

I have reviewed the EIS document, titled: *STUBBO SOLAR FARM ENVIRONMENTAL IMPACT STATEMENT December 2020* prepared by Ramboll Australia Pty Ltd with regard to historic heritage aspects of the proposal, and also the report by OzArk Environment & Heritage (Appendix D) titled: *Aboriginal Cultural Heritage & Historic Heritage Assessment Report, Stubbo Solar Farm Mid-Western Regional Council Local Government Area, NSW December 2020* for historic heritage aspects.

I note that the EIS advises (p.5):

Historic heritage

A field assessment of the study area was on 10–14 August and 17–19 August 2020. Overall, there was limited potential for historic heritage to be present inside the site due to the current land use of the study area being grazing and limited cropping. No historic sites were identified within the site and, as such, there would be no impact to any historic sites as a result of the proposal.

and similarly on p.153:

There are no historic sites recorded within the study area. As such, there would be no impact to any historic sites during the proposed works. Overall, there was limited potential for historic heritage to be present inside the study area. The structures which make up The Pinnacle homestead are not of historic heritage significance.

Chapter 8 of the EIS also describes the historic research and investigations for the proposal (in the general vicinity of the historic 'Guntwang' run near Gulgong NSW).

p.151 notes that 'The historic heritage assessment has been undertaken in accordance with the Heritage Council's *Historical Archaeology Code of Practice* (Heritage Council 2006).'

Although it is taken from the report in Appendix D this is an odd comment as the Code describes the responsibilities of various different parties for archaeological site investigations. Other relevant Heritage Council documents for this type of work would be *Archaeological Assessments 1966* and *Assessing Significance for Historical Archaeological Sites and Relics 2009*.

Chapter 8 of the EIS provides a number of mitigation measures for historic heritage (p153) as mitigation measures HH1, HH2, HH3.

These include an Unanticipated Finds Protocol for Historic Heritage and limiting the disturbance footprint of the project.

The measures are considered sufficient for this project as it is unlikely to affect an historic heritage sites or "relics" within the meaning of the NSW Heritage Act, 1977.

If the project is approved, DPIE could consider placing an Unexpected Finds Condition for historic heritage on the approval.

I note that if 'relics' are found s146 of the NSW Heritage Act, 1977 requires them to be reported to the Heritage Council of NSW. That section of the Act is not suspended by the planning approval process.

I trust this advice will be of assistance to you.

Regards,

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I acknowledge and respect the Traditional Custodians and Ancestors of the land I work across.

Heritage NSW and coronavirus (COVID-19)

Heritage NSW has taken steps to protect the safety, health and wellbeing of our staff, communities and customers. Whilst our offices remain open, we have put in place flexible working arrangements for our teams across NSW and continue to adapt our working arrangements as necessary. Face-to-face meetings and field work/site visits with our customers are subject to rules on gatherings and social distancing measures. We thank you for your patience and understanding at this time.