



Our ref: DOC22/216041

Javier Canon
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Energy Resources Industry Assessment
Department of Planning and Environment
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Dear Javier Canon,

Heritage NSW - Aboriginal Cultural Heritage - Environmental Impact Statement – Daroobalgie Solar Farm (SSD-10387)

Thank you for your referral dated 17 March 2022, inviting comments on the Environmental Impact Statement (EIS) on the above State Significant Development (SSD) proposal, with respect to Aboriginal cultural heritage. Heritage NSW has reviewed *Daroobalgie Solar Farm Project - Aboriginal Cultural Heritage Assessment Report, Report to Pacific Hydro, Umwelt Environmental and Social Consultants, June 2021*, and makes the following comments.

Heritage NSW understands that Pacific Hydro engaged Umwelt Environmental and Social Consultants (Umwelt) to prepare an Aboriginal Cultural Heritage Assessment Report (ACHAR) for the development of the Daroobalgie Solar Farm Project, within the Forbes Shire Council LGA. The proposal is for the installation of approximately 420,000 solar PV panels and associated infrastructure, which will generate approximately 100 megawatts and is estimated to provide enough electricity to power up to the equivalent of 34,000 homes each year.

The Aboriginal Cultural Heritage Assessment Report (ACHAR) provided is complies requirements regarding Heritage in the SEARs. Heritage NSW recommends the following additions to the management and mitigation measures and updates required to the ACHAR and EIS:

- Heritage NSW notes that the Aboriginal Heritage Information Management System (AHIMS) search is greater than 12 months old at the time of submission. Heritage NSW requires, as per Requirement 1b of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010), that AHIMS searches be less than 12 months old. Please update the AHIMS search.
- Heritage NSW requires the track logs and/or location of transects surveyed in order to make an assessment of the thoroughness of the archaeological survey. It is not clear from the provided mapping the extent of survey units, landforms surveyed, and the areas within the units subject to survey.
- Section 6.4 of the ACHAR outlines that there is limited potential for subsurface *in situ* subsurface archaeological deposit owing to disturbance caused by farming activities. However, there are extensive number of cases where such disturbances have not removed the potential for *in situ* archaeological deposit. The *Daroobalgie Solar Project, Soil and Land Resource Assessment, prepared by Minesoils*, dated March 2021, notes that within the Core Development Area (CDA) there is A horizon soils present to varying depths. The identification of 95 surface artefacts across the project area, especially two larger sites within the Electricity Transmission Line (ETL), coupled with varying depths of A horizon soils in the CDA indicate that there may be greater potential for further archaeological material than identified in the ACHAR. Provide greater explication on the potential for subsurface material and justification on why test excavations should not occur prior to construction in the project area. If adequate justification is not provided, Heritage NSW recommends that test excavations occur prior to any construction impacts in the project area.
- Clarification is required on the location of artefacts within their respective site boundaries and in relation to the project area and proposed impacts. Several sites appear to be outside of the proposed SSD area and/or impact area. If these sites are not within the project area but may



be harmed through construction or other works then these sites may require an Aboriginal Heritage Impact Permit (AHIP) before any harm could occur.

- The ACHAR recommends that an Aboriginal Heritage Management Plan (ACHMP) be developed and implemented for the project. Heritage NSW recommends the ACHMP should be included in the Conditions of Approval and that an ACHMP be created and approved by Department of Planning and Environment prior to any development activities occurring within the project area.

Should you require any further information, please contact Corey O'Driscoll, Senior Assessments Officer, Heritage NSW on 6229 7079 or corey.odriscoll@environment.nsw.gov.au.

Yours sincerely

Nicole Davis
Manager Assessments

Heritage NSW

Department of Planning and Environment

13 April 2022