

Our ref: DOC24/197448

Your ref: SSD-4832310

Natasha Homsey

Team Leader

Department of Planning, Housing and Infrastructure

natasha.homsey@dpie.nsw.gov.au

Advice on Response to Submission – State Significant Infrastructure

Proposal: Central-West Orana REZ Transmission Line

Major Project reference: SSI-48323210

Received: 11 March 2024

Dear Natasha

Thank you for your referral seeking advice for the above State Significant Infrastructure Response to Submissions. Thank you for the continued opportunity to comment on the project.

This letter has been prepared based on a review of the following documents:

- Central-West Orana Renewable Energy Zone Transmission Project Submissions Report, prepared by EnergyCo, dated March 2024, including Appendix H Aboriginal Cultural Heritage Assessment Addendum, prepared by EMM Pty Ltd, dated 4 March 2024;
- Aboriginal Cultural Values Mapping Report for the Central West Orana REZ Transmission Project, near Gulgong, NSW, prepared by Dr Philip A Clarke, dated 21 June 2023. Included as Appendix C of the Aboriginal Cultural Heritage Assessment Report (previously redacted); and
- Central-West Orana Renewable Energy Zone Transmission Project Amendment Report, prepared by EnergyCo, dated March 2024.

The information presented in these documents sufficiently addresses several of the key considerations raised by Heritage NSW on Aboriginal cultural heritage matters. However, it is understood that the Aboriginal Cultural Heritage Assessment Addendum was not provided to the Registered Aboriginal Parties for review and comment. This report includes substantial information on the outcomes of additional survey and test excavation, including the identification of new sites for which management recommendations are provided. On this basis, Heritage NSW recommends that the Aboriginal Cultural Heritage Assessment Addendum be provided to the Registered Aboriginal Parties for review and comment, with any comments received to be addressed in the finalisation of this document. Without this information, Heritage NSW cannot provide final advice on the adequacy of the assessment with reference to the impacts to Aboriginal cultural heritage and the proposed management and mitigation of any such impacts.

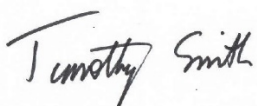
Following revision of the Aboriginal Cultural Heritage Assessment Addendum to address the matter identified above, Heritage NSW request the opportunity to undertake additional review and provide further advice.

The other outstanding matters can be addressed as part of the development of an Aboriginal cultural heritage management plan. These are outlined below.

- Heritage NSW notes that the predicted artefact density for the site-wide artefact scatter (SNI-BS1, containing AHIMS sites as listed in Table 1) is an over-estimation of artefact distribution within the area. Heritage NSW accepts that this predicted artefact density is applicable to landforms bordering identified creek lines (as evidenced by the outcomes of test excavation) but that, based on the archaeological pattern for the region and the survey outcomes, the remainder of the mapped site area is likely to contain much lower densities of stone artefacts, with sporadic distribution. This should be acknowledged in the project Aboriginal Cultural Heritage Management Plan and/or in any subsequent assessment.
- Site SNI-RS05 is a rock shelter that is located within 10 metres of the amended construction area. Given that sites of this type are vulnerable to indirect impacts (such as vibration from blasting, changes to sedimentation regimes etc), the Aboriginal Cultural Heritage Management Plan should consider the potential for indirect impacts to this site and any other rock shelters or grinding groove sites located within 50 metres of the amended construction area.
- The amended construction area intersects with the main channel of the Talbragar River at two locations (as shown in Map 12 of Figure 5.1 of Appendix H). In the Aboriginal Cultural Heritage Management Plan, please clarify why this area was not test excavated and was not assessed as an area of archaeological sensitivity. Where warranted, please include provision for further investigation of this area (including test and salvage excavation as required).
- There are inconsistencies in the information presented in Section 5.3.4 and Table 6.1 of Appendix H in relation to the density of artefacts. For example, Section 5.3.4 describes SNI-FA02, SNI-FA06, SNI-FA08, SNI-FA09 & SNI-FA10 as characterised by high densities of sub-surface artefacts whereas Table 6.1 states artefact densities are moderate. Please revise &, if required, adjust the significance assessment accordingly in the Aboriginal Cultural Heritage Management Plan.
- There are several sites that do not yet have AHIMS IDs. Please ensure all sites are registered on AHIMS and AHIMS IDs are referenced in the Aboriginal Cultural Heritage Management Plan.

If you have any questions regarding these comments, please contact Nicola Roche, Principal Assessments Officer, at Heritage NSW on 9228 6424 or nicola.roche@environment.nsw.gov.au.

Yours Sincerely



Tim Smith OAM

Director Assessments

Heritage NSW

Department of Climate Change, Energy, the Environment and Water

As Delegate under National Parks and Wildlife Act 1974

27 March 2024