsw.gov.au.

Yours sincerely



Kym McNamara
Senior Assessments Officer
Heritage NSW
Department of Planning and Environment
(by Delegation)
Date: 5 July 2022