

Our ref: DOC24/555075

Your ref: SSD-30448824

Tatsiana Bandaruk

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Department of Planning, Housing and Infrastructure

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Letter uploaded to the Major Projects Planning Portal

Advice on Environmental Impact Statement – State Significant Development

Proposal: Junction Rivers Wind Farm

Major Project reference: SSD-30448824

Received: 11 July 2024

Dear Tatsiana,

Thank you for your referral seeking advice on the above State Significant Development proposal for a wind farm and associated infrastructure.

In preparing this advice Heritage NSW has reviewed the following documents:

- Relevant Sections of Junction Rivers Wind Project Environmental Impact Statement - prepared by Umwelt, dated May 2024.
- Appendix 12 Aboriginal Cultural Heritage Assessment Junction Rivers Wind Project - prepared by NGH, April 2024.

Following the review of the above documents, Heritage NSW requests additional information to inform its advice to the Department on whether the Aboriginal Cultural Heritage Assessment Report (ACHAR) adequately addresses the Secretary's Environmental Assessment Requirements (SEARs) for the project, including the associated recommendations for the management of Aboriginal cultural heritage. Additional information is required in relation to the following matters.

1. Please provide copies of the AHIMS extensive search results.
2. Please provide further explanation of the assessment of potential archaeological deposit (PAD) for the identified sites. For example, the Archaeological Technical Report Appendix A 'Site Descriptions', includes sites 47-6-1174 and 47-6-1175 both described as artefact scatters located on the basal slope of a red sandy rise in proximity to an ephemeral water source. AHIMS site 4-6-1193 is described as a hearth in the wall of a blow out with a nearby stone

artefact. The predictive model in the ACHAR describes these landforms as areas of high archaeological potential.

Please provide an assessment of the surrounding landform of all the identified sites for potential subsurface archaeological deposit, as well as a detailed explanation in relation to the potential for subsurface material, and justification as to why test excavations should not occur prior to construction in the project area. Should adequate justification not be provided, Heritage NSW recommends that test excavations occur prior to any construction impacts in the project area.

3. The PDF of the ACHAR provided includes a Due Diligence Report regarding the road upgrades required as a part of the project. These road upgrades are located outside the project area of the provided ACHAR. A Due Diligence report does not address the requirements set out in the SEARs, issued 19 December 2023. Both requirements for 'assessment of the impact to Aboriginal cultural heritage items (archaeological and cultural) in accordance with the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010)' and provide evidence of consultation with Aboriginal communities in determining and assessing impacts, developing options and selecting options and mitigation measures ... with regard to the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010)' are not met. There is insufficient information provided for Heritage NSW to advise the Department on whether the management recommendations and archaeological assessment are adequate with regard to upgrades of the transport route.

Please provide an ACHAR developed in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010), the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010) for all the areas of proposed impact on the transport route.

If you have any questions regarding these comments, please contact Alison Lamond, Senior Assessments Officer, at Heritage NSW on 9873 8500 or heritagemailbox@environment.nsw.gov.au.

Yours sincerely

Nicole Davis

Nicole Davis
Manager Assessments
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under National Parks and Wildlife Act 1974
12 August 2024