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12 June 2019

Harrison Holihan
Commercial Manager
Genex Power
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Sydney NSW 2000

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Dear Harrison,

RE – 19-130 – Jemalong Modification- Heritage

NGH Environmental were commissioned by Genex Power to examine a proposed modification to the Jemalong Solar PV project. The 50 MW Jemalong Solar farm was approved in May 2018 as a State Significant Development (SSD 8803). Genex Power wish to modify the development and have been provided with advice from the Department of Environment and Planning (DPE) (dated 4/6/2019) on what information the DPE needs to make a determination that the modification has minimal environmental impact. This includes an assessment of the cultural heritage impacts of the modification proposal, amongst other things.

This letter is to provide Genex Power with an independent assessment of the heritage implications for the proposed modification, in order to respond to DPE. Our assessment of the modification in relation to Aboriginal cultural heritage is outlined below.

If you have any comments or require further information, please contact me.

Yours sincerely,

Matthew Barber
Principal Heritage Consultant

Ph 02 6153 6320

NGH Environmental



EXISTING INFORMATION

The Aboriginal heritage survey for the Jemalong solar project was carried out by Julie Dibden of NSW Archaeology on behalf of NGH Environmental in 2014 (NSW Archaeology 2015). The report was later updated with new information for a modification to the layout in 2017 (NSW Archaeology 2017). The assessment was in accordance with relevant Office of Environment and Heritage guidelines, including conducting consultation with the Aboriginal community. The field survey undertaken by NSW Archaeology was comprehensive, carried out over two days with two archaeologists and a representative from the Condobolin Local Aboriginal Land Council.

The survey was aimed at locating Aboriginal objects and also assessing previous land disturbance, the ground surface visibility and the archaeological potential of the land. The survey covered approximately 28 km of pedestrian transects across the proposal site and the transmission line was also walked as a single transect (NSW Archaeology 2017). No further survey was required for the modification to the project in 2017 as all areas had been sufficiently surveyed in 2014 (NSW Archaeology 2017).

NSW Archaeology recorded six locales containing Aboriginal stone artefacts, all of which were outside the proposed solar array footprint and transmission line. Five of the locations contained a single stone artefact and one, Locale 3, contained five stone artefacts. NSW Archaeology found no areas of high archaeological subsurface potential and recommended that no further archaeological investigation was necessary.

NEW PROPOSAL

Modification 2 for the Jemalong PV solar farm project involves an increase in the footprint of the proposal. Figure 1 shows the original proposal layout and Figure 2 the proposed modification layout. An increase in the footprint is proposed in the south western corner of the project as well as in the northern central portion and the north eastern section. All of these additional areas are within the original project assessment area identified in the original archaeological assessment and EIS. The areas identified as archaeologically sensitive, namely the areas within 200 m of the lagoon will still be avoided.

ABORIGINAL ASSESSMENT

The survey undertaken by NSW Archaeology in 2014 was “comprehensive” but did not locate any Aboriginal objects or sites within the original footprint, all sites being outside the solar array panels. The sites they recorded were also outside the modification that was assessed in 2017.

The footprint for modification 2 extends beyond that of the 2017 modification but none of the sites recorded by NSW Archaeology are situated within this new revised footprint. There is no survey coverage map in the NSW Archaeology report but NGH are reasonably confident that the areas of the current modification were covered by NSW Archaeology’s survey. This is based on the textual reference to the “comprehensive” survey strategy by NSW Archaeology, who noted the spacing (15 m) of participants (2017:27) and the fact that sites were found outside the original footprint. In support of this evidence was the modification 1 revision, which expanded the footprint, but remained within the overall project area, NSW Archaeology did not require any further site survey.

CONCLUSION

Based on the evidence provided in the NSW Archaeology archaeological reports (2015 & 2017) and the location of the proposed solar arrays for the modification 2, NGH concludes that it is unlikely that Aboriginal heritage objects would be impacted by the modification and therefore there is negligible additional impact on the heritage values of the project area.

REFERENCES

NSW Archaeology 2015 Jemalong Solar Station: Aboriginal Cultural Heritage Assessment Report. Report prepared for Vast Solar Pty Ltd.

NSW Archaeology 2017 Jemalong 50MW PV Project: Aboriginal Cultural Heritage Assessment Report. Report prepared for Vast Solar Pty Ltd.

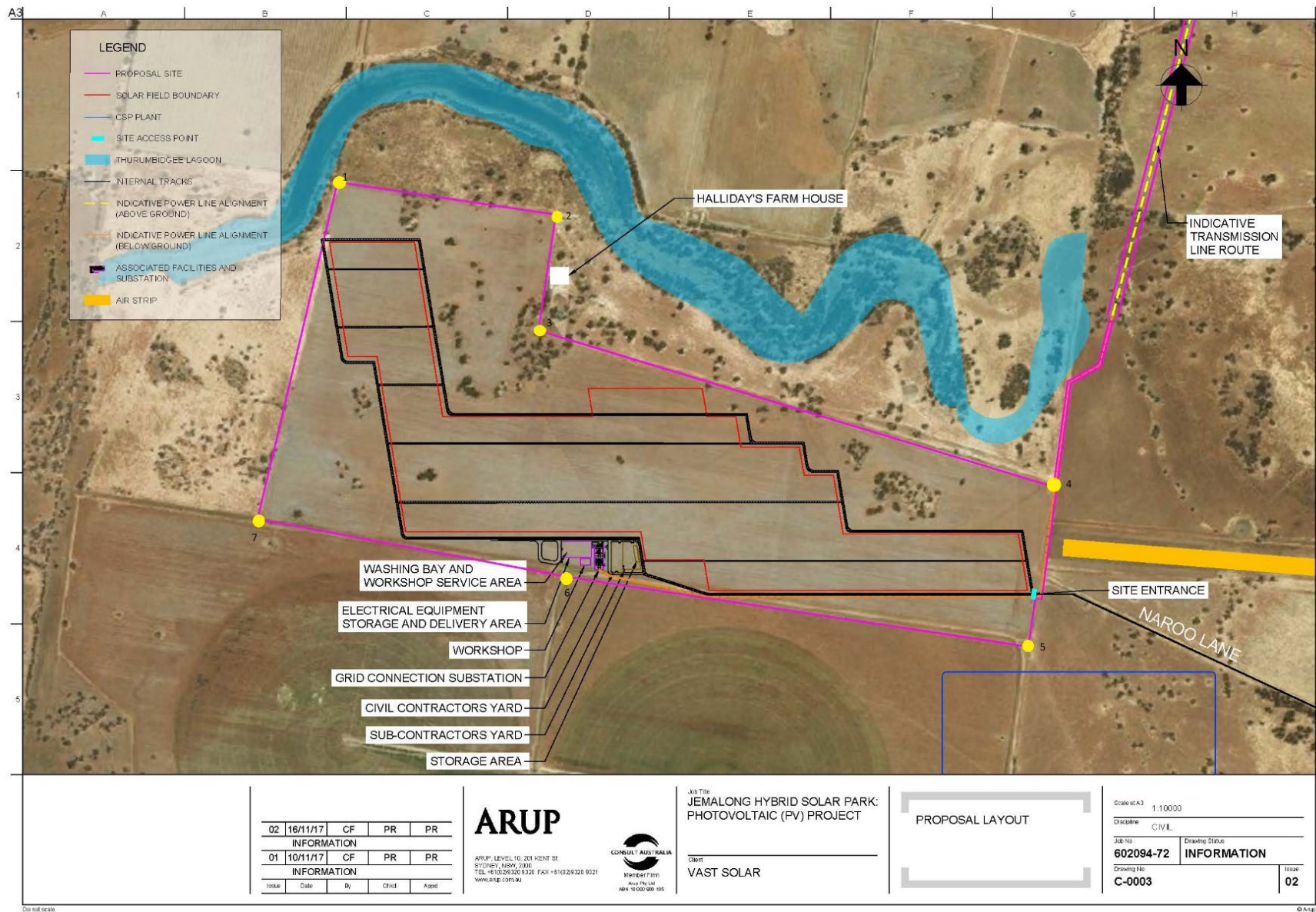


Figure 1. Footprint of solar array modification 1.

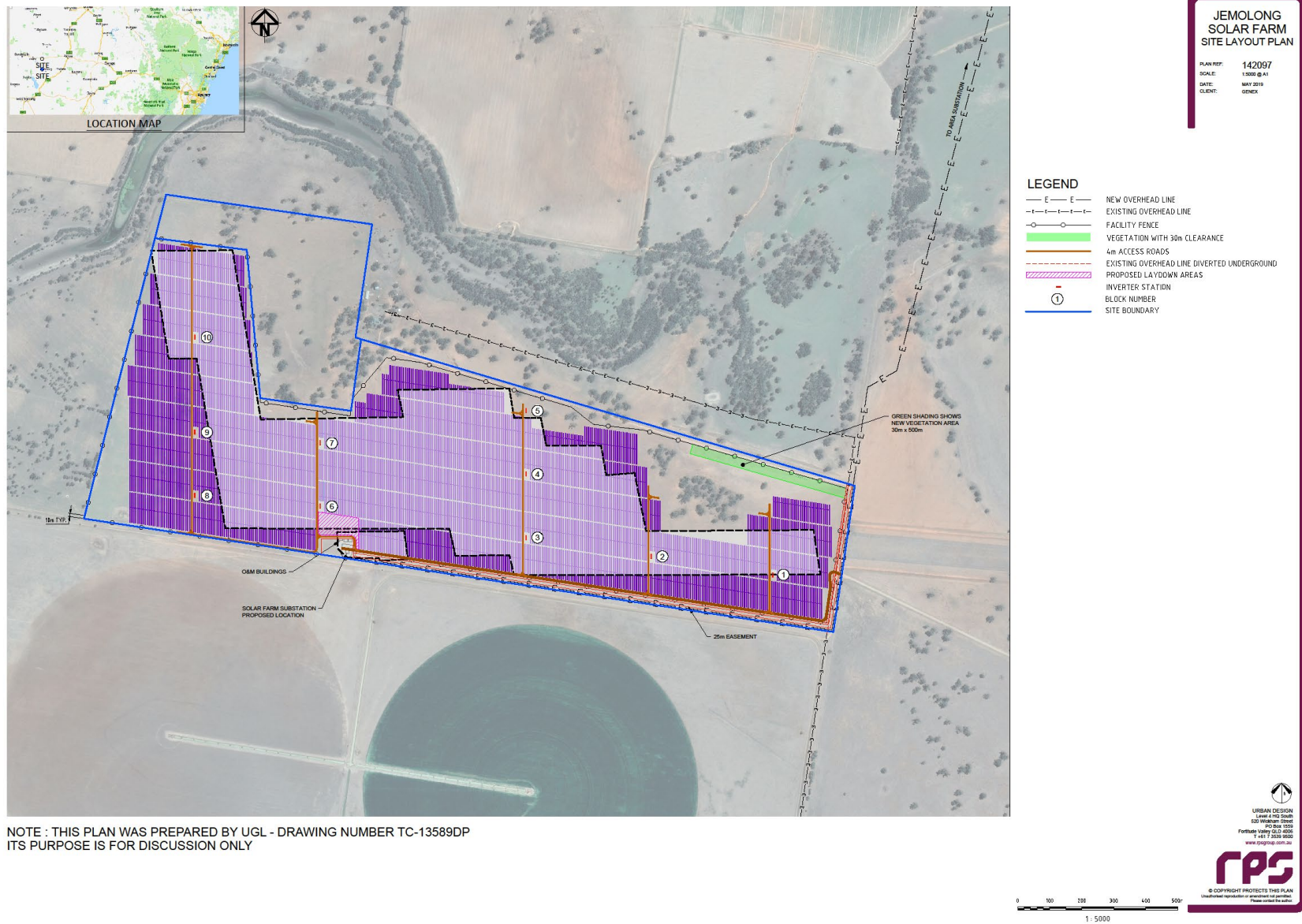


Figure 2. Footprint of modification 2 (map supplied by Genex Popwer).