

5 November 2020

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Energy, Industry and Compliance
Department of Planning, Industry and Environment
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Dear Javier

Re: Avonlie Solar Farm (SSD-9031-Mod1)

On 3 November 2020, a Request for Information (RFI) was submitted to the Department of Planning, Industry and Environment (DPIE) Planning Portal seeking additional information on the recent Aboriginal Heritage Management System (AHIMS) search.

This request was in response to an earlier RFI on 21 October 2020 seeking confirmation if a recent AHIMS search had been conducted, given the previous AHIMS search was conducted in 2018 and only valid for a period of 12 months.

An updated AHIMS search was conducted by NGH on 22 October 2020 indicating 116 aboriginal sites recorded within 5km of the Subject Land boundary. The previously submitted AHIMS search conducted on 8 November 2018 (attached as an appendix to the Addendum Aboriginal Cultural Heritage Assessment Report (ACHAR) dated 15 November 2018) indicated 59 aboriginal sites recorded within the Development Footprint.

The difference in the AHIMS searched conducted in 2018 and 2020 is discussed overleaf.

If you have any questions, please contact me on (02) 6923 1562. I would be pleased to discuss this project with you further.

Yours sincerely

Sarah Hillis
Senior Environmental Planner



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1 AHIMS SEARCH 8 NOVEMBER 2018

An addendum ACHAR was submitted to the Department in November 2018 (dated 15 November 2018), with an updated November 2018 AHIMS search. This AHIMS search was clipped to the proposed Development Footprint with no buffer, indicating a total of 59 aboriginal sites.

As a result, all artefacts (including modified or scarred trees or artefact scatters) that fell outside of the Development Footprint (to be retained/protected on site), were on the edge of the Development Footprint (to be removed) or captures as a centroid for an artefact scatter (to be retained/protected or partially destroyed) were not captured within the AHIMS Search.

When compared to the AHIMS search conducted in October 2020, it appears that 57 artefacts are missing (refer Table 4-1 and Figure 4-1) or not recorded.

2 SALVAGE REPORT 16 DECEMBER 2019

Planning approval was granted for Avonlie Solar Farm on 8 August 2019. NGH was engaged by RES Australia Pty Ltd (RES), on behalf of the Avonlie Solar Project Co Pty Ltd (ASPC), to undertake an archaeological surface salvage at the Avonlie Solar Farm in accordance with conditions of approval for the project.

In accordance with the planning approval Conditions of Consent (CoC) issued by the NSW Department of Planning, Industry and Environment (DPIE, formerly Department of Planning and Environment) on 8 August 2019, a number of conditions relating to Aboriginal Heritage are included in Schedule 3 (CoC #17-18) and must be met prior to construction, including:

Protection of Heritage Items (Condition 17):

- *The Applicant must ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in Table 1 of Appendix 4 or located outside the approved development footprint.*
- *Prior to carrying out any development that could directly or indirectly impact the heritage items identified in Table 2 of Appendix 4, the Applicant must salvage and relocate the item/s that would be impacted to a suitable alternative location on site, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), or its latest version.*

Heritage Management Plan (Condition 18):

- *Prior to commencing construction, the Applicant must prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:*
 - a) *be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;*
 - b) *be prepared in consultation with OEH and Aboriginal Stakeholders;*
 - c) *include a description of the measures that would be implemented for:*
 - *protecting the Aboriginal heritage items identified in Table 1 of Appendix 4 or outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction;*

- *salvaging and relocating the Aboriginal heritage items located within the approved development footprint, as identified in Table 2 of Appendix 4;*
- *a contingency plan and reporting procedure if:*
 - *previously unidentified heritage items are found; or*
 - *Aboriginal skeletal material is discovered;*
- *ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and*
- *ongoing consultation with Aboriginal stakeholders during the implementation of the plan;*
- *include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.*

Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.

The Heritage Management Plan (or CHMP) was prepared by NGH (2019) and approved by the Secretary on the 1st of November 2019. The current report specifically details the findings of the salvage and relocation of all Aboriginal heritage items located within the approved development footprint, which were undertaken in accordance with the approved CHMP.

Surface collection salvage was undertaken from 21 to 24 October 2019 by NGH archaeologists and Aboriginal community representatives with the aim of collecting the previously recorded surface artefacts located within the approved development footprint for the Avonlie Solar Farm and listed within Appendix 4 Table 2 of the CoCs.

In accordance with the approved development footprint and the CoC the following sites were subject to surface collection salvage (partial or whole).

Table 2-1 Sites listed for salvage collection

AHIMS#	Site Name	Salvage (Whole/Partial)
AHIMS ID #49-6-0199	Avonlie Artefact Scatter 1	Partial
AHIMS ID #49-6-0201	Avonlie Artefact Scatter 2	Whole
AHIMS ID #49-6-0230	Avonlie Solar Farm IF 3	Whole
AHIMS ID #49-6-0203	Avonlie Solar Farm IF 4	Whole
AHIMS ID #49-6-0204	Avonlie Solar Farm IF 5	Whole
AHIMS ID #49-6-0176	Avonlie Solar Farm IF 6	Whole
AHIMS ID #49-6-0205	Avonlie Solar Farm IF 7	Whole
AHIMS ID #49-6-0206	Avonlie Solar Farm IF 8	Whole
AHIMS ID #49-6-0207	Avonlie Solar Farm IF 9	Whole
AHIMS ID #49-6-0211	Avonlie Solar Farm IF 10	Whole
AHIMS ID #49-6-0208	Avonlie Solar Farm IF 11	Whole
AHIMS ID #49-6-0209	Avonlie Solar Farm IF 12	Whole
AHIMS ID #49-6-0212	Avonlie Solar Farm IF 13	Whole
AHIMS ID #49-6-0141	Avonlie Solar Farm IF 14	Whole
AHIMS ID #49-6-0210	Avonlie Solar Farm IF 15	Whole
AHIMS ID #49-6-0213	Avonlie Solar Farm IF 16	Whole
AHIMS ID #49-6-0214	Avonlie Solar Farm IF 17	Whole
AHIMS ID #49-6-0215	Avonlie Solar Farm IF 18	Whole
AHIMS ID #49-6-0216	Avonlie Solar Farm IF 19	Whole
AHIMS ID #49-6-0217	Avonlie Solar Farm IF 20	Whole
AHIMS ID #49-6-0218	Avonlie Solar Farm IF 21	Whole

AHIMS ID #49-6-0219	Avonlie Solar Farm IF 22	Whole
AHIMS ID #49-6-0220	Avonlie Solar Farm IF 23	Whole
AHIMS ID #49-6-0221	Avonlie Solar Farm IF 24	Whole
AHIMS ID #49-6-0156	Avonlie Solar Farm IF 25	Whole
AHIMS ID #49-6-0222	Avonlie Solar Farm IF 26	Whole
AHIMS ID #49-6-0223	Avonlie Solar Farm IF 27	Whole
AHIMS ID #49-6-0224	Avonlie Solar Farm IF 28	Whole
AHIMS ID #49-6-0225	Avonlie Solar Farm IF 29	Whole
AHIMS ID #49-6-0226	Avonlie Solar Farm IF 30	Whole
AHIMS ID #49-6-0227	Avonlie Solar Farm IF 31	Whole
AHIMS ID #49-6-0168	Avonlie Solar Farm IF 32	Whole
AHIMS ID #49-6-0169	Avonlie Solar Farm IF 33	Whole
AHIMS ID #49-6-0171	Avonlie Solar Farm IF 34	Whole
AHIMS ID #49-6-0170	Avonlie Solar Farm IF 35	Whole
AHIMS ID #49-6-0172	Avonlie Solar Farm IF 36	Whole
AHIMS ID #49-6-0173	Avonlie Solar Farm IF 37	Whole
AHIMS ID #49-6-0174	Avonlie Solar Farm IF 38	Whole
AHIMS ID #49-6-0175	Avonlie Solar Farm IF 39	Whole
AHIMS ID #49-6-0177	Avonlie Solar Farm IF 40	Whole
AHIMS ID #49-6-0178	Avonlie Solar Farm IF 41	Whole
AHIMS ID #49-6-0142	Avonlie Solar Farm IF 42	Whole
AHIMS ID #49-6-0179	Avonlie Solar Farm IF 43	Whole
AHIMS ID #49-6-0180	Avonlie Solar Farm IF 44	Whole
AHIMS ID #49-6-0181	Avonlie Solar Farm IF 45	Whole
AHIMS ID #49-6-0182	Avonlie Solar Farm IF 46	Whole
AHIMS ID #49-6-0183	Avonlie Solar Farm IF 47	Whole
AHIMS ID #49-6-0184	Avonlie Solar Farm IF 48	Whole
AHIMS ID #49-6-0185	Avonlie Solar Farm IF 49	Whole
AHIMS ID #49-6-0186	Avonlie Solar Farm IF 50	Whole
AHIMS ID #49-6-0187	Avonlie Solar Farm IF 51	Whole
AHIMS ID #49-6-0188	Avonlie Solar Farm IF 52	Whole
AHIMS ID #49-6-0189	Avonlie Solar Farm IF 53	Whole
AHIMS ID #49-6-0190	Avonlie Solar Farm IF 54	Whole
AHIMS ID #49-6-0191	Avonlie Solar Farm IF 55	Whole
AHIMS ID #49-6-0192	Avonlie Solar Farm IF 56	Whole
AHIMS ID #49-6-0193	Avonlie Solar Farm IF 57	Whole
AHIMS ID #49-6-0194	Avonlie Solar Farm IF 58	Whole
AHIMS ID #49-6-0195	Avonlie Solar Farm IF 59	Whole
AHIMS ID #49-6-0196	Avonlie Solar Farm IF 60	Whole
AHIMS ID #49-6-0197	Avonlie Solar Farm IF 61	Whole
AHIMS ID #49-6-0229	Avonlie Solar Farm IF 62	Whole
AHIMS ID #49-6-0228	Avonlie Solar Farm IF 63	Whole
AHIMS ID #49-6-0143	Avon463511	Whole
AHIMS ID #49-6-0150	Avon462418	Whole
AHIMS ID #49-6-0165	Avon462256	Whole

Twenty-one additional isolated finds were identified during the salvage fieldwork (Avonlie Solar Farm IF 64 to Avonlie Solar Farm IF 85). All of these would have been impacted by the proposed solar

farm development and were therefore collected as part of the salvage program. Each artefact was recorded in full and photographed prior to being collected and placed in a correspondingly labelled bag. The additional salvage sites were also subject to reburial along with all the relocated artefacts listed in Table 2-1 above. Site cards and site impact recording forms were submitted for each of the additional sites which were recorded and collected.

Following the completion of the surface collection, all salvaged artefacts were placed in a box labelled with relevant information which was then reburied at a location agreed upon by archaeologists, the Aboriginal community representatives, RES and the landowner. The reburial site was recorded and photographed, and this information was submitted to AHIMS in a new site card by Mark Saddler (Bundi Aboriginal Cultural Knowledge) (AHIMS#49-6-0237).

This has resulted in an additional 22 AHIMS sites previously not recorded within the November 2018 AHIMS Search (refer Table 4-1 and Figure 4-1).

3 AHIMS SEARCH 22 OCTOBER 2020

As requested by DPIE on 21 October 2020, an updated AHIMS search was conducted on 22 October 2020. This search was undertaken with an approximate 5km buffer from the Subject Land boundary, resulting in 116 recorded artefacts returned.

Of these 116 records:

- 6 artefacts fall outside of the Development Site.
- 2 artefacts are a duplicated of another artefact (49-6-0200).
- 59 artefacts were previously recorded in the 2018 AHIMS search.
- 22 artefacts (including the new burial site) were additional recorded and salvaged as part of the 2019 salvage works.
- 27 artefacts fell outside of the Development Footprint (to be retained).

4 CONCLUSION

As a result of the above summation, it can be concluded that an additional 22 artefacts found on the October 2020 AHIMS search are in addition to those within the project previously assessed.

However, as discussed these were collected as part of the salvage program in accordance with Schedule 3, CoC 17 and 18.

Table 4-1 October 2018 AHIMS search results against findings

Site ID	Site name	2018 AHIMS Search	2019 Salvage	Salvaged	Retain /Protect	Outside of Development Site
49-6-0149	Avon 461353				X	
49-6-0151	Avon 461812				X	
49-6-0152	Avon 461914				X	
49-6-0157	Avon 461986	X			X	
49-6-0158	Avon 462085				X	
49-6-0162	Avon 462086				X	
49-6-0161	Avon 462104				X	
49-6-0160	Avon 462113				X	
49-6-0164	Avon 462114				X	
49-6-0159	Avon 462117				X	
49-6-0163	Avon 462127				X	
49-6-0153	Avon 462130				X	
49-6-0154	Avon 462131				X	
49-6-0155	Avon 462150				X	
49-6-0165	Avon 462256	X		X		
49-6-0150	Avon 462418	X		X		
49-6-0148	Avon 462462				X	
49-6-0144	Avon 463267 (Duplicate of 49-6-0200)				X	
49-6-0145	Avon 463273				X	
49-6-0147	Avon 463277 (Duplicate of 49-6-0200)				X	
49-6-0146	Avon 643254				X	
49-6-0143	AVON463511	X		X		
49-6-0199	Avonlie Solar Farm Artefact Scatter 1			X	X	
49-6-0201	Avonlie Solar Farm Artefact Scatter 2			X		
49-6-0200	Avonlie Solar Farm Artefact Scatter 3				X	
49-6-0198	Avonlie Solar Farm Artefact Scatter 4				X	
49-6-0167	Avonlie Solar Farm IF1				X	X
49-6-0211	Avonlie Solar Farm IF10	X		X		
49-6-0208	Avonlie Solar Farm IF11	X		X		
49-6-0209	Avonlie Solar Farm IF12	X		X		

49-6-0212	Avonlie Solar Farm IF13	x		x		
49-6-0141	Avonlie Solar Farm IF14	x		x		
49-6-0210	Avonlie Solar Farm IF15	x		x		
49-6-0213	Avonlie Solar Farm IF16			x		
49-6-0214	Avonlie Solar Farm IF17			x		
49-6-0215	Avonlie Solar Farm IF18	x		x		
49-6-0216	Avonlie Solar Farm IF19	x		x		
49-6-0202	Avonlie Solar Farm IF2	x			x	x
49-6-0217	Avonlie Solar Farm IF20	x		x		
49-6-0218	Avonlie Solar Farm IF21	x		x		
49-6-0219	Avonlie Solar Farm IF22	x		x		
49-6-0220	Avonlie Solar Farm IF23	x		x		
49-6-0221	Avonlie Solar Farm IF24			x		
49-6-0156	Avonlie Solar Farm IF25			x		
49-6-0222	Avonlie Solar Farm IF26	x		x		
49-6-0223	Avonlie Solar Farm IF27	x		x		
49-6-0224	Avonlie Solar Farm IF28	x		x		
49-6-0225	Avonlie Solar Farm IF29	x		x		
49-6-0230	Avonlie Solar Farm IF3	x		x		
49-6-0226	Avonlie Solar Farm IF30	x		x		
49-6-0227	Avonlie Solar Farm IF31	x		x		
49-6-0168	Avonlie Solar Farm IF32	x		x		
49-6-0169	Avonlie Solar Farm IF33	x		x		
49-6-0171	Avonlie Solar Farm IF34	x		x		
49-6-0170	Avonlie Solar Farm IF35	x		x		
49-6-0172	Avonlie Solar Farm IF36	x		x		
49-6-0173	Avonlie Solar Farm IF37	x		x		
49-6-0174	Avonlie Solar Farm IF38	x		x		
49-6-0175	Avonlie Solar Farm IF39	x		x		
49-6-0203	Avonlie Solar Farm IF4	x		x		
49-6-0177	Avonlie Solar Farm IF40	x		x		
49-6-0178	Avonlie Solar Farm IF41	x		x		
49-6-0142	Avonlie Solar Farm IF42	x		x		
49-6-0179	Avonlie Solar Farm IF43	x		x		
49-6-0180	Avonlie Solar Farm IF44	x		x		

49-6-0181	Avonlie Solar Farm IF45	x		x		
49-6-0182	Avonlie Solar Farm IF46	x		x		
49-6-0183	Avonlie Solar Farm IF47	x		x		
49-6-0184	Avonlie Solar Farm IF48	x		x		
49-6-0185	Avonlie Solar Farm IF49	x		x		
49-6-0204	Avonlie Solar Farm IF5	x		x		
49-6-0186	Avonlie Solar Farm IF50	x		x		
49-6-0187	Avonlie Solar Farm IF51	x		x		
49-6-0188	Avonlie Solar Farm IF52			x		
49-6-0189	Avonlie Solar Farm IF53			x		
49-6-0190	Avonlie Solar Farm IF54			x		
49-6-0191	Avonlie Solar Farm IF55	x		x		
49-6-0192	Avonlie Solar Farm IF56	x		x		
49-6-0193	Avonlie Solar Farm IF57	x		x		
49-6-0194	Avonlie Solar Farm IF58	x		x		
49-6-0195	Avonlie Solar Farm IF59	x		x		
49-6-0176	Avonlie Solar Farm IF6	x		x		
49-6-0196	Avonlie Solar Farm IF60	x		x		
49-6-0197	Avonlie Solar Farm IF61	x		x		
49-6-0229	Avonlie Solar Farm IF62	x		x		
49-6-0228	Avonlie Solar Farm IF63	x		x		
49-6-0234	Avonlie Solar Farm IF64		x	x		
49-6-0241	Avonlie Solar Farm IF65		x	x		
49-6-0242	Avonlie Solar Farm IF66		x	x		
49-6-0243	Avonlie Solar Farm IF67		x	x		
49-6-0244	Avonlie Solar Farm IF68		x	x		
49-6-0245	Avonlie Solar Farm IF69		x	x		
49-6-0205	Avonlie Solar Farm IF7	x		x		
49-6-0246	Avonlie Solar Farm IF70		x	x		
49-6-0247	Avonlie Solar Farm IF71		x	x		
49-6-0248	Avonlie Solar Farm IF72		x	x		
49-6-0249	Avonlie Solar Farm IF73		x	x		
49-6-0250	Avonlie Solar Farm IF74		x	x		
49-6-0251	Avonlie Solar Farm IF75		x	x		
49-6-0252	Avonlie Solar Farm IF76		x	x		

49-6-0253	Avonlie Solar Farm IF77		x	x		
49-6-0254	Avonlie Solar Farm IF78		x	x		
49-6-0255	Avonlie Solar Farm IF79		x	x		
49-6-0206	Avonlie Solar Farm IF8	x		x		
49-6-0256	Avonlie Solar Farm IF80		x	x		
49-6-0257	Avonlie Solar Farm IF81		x	x		
49-6-0258	Avonlie Solar Farm IF82		x	x		
49-6-0238	Avonlie Solar Farm IF83		x	x		
49-6-0239	Avonlie Solar Farm IF84		x	x		
49-6-0240	Avonlie Solar Farm IF85		x	x		
49-6-0207	Avonlie Solar Farm IF9	x		x		
49-6-0037	Kindra 1				x	x
49-6-0237	Repat Avonlie 462097				x	
49-6-0038	Sandigo 1				x	x
49-6-0039	Sandigo 2				x	x
49-6-0236	Sandigo 466669				x	x

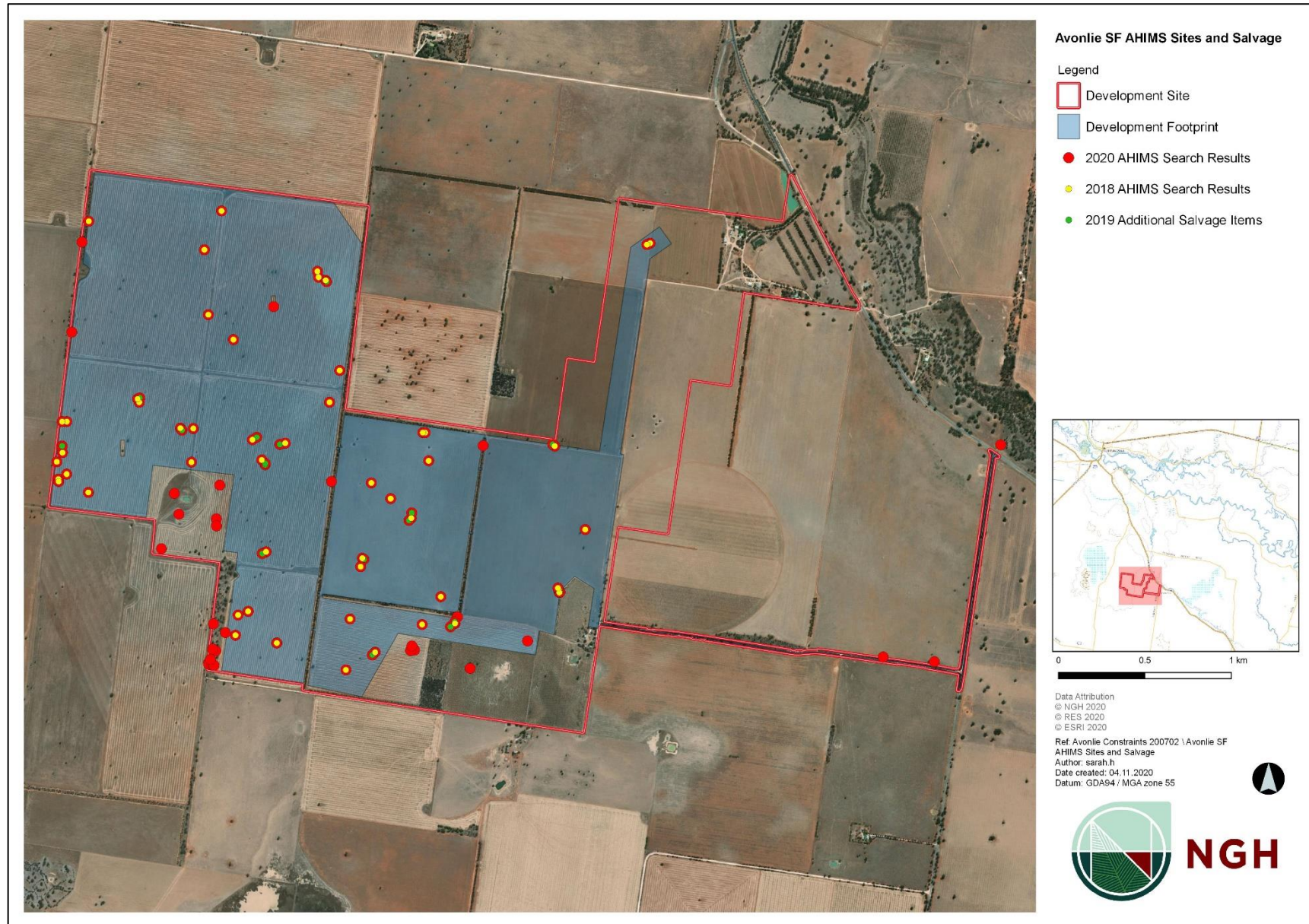


Figure 4-1 Location of 2018 and 2020 AHIMS sites, and additional sites as part of the salvage program