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Department of Planning Infrastructure and Environment  
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Dear Lander

**Notice of Exhibition of application for Dunedoo Solar Farm, Nyngan (SSD 8847)**

Thank you for the opportunity for Heritage NSW (HNSW) to review and comment on the above State Significant Development (SSD) proposal.

Heritage NSW have reviewed and considered the Aboriginal cultural heritage (ACH) assessment for the project prepared by NGH Pty Ltd (September 2020), Appendix E of the Environmental Impact Assessment (EIS).

**Project description**

The proposed solar farm involves developing 128 hectares near the small township of Dunedoo, central west NSW, to produce 66 Mega Watts DC of electricity. The proposal is also linked to a proposed 66kV transmission line and an upgrade of an existing road intersection. HNSW understand that the ACH assessment has identified that Aboriginal objects will be harmed from the construction of the development proposal and associated infrastructure especially, where the proposed footprint intersects near lands close to the Talbragar River. HNSW also note that areas of the proposed footprint occur in ploughed fields in areas of low archaeological potential.

**ACH assessment is adequate**

Heritage NSW is satisfied with the ACH assessment of the proposed project area which has been undertaken in a manner consistent with the Secretary's Environmental Assessment Requirements (SEARs). The ACH assessment is supported by a relatively extensive test excavation program that guided the overall assessment towards determining areas of high to low artefact material, relative to the proposed footprint. The assessment has adequately established a statement of significance that is based on the results of test excavation program, field surveys and discussions with the Registered Aboriginal Parties (RAPs).

HNSW also note that a section of the project boundary was not investigated for ACH because no development of these lands is proposed (south west corner) but will be investigated if the project is modified.

**Aboriginal consultation is adequate**

HNSW have identified that the Aboriginal consultation undertaken for the project is consistent with the requirements set down in the SEARs (as described in NGH 2020:18-23). HNSW accept methods used for providing the RAPs with opportunities to participate in the test excavation program and the field survey component and this has provided the RAPs with an

informed opinion on the adequacy of the ACH assessment and the management approaches to mitigate harm to Aboriginal objects (please refer to NGH 2020:20-22). HNSW further note that the RAPs have informed the proponent of culturally sensitive areas that are outside of the project boundary and will therefore not be harmed.

### **Overall harm to ACH is low**

HNSW acknowledge that many sites recorded during the ACH assessment will not be harmed due to a size reduction of the proposed footprint and because the objects will be collected prior to works and relocated (movement, as defined under the *National Parks and Wildlife Act 1974*). This considerably reduces harm overall. HNSW acknowledge that a substantial number of objects will remain unaffected by the project. The ACH assessment has also adequately demonstrated that the objects have been previously subject to a history of land use disturbance.

### **Proposed management recommendations are adequate**

The ACH management recommendations described by NGH (2020:78-9) are reasonable and proportionate to the harm incurred on Aboriginal objects and the overall significance of the objects. HNSW note that the RAPs are generally supportive of the recommendations.

In some instances, the RAPs argued for continuing archaeological excavations in areas which have only yielded low frequency and density of objects (stone artefacts). HNSW note and accept the responses from NGH to the RAP's request (2020:21) which is that, the recommended excavation proposal is geared towards expanding the test excavation of areas where higher frequency and density of objects are likely to occur.

Overall HNSW consider that the ACH assessment has adequately captured the Aboriginal cultural and archaeological values of the project area and provided suitable ways to manage ACH.

### **Issue: Management of salvaged Aboriginal objects.**

The RAPs have raised objection (NGH 2020:21-22) to salvaged objects placed in plastic bags as proscribed in requirement 26 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (OEH, 2010). HNSW has no issue if the RAPs prefer a more culturally appropriate way to have the objects managed. The Code is designed to support and manage Aboriginal objects in a way that reduces harm to objects during the initial stage of the investigation and prior to, project determination. The management of the salvaged objects can be further explored and facilitated in a manner suitable to the RAPs through the development of the Cultural Heritage Management Plan, post project approval.

### **Recommendation 1**

Engage with the RAPs on the way in which the RAPs wish all salvaged Aboriginal objects to be buried on-site.

If you have any questions regarding the above advice, please contact Phil Purcell, Archaeologist at Heritage NSW on 68835341 or [phil.purcell@environment.nsw.gov.au](mailto:phil.purcell@environment.nsw.gov.au).

Yours sincerely

A handwritten signature in blue ink, appearing to be 'SH' or similar initials, written in a cursive style.

**DR SAMANTHA HIGGS**

Senior Team Leader

Aboriginal Cultural Heritage Regulation - North

Heritage NSW Community Engagement

Department of Premier and Cabinet

9 December 2020