



OzArk Environment & Heritage

ABN 59 104 582 354

Head office: Dubbo

T: 02 6882 0118

Satellite offices:

enquiry@ozarkehm.com.au

Queanbeyan | Wollongong

www.ozarkehm.com.au

Newcastle | Brisbane

145 Wingewarra St

PO Box 2069

DUBBO NSW 2830

3/07/2023

Nicko Keene

Project Development Manager

ACEN Australia

M: +61 190 695 785

E: nicko.keene@acenrenewables.com.au

NARRAGAMBA SOLAR PROJECT
ABORIGINAL AND HISTORIC HERITAGE DESKTOP LETTER

Dear Nicko,

As requested, the following pages summarise the results of the desktop heritage searches conducted for the Narragamba Solar Project.

Further heritage assessment in the form of both desktop modelling and field studies for the project will be required to result in a standalone specialist report to inform the Environmental Impact Statement (EIS).

Kind regards,

A handwritten signature in black ink that reads "Jodie Benton". The signature is written in a cursive style with a large, looped initial "J".

Dr Jodie Benton

Director

jodie@ozarkehm.com.au

1 INTRODUCTION

OzArk Environment & Heritage (OzArk) was engaged by ACEN Australia Pty Ltd (the Proponent) to complete an Aboriginal and Historic Heritage basic desktop assessment to inform the Scoping Study for the Narragamba Solar Project (the Project).

The Project is located approximately 15.3 kilometres (km) northeast of Gulgong NSW, within the Mudgee Local Aboriginal Land Council (LALC) and Mid-Western Regional local government area (LGA) boundaries (**Figure 1-1**). The Narragamba Solar Project study area encompasses approximately 1,033 hectares (**Figure 1-2**) and will include Merotherie Road.

Figure 1-1: Location of the Project

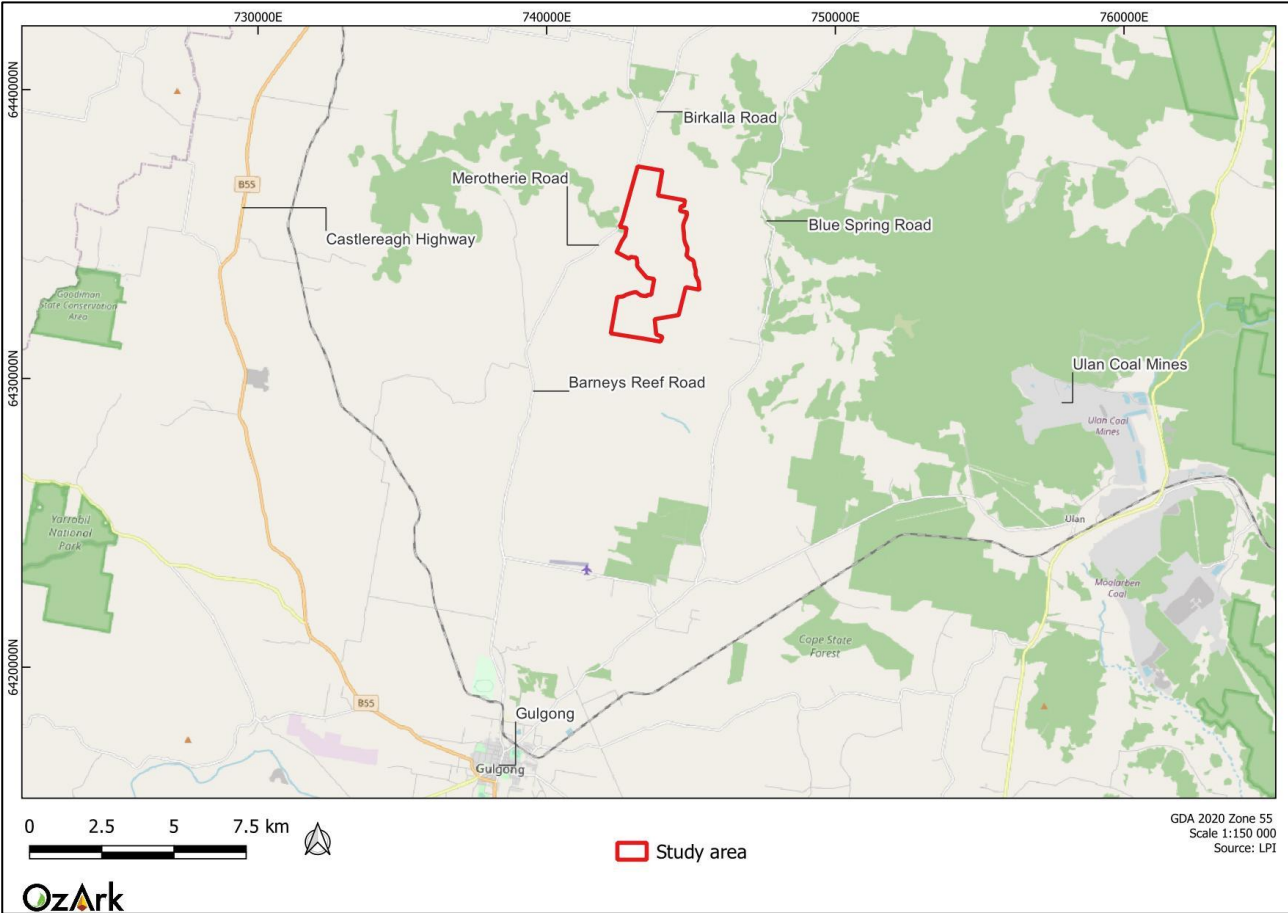


Figure 1-2: Narragamba Solar Project study area.



2 ABORIGINAL HERITAGE

2.1 ABORIGINAL HERITAGE - DESKTOP SEARCHES

A search of the NSW Native Title Vision website indicates that Project is located within the Warrabinga-Wiradjuri #7 Native Title claim which has been registered since 31 August 2018.

The Project is not situated on crown land and as such there are no known land claims under the *Aboriginal Land Rights Act 1983*.

A search of the Department of Planning and Environment (DPE) administered Aboriginal Heritage Information Management System (AHIMS) database on 17 April 2023 returned 43 results for Aboriginal sites within an approximate 6 km x 6 km area around the study area (GDA Zone 55 Eastings: 738254–750285, Northings: 64283436–6440375). There are no Aboriginal sites recorded in the study area (**Figure 2-1**). The closest site is Rosevale IF-01 (36-3-3691), an isolated find located 850 m east of the southern extent of the study area. This isolated stone artefact was recorded for the Stubbo Solar and Battery Project.

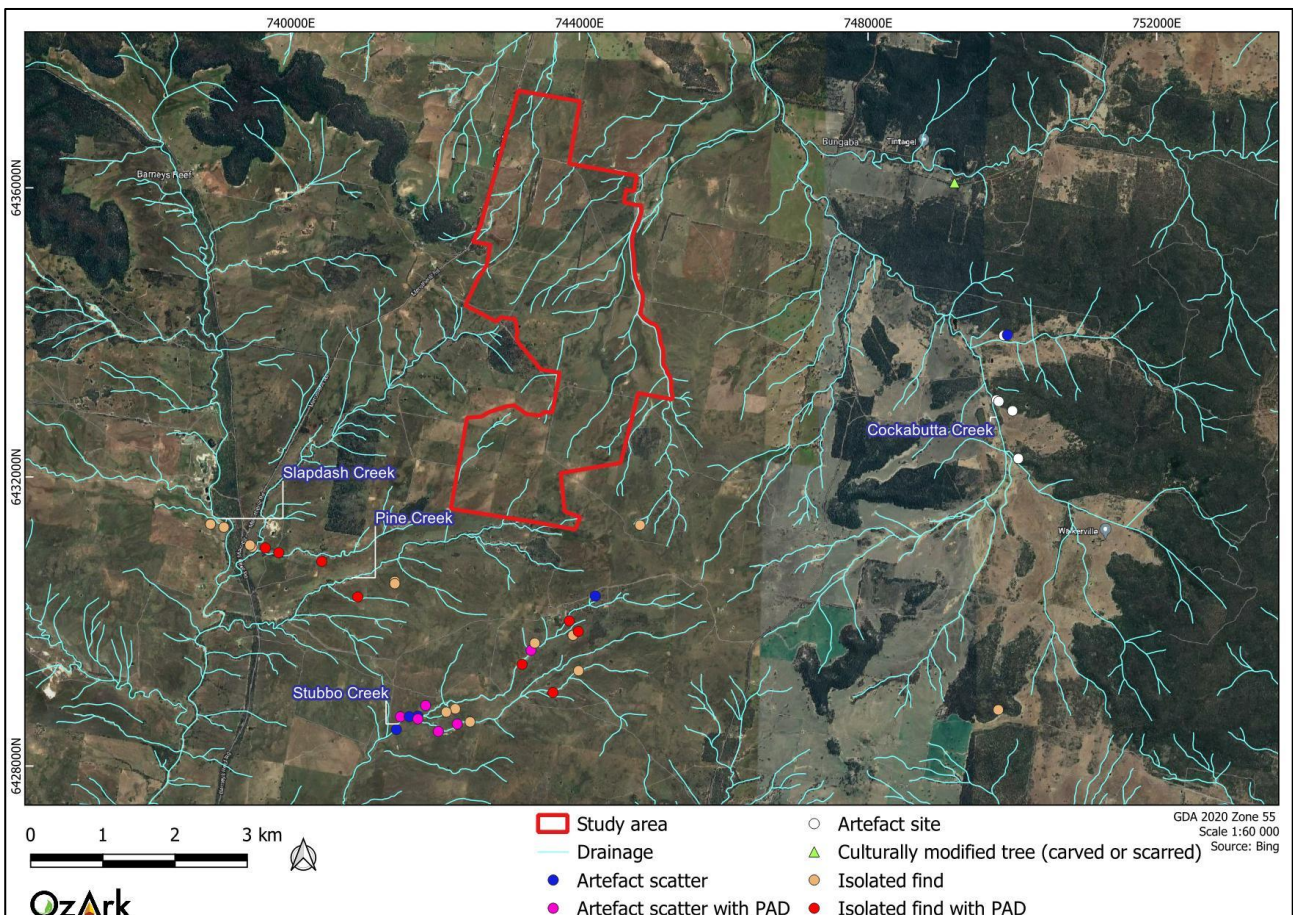
Table 2-1: Site types and frequencies of AHIMS sites near the study area.

Site Type	Number	% Frequency
Isolated find	14	33
Isolated find with PAD	8	19
Artefact scatter	7	16
Artefact site	7	16
Artefact scatter with PAD	6	14
Culturally modified tree (carved or scarred)	1	2
Total	43	100

The most frequently recorded site types within the search area are isolated finds (33%). Isolated find with PAD (19%), artefact scatter (16%) and artefact site (16%) are recorded less frequently. Artefact scatter with a PAD account for 14% of the total site types and there is only one recorded culturally modified tree. Most of these sites are located along the drainage lines of Stubbo Creek to the south of the study area and in association with Slapdash Creek and Pine Creek to the southwest of the study area. Several artefact scatters east of the study area are located within areas of seemingly undisturbed land in proximity to Cockabutta Creek.

The distribution of previously recorded sites demonstrates the effort of previous studies undertaken near the study area (for development projects) and does not reflect the actual distribution of Aboriginal sites in the landscape. We can infer from these recorded sites, however, their relationship with associated landforms.

Figure 2-1: Previously recorded sites in relation to the study area.



2.2 ABORIGINAL HERITAGE – DESKTOP ANALYSIS

Aerial imagery of the study area shows that the land has been predominantly cleared of vegetation with some small clusters of potentially mature native vegetation located near the northeast and southeast boundaries. Trees in these areas, as well as occasional paddock trees, may bear evidence of Aboriginal cultural scarring. The lack of culturally modified trees previously registered within and near to the study area is likely the result of extensive land clearing combined with piecemeal previous assessment.

Several ephemeral drainage lines transect the study area that are tributaries to the larger more permanent waterways in the region, primarily Cockabutta Creek located approximately 2.2 km to the northeast, Pine Creek approximately 60 m south and Slapdash Creek approximately 500 m southwest. There are no named waterways within the study area with the closest being Merotherie Creek located 80 m from the south from part of the west boundary and Pine Creek.

The quantity of Aboriginal sites recorded by the limited number of previous studies within the search area, and the distribution of these sites in proximity to waterways suggests there is potential for artefact sites, particularly artefact scatters, to be recorded within the study area. There is a lower likelihood for culturally modified trees to be recorded. Other site types such as grinding grooves or quarries, will be dependent on the presence of suitable stone.

2.3 HISTORIC HERITAGE

A desktop search was conducted on 20 April 2023 across various historic heritage databases to identify any potential previously recorded heritage of local, state or national significance within the study area. These databases included:

- Historic Heritage Management System
- Mid-Western Regional Local Environmental Plan 2012 (LEP).
- NSW State Heritage Inventory
- National and Commonwealth Heritage Listings

There were no listed heritage items located within 10 km of the study area.

2.4 FUTURE INVESTIGATIONS AND RECOMMENDATIONS

2.4.1 Aboriginal Heritage

Construction of the project has the potential to impact currently unidentified Aboriginal heritage sites. The potential for other archaeological site types and intangible cultural values to occur within the study area needs to be established through further archaeological investigation and consultation with Registered Aboriginal Parties (RAPs).

To this end an *Aboriginal Cultural Heritage Assessment Report* (ACHAR) will be required for the Project as part of the EIS.

The ACHAR should be prepared in accordance with the following guidelines:

- *Code of Practice for the Investigation of Aboriginal Objects in New South Wales 2010*
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW 2011*
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.*

The investigations for the ACHAR will include the following steps:

- Full and formal consultation with the Aboriginal community to establish the RAPs for the project and continued consultation throughout the life of the project
- Desktop review to develop a predictive model for the location of Aboriginal objects and methodology for assessment
- Site survey with the assistance of the RAPs to identify any Aboriginal objects that may be present, as well as identifying any landforms where subsurface archaeological deposits may be present
- Identify any areas/landforms of cultural significance in consultation with the Aboriginal community
- Undertake test excavation if warranted (if project impacts cannot be avoided over specific landforms with identified Aboriginal heritage potential)
- Determination of the significance of the Aboriginal objects and/or landforms identified during the site survey in consultation with the Aboriginal community
- Assessment of the impact to identified Aboriginal heritage values including both tangible and intangible values
- Development of mitigation measures to minimise impacts to Aboriginal cultural values.

The major constraint to the field survey is likely to be low ground surface visibility (GSV) within the landforms comprising the study area. Previous assessments of Stubbo Solar and Battery Project noted that low GSV within the assessment footprint was the greatest survey impediment, due to thick grass cover however, not to the extent that the efficacy of the survey was unduly diminished.

The results of the survey, Aboriginal community consultation, and any test excavation results (if required) will be presented in the ACHAR.

2.4.2 Historic Heritage

The results of the field survey phase of the heritage assessment will indicate whether a *Historic Heritage Impact Assessment* (HHIA) is required (if previously unidentified historic heritage items are recorded).

The HHIA should be undertaken in accordance with the following guidelines:

- *NSW Heritage Manual 1996.*

The investigation for the HHIA will include the following steps:

- Desktop review of the history of the area and investigation of historical resources

- Site survey to identify potential previously unidentified historical items and where subsurface archaeological deposits may be present
- Undertake test excavation if warranted
- Assessment of the impact to identified historic heritage sites / values including both tangible and intangible values if warranted
- Development of mitigation measures to minimise impacts to historic values of significance if warranted.