

21 August 2025

Re: Strontian Solar Farm - Aboriginal and Historical Heritage Constraints and Opportunities Assessment

This report constitutes of a desktop Aboriginal and historical heritage constraints and opportunities assessment regarding the proposed Scoping Report to be lodged with the NSW Department of Planning, Housing and Infrastructure for a site located on Strontian Road, Sandigo, NSW 2700.

Proposal

Strontian Solar Farm Pty Ltd (the proponent) is proposing to develop the land located at Strontian Road, Sandigo as part of the Strontian Solar Farm project. The proponent intends on seeking development consent for the proposed works under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as a State Significance Development (SSD). The Secretary's Environmental Assessment Requirements (SEARs) for the project have not yet been issued, but it is assumed they will require the assessment of the likely impacts of the proposed works on Aboriginal and Historical heritage.

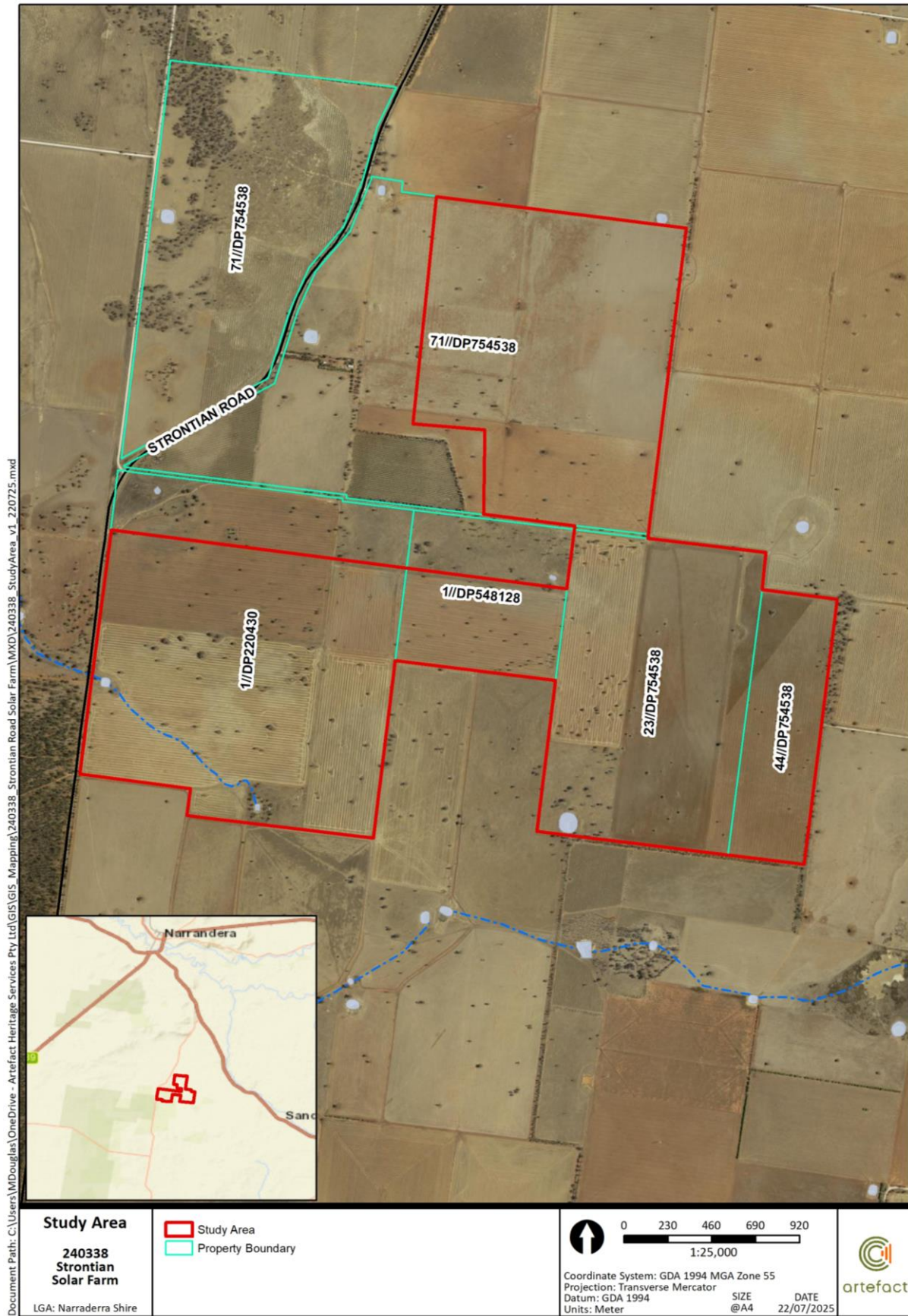
Artefact Heritage and Environment (Artefact) has been engaged by the proponent to prepare a Heritage Constraints and Opportunities Assessment report for the proposed works to identify any potential heritage constraints. This report accompanies the Scoping Report submitted to request the Secretary's Environmental Assessment Requirements (SEARs).

The study area is located within the Narrandera Local Aboriginal Land Council (LALC), and within the Narrandera Local Government Area (LGA), parish of Birrego, County of Mitchell.

The study area (Figure 1) is comprised of properties located on Strontian Road, Sandigo, NSW, 2700 and is legally defined as:

- Lot 1 DP220430
- Lot 1 DP548128
- Lot 23 DP754538
- Lot 44 DP754538
- Lot 71 DP754538

Figure 1: The study area



Aboriginal Heritage

AHIMS search

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) database was undertaken on 27 June 2025 (Client Service ID 1018381) to determine the location of registered Aboriginal sites in relation to the current study area. The search area was defined as 6km x 6km of land surrounding the study area to inform the characterisation of the local archaeological context.

The search determined that there are 79 recorded Aboriginal sites listed on AHIMS within the search area (Figure 2). The extensive search demonstrated that there were no registered sites within the study area. There are 24 recorded Aboriginal sites within 200 metres of the study area (Figure 3). The closest registered site to the study area is AHIMS ID 49-6-0151 'Aboriginal Ceremony and Dreaming', which is approximately 43 metres from the study area.

Overall, the AHIMS data is limited to areas that have been previously surveyed. However, the proximity of numerous AHIMS sites to the study area indicate that it is likely that Aboriginal objects are also located within the study area.

The proximity of a large number of sites along the study area boundary also suggest some of those sites may extend into the study area. Further research of those sites during the next stages of archaeological investigation is required.

Figure 2: AHIMS extensive search results

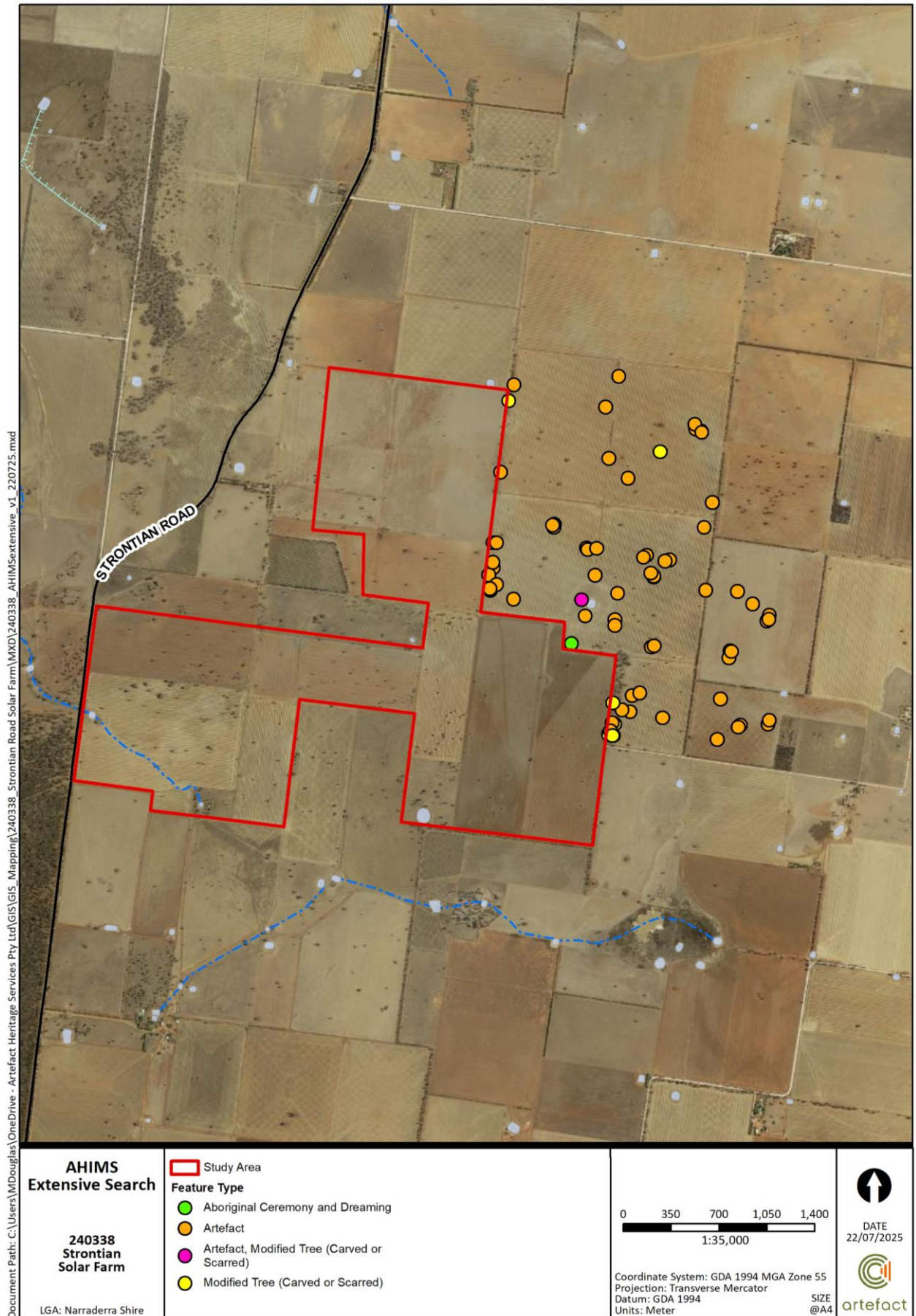


Figure 3: AHIMS detailed search results



Landscape features that indicate the presence of Aboriginal objects

Aboriginal objects are often associated with particular landscape features as a result of Aboriginal people's use of those features in their everyday lives and for traditional cultural activities. Therefore, it is likely that Aboriginal objects will be present on land that is:

- Within 200m of water, or
- Located within a sand dune system, or
- Located on a ridge top, ridge line, or headland, or
- Located within 200m below or above a cliff face, or
- Within 20m of or in a cave, rock shelter, or cave mouth
- Is on land that has not been subject to human activity that has changed the land's surface, in a clear and observable manner.

A review of aerial imagery and desktop resources indicate that the study area contains **one** of the landscape features that often associated with Aboriginal objects.

Landscape Feature	Presence in study area
Within 200m of water	Yes. Mapping for the study area indicates that a watercourse, which is most likely ephemeral, is located within the southwest portion of the study area.
Located within a sand dune system	No. The study area is not located within a sand dune system.
Located on a ridge top, ridge line, or headland	No. The study area is not located on a ridge top, ridge line, or headland
Located within 200m below of a cliff face	No. The study area is not located below a cliff face
Within 20m of or in a cave, rock shelter, or cave mouth (Environment 2010)	No. The study area is not located within 20m of a cave, rock shelter or cave mouth
Is not on disturbed land – Land is disturbed if it has been the subject of a human activity that has changed the land's surface, being changes that remain clear and observable.	Not considered to be disturbed land. There is likely to have been varying levels of effects to the ground surface from vegetation clearance, changes to run-off patterns, etc., but overall, in this constraints level assessment the study area is not considered to be disturbed land.

Previous relevant archaeological assessments

A summary of previous relevant Aboriginal archaeological assessments within and within proximity to the study area are provided in Table 1 below:

Table 1: Previous Aboriginal archaeological assessments

Report	Summary	Proximity to study area
Australian Cultural Heritage Management (ACHM), 2018, Proposed Sandigo Solar Farm Aboriginal Cultural Heritage Assessment Report (ACHAR). Report to Accent Environmental.	This ACHAR was prepared to identify Aboriginal cultural heritage values within the development site and surrounding area with consultation and input from a Wiradjuri Registered Aboriginal Party (RAP) representative. The archaeological survey identified six Aboriginal sites of low scientific significance. It was recommended that the Aboriginal objects within the study area be relocated in consultation with the RAP.	Approximately 15 kilometres southeast
NGH Environmental Pty Ltd, 2018, Aboriginal Cultural Heritage Assessment Avonlie Solar Farm. Report to RES Australia Pty Ltd.	185 archaeological sites were identified during archaeological survey, and an additional seven scarred trees within and within close proximity of the study area. Due to the nature of the Aboriginal objects identified (stone tools, scarred trees, etc.), the report concluded that this area was likely occupied by Aboriginal people prior to European settlement. Negligible potential for the presence of intact subsurface deposits with a high density of objects or cultural material were expected at the proposed area for Avonlie Solar Farm. Two exclusion zones were proposed and accepted by the RES into the design, and a further 20m diameter exclusion zone was recommended around an identified scarred tree to reduce the potential harm of the development. The overall recommendation regarding the stone artefacts was a salvage excavation by an archaeologist with representatives of the registered Aboriginal parties prior to the proposed development commencing. It is likely that the Sandigo Solar Farm should encounter similar results and expectations.	Directly adjacent to the right of the study area
OzArk Environmental & Heritage Management Pty Ltd, 2015, Euroley Poultry Production Complex – Aboriginal Archaeological Assessment. Report to SLR Consulting Australia Pty Ltd on behalf of ProTen Ltd.	The archaeological survey focussed on areas with sensitive landscape features such as fringes of ephemeral waterways and areas of lower historical disturbance. Three sites were recorded in locations which matched the expectations of the investigations – low archaeological potential due to the landscape and existing levels of disturbance. Overall, the social or cultural value of the area was significant (moderate-high), but the archaeological value of the objects identified were low.	Approximately 20 kilometres northwest

Aboriginal archaeological potential

Based on the AHIMS search and previous archaeological assessments, the study area is assessed as likely to contain Aboriginal objects. No Aboriginal objects have been identified within the study area, but the closest AHIMS is within 43 metres, and there are 24 sites within 200 metres of the study area. Additionally, the presence of a watercourse within the study area is likely to indicate the presence of Aboriginal objects, given the findings of other archaeological investigations in this region (Table 1).

Furthermore, the investigations for Avonlie Solar Farm are immediately adjacent to the study area and investigations for this project identified 185 Aboriginal sites. The immediate proximity of this area and similarity of landforms suggests a continuation of that frequency of Aboriginal sites in the study area.

Based on preliminary desktop assessment, Aboriginal objects are likely to be present in the study area and, as such, may be impacted by the proposed works. Further assessment is required in order to more fully quantify this level of impact.

Built heritage and non-Aboriginal archaeology

Heritage registers search

A search of relevant heritage registers undertaken on 2 June 2025 did not identify any listed heritage items within or adjacent to the study area.

In relation to historical archaeology, the site/study area is subject to the following statutory and non-statutory controls:

- *Heritage Act 1977 (NSW)*¹
- *Environmental Planning and Assessment Act 1979*²
 - *Narrandera Local Environmental Plan 2013*.³
- *State Heritage Register*
- *Section 170 registers*
- *'Relics' provisions*
- *National Heritage List (non-statutory)*
- *Register of the National Estate (non-statutory)*

Previous archaeological assessments

The Avonlie Solar Farm Aboriginal Cultural Heritage Assessment includes a small historical assessment of the area, stating that the Narrandera region was used for intensive agricultural and pastoral purposes, with most of the area being for grazing and crop production since the early 1800s. (Aboriginal Cultural Heritage Assessment Avonlie Solar Farm, p. 12).

The Environmental Impact Statement for Avonlie Solar Farm also includes a small historical assessment of the area. A register search of 10km was conducted for the study area (Environmental Impact Assessment Avonlie Solar Farm, p.197), and no known historical items or places occur within the development site.

Historical heritage review

Although there are no listed heritage items nor any readily available historical reports found during preparation of this report specific to the study area, there are potentially physical remains in the study area or surrounds of colonisation and the forceable reallocation of land from First Nations People to colonists, and conflict between colonists and Wiradjuri People.

Part of the process of land reallocation included both 'free selectors' and squatters, staking claims on pieces of land. The National Museum of Australia's (NMA) series of 'Paddock Walks' in the vicinity of the study area identified a stone chimney and ceramic pieces marking the former location of a free selector's home (Paddock Report Three | National Museum of Australia).

Further investigation of the historical context of the study area, and site inspection to confirm potential archaeological remains is recommended.

¹ NSW Heritage Act 1977 <https://legislation.nsw.gov.au/view/html/inforce/current/act-1977-136>.

² *Environmental Planning and Assessment Act 1979* <https://legislation.nsw.gov.au/view/html/inforce/current/act-1979-203>.

³ NSW Government, Narrandera Local Environmental Plan 2013.

Figure 4: Nil heritage items within close proximity to the study area

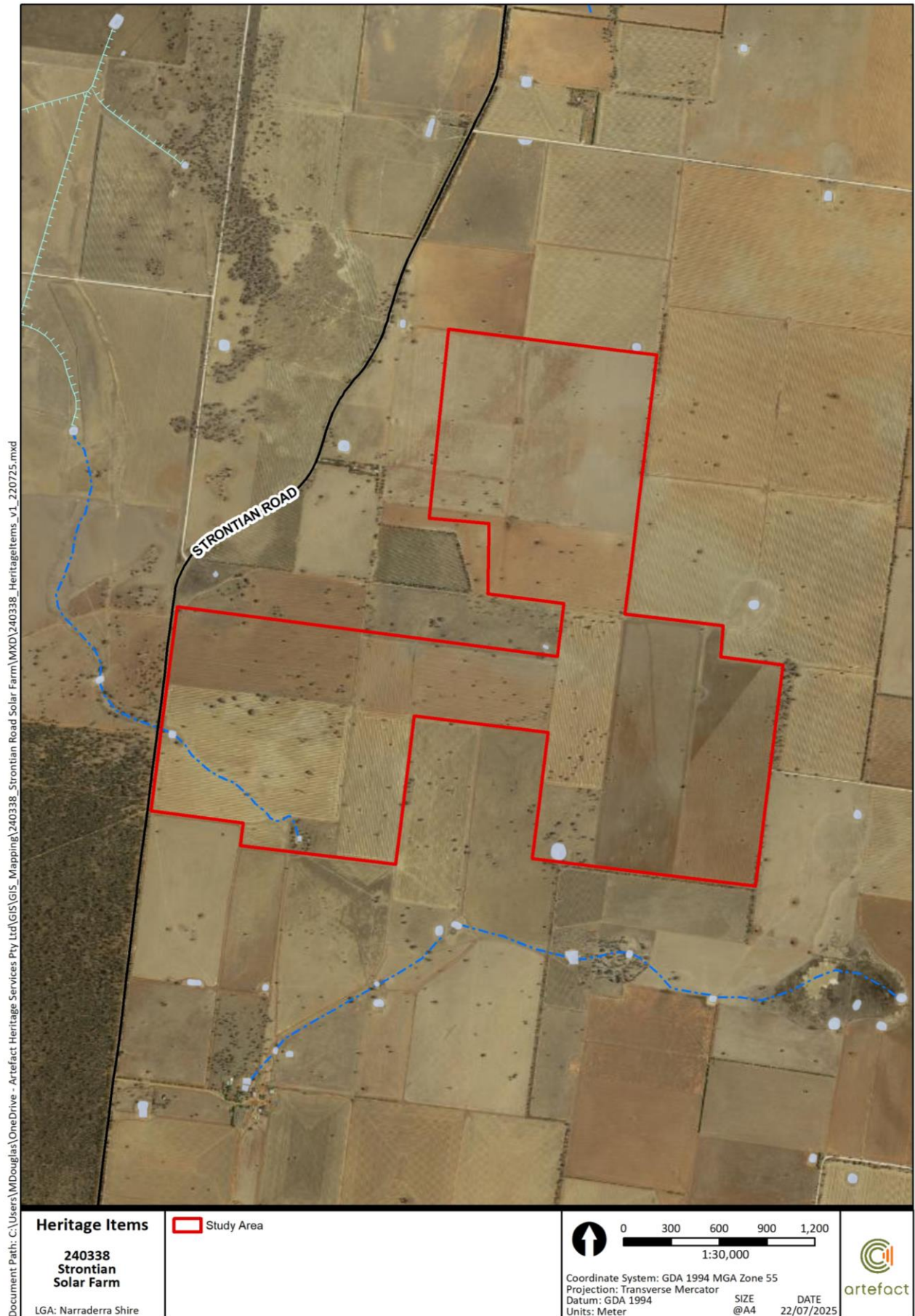


Figure 5: 1899 Parish of Birrego, study area had been subdivided and resumed for The Commercial Banking Company Sydney Ltd, but no development took place.



Figure 6: 1967 Aerial of study area, still no development within the study area, no potential for historical archaeological resources



Conclusions and recommendations

Conclusion

It was found that:

- No Aboriginal sites are recorded in the study area on the AHIMS site register. However, 185 Aboriginal sites were recorded in the adjacent properties for the Avonlie Solar Farm project.
- Based on the presence of a watercourse within the study area (which has been associated with the presence of Aboriginal objects in other archaeological investigations of this region) as well as a significant number of AHIMS sites within proximity to the study area, the study area is likely to contain Aboriginal objects.
- The study area is not heritage listed and there are no heritage listed items in proximity to it.
- Further investigation of the historical archaeological potential of the study area, and site inspection, is recommended.

Recommendations

It is recommended that:

- Due to the likelihood of Aboriginal objects being located with the study area, an Aboriginal Cultural Heritage Assessment Report (ACHAR) should be prepared ahead of the proposed works. This would involve a full archaeological and cultural assessment to identify if Aboriginal objects or cultural values present within the study area would be harmed by the proposed works. The ACHAR would be supported by an Archaeological Technical Report (ATR). Both the ACHAR and ATR would be conducted in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010), *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011), and the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010). While SEARs for the proposed works have not yet been issued, it is anticipated that they will likely condition that an ACHAR be prepared based on industry specific SEARs for other solar energy projects.
- Further historical research and preparation of a historical archaeological assessment for the study area is recommended.



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Spatial Collaboration Portal.