Subject: Orange Grove Solar - Draft Development Consent

From: John Zammit <john.zammit@overlandsunfarming.com.au>
Sent: Thursday, 24 January 2019 2:38 PM
To: Tatsiana Bandaruk <Tatsiana.Bandaruk@planning.nsw.gov.au>
Cc: Samantha Wynn <Samantha.Wynn@environment.nsw.gov.au>; Sten Fraser <sten.fraser@overlandsunfarming.com.au>
Subject: Re: Orange Grove Solar - Draft Development Consent
Importance: High

Hi Tatsiana

We provide the following response from our heritage consultant Ryan Desic at EMM about the proposed impacts and management of OG_ISF1, hopefully this will close out the issue, please let me know if you require anything further.

"I am writing to you about the proposed impacts and management for isolated stone artefact OG_ISF1 associated with the Orange Grove Sun Farm (the project).

This artefact is located within the project study area (refer Figure 6.1 of the ACHA (EMM 2018), attached) that was initially considered for disturbance/impact through placement of infrastructure, and was therefore considered during archaeological field survey and impact assessment. Subsequent to the archaeological field survey, the development footprint was defined in response to other identified constraints, which consequently resulted in avoidance of impact to OG_ISF1. As a result, the ACHA exhibited as part of the EIS designated OG_ISF1 for avoidance. However, in response to issues identified during the Response to Submission (RtS) phase of the project, the development footprint has been revised to include the area in which OG_ISF1 is located and therefore will now be impacted by the project.

EMM recommend for the conditions of consent to allow the proponent to carry out unmitigated impacts over OG_ISF1. As identified in the Aboriginal cultural heritage assessment (ACHA) for the project, this site is of low scientific significance and no socio-cultural significance has been associated with the site or the broader study area. The other isolated stone artefact (OG_ISF2) in the development footprint has similarly low cultural heritage value and was proposed for unmitigated impact without objection from the Aboriginal community. Accordingly, EMM propose that it is appropriate for OG_ISF1 to receive the same measures as OG_ISF2. This recommendation is from a pragmatic view as the alternative of dedicating the time and resources of salvaging a single artefact of low value is somewhat excessive.

At the time of the archaeological survey, the development footprint was yet to be confirmed, and survey was undertaken across the area referred to as the project study area (represented by the study area shown on Figure 6.1 of the ACHA). RAPs were made aware that all areas surveyed had the potential to be impacted. This point is evidenced by one of the aims on p.31 of the ACHA that states an aim was to "sample a wider geographical area (the study area) than the development footprint so that there was flexibility to refine the development footprint based on the outcomes of the archaeological and ecological surveys". RAPs strongly expressed that the trees possibly scarred by Aboriginal people (OG_PST1 and OG_PST2) should be avoided; a recommendation that was adopted by the proponent. However, there were no concerns raised by the RAPs about the isolated artefacts.

The project RAPs will have the opportunity to input into further management measures and protocols during the development of an Aboriginal cultural heritage management plan (AHMP), and will therefore be updated about the change in development footprint. Preparation of the AHMP would provide a more appropriate forum for management discussion, rather than having an additional consultation period in the interim prior to project approval.

Please do not hesitate to contact me if you have any further questions.

Regards,

Ryan Desic
Senior Archaeologist – Heritage Team Leader

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Regards
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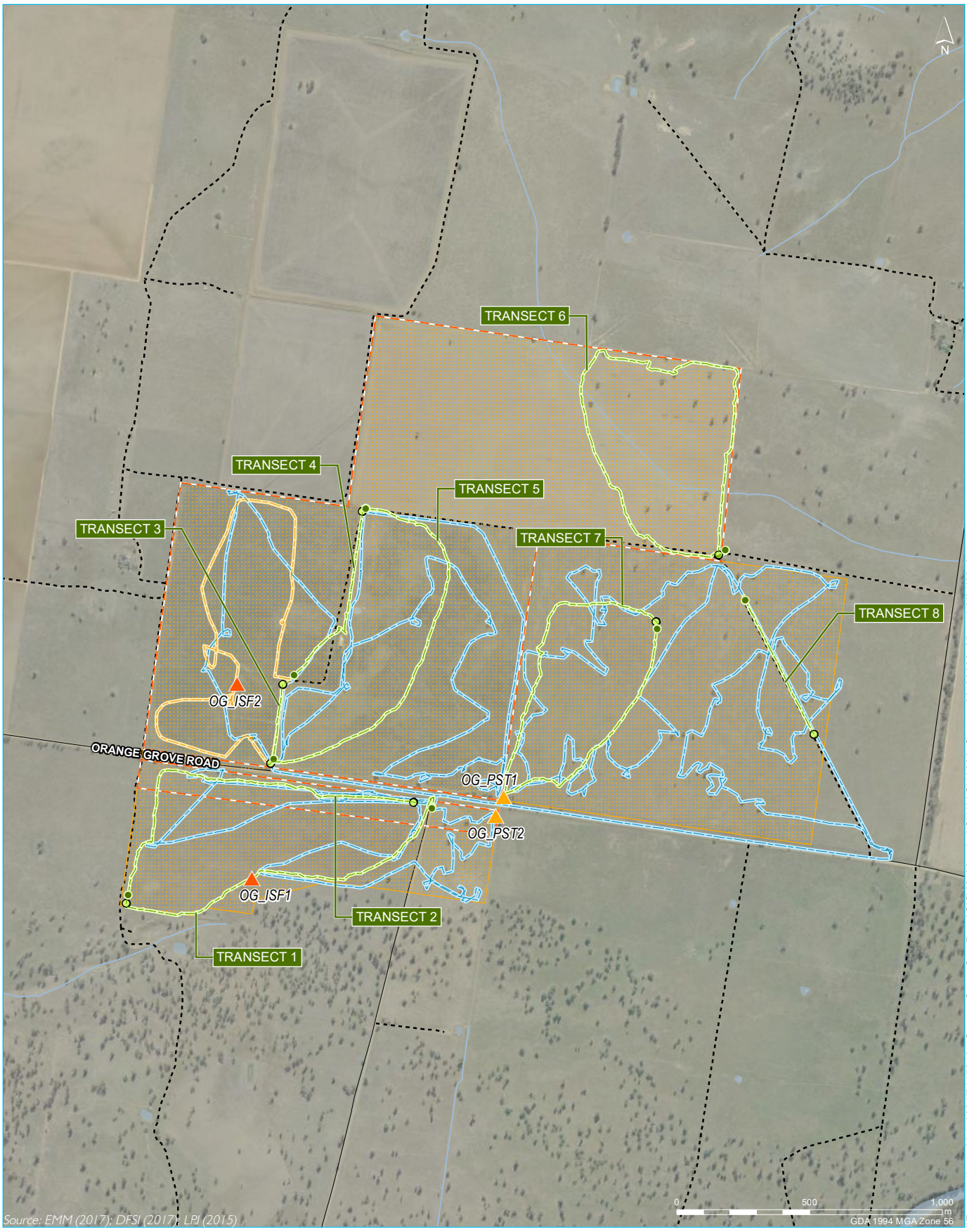

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KEY

- Development footprint
- Study area
- Local road
- Vehicular track
- Watercourse / drainage line
- Waterbody

Heritage survey results

- Isolated find
- Tree with scar

Heritage survey effort

- Pedestrian survey transect
- Vehicle/pedestrain transect
- Vehicle tree survey

Field survey results

Orange Grove Sun Farm
Aboriginal cultural heritage assessment
Figure 6.1

EMM