



Office of  
Environment  
& Heritage

DOC16/531129  
SSD 7618

Mr Anthony Ko  
Planning Officer  
Department of Planning and Environment  
anthony.ko@planning.nsw.gov.au

Dear Mr Ko

**Goonumbla Solar Farm Project (SSD 7618)**

I refer to the email received from the Department of Planning and Environment (DPE) on 28 September 2016 inviting the Office of Environment and Heritage (OEH) to comment on the Goonumbla Solar Farm Project (SSD 7618).

Our recommendations are summarised in **Attachment A**. Detailed comments are provided in **Attachment B**.

If you have any queries, please contact Liz Mazzer, Conservation Planning Officer on (02) 6883 5325 or [liz.mazzer@environment.nsw.gov.au](mailto:liz.mazzer@environment.nsw.gov.au).

Yours sincerely

**STEVEN COX**  
**Senior Team Leader Planning**  
**North West Region**

Date: 15<sup>th</sup> November 2016

Contact officer: LIZ MAZZER  
02 6883 5325

**Summary of OEH Recommendations**

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1. Paddock trees to be impacted should be identified and quantified, and at a minimum the following compensatory actions should be included in the project design,
  - Improving the condition of the remnant native vegetation patches on-site (through actions such as weed control);
  - Landscaping using plant species that are characteristic of the Western Grey Box – Poplar Box – White Cypress Pine tall woodland community; and
  - Salvaging of hollows from paddock trees and hanging these in the areas of remnant native vegetation.
2. A monitoring program to retrieve Aboriginal objects to be developed as part of the management of Aboriginal heritage (as per recommendation of the Wiradjuri Council of Elders report).
3. A research program be carried out for the Miller's Lookout axe quarry site, based on the results of significance detailed in the ACH assessment report (Access Archaeology & Heritage 2016).

## Goonumbla Solar Farm – Detailed Comments

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### Biodiversity

The Office of Environment and Heritage (OEH) notes that the site contains a total of 7.57 hectares of remnant Western Grey Box – Poplar Box – White Cypress Pine tall woodland, and that all 7.57 hectares will be avoided. We congratulate the proponent on designing the project to avoid impacts on this vegetation.

The proposal will still result in the removal of an unspecified number of paddock trees across the site, and some limited trimming and/or removal of vegetation for access to the site. While not detailed in the environmental impact statement, the figure (EV03) showing the development footprint indicates that there is an intent to include some landscaping in the project design. This provides an opportunity to compensate for removal of paddock trees by planting with species that comprise the Western Grey Box – Poplar Box – White Cypress Pine tall woodland.

It is noted that the mitigation measures include,

*All scattered hollow-bearing trees to be removed should be placed in areas of retained vegetation to provide additional fauna habitat.*

OEH recommends that, rather than entire trees being placed in areas of retained vegetation, hollows should be salvaged and hung in appropriately sized trees within the remnant vegetation.

In addition, the paddock trees to be impacted should be identified and quantified, and compensatory actions be included in the project design. At a minimum, such compensatory actions should include:

- Improving the condition of the remnant native vegetation patches on-site (through actions such as weed control);
- Landscaping using plant species that are characteristic of the Western Grey Box – Poplar Box – White Cypress Pine tall woodland community; and
- Salvaging of hollows from paddock trees and hanging these in the areas of remnant native vegetation.

### Recommendations

1. Paddock trees to be impacted should be identified and quantified, and at a minimum the following compensatory actions should be included in the project design,
  - Improving the condition of the remnant native vegetation patches on-site (through actions such as weed control), and
  - Landscaping using plant species that are characteristic of the Western Grey Box – Poplar Box – White Cypress Pine tall woodland community, and
  - Salvaging of hollows from paddock trees and hanging these in the areas of remnant native vegetation.

### Aboriginal Cultural Heritage

OEH have reviewed the Aboriginal Cultural Heritage (ACH) assessment report and consultation for the proposed development. Both adequately address the ACH assessment and consultation requirements as listed in the project Secretary's Environmental Assessment Requirements. OEH note the number and variety of Aboriginal objects discovered within the easement and the land use disturbance history and support the assessment findings.

OEH have also considered the report by the Wiradjuri Council of Elders in attachment 3 of the ACH assessment report. As a result of both report findings OEH have two recommendations to be acted on through the Aboriginal cultural heritage management plan process.

### Recommendations

2. A monitoring program to retrieve Aboriginal objects to be developed as part of the management of Aboriginal heritage (as per recommendation of the Wiradjuri Council of Elders report).
3. A research program be carried out for the Miller's Lookout axe quarry site, based on the results of significance detailed in the ACH assessment report (Access Archaeology & Heritage 2016).

#### OEH rationale for heritage research at Miller's Lookout axe quarry site

OEH support the conclusions of the ACH assessment that the Miller's Lookout site is a rare site type and believes it offers significant research potential. OEH therefore recommend that the site is comprehensively recorded. The current recording is based on a preliminary inspection. As a minimum OEH expect that the site boundaries are clearly mapped to aide future management of the site and its contents adequately inspected to determine intensity of the site's use and axe reduction method.

OEH request that detailed recording of the site occur as part of the activities of the ACH management plan to mitigate against the harm to Aboriginal sites in the immediate project footprint. A detailed recording of the site would provide the following positive outcomes:

#### Educational

Aboriginal team participants will develop an awareness on how to distinguish axe quarried material from natural exfoliation and historic mining and the method used at the site to prepare axe blanks. This contributes to other learning experiences of earlier Aboriginal lifeways and the manner in which Aboriginal economic life was organised.

#### Scientific

The study would create a record that would inform the AHIMs data base and this would assist in interpreting sites locally and regionally. For example, material from Miller's Lookout discovered at other sites in the region would reveal Aboriginal movement patterns across the landscape expanding on current understanding of patterns locally and regionally. This can potentially heighten the importance of those sites for conservation purposes.

#### Culturally

The incremental harm to Aboriginal sites from previous land use and further harm that will occur from the construction of the proposed solar farm is mitigated by improving Aboriginal people's awareness and knowledge of the site for their cultural use. Understanding Millers Lookout axe quarry would be integral to that experience for future generations.