Environmental Impact Statement
Glenellen Solar Farm

Appendix D: Aboriginal Cultural Heritage Assessment Report and Addendum Letter

October 2020

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Our ref: 20ARM-15523

The Director
Glenellen Solar Farm Pty Ltd
C/- Addsum Accountants
Suite 1903
109 Pitt Street
Sydney, NSW 2000

Attention: Nalin Wickramasinge

Dear Nalin,

Glenellen Solar Farm, Jindera NSW – Aboriginal Cultural Heritage Assessment Addendum Letter

The purpose of this addendum letter is to provide an update to the Aboriginal Cultural Heritage Assessment (ACHA) prepared in 2018 by NSW Archaeology for the proposed development of a utility-scale photovoltaic solar farm within Jindera, NSW. The proposed solar farm is to be situated either entirely or partially within the following lots:

- Lot DP 3 411022;
- Lot 3 DP 1190444,
- Lot 27 DP 753342;
- Lot 101 DP 791421;
- Lot 1004 DP 1033823 and
- Lot 1 DP 588720

The ACHA prepared by NSW Archaeology in 2018 was done so on behalf of CWP Renewables Pty Ltd (CWP). Since the preparation of this ACHA, a number of changes have occurred regarding the proposed works and ownership of the Glenellen Solar Farm (GSF) site. These changes are summarised below:

- In 2020, CWP Renewables sold the GSF site to Trina Solar Development Australia, who are now the proponent for the construction of the GSF. Therefore, all mention of CWP Renewables as the proponent within the NSW Archaeology ACHA should be disregarded.
- The proposed development footprint for the GSF site has since changed based on updated designs by Trina Solar. Refer to **Figure 1** for the current proposed layout of the GSF.
- In addition to the revised layout, the updated design of the GSF is proposed to generate approximately 200 megawatts of power at the point of connection, and no longer includes battery-based storage facilities.

In addition to the ownership and design changes stated above, Eco Logical Australia (ELA) has attached a number of Appendices to the NSW Archaeology ACHA that provide a record of the consultation between ELA (on behalf of Trina Solar) and Registered Aboriginal Parties (RAPs) for this project, as required by the Heritage NSW, Department of Premier and Cabinet (Heritage NSW) *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010).

Also included in the appendices prepared by ELA is a record of updated searches of the Aboriginal Heritage Information Management System (AHIMS) database, as well as a methodology for undertaking mitigative community collection of Aboriginal objects located within the area of the proposed solar farm.

Regards,

Daniel Claggett
Archaeologist

Figure 1: The updated layout of the GSF (Source: Trina Solar)

New South Wales
ARCHAEOLOGY

Final v. 1

Glenellen Solar Farm

Aboriginal Cultural Heritage Assessment Report

Date: 13 November 2018

Author: Dr Julie Dibden

Proponent: Glenellen Solar Farm Pty Ltd

Local Government Area: Greater Hume Shire Council

www.nswarchaeology.com.au

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EXECUTIVE SUMMARY

This Aboriginal Cultural Heritage Assessment Report (ACHAR) and historic heritage assessment has been prepared for CWP Renewables Pty Ltd (CWP) on behalf of Glenellen Solar Farm Pty Ltd (GSF) to support a Development Application to build and operate a utility-scale photovoltaic solar farm at Glenellen, approximately three kilometres north-east of Jindera, via Albury, NSW.

The proposal to construct and operate the Glenellen Solar Farm requires development consent under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). In accordance with Section 4.36 of the EP&A Act, an activity will be State Significant Development (SSD) if it is declared to be SSD by a State Environmental Planning Policy (SEPP). *State Environmental Planning Policy (State and Regional Development) 2011* declares the Glenellen Solar Farm to be SSD (SSD 9550) as it is development for electricity generating works with a capital cost of greater than $30 million (clause 20, Schedule 1).

The Department of Planning and Environment (DP&E) Secretary's Environmental Assessment Requirements (SSD 9550) issued on 14 September 2018 identifies *Heritage* to be a specific issue to be addressed in the Environmental Impact Assessment (EIS). This ACHAR has been prepared to address the SEARs. In respect of heritage, the following specific issues are required:

> *an assessment of the likely Aboriginal and historic heritage (cultural and archaeological) impacts of the development, including consultation with the local Aboriginal community in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents.*

The NSW OEH made the following specific recommendation in respect of the Environmental Impact Assessment:

> *An Aboriginal Cultural Heritage Assessment Report (ACHAR) will be required as part of the EIS. The ACHAR must demonstrate consultation in accordance with the 'Aboriginal cultural heritage consultation requirements for proponents 2010' (DECCW). Aboriginal cultural heritage values that exist across the whole area that will be affected by the development must be identified and documented in the ACHAR. All Aboriginal objects identified must be reported to the OEH through registration on AHIMS in accordance with the mandatory notification requirements of section 89A of the National Parks and Wildlife Act 1974.*

The heritage assessment has been conducted in accordance with the NSW Office of Environment and Heritage (NSW OEH) *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011) and *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (NSW DECCW 2010a). The historic heritage assessment has referred to the NSW Heritage Manual.

A process of Aboriginal community consultation has been undertaken in accordance the NSW OEH's *Aboriginal cultural heritage consultation requirements for proponents 2010* (NSW DECCW 2010b).

The study has sought to identify and record Aboriginal cultural areas, objects or places, assess the archaeological potential of the proposal area and formulate management recommendations based on the results of the community consultation, background research, field survey and a significance assessment.

A search of the NSW OEH Aboriginal Heritage Management Information System (AHIMS) has been conducted (AHIMS Reference: #354792). Ten Aboriginal object sites are listed for the search area (432 sq. km.), none of which occur in the Study Area (Appendix 2). No historic heritage for the Study Area is listed on any of the Commonwealth, State or Local heritage schedules.

A field survey for Aboriginal areas, objects and places has been conducted in September 2018. The site was found to be highly impacted by a long history of agricultural land use. The majority of the Study Area has been cultivated and levelled. It is highly modified and hence any artefact presence will have been comprehensively disturbed.

Three stone artefact locales were recorded during the field survey. Generally, the Study Area has been found to be of very low archaeological potential, sensitivity and significance. No historic heritage items or relics have been recorded. The Study Area has no historic heritage values.

As a result of the assessment, the following conclusions and recommendations are made (see Sections 7 & 9 for detailed recommendations):

- The land in which impacts would occur is highly disturbed, modified and impacted by previous agricultural land use.
- The recorded Aboriginal object locales and the predicted subsurface artefact distribution (assessed to be negligible to very low density) in

the Study Area do not surpass archaeological significance thresholds which would act to preclude the proposed development.

- The three recorded Aboriginal object locales are assessed to be representative of a very low-density distribution of stone artefacts in the Study Area. This artefact presence is assessed to be of low archaeological significance.
- There are no heritage constraints in regard to the development within the Study Area. No further archaeological investigations are required.
- No impact mitigation is warrented.

Acknowledgments

Matthew Flower, CWP Renewables Pty Ltd;
Beth Taylor, landowner;
John Weidner, landowner;
Sam Kirby, Draie McGrath, Troy McGrath, Albury District Local Aboriginal Land Council;
John Gilding, South West Branch, Office of Environment and Heritage

Archaeological evidence confirms that Aboriginal people have had a long and continuous association with the region for thousands of years. We would like to acknowledge and pay our respects to the traditional owners of the country which is encompassed by the proposal.

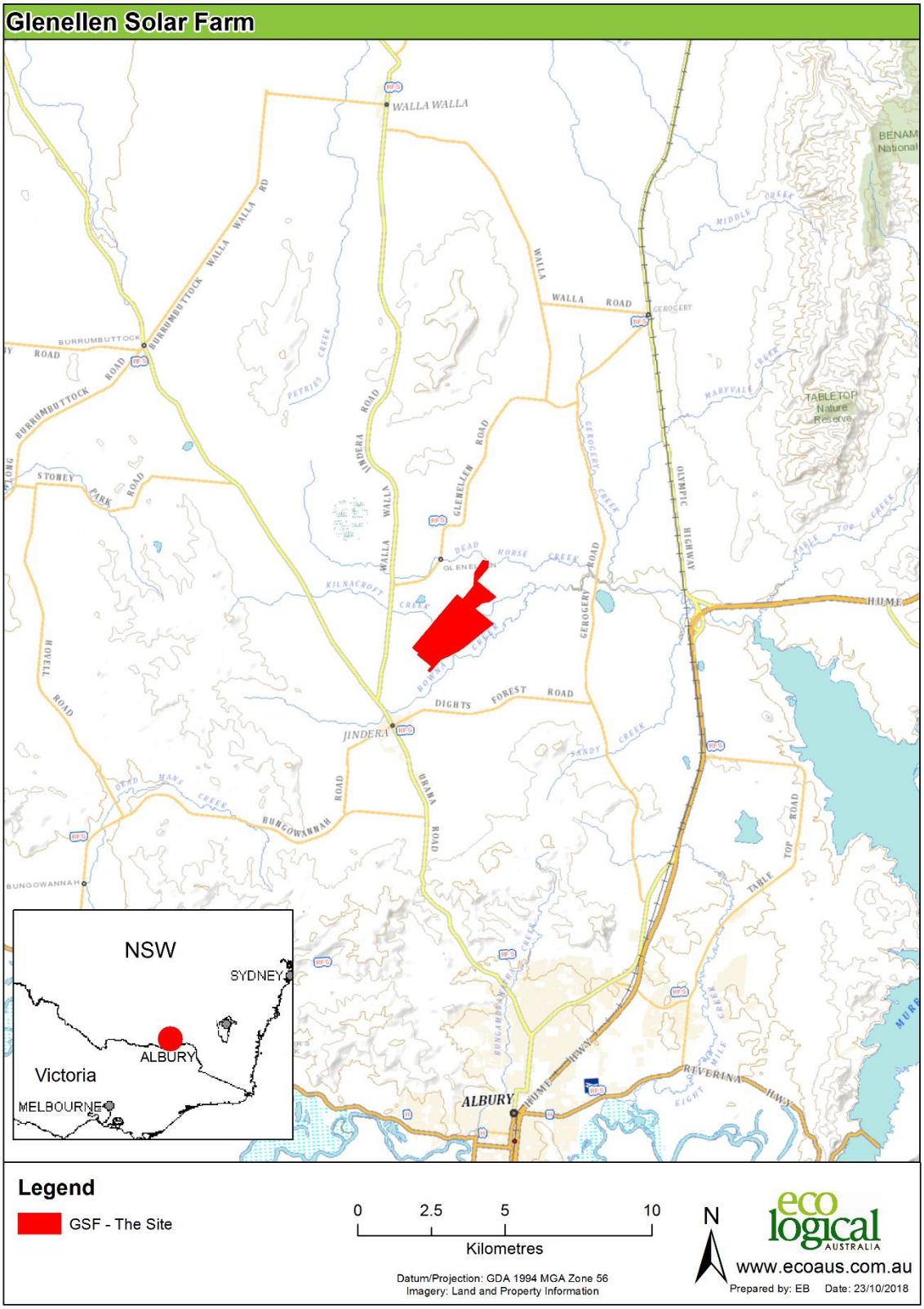

Figure 1 Location of the Study Area.

1. INTRODUCTION

Glenellen Solar Farm Pty Ltd propose to construct a utility-scale photovoltaic solar farm at Glenellen, approximately four kilometres north-east of Jindera, via Albury, NSW (Figure 1).

The Study Area is located on land within the Greater Hume Local Government Area (LGA) in southern NSW. Access to the site is via the western part of Lindner Road, leading to Ortlipp Road on the north western side. Drumwood Road is on the south eastern side of the site. A TransGrid substation is located adjacent to the site on Ortlipp Road, which will serve as the grid connection point. The identified land is currently used for grazing and/or cultivation by landholders included in the project.

The Glenellen Solar Farm (GSF) would generate electricity through the conversion of solar radiation to electricity using PV panels laid out across the site in a series of modules, mounted on steel racks with piled supports. Other infrastructure would include battery-based storage facilities, electrical power conversion units, underground and/or above ground electrical cabling, telecommunications equipment, amenities and storage facilities, vehicular access and parking areas, security fencing and gates. When it is fully constructed the GSF would have an electricity generation capacity of approximately 150 megawatts at the point of connection.

The footprint and scale of the GSF will be refined through the environmental assessment, community consultation and detailed design processes.

The content and format of the report is set out in accordance with the NSW OEH (2011) *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* document. The report aims to document:

- The Aboriginal objects and declared Aboriginal places located within the area of the proposed activity, as relevant;
- The cultural heritage values, including the significance of the Aboriginal objects and declared Aboriginal places that exist across the whole area that will be affected by the proposed activity, and the significance of these values for the Aboriginal people who have a cultural association with the land, as relevant;
- How the requirements for consultation with Aboriginal people have been met (as specified in clause 80C of the NPW Regulation);

- The views of those Aboriginal people regarding the likely impact of the proposed activity on their cultural heritage (if relevant);
- The actual or likely harm posed to the Aboriginal objects or declared Aboriginal places from the proposed activity, with reference to the cultural heritage values identified, as relevant;
- Any practical measures that may be taken to protect and conserve those Aboriginal objects or declared Aboriginal places (if relevant); *and*
- Any practical measures that may be taken to avoid or mitigate any actual or likely harm, alternatives to harm, or, if this is not possible, to manage (minimise) harm (if relevant).

This heritage assessment has been conducted by Dr Julie Dibden (ANU: BA honours; PhD), Andrew Pearce (UNE: BA Archaeology and Palaeoanthropology) and Tom Knight (ANU: BA; MLitt; MPhil), NSW Archaeology Pty Ltd.

Assistance in the field was provided by Troy McGrath and Draie McGrath, Albury District Local Aboriginal Land Council. The fieldwork work was undertaken in late September 2018 over three days.

2. DESCRIPTION OF THE AREA – BACKGROUND INFORMATION

In this section, background and relevant contextual information is compiled, analysed and synthesized. The purpose of presenting this material is to gain an initial understanding of the cultural landscape; the following topics are addressed (*cf*. NSW OEH 2011: 5):

- The physical setting or landscape;
- History of peoples living on that land; *and*
- Material evidence of Aboriginal land use.

2.1 The Physical Setting or Landscape

Aboriginal people have occupied NSW for more than 42,000 years (Bowler *et al*. 2003). Evidence and cultural meanings relating to occupation are present throughout the landscape (NSW OEH 2011: iii). A consideration of landscape is particularly valuable in archaeological modelling for the purposes of characterising and predicting the nature of Aboriginal occupation across the land. In Aboriginal society, landscape could be both the embodiment of Ancestral Beings and the basis of a social geography and economic and technological endeavour. The various features and elements of the landscape are/were physical places that are known and understood within the context of social and cultural practice.

Given that the natural resources that Aboriginal people harvested and utilised were not evenly distributed across landscapes, Aboriginal occupation and the archaeological manifestations of that occupation will not be uniform across space. Therefore, the examination of environmental context is valuable for predicting the type and nature of archaeological sites which might be expected to occur. Factors that typically inform the archaeological potential of landscape include the presence or absence of water, animal and plant foods, stone and other resources, the nature of the terrain and the cultural meaning associated with a place.

Additionally, geomorphological activated processes need to be defined as these will influence the degree to which archaeological sites may be visible and/or conserved. Land which is heavily grassed and geomorphologically stable will prevent the detection of archaeological material, while places which have suffered disturbance may no longer retain artefacts or stratified deposits. A consideration of such factors is necessary in assessing site

significance and formulating mitigation and management recommendations. The following information describes the locational and landscape context of the Study Area (Figures 2, 3 and 4).

The land tenure of the Study Area is as follows: Lot DP 3 411022, Lot 3 DP 1190444, Lot 27 DP 753342, Lot 101 DP 791421, Lot 1004 DP 1033823 and Lot 1 DP 588720. The Study Area is in the Parish of Jindera, County of Goulburn.

The land in the Study Area is mostly non-native agricultural grassland with isolated trees. Some patches of native trees are present with varying prevalence of native species in the understorey, occurring mostly along the public road verges, and around the periphery of the land. The land is a highly modified agricultural landscape.

The landscape is relatively flat with minor undulations, with patches of remnant vegetation along roadsides, paddock edges, lower lying areas along drainage lines and scattered throughout paddocks. The underlying geology is granitic, none of which is exposed as bedrock, and the soils groups include Red Brown Earths and Solodized Solonetz (Figures 2, 3 & 4). Gradients across the site and very gently undulating or flat.

The drainage lines on the land are largely ephemeral with minimal bank delineation and limited riparian vegetation. Bowna Creek flows immediately to the south of the Study Area (Figure 2).

The Aboriginal landscape

The region along the Upper Murray River is rich in Aboriginal food resources. The river valleys and the hill country provided large and small animals, birds, fish, crustaceans, reptiles and edible plant foods. The wetlands in the river valley were rich in game and flora and were a focus of subsistence activities during the summer months. Between 1839 and 1844, George Robinson describes the daily lives of the local Aboriginal people and provides a written source of likely food resources gathered and hunted during this period.

The changes in the Lake Hume region after European settlement have been considerable. Previously, the Murray River valley's extensive floodplains would have flooded seasonally, resulting in a highly productive environment for both plant and animal. This in turn provided an abundance of food and consequently, people focused heavily on the riverine food resources in these

areas. The forested hills were also important as they provided other types of food resources, artefacts, shelter and medicinal plants.

Plants provided a good source of nutrition mostly gained from the fruits, greens and stems, roots and seeds although grass seeds were more important in the lower rainfall areas of Australia (National Heritage Consultants 2007: 100). The cooking of plant food was usually undertaken in an earth oven, a hole dug into the ground and filled with either suitable stone or clay balls for heat retainers (Beveridge 1883). Animals could also be cooked using this method.

Eucalypts were also important as these provided bark and timber for implements and other craft. Gott (1999) has identified 29 different species of Eucalyptus occurring in the forest and woodland areas in the Lake Hume region and, accordingly, the hill country would have been an area of focus for Aboriginal people. Other trees such as Wattles, Kurrajongs and She-oaks would also have been exploited.

Summary

The local area is situated away from reliable water and is comprised of large, amorphous landforms. There are no focal micro topographies which may have been targeted for camping and other activities which would result in elevated levels of artefact discard.

In an Aboriginal land use context, the Study Area is likely to have been utilised by Aboriginal people for a limited range of activities which may have included hunting, gathering and foraging excursions by small groups, and travel through country. Such activities are likely to have resulted in generally low levels of artefact discard.

Landforms located adjacent to the major waterways in the region are likely to have been utilised by Aboriginal people for camping while they occupied the local area. These areas would have provided resource diversity and a ready access to drinking water. Artefact discard is likely to have been greater in such areas reflecting more frequent and/or sustained occupation. It is possible that artefact diversity may also be greater in such areas. Such areas are located outside the area of proposed impacts.

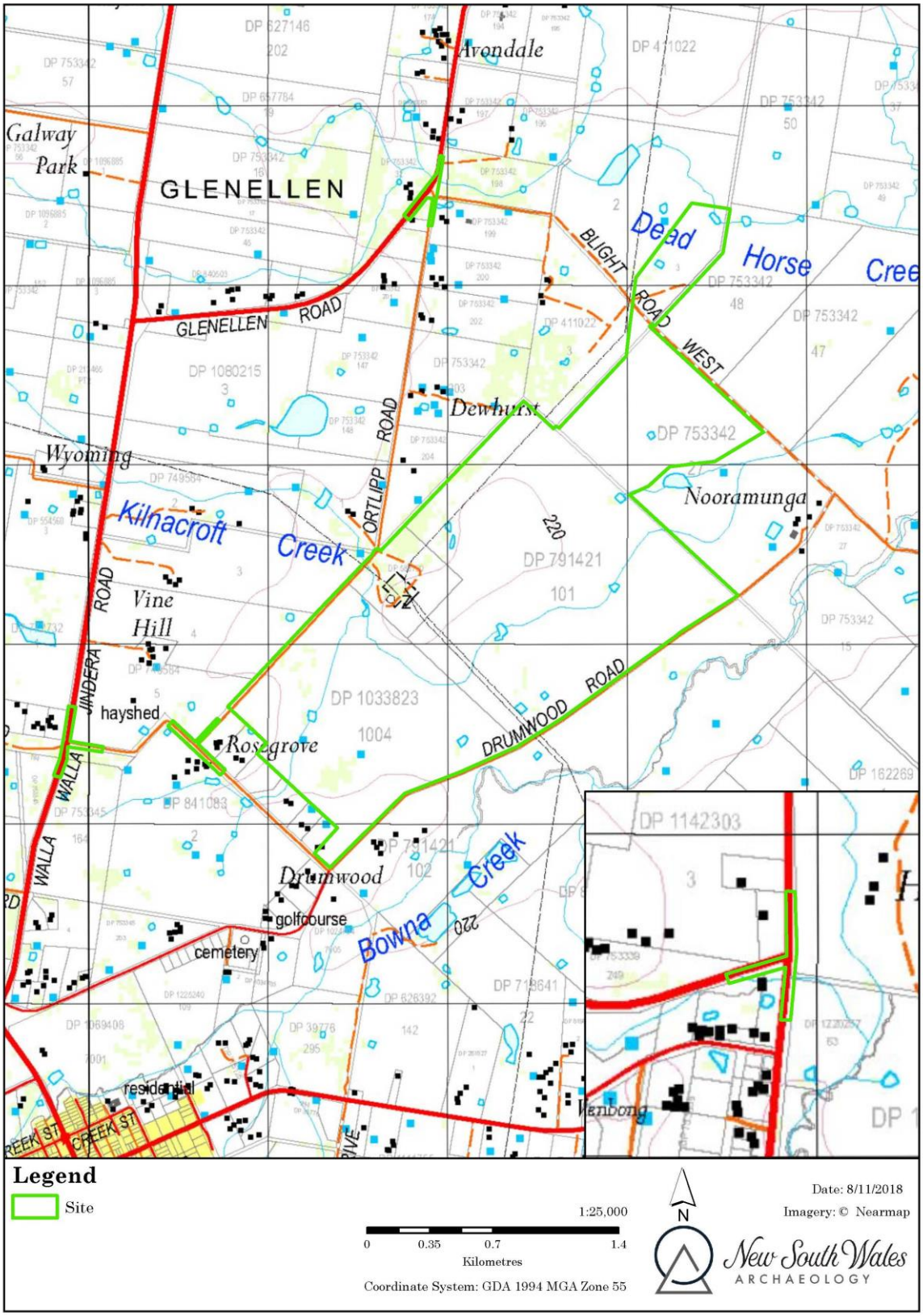

Figure 2 The topographic context of the Study Area.

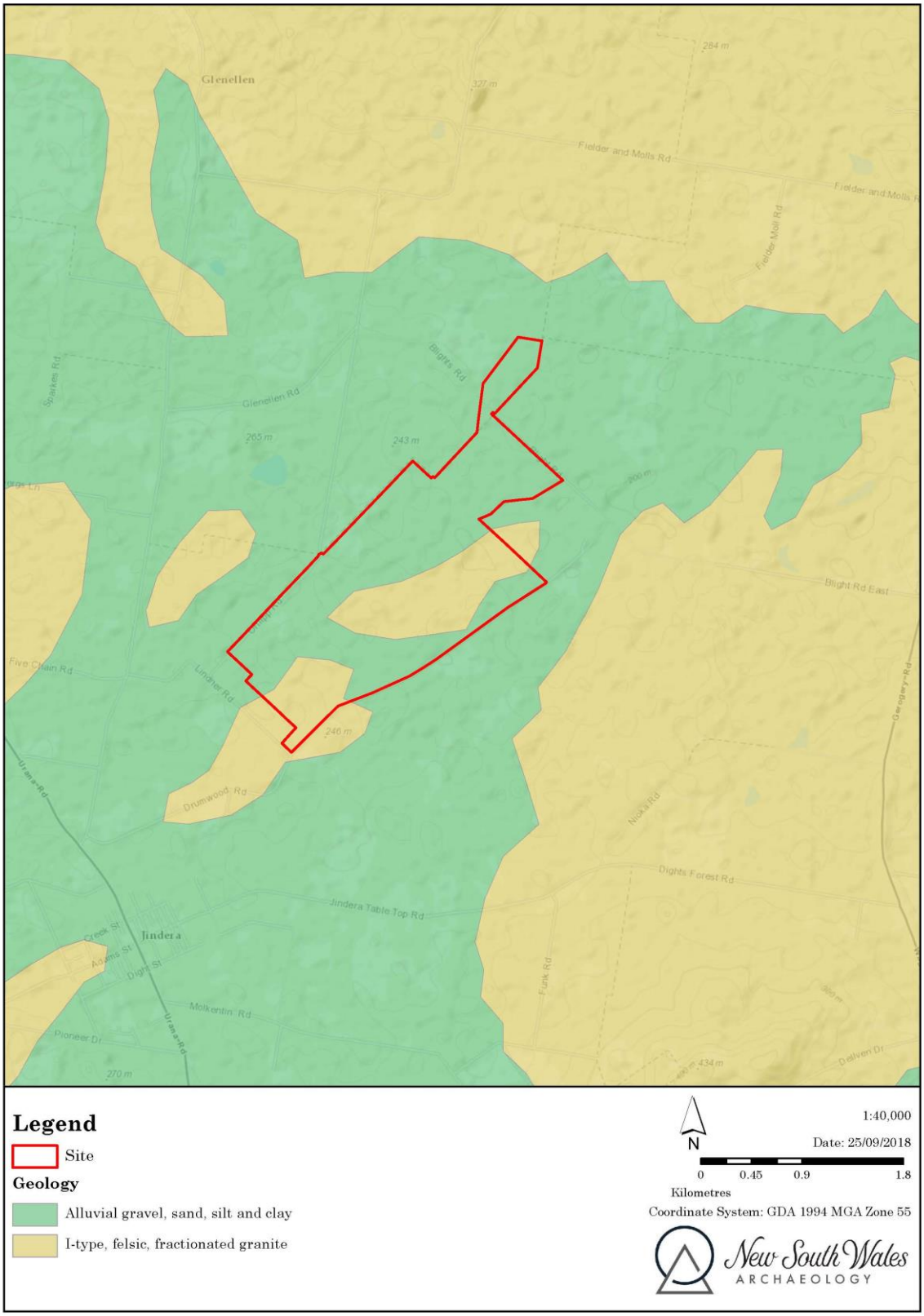

Figure 3 The geology of the local area.

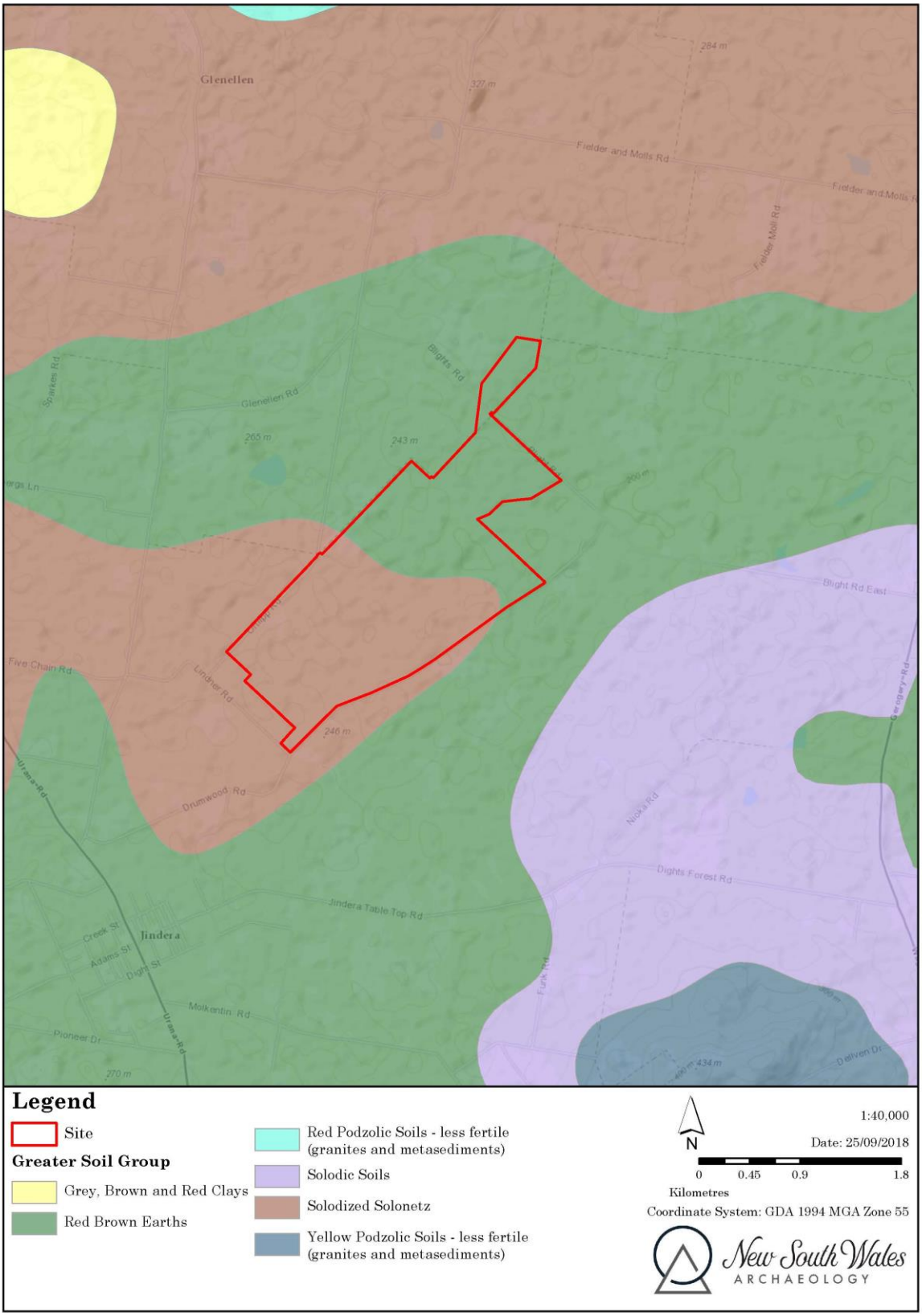

Figure 4 The soils of the local area.

2.2 History of Peoples Living on the Land

Aboriginal people have occupied Australia for at least 40,000 years and possibly as long as 60,000 (Bowler *et al.* 2003; Mulvaney and Kamminga 1999: 2). By 35,000 years before present (BP), all major environmental zones in Australia were occupied, including periglacial environments of Tasmania (Mulvaney and Kamminga 1999: 114). At the time of early occupation, Australia experienced moderate temperatures. However, between 25,000 and 12,000 years BP (the Last Glacial Maximum), dry and either intensely hot or cold temperatures prevailed across the continent (Mulvaney and Kamminga 1999: 114). At this time, the mean monthly temperatures on land were 6 - 10ºC lower; in southern Australia coldness, drought and winds acted to change the vegetation structure from forests to grass and shrublands (Mulvaney and Kamminga 1999: 115-116).

During the Last Glacial Maximum at about 24 - 22,000 years ago, sea levels fell to about 130 metres below present and, accordingly, the continent was correspondingly larger. With the cessation of glacial conditions, temperatures rose with a concomitant rise in sea levels. By c. 6,000 BP, sea levels had more or less stabilised to their current position. With the changes in climate during the Holocene, Aboriginal occupants had to deal not only with reduced landmass but changing hydrological systems and vegetation; forests again inhabited the grass and shrublands of the Late Glacial Maximum. As Mulvaney and Kamminga (1999: 120) have remarked:

> *When humans arrived on Sahul's*[1] *shores and dispersed across the continent, they faced a continual series of environmental challenges that persisted throughout the Pleistocene. The adaptability and endurance in colonising Sahul is one of humankinds' inspiring epics.*

Our knowledge and understanding of Aboriginal social life and organisation in south-eastern New South Wales at the time of European occupation is limited. Our ethnographic understanding of Aboriginal people in this area, and the historical dimension of the colonial encounter, has been reconstructed from scant historical records produced during a context of death and dispossession (Swain 1993: 115), and is sketchy and biased. Stanner (1977) has described the colonial and post-colonial past as a 'history of indifference', and this portrays both the substantive situation which prevailed at that time,

[1] Sahul is the name given to the single Pleistocene era continent which combined Australia with New Guinea and Tasmania.

and the subsequent lack of regard for this history. For a considerable period of time after Europeans arrived in Australia, no concerted ethnographic investigations were undertaken to learn about the culture and society of Aboriginal peoples. As a result, in trying to reconstruct the complex traditional cultures of varying Aboriginal groups, investigators of today are necessarily required to piece together, as best as possible, fragmentary information derived from the generally incidental annotations of disparate early observers.

According to Tindale (1974), Albury was situated at a junction between the countries of a number of different groups. Bungambrawatha is an Aboriginal name for the area and where people are reported to have gathered before going into the high plains in summer (Bell 2002; Jones 1991). The Tindale map of tribal boundaries shows the area north of the Murray from Albury extending to the northwest beyond Jerilderie as being the country of the Jeithi people. The area around Wodonga and further southwest is mapped as Dhudhuroa. Other surrounding people are listed as the Kwat Kwat on the south side of the river west of Wodonga and the Wiradjuri to the north-east of Albury.

However, Tindale's (1974) modelling of tribal boundaries was based on an uncritical adoption of the Radcliffe-Brown model of social organization in which the band is perceived as the most important structural feature in Aboriginal social organisation. Tindale's tribal boundaries were largely defined according to what he understood to be language groups (Flood 1980: 107). His work was conceptualized according to a model of band social organisation in which the 'horde' or clan was considered to be the group which possessed political power and proprietary rights to land (Rumsey 1989: 70). The 'tribes' which Tindale determined to have existed were seen as coterminous with language groups with the implication that these groupings were territorial units.

The assumptions inherent in this conflation of language group with tribe are no longer seen to be relevant and, furthermore, the concept of tribe as a territorial group is not regarded as being correct or useful. In Aboriginal society people were multilingual rather than monolingual. Therefore, conceiving of language groups as bounded social groupings is not appropriate (Rumsey 1989: 74). In the Radcliffe-Brown model, the land/language relationship was seen as indirect: the estate of a tribe was seen as the aggregation of all the clan estates who spoke the same language. This

relationship is now viewed to be direct – it is recognised that the importance of land/language relations in Aboriginal society is that particular languages and particular tracts of country were directly linked according to Dreaming activity (Rumsey 1989: 74-75).

While it was previously assumed that tribes or language groups functioned as politically cohesive corporate groups, more recently it has been recognised that linguistic groupings do not structure the Aboriginal social and geographical landscape. Sutton and Rigsby (1979: 722) argue that Tindale's tribal boundaries are not meaningful at either a demographic or political level. In order to overcome Tindale's limited and flowed tribal boundary model, recourse must be made to more contemporary anthropological concepts and understanding. A person's identity is likely to have included totemic identity and specific relationships to country inherited via birth rights, place of birth and so on. People would have travelled to and resided in different tracts of country, forging temporary groups of varying personnel and clan composition for the fulfilment of a variety of economic, familial and ceremonial purposes. Archaeological conceptions of social groupings need to consider the multidimensional nature of groups based on clan, gender and age identities which are likely to have been both contemporaneously and generationally fluid.

Historical recordings during the nineteenth century regarding language and dialect group distributions have been the basis for defining traditional boundaries, however, the anthropological accounts are not always reliable. Wesson (1994, 2000) and Clark (1990, 1998a) revised the available information for the Lake Hume region and proposed the Murray River was a natural boundary between the Wiradjuri speakers in the north and Dhudhuroa speakers in the south.

The Wiradjuri language group was the largest single language area in NSW prior to European settlement (Wesson 2000:81). The territorial tribal boundary of the Wiradjuri encompassed land across the central-west slopes and plains of the Riverine region from Nyngan to Albury and Bathurst to Hay (Horton 1994:1189). Within this large territory the dialects differ between Bathurst and Albury (Tindale 1974:129, 201). Other regional differences occur throughout the Wiradjuri language area and include social organisation, ceremonies and burial practices, subsistence and material culture.

The Wiradjuri of the upper Murray River region are the most southern member of the language group. George Robinson is the primary source of historical information relating to the southern Wiradjuri, collected as he travelled through the region as Chief Protector in 1846. Robinson recounts the Wiradjuri as the original inhabitants and, following interviews, established that the Wiradjuri language spoken around Albury extended north to Gundagai. The social system within the Wiradjuri on the Murray River is made up of the smallest unit known as a 'nuclear family' followed by a band which is made up of a number of 'nuclear families', and several of bands make a tribe or the like (MacDonald 1983:9).

The religion and rituals associated with the southern Wiradjuri include burials and ceremonial initiations of young boys. Burial tree carving is part of the northern Wiradjuri rituals; however, it was noted to be mostly absent from the southern Wiradjuri area with the boundary between the Lachlan and Murrumbidgee Rivers (White 1986:96). In the Yass-Murrumbidgee-Tumut region, human burials were positioned in the ground, in caves or in hollow trees (White 1986: 96).

Ceremonial customs include the *Copi-Rah*, a number of ceremonies held for individuals to help guide them through life, and *burbung/murmung* ceremony, the initiation of young boys into adulthood (Knight 2001b). The initiation ceremonies were attended by males only and took place in a circle linked by a path to another circle. These circles could be made from mounded earth or stone alignments and were located in secluded areas, such as on a mountain top or in a forest (see Mitchell n.d:25; Howitt 1904:584; Knight 2001a, 2001b:73).

John F.H. Mitchell, born in 1831, lived at 'Thurgoona' on the Murray River, and as a boy, witnessed a local Aboriginal *'murmung'* ceremony held down river to the present-day Hume Dam (Barber 2002:8-14). Mitchell recounts the initiate had his head plastered in white clay and following this, his hair was singed off and then a front tooth was removed. No communication to anyone was allowed by the initiate until his hair had regrown, and only then he was ready to marry (Mitchell n.d.:25).

Anecdotal accounts of Wiradjuri living in the present-day Lake Hume area in the second half of the nineteenth century include a Wiradjuri attack on Dora Dora station and another of small groups of Aborigines coming down from the Dora mountains onto the Murray River flats to enjoy fruiting shrubs and trees

(Warnock 2001:17-21; Burns 1997). During 1824 and 1825, the explorers William Hovel and Hamilton Hume observed numerous groups of Aboriginal men near Table Top and a camp of around 60 women, children and young men (Barber 2002: 8-15).

During the colonial encounter, in the first half of the 19th century the people of the Albury area suffered from introduced diseases, conflicts over lands and resources with settlers and loss of traditional lifestyle resulting in a swift depopulation in the region (Andrews 1912; see also Mulvaney and Kamminga 1999:66-69). In 1844, George Robinson journeyed to the Murray and Murrumbidgee Rivers and saw firsthand the devastating effects of the 1830 smallpox epidemic (Mackaness c. 1844:28; Clark 2000c:74). In 1852, Alfred Howitt wrote about a large Aboriginal camp at Albury, east of the confluence of Bungambrawatha Creek and the Murray River. Howitt described the camp occupants as poor in health and welfare, relying in part on the settlers for food and clothing (Spennemann 2003:16).

From 1858, a Victorian Central Board began establishing Aboriginal Reserves and stations, places for the local Aboriginal people to be compulsorily housed and overseen by appointed guardians. The greatest dispersal of Aboriginal people in Victoria and south-eastern New South Wales occurred during the 1860s and 1870s. Tangambalanga Aboriginal Reserve southeast of Albury and situated in Dhudhuroa territory, was operational from 1861 and 1872 (ECC 1887:16 Map 6). In the 1870s, parents were persuaded by the Victorian Government to send their children to the Coranderrk Reserve at Healesville (Wesson 2000:59). Wesson (2000:59) states the Aboriginal population in north-eastern Victoria declined form 1,628 in the 1840s to 37 in 1877.

2.3 Material Evidence

A search of the NSW OEH Aboriginal Heritage Information Management System (AHIMS) has been conducted for this project on the 3 August 2018 (AHIMS Reference: #354792). The search area measured 432 km² and encompassed the area between eastings 487000 – 498000, and northings 6020000 – 6029000. Ten Aboriginal object sites are listed for the search area (Table 1; Appendix 2). The location of Aboriginal object sites, as per the AHIMS grid references are shown in Figure 5. There are no previously recorded Aboriginal objects in the Study Area listed on the AHIMS register.

It is noted that the AHIMS register only includes sites which have been reported to the NSW OEH. Generally, sites are only recorded during targeted surveys undertaken in either development or research contexts. Accordingly, this AHIMS search is not an actual or exhaustive inventory of Aboriginal objects situated within the local area or indeed within the Study Area.

It is also noted that sites listed on AHIMS may be variable in their accuracy; it is not uncommon for grid references and/or the datum to be incorrect.

Searches have been conducted of the NSW State Heritage Inventory and the Australian Heritage Database. No Aboriginal sites for the area were listed in either database.

Table 1 AHIMS sites (AHIMS Reference: #354792).

Site ID	Site name	Datum	Easting	Northing	Site features	Site types
55-6-0041	ABP/NSW 5	AGD	492840	6020080	Artefact : 4	
55-6-0042	ABP/NSW 6	AGD	492800	6020120	Artefact : 1	
55-6-0098	Drumwoord Road Test Ex	GDA	490400	6021900	Artefact : 10	
55-6-0034	BP 1 (Howlong)	AGD	494400	6021520	Artefact : -	Open Camp Site
55-6-0035	BP 2 (Howlong)	AGD	495950	6022250	Artefact : -	Open Camp Site
55-6-0036	BP 3 (Holwong)	AGD	495700	6022300	Artefact : -	Open Camp Site
55-6-0003	Jindera;	AGD	489701	6021192	Modified Tree (Carved or Scarred) : -	Scarred Tree
55-6-0004	Jindera;	AGD	492885	6022687	Artefact : -	Open Camp Site
55-6-0005	Jindera;	AGD	493809	6021691	Artefact : -	Open Camp Site
55-6-0006	Jindera;	AGD	494358	6021606	Artefact : -	Open Camp Site

The most common Aboriginal object recordings in the region are distributions of stone artefacts. Rare site types include rock shelters, scarred trees, quarry

and procurement sites, burials, stone arrangements, carved trees and traditional story or other ceremonial places. The distribution of each site type is related at least in part to variance in topography and ground surface geology.

The following discussion in Section 2.3 will present a review of previous archaeological investigations in the region for the purposes of producing a predictive model of site type and location relevant to the Study Area.

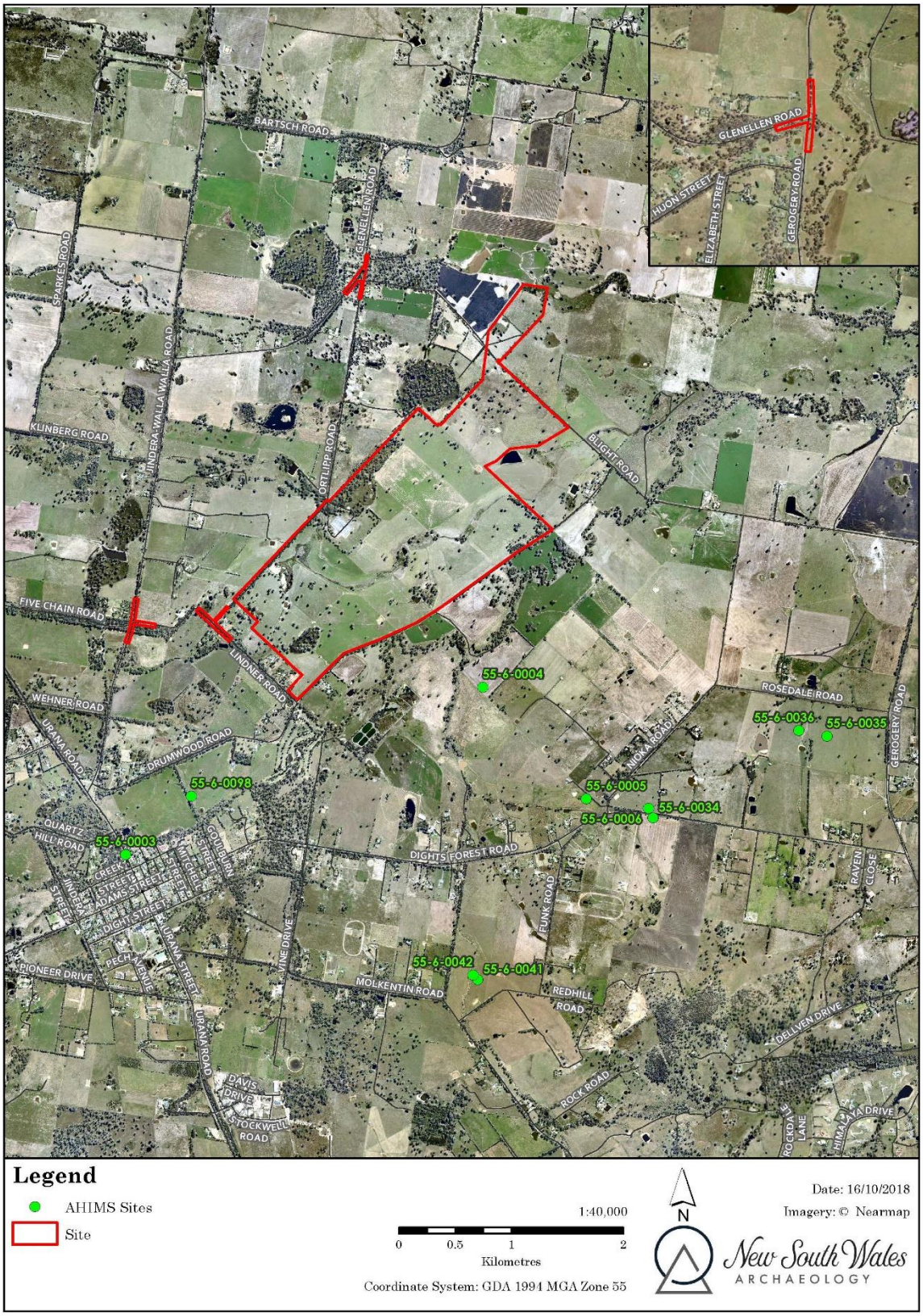

Figure 5 The location of AHIMS Aboriginal object locales in respect of the Study Area.

2.3.1 Previous Archaeological Assessment

The following is a review of previous archaeological assessments conducted in the local area.

Buchan (1974) completed an archaeological survey of a 50 kilometre strip of riverine country from Albury to Mildura. The study located a ceremonial site on a hill top consisting of two hollows linked via a shallow trench and four 'oven mounds' containing baked clay, charcoal, bone and shell near Corowa. The ceremonial site was noted to be a common site type associated with water sources and well represented throughout the Murray River area.

In 1976, Witter (1976) undertook an archaeological survey of Baranduda near Albury-Wodonga. The survey area overlooked the Murray River and consisted of a terrace, a ridge and simple slopes of gentle gradient. Witter recorded 62 isolated artefacts, three scarred trees and nine scattered lithic sites on a Pleistocene terrace. The scarred trees stood on an elevated landform overlooking the terrace. No sites were located on the steeper country beyond the terrace. Quartz was the focal artefact material type accounting for 95% of the stone. A smaller survey area at Thurgoona located a further two lithic scatters, one of which contained ground edged artefacts, followed by the location of another three sites. Witter suggests the lithic scatters are possibly indicative of areas utilised as minor camping places by Aboriginal people and are a common site type found on floodplains, terraces and rolling hills.

Djekic (1978) undertook an archaeological survey for a proposed powerline route of an area between Albury and Wagga Wagga. During the survey Djekic identified three scarred trees, one definite and two recorded as probable, as well as one isolated stone artefact.

Crosby (1978) surveyed several areas around Thurgoona and recorded seven scarred trees. Crosby identified one of these as a probable carved tree and the remaining six as possible carved trees.

Crosby (1979) completed a survey within the Albury region and located a further six possible scarred trees in an area of uncleared vegetation along the Murray River and only one possible scarred tree in a cleared section along the Murray River of similar size. Crosby suggests scarred trees would have been a common site type within this region prior to European land clearance.

Haglund (1980) undertook an archaeological survey using a vehicle of an area between Brocklesby, Table Top, Albury for a pipeline easement. One possible Aboriginal scarred tree was identified during this survey.

Barz (1980) undertook a linear archaeological survey of an area near Albury. Seven sites were recorded comprising of three quartz isolated finds and four quartz artefact scatters. At one of the sites, Barz identified a thumb nail scraper.

Presland (1981) completed an archaeological survey of an area nine kilometres northeast to 15 kilometres south of Albury. During this survey, Presland located one quartz artefact scatter and 22 isolated quartz artefacts.

Ferguson (1982) conducted an archaeological survey of an area along the Hume Highway external bypass located north and northwest of Albury. A total of 23 sites were recorded, 11 quartz artefact scatters and 12 isolated finds. A hammerstone, anvil, hatchet head and grindstone fragment were some of the isolated find artefacts recovered.

Zobel (1984) reviewed the available information regarding the Aboriginal archaeology of northeast Victoria. At the time of this review only 83 sites had been recorded and Zobel concluded the existing information was insufficient to reliably predict site locations or support management recommendation proposals. Of the 83 sites, there were scarred trees, isolated finds, artefact scatters, rock art, mounds, rock arrangement, rock shelters with habitation deposit, mound with burial, quarry and human burial. Only three excavation programs had been executed, one rock art site at Mudgegonga and two camp sites at Baranduda.

Smith and Upcher (1992) surveyed a 700-hectare area at Maryvale, ten kilometres north of Albury. Sixteen sites were recorded during the survey comprising ten artefact scatters and six scarred trees. Most artefacts recorded were quartz except for one silcrete implement. All but one artefact scatter site was located on creek banks within 50 metres of the main creekline, however, the scarred trees were found on both creeklines and hill slopes.

Paton (1994) surveyed areas west of Albury in Nursery Creek valley above the Murray River floodplain and an area of floodplain including Cooks Lagoon. Five artefact scatters and one isolated find were located near creeks on the low gradient slopes of the Nursery Creek valley and a further five

artefact scatters and two isolated finds were located on the floodplain. The sites on the floodplain were positioned on remnant river terraces and not on the modern floodplain. No sites were recorded on the steeper slopes of the valley. Following subsurface excavation of 45 shovel test pits, the results showed no cultural material was recovered from the slopes of Nursery Creek nor the modern floodplain. Artefact densities at lithic scatter sites differed at Nursery Creek and on the Murray River floodplain terraces with the higher densities at the terrace sites. Paton concludes that the ancient floodplain had been an area more intensely occupied by Aboriginal people than Nursery Creek valley.

Upcher and Smith (1994) undertook an archaeological survey of the proposed Albury-Wodonga bypass route. Ground surface visibility was noted as poor and indicative of the effective survey coverage estimate of one square kilometre. Eleven sites were recorded, eight artefact scatters and three isolated finds. All recorded artefacts were quartz.

Kelton (1996) conducted an archaeological survey of an area between Albury and the Hume Dam, approximately 10 kilometres east of Albury. The Study Area included Murray River floodplain and adjacent hill slopes of varying degrees of steepness. No surface artefacts were located. Kelton recorded one area of sensitivity, however following a test excavation program undertaken within this area, no cultural material was revealed.

Navin Officer (1996) undertook a linear survey of areas between Wodonga and Wagga Wagga from the Murray River floodplain at Wodonga northward. An estimate of approximately 84.9 kilometres of the proposed 146 kilometre of the pipeline easement was surveyed by parallel and opportunistic traversing. During this survey, Navin Officer recorded twelve artefact scatters, ten isolated finds, three scarred trees and eight PADs. The site distribution revealed stone artefact scatters were more common within well drained contexts within riparian zones and adjacent to watercourses and that scarred trees may be found throughout the landscape, The ridge crests and saddles within the survey area were assessed as having low potential for artefact scatter sites. The area surveyed within the Lake Hume region includes the Murray River floodplain, Billabong Creek and the Murrumbidgee River. The Murray River floodplain within NSW revealed four lithic scatters and two isolated finds.

Thompson (1996) undertook an Aboriginal cultural heritage study of north eastern Victoria. The study included an archaeological survey of a 20-kilometre corridor along the Ovens River form the headwaters to its confluence with the Murray River east of Yarrawonga. The areas surveyed included Murray Basin Plain, the Foothills and the Eastern Highlands. The survey identified 111 sites, comprising 42 lithic scatters and 69 scarred trees. Thompson found scarred trees to be mostly located on the Riverine Plains of the Murray River and the lithic scatters occurring mostly near water sources on the Riverine Plains and in the Eastern Highlands.

Buckley and Hughes (2000) conducted an Aboriginal cultural heritage study of North East forest region finding at this time, 326 known Aboriginal sites were in existence. The sites included scarred trees, isolated artefacts, lithic scatters, rock art sites, rock arrangements, stone quarries, rock shelters with evidence of prehistoric habitation, human burials, fish trap and rock well, several historical or scientific site recordings in literature and several Aboriginal Historic Places. The Buckley and Hughes review found lithic scatters were the most common site across the region and scarred tree sites were also relatively common, predominantly situated in the lowlands in the western part of the Study Area and river valleys. Buckley and Hughes predicted that the Foothills of Mitta and Tallangatta have low archaeological sensitivity and Granya and Corryong Foothills had medium sensitivity.

O'Halloran (2000) conducted an archaeological field survey of Old Bowna as part of an archaeological and cultural heritage research study of Lake Hume. O'Halloran recorded a large lithic scatter and hearths at Old Bowna and a further 16 sites along Twelve Mile Creek.

Bell (2001) conducted an archaeological survey within a 150-200 metre wide and 26 kilometre long corridor for a proposed Albury-Wodonga highway bypass. Eleven sites were identified during the survey comprising of four quartz artefact scatters, two isolated finds, four scarred trees and one 'graft tree'. Areas of PAD were also recorded.

Kelly (2002) conducted an archaeological survey in Thurgoona. During the initial survey, Kelly recorded four isolated quartz artefacts, a possible Aboriginal scarred tree and one area of PAD. A subsequent survey identified a further single artefact scatter of 34 artefacts and recorded as the Woolshed Creek Site. The Woolshed Creek Site was assessed as having 'high

significance' as the site contained a variety of artefact materials and types as well as it being the largest site recorded within the Albury area at that time.

Knight (2001) conducted an archaeological survey of Table Top Nature Reserve. Three rock art sites and a number of small artefact scatters were recorded. One of the rock art sites included turtle and kangaroo track engravings on a sandstone or conglomerate rock face. A second site was grinding grooves in a sandstone slab in a bed of a gully. The second rock art site was an engraving of a lizard on sandstone.

Barber (2002) conducted an archaeological survey of Woomargama National Park and Crown Reserve, immediate north of Dora Dora and about 60 kilometres northeast of Albury and 20 kilometres southeast of Holbrook. The Study Area consists mainly of rising hills, ridges and rocky granitic summits encircled by undulating country with the highest elevations reaching 900 metres. Barber concentrated his survey along ridges and spur crests and recorded 47 sites. The sites comprised of 36 artefact scatters, eight isolated finds, two possible scarred trees and one rock art site. Most sites were located on spur crests with small reliable water sources nearby, although Barber notes it is likely sporadic Aboriginal visitation and camping occurred throughout the entire Study Area. Barber considered the lithic scatters as small and quartz the most common artefact material. The rock art site recording comprises pigment figures in red ochre on the side of a granite boulder located on a steep slope south of Mount Narra Narra, with the shelter overlooking the plains to the north.

Dearling and Grinbergs (2002) completed an archaeological survey of the Benambra National Park, approximately 30 kilometres north of Albury, taking in the north-eastern section of Yambla Ridge and Little Yambla Ridge. A total of 23 sites were recorded consisting of 15 artefact scatters containing one to 14 artefacts, eight isolated finds and one area of PAD. Most of the artefacts were quartz, probably imported into the region as the quality appeared better than the local quartz. Dearling and Grinbergs suggest the artefacts recorded included microlithic and bipolar items and these artefact types are common within the region and the Lake Hume area. The site locations were associated with all major landforms with no real distinction between artefact densities of lithic scatters. It is also noted surface water within the Study Area was uncommon. Dearling and Grinbergs concluded that Benambra National Park was not intensively occupied by Aboriginal

people, but that the Daly Creek and the cuffed escarpments may have held meaning for culturally significant features.

Kelly and Price (2003) conducted an archaeological subsurface investigation of the Woolshed Creek Site, located on a minor dissected terrace about 15 kilometres northeast of Albury. The cultural horizon was assessed as being 35 cm deep and produced a total of 115 stone artefacts, 99 of these were quartz and identified as being flaking debitage. The remaining artefacts recorded comprised one quartz geometric microlith, one chert flake, a quartzite hammerstone, a quartzite fragment with grinding wear and some possible Aboriginal stone manuports.

DECC (2007) conducted a survey of scarred trees in the Thurgoona-Ettamogah Creek area. Some 30 trees were assessed as possible or probable Aboriginal scarred trees with scarring sizes varying greatly. Most of the site locations were in paddocks and comprised of single isolated trees. Tree species included White Box, Yellow Box, River Red Gum and Blakely's Red Gum.

Kamminga *et al*. (2008) conducted a comprehensive survey of the Lake Hume foreshore (259 km). A total of 441 Sites were recoded, comprised of 358 artefact scatters, 79 isolated finds, three possible scarred trees and one Aboriginal historic place. Isolated artefacts included flakes/cores, hammerstones/anvils., pestles, hatchet heads, pebble tools, end-flaked tools, mortars, and whetstones. Quartz was the dominant raw material in the lithic assemblages, consistent with all other local survey results. In addition silcrete, chert,, quartzite, hornfels, rhyolite and other volcanic and metamorphic materials were present in minor frequencies.

Brown *et al.* (2015) conducted an assessment of Lot 204 DP 753345 near to the Study Area and in a comparable environmental and hydrological context. During test excavation, eight stone artefacts were recovered from a total excavation area of 20.5 square metres. That is, artefact density was found to be less than one artefact per square metre (0.39/sq m) which is extremely low.

Brown *et al.* (2018) conducted an assessment of land to the south east of the Study Area near to Lake Hume. No Surface artefacts were recorded and during test excavation, eight stone artefacts were recovered from a total excavation area of 6.75 square metres. That is, artefact density was found to be 1.19/sq m which is extremely low.

2.3.2 Predictive Model

Stone artefacts

Stone artefacts are found either on the ground surface and/or in subsurface contexts. Stone artefacts will be widely distributed across the landscape in a virtual continuum, with significant variations in density in relation to different environmental factors (Pearson 1981; Hall and Lomax 1996). Artefact density and site complexity is expected to be greater near reliable water and the confluence of a number of different resource zones (Pearson 1981). The detection of artefacts during a surface survey depends on whether or not the potential archaeological bearing soil profile is visible.

Given the environmental context of the proposed GSF which encompasses areas of low biodiversity with lower order watercourses originating from minor catchment areas, stone artefacts are predicted to be present in negligible to very low densities across the Study Area. This prediction is supported by the results of the test excavation conducted by Brown *et al.* (2015) in Lot 204 DP 753345 near to the Study Area and in a comparable environmental and hydrological context (see AHIMS sites 55-6-0098 on Figure 5). Brown *et al.* (2015) recovered eight stone artefacts from a total excavation area of 20.5 square metres. That is, artefact density was found to be less than one artefact per square metre (0.39/sq m) which is very low.

Grinding Grooves

Grinding groove sites contain grooves in rock surfaces that are produced through the shaping and/or sharpening of ground-edge stone hatchet heads or other tools (Attenbrow 2004). Groove size and morphology can be variable which suggests that they can result from the sharpening of a variety of different tools, and the preparation of food (*cf.* Attenbrow 2004: 43). Generally, groove dimensions indicate that grinding grooves result for the sharpening of stone hatchet heads.

A broad temporal framework for the age of grinding groove sites can be inferred on the basis of the age of ground-edge hatchet heads found within archaeological deposits. Across Australia, there is significant variation in the timing of the introduction of ground-edge hatchet technology, and in the south-east, the earliest hatchet heads date to the fourth millennium BP (Dibden 1996: 35; Attenbrow 2004: 241), and no earlier than 3,500 years ago (Hiscock 2008: 155). Grinding groove sites in the south-east can be no older than 3,500 years. Given that hatchets were used at the time of European

occupation, the use of some grinding groove sites may have spanned this temporal range.

Grinding hatchet heads on stone creates indelible marks on the rock surface and land. Grinding groove sites may have become significant and meaningful locales over time given their reference to an important item of material culture and their strong material presence in the landscape. Sites containing high groove counts are now visually significant marked locales. While the original motivation which led people to choose to grind hatchet heads at a specific place is now not well understood, it is possible over time and as a place became increasingly embellished with grooves, that the meaning and significance of that locale was changed correspondingly. Grinding groove sites may have provided a physical and conceptual reference to the ancestral past and activities of previous generations (Dibden 2011b). Because of the enduring materiality of grinding groove sites they may have been meaningfully constituted expressions of place and mnemonic of past events and personal and group history (*c.f.*, Peterson 1972: 16).

Grinding grooves are only found on abrasive sedimentary rocks such as sandstone. Given the probable absence of suitable rock exposures in the Study Area, grinding groove sites are unlikely to be present.

Burials sites

Burial sites have been recorded within the wider region. This site type is rarely located during field survey and given the topography, nature of the soils and geology, the potential for burials to be present in the area is negligible.

Rock Shelter Sites

Rock shelters sites are unlikely to be present in the area given the absence of large vertical stone outcrops.

Scarred and Carved Trees

Scarred and carved trees result from either domestic or ceremonial bark removal. Carved trees associated with burial grounds and other ceremonial places have been recorded in the wider region. In an Aboriginal land use context, this site type would most likely have been situated on flat or low gradient landform units in areas suitable for either habitation and/or ceremonial purposes.

Bark removal by European people through the entire historic period and by natural processes such as fire blistering and branch fall make the identification of scarring from a causal point of view very difficult. Accordingly, given the propensity for trees to bear scarring from natural causes their positive identification is impossible unless culturally specific variables such as stone hatchet cut marks or incised designs are evident and rigorous criteria in regard to tree species/age/size and it specific characteristics in regard to regrowth is adopted.

Nevertheless, the likelihood of trees bearing cultural scarring remaining extant and in situ is low given events such as land clearance and bushfires. Generally scarred trees will only survive if they have been carefully protected (such as the trees associated with Yuranigh's grave at Molong where successive generations of European landholders have actively cared for them).

The Study Area has been extensively cleared although some trees of moderate age remain. While not impossible, this site type is unlikely to have survived and therefore be extant.

Stone Quarry and Procurement Sites

A lithic quarry is the location of an exploited stone source (Hiscock & Mitchell 1993:32). Sites will only be located where exposures of a stone type suitable for use in artefact manufacture occur. Quarries are rare site types in the region and given the likely absence of suitable stone outcrops, are not predicted to be present.

Ceremonial Places and Sacred Geography

Burbung and ceremonial sites are places which were used for ritual and ceremonial purposes. Possibly the most significant ceremonial practices known were those which were concerned with initiation and other rites of passage such as those associated with death. Sites associated with these ceremonies are burbung grounds and burial sites. Additionally, secret rituals were undertaken by individuals such as clever men. These rituals were commonly undertaken in 'natural' locations such as water holes.

In addition to site specific types and locales, Aboriginal people invested the landscape with meaning and significance; this is commonly referred to as a sacred geography. Natural features are those physical places which are intimately associated with spirits or the dwelling/activity places of certain

mythical beings (*cf*. Knight 2001; Boot 2002). Boot (2002) refers to the sacred and secular meaning of landscape to Aboriginal people which has '… legitimated their occupation as the guardians of the places created by their spiritual ancestors'.

Given the potential for natural features to have been important places within an Aboriginal cosmological frame of reference, the survey has sought to identify outstanding natural features present in the Study Area. It is, however, noted that the landscape of the Study Area is significantly disturbed, amorphous and flat, and relatively indistinct in the surrounding topography so that places are unlikely to standout as unusual or significant in this setting. No cultural knowledge relating to the Study Area has been received during the formal process of consultation we have undertaken.

Contact Sites

These sites are those which contain evidence of Aboriginal occupation during the period of early European occupation in a local area. Evidence of this period of 'contact' could potentially be Aboriginal flaked glass, burials with historic grave goods or markers, and debris from 'fringe camps' where Aborigines who were employed by or traded with the white community may have lived or camped. The most likely location for contact period occupation sites would be camp sites adjacent to permanent water and located in relative proximity to centres of European occupation such as towns and homesteads. The potential for such sites to be present in the Study Area is possible but considered unlikely.

2.3.3 Field Inspection – Methodology

The methodological approach adopted in this assessment attends particularly to location and relationality as a means of contextualising the material evidence of cultural practice across space. Given the nature of the physiography, different places within the region are likely to have been utilised for different purposes, and also by different categories of people. Landscape is more than a set of 'objective' topographic features. Landscapes are constructed out of cultural and social engagement; they are '... topographies of the social and cultural as much as they are physical contours' (David & Thomas 2008: 35). The conceptual approach to understanding landscape in this assessment is based on a concern with experience, occupation and bodily practice (*cf*. Thomas 2008: 305). The location of material evidence in different environmental and topographic contexts across

the Study Area has the potential to be informative of different activities and social contexts. Landform and environmental elements, as measurable empirical space, will be employed methodologically to explore landuse, occupation and the nature of both recorded and unseen (ie subsurface) material evidence. Given the vast space encompassed by the Study Area, this methodology allows for the identification, at a fine level of spatial resolution, of elements representative of the patterns of social life and how these may vary over the landscape.

The approach to recording in the current study has been a 'nonsite' methodology (*cf.* Dunnell 1993; Shott 1995). The density and nature of the artefact distribution will vary across the landscape in accordance with a number of behavioural factors which resulted in artefact discard. While cultural factors will have informed the nature of land use, and the resultant artefact discard, environmental variables are those which can be utilised archaeologically in order to analyse the variability in artefact density and nature across the landscape. Accordingly, in this study, while the artefact is the elementary unit recorded, Survey Units (morphological types - see below) are utilised as a framework of recording, analysis (*cf.* Wandsnider and Camilli 1992) and ultimately, the formulation of recommendations. The data collected during this field assessment forms the basis for the documentation of survey results outlined in the section below. The variables recorded are defined below:

Survey Unit Variables

Landscape variables utilised are conventional categories taken from the *Australian Soil and Land Survey Field Handbook* (McDonald *et al.* 1998). The following landform variables were recorded:

Morphological type:

- Crest: - element that stands above all or almost all points in the adjacent terrain – smoothly convex upwards in downslope profile. The margin is at the limit of observed curvature.
- Simple slope: - element adjacent below crest or flat and adjacent above a flat or depression.
- Flat with drainage depression: - association of a level or very gently inclined planar element which is not a crest, with an element that stands below all points in the adjacent terrain.
- Drainage depression: - a landform element, concave upwards, that stands below all points in the adjacent terrain.

Slope class and value:

- Level 0 - 1%.
- Very gentle 1 - 3%.
- Gentle 3 – 10%.

Geology

The type of geology has been recorded and as well the abundance of rock outcrop – *as defined below*.

No rock outcrop - no bedrock exposed.

Soil

Soil type and depth was recorded. The potential for soil to contain subsurface archaeological deposit (based on depth) was recorded. This observation is based solely on the potential for soil to contain artefacts; it does not imply that artefacts will be present or absent.

Survey coverage variables were also recorded; these are described further below. The archaeological sensitivity of each Survey Unit was defined according to assessed artefact density as negligible.

Aboriginal Object Recording

The Study Area was found to contain discrete distributions of stone artefacts. For the purposes of defining the artefact distribution in space, they have been labelled as a locale within their individual Survey Units (eg. Survey Unit 1/Locale 1).

The measurable area in which artefacts were observed has been noted, and if relevant, a broader area encompassing both visible and predicted subsurface artefacts has been defined. In addition, locale specific assessments of survey coverage variables have been made. The prior disturbance to the locale has been noted as low, moderate or high. Artefact numbers in each locale have been recorded and a prediction of artefact density noted, based on observed density taking into consideration Effective Survey Coverage, and a consideration of the environmental context.

Artefact density has been defined in arbitrary categories (based on a consideration of artefact density calculated in detailed subsurface work conducted elsewhere) as follows;

- Negligible: insignificant;
- Very low: <1 artefact per square metre.

The potential for soil to contain subsurface archaeological deposit (based on depth) was recorded. Similarly, to Survey Unit recordings, this observation is based solely on the potential for soil to contain artefacts; it does not imply that subsurface artefacts will be present, nor does it refer to a prediction of artefact density.

Survey Coverage Variables

Survey coverage variables were also recorded; these are described further below. Survey Coverage Variables are a measure of ground surveyed during the study and the type of archaeological visibility present within that surveyed area. Survey coverage variables provide a measure with which to assess the effectiveness of the survey so as to provide an informed basis for the formulation of management strategies.

Specifically, an analysis of survey coverage is necessary to determine whether or not the opportunity to observe stone artefacts in or on the ground was achieved during the survey. If it is determined that ground exposures provided a minimal opportunity to record stone artefacts, it may be necessary to undertake archaeological test excavation for determining if stone artefacts are present. Conversely, if ground exposures encountered provided an ideal opportunity to record the presence of stone artefacts, the survey results may be adequate and, accordingly, no further archaeological work may be required.

Two variables were used to measure ground surface visibility during the study; the area of ground exposure encountered, and the quality and type of ground visibility (archaeological visibility) within those exposures. The survey coverage variables estimated during the survey are defined as follows:

Ground Exposure (GE) – an estimate of the total area inspected which contained exposures of bare ground; and

Archaeology Visibility (AV) – an estimate of the average levels of potential archaeological surface visibility within those exposures of bare ground.

Archaeological visibility is generally less than ground exposure as it is dependent on adequate breaching of the bare ground surface which provides a view of the subsurface soil context. Based on subsurface test excavation results conducted in a range of different soil types across the New South Wales south-east it is understood that artefacts are primarily situated within 10 - 30 cm of the ground profile; reasonable archaeological visibility therefore requires breaching of the ground surface to at least a depth of 10 cm.

Based on the two visibility variables as defined above, an estimate (Net Effective Exposure - NEE) of the archaeological potential of exposure area within a survey unit has been calculated. The Effective Survey Coverage (ESC) calculation is a percentage estimate of the proportion of the Survey Unit which provided the potential to view archaeological material.

2.3.4 Field Inspection – Results

In accordance with the OEH *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*, the purpose of a field survey is to record the material traces and evidence of Aboriginal land use that are:

- Visible at or on the ground surface, or
- Exposed in section or visible as features (e.g. rock shelters with rock-art),

and to identify those areas where it can be inferred that, although not visible, material traces have a high likelihood of being present under the ground surface (DECCW 2010a: 12).

Survey Coverage and Results

A field assessment has been conducted by Andrew Pearce and Tom Knight, NSW Archaeology Pty Ltd, and Troy McGrath and Draie McGrath, Albury District Local Aboriginal Land Council. The assessment was conducted on 25, 26 and 27 September 2018.

The field survey was aimed at locating Aboriginal objects. An assessment was also made of prior land disturbance, survey coverage variables (ground exposure and archaeological visibility) and the potential archaeological sensitivity of the land. Each Survey Unit was systematically and comprehensively surveyed.

Survey results are summarised in Tables 2 and 3. Survey Units are shown in Figures 6 and 7.

A total of 13 Survey Units have been defined based on morphological type landform attributes. They are described individually in Table 2 below.

Survey coverage variables are described in Table 3. The assessment survey area measured 405.5 hectares. Of that, c. 1.7 hectares of ground exposure was present, and, within that, archaeological visibility is estimated to have been approximately 0.5 hectares i.e. the potential artefact bearing soil profile. Effective survey coverage achieved during the field survey is calculated to be 0.13%. This very low ESC is due to the very low levels of ground exposure encountered during the survey due to a consistent cover of grass.

Table 2 Survey Unit descriptions.

SU ID	Landform	Gradient	Aspect	Geology/soils	Vegetation	Previous land use	Predicted artefact density
SU1	Minor, low elevation crest	0-4°	open	No exposed bedrock; moderate disturbance to soils	Grass, sparse Eucalypts	Road construction, Telstra, clearance, mechanical, ploughing, grazing, dam construction	negligible
SU2	Drainage depression	0-2°	open	No exposed bedrock; moderate - high disturbance to soils	Grass, sparse Eucalypts	Road construction, Telstra, clearance, drainage line is mechanically modified, ploughing, grazing (heavily pugged by cattle), dam construction	negligible
SU3	Undulating crest	0-3°	open	No exposed bedrock; moderate - high disturbance to soils	Grass, sparse Eucalypts	clearance, ploughing, mechanical levelling (planing), grazing, dam construction	negligible
SU4	Broad drainage depression	0-2°	open	No exposed bedrock; moderate - high disturbance to soils	Grass, sparse Eucalypts	clearance, ploughing, mechanical landscaping-levelling (planing), grazing, dams, powerline	negligible
SU5	Crest	0-5°	open	No exposed bedrock; moderate - high disturbance to soils	Grass, sparse Eucalypts	clearance, ploughing, mechanical levelling (planing), landscaping near sub-station, powerlines, grazing, dam construction	negligible

SU ID	Landform	Gradient	Aspect	Geology/soils	Vegetation	Previous land use	Predicted artefact density
SU6	Flat (low lying - boggy)	0-1°	open	No exposed bedrock; moderate - high disturbance to soils	Grass, sparse Eucalypts	clearance, ploughing, mechanical landscaping-levelling (planing), landscaping near sub-station, powerlines, road, grazing (pugged areas), dam construction	negligible
SU7	Simple slope	3-5°	SE	No exposed bedrock; moderate disturbance to soils	Grass, sparse Eucalypts	clearance, mechanical, ploughing, grazing	negligible
SU8	Undulating minor crest	0-4°	open	No exposed bedrock; moderate disturbance to soils	Grass, sparse Eucalypts	clearance, ploughing, grazing, dam construction, excavated drainage	negligible
SU9	Simple slope	3-5°	300°	No exposed bedrock; moderate disturbance to soils	Grass, sparse Eucalypts	clearance, mechanical, ploughing, grazing	negligible
SU10 Lindner/ Ortlipp Road intersection	Flat	-	open	No exposed bedrock; high disturbance to soils	Grass, sparse Eucalypts	clearance, road construction	negligible
SU11 Lindner/	Crest	-	open	No exposed bedrock; high	Grass, sparse Eucalypts	clearance, road construction	negligible

SU ID	Landform	Gradient	Aspect	Geology/soils	Vegetation	Previous land use	Predicted artefact density
Walla Walla Road intersection				disturbance to soils			
SU12 Ortlipp/ Glenellen Road intersection	Simple slope	-	open	No exposed bedrock; high disturbance to soils	Grass, sparse Eucalypts	clearance, road construction	negligible
SU13 Glenellen/ Gerogery Road intersection	Simple slope	3°	60°	No exposed bedrock; high disturbance to soils	Grass, sparse Eucalypts	clearance, road construction	negligible

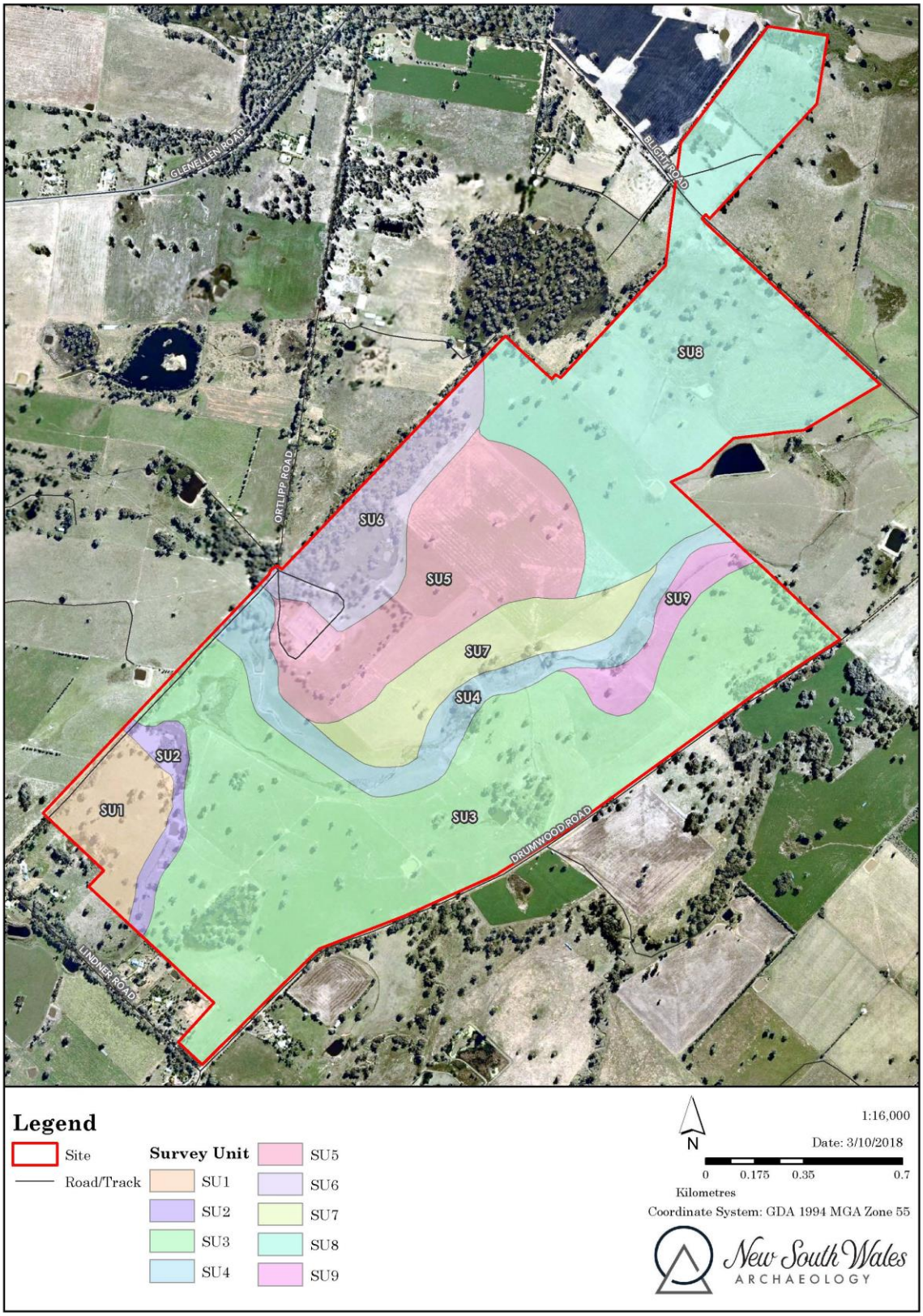

Figure 6 Survey Unit locations in the Study Area.

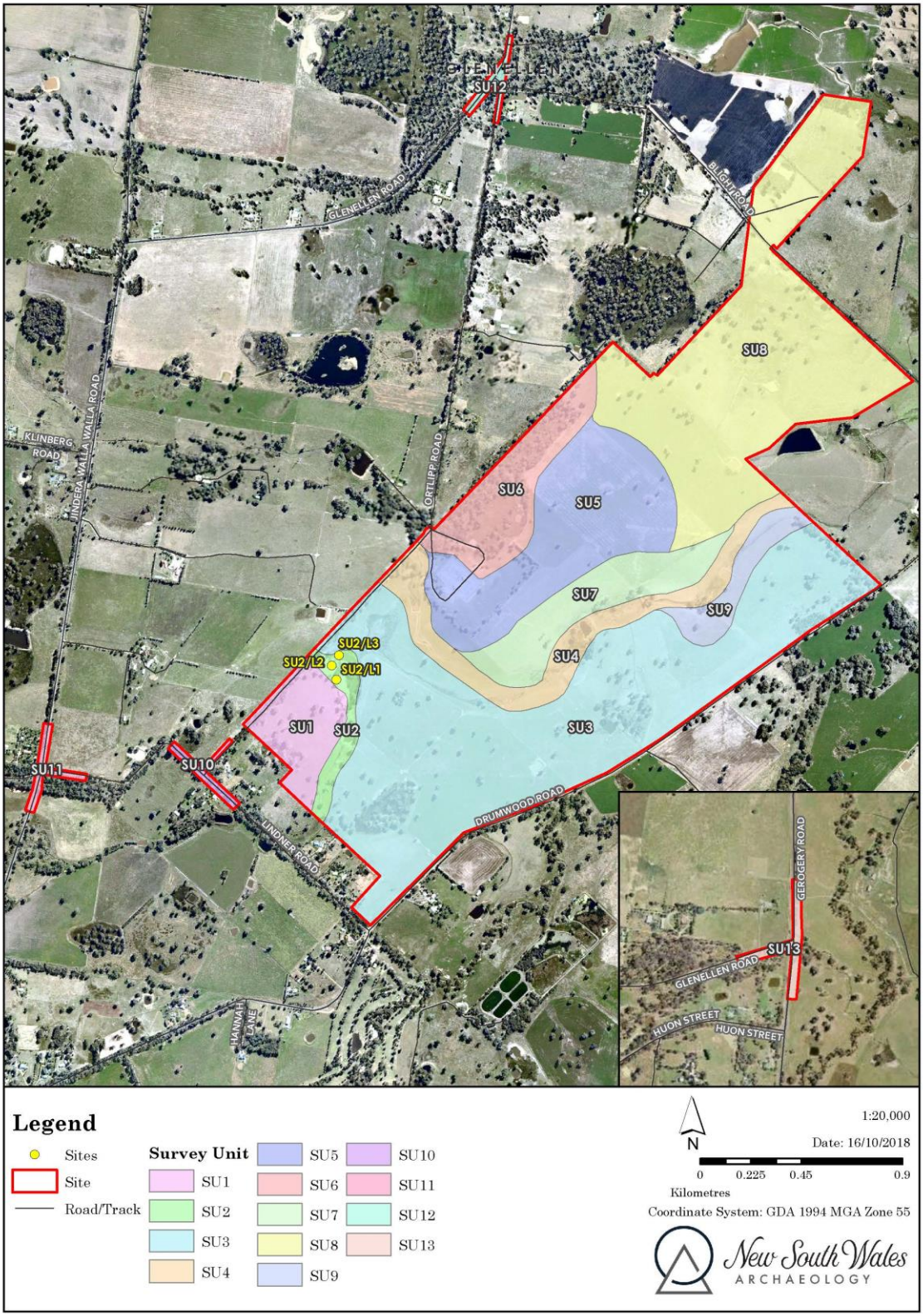

Figure 7 Survey Unit locations, inclusive of road intersections.

Table 3 Effective Survey Coverage.

Name	Area sq m	GE %	GE sq m	AV %	NEE sq m	ESC %
1	228970	0.5	1144.85	20	228.97	0.1
2	250627	2	5012.54	30	1503.762	0.6
3	240465	0.1	240.465	30	72.1395	0.03
4	1036399	0.5	5181.995	20	1036.399	0.1
5	505122	0.1	505.122	60	303.0732	0.06
6	97670	3	2930.1	30	879.03	0.9
7	67963	0.1	67.963	40	27.1852	0.04
8	160958	0.1	160.958	30	48.2874	0.03
9	1419579	0.1	1419.579	30	425.8737	0.03
10	12000	4	480	60	288	2.4
11	12000	1	120	50	60	0.5
12	12000	3	360	60	216	1.8
13	12000	2	240	60	144	1.2
	4055,753		17,863.6		5232.7	0.13

Plate 1 Survey Unit 1; looking 150°.

Plate 2 Survey Unit 2; looking 10°.

Plate 3 Survey Unit 3; looking 225° along Ortlipp Road.

Plate 4 Survey Unit 3; looking 300°.

Plate 5 Survey Unit 4; looking 210°.

Plate 6 Survey Unit 5; looking 45°.

Plate 7 Survey Unit 5; looking 315°.

Plate 8 Survey Unit 6; looking 340°.

Plate 9 Survey Unit 6; looking north.

Plate 10 Survey Unit 7; looking 45°.

Plate 11 Survey Unit 8; looking 60°.

Plate 12 Survey Unit 9; looking 240°.

Plate 13 Survey Unit 10; looking 30°.

Plate 14 Survey Unit 11; looking north.

Plate 15 Survey Unit 12; looking north.

Plate 16 Survey Unit 13; looking 60°.

Survey Results

A total of three Aboriginal object locales were recorded during the field survey, as described in detail further below. Their location is shown on Figure 8.

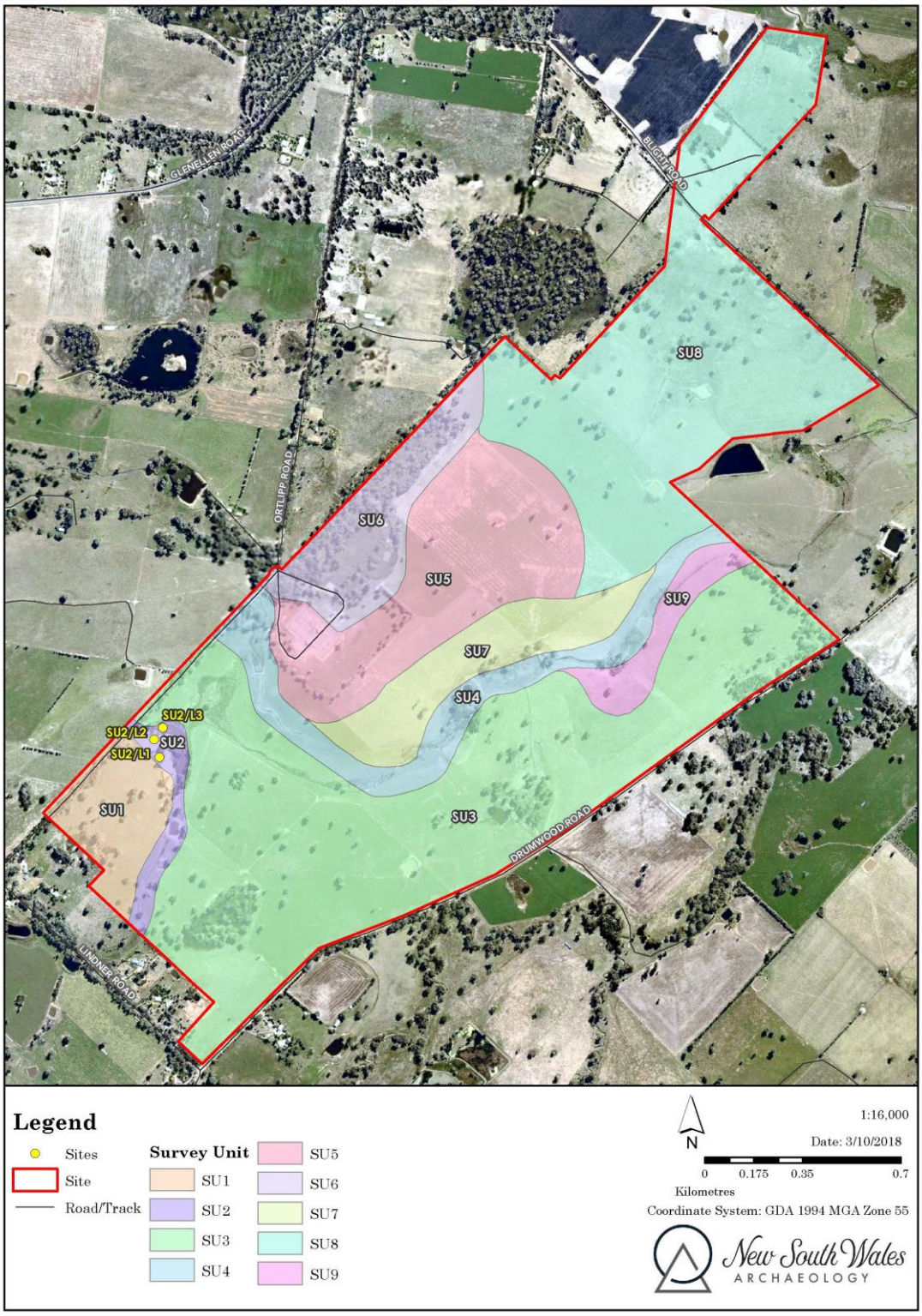

Figure 8 Location of Aboriginal object sites recorded during the field survey.

Survey Unit 2/Locale 1 (SU2/L1) GPS (GDA): 491191e 6023855n

This recording consists of three stone artefacts situated in an exposure (animal treadage/bog) measuring 10 by 10 metres in Survey Unit 2 (Plate 17). The landform is a drainage depression with a very gentle gradient and an open aspect. The ground surface visibility at the locale was assessed to be 50%, with an estimated archaeological visibility of 40%. The artefacts were in a 5 m by 5 m area within the larger exposure. They are described as follows:

- Milky quartz flake measuring 19 x 23 x 7 mm; broad platform; Hertzian initiation; 40% pebble cortex;
- Milky quartz distal flake portion measuring 11 x 14 x 3 mm; feather termination;
- Milky quartz flake measuring 12 x 14 x 4 mm; broad platform; Hertzian initiation; step termination.

It is likely that additional artefacts (undetected or otherwise in a subsurface context) are present adjacent to this locale in Survey Unit 2. However, it is predicted that these would be present in very low numbers and density. The artefact locale and broader survey unit is moderately to highly disturbed.

Plate 17 The location of SU2/L1; looking 80°.

Survey Unit 2/Locale 2 (SU2/L2) GPS (GDA): 491171e 6023918n

This recording consists of three stone artefacts situated in an exposure (animal treadage/water) measuring 40 by 40 metres in Survey Unit 2 (Plate 18). The landform is a drainage depression with an open aspect. The ground surface visibility at the locale was assessed to be 80%, with an estimated archaeological visibility of 30%. The artefacts were in a 10 m by 10 m area within the larger exposure. They described as follows:

- Translucent quartz flake measuring 17 x 14 x 3 mm; broad platform; Hertzian initiation; 40% pebble cortex;
- Milky quartz flaked piece measuring 20 x 14 x 4 mm;
- Milky quartz flaked piece measuring 20 x 14 x 4 mm.

It is likely that additional artefacts (undetected or otherwise in a subsurface context) are present adjacent to this locale in Survey Unit 2. However, it is predicted that these would be present in very low numbers and density. The artefact locale and broader survey unit is moderately to highly disturbed.

Plate 18 The location of SU2/L2; looking 135°.

Survey Unit 2/Locale 3 (SU2/L3) GPS (GDA): 491203e 6023961n

This recording consists of three stone artefacts situated in an exposure (animal treadage/bog) measuring 20 by 20 metres in Survey Unit 2 (Plate 19). The landform is a drainage depression with a very gentle gradient and an open aspect. The ground surface visibility at the locale was assessed to be 80%, with an estimated archaeological visibility of 40%. The artefacts were in a 5 m by 5 m area within the larger exposure. They described as follows:

- Milky quartz flaked piece measuring 18 x 11 x 3 mm;
- Milky quartz flaked piece measuring 14 x 9 x 4 mm;
- Milky quartz flaked piece (possible) measuring 15 x 6 x 3 mm.

It is likely that additional artefacts (undetected or otherwise in a subsurface context) are present adjacent to this locale in Survey Unit 2. However, it is predicted that these would be present in very low numbers and density. The artefact locale and broader survey unit is moderately to highly disturbed.

Plate 19 The location of SU2/L3; looking 130°.

Summary

The Study Area has undergone intensive farming entailing land clearance, fencing, ploughing and cultivation, and animal grazing. More recently almost the entirety of the paddocks has been land planed, penetrating the ground surface to a depth of some 100 mm. This process was carried out in order to infill holes and divots, and, in so doing, to level and smooth the landscape.

The result is an even and modified ground surface with drainage lines that have been smoothed and customised.

The Study Area is comprised of broad amorphous landforms that lack focal features which would attract or support intensive Aboriginal habitation or land usage. Instead, the area would have been used for transitory activities, such as hunting and movement through country. More permanent habitation would have been based around larger and more permanent waterways in the district, and not the minor ephemeral creeks that exist in the Study Area.

While it is predicted that additional stone artefacts would be present in the Study Area, it is assessed that they would generally be distributed in very low or negligible density. Because of the broad rolling nondescript landforms present which lack distinct features that are recognized as being advantageous for sustained Aboriginal habitation, it is not possible to identify where such artefacts would be located. Accordingly, each Survey Unit is assessed to contain stone artefacts which have been either undetected during the survey or located in a subsurface context.

3. CONSULTATION PROCESS

A process of Aboriginal community consultation has been undertaken in accordance with the guidelines as set out in the OEH's *Aboriginal cultural heritage consultation requirements for proponents 2010* (NSW DECCW 2010b).

3.1 Consultation

In order to identify, notify and register Aboriginal people who may hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places in the area of the project, the following procedure was implemented (see various related documents in Appendix 3).

Correspondence dated 1 August 2018 was sent to:

- NSW OEH Albury office;
- Albury and District Local Aboriginal Land Council;
- the Registrar, Aboriginal Land Rights Act 1983;
- the National Native Title Tribunal, requesting a list of registered native title claimants, native title holders and registered Indigenous Land Use Agreements;
- Native Title Services Corporation Limited (NTSCORP Limited);
- Greater Hume Shire Council; and
- Murray Local Land Services.

In addition, an advertisement was placed in the local newspaper (The Border Mail) on 4 August 2018.

Correspondence was received from the Office of Environment and Heritage (dated 10/8/18) furnishing a list of Aboriginal parties who may have an interest in the area. Correspondence dated 13 August 2018 was sent to these groups.

A response was received from the National Native Title Tribunal (NNTT) providing a spreadsheet showing an Overlap Analysis Report (6/8/18). No overlap is listed. The Registrar, Aboriginal Land Rights Act 1983, provided advice that the area did not have Registered Aboriginal Owners (16/8/18).

There are two Registered Aboriginal Parties (RAPs) in the formal process of consultation:

- Mark Saddler, Bundyi; and
- The Albury and District Local Aboriginal Land Council.

In accordance with Section 4.2 and 4.3 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (NSW DECCW 2010b) guidelines, information with regard to the project, proposed consultation process and assessment methodology was furnished to the RAP's for comment (27/8/18) and were requested to provide feedback within 28 days. No response was received.

A draft copy of this report was provided to the RAPs for review and comment on the 16 October 2018. One response was received from Mark Saddler who requested clearer maps, access to site cards, and the deletion of the work *exploited* (in the context: *Aboriginal people exploited resources*) from the text. Accordingly, a clear map was supplied and *exploited* was removed from the text. The site cards were unavailable to be provided.

4. SUMMARY AND ANALYSIS OF BACKGROUND INFORMATION

In the previous section, the results of the background research and information have been outlined. The purpose of this section of the Aboriginal Cultural Heritage Assessment Report is to explain the results.

It is noted that no information about Aboriginal places, areas or objects has been identified as a result of the process of Aboriginal consultation which has been undertaken (as specified in clause 80C of the NPW Regulation).

No previously recorded Aboriginal object sites are known to be present in the Study Area.

A total of three Aboriginal object locales were recorded during the field survey, all of which are stone artefact occurrences. All artefacts found were made of quartz and this result is comparable to other findings in the local area. Artefact density was assessed to be negligible or very low based on a consideration of the environmental and geographic context (discussed further below).

The field survey of the Study Area can be considered to have been comprehensive. All survey units were subject to intensive survey with regular and parallel pedestrian transects by four people made at reasonably close intervals (100m). Nevertheless, Effective Survey Coverage for the surveyed area is calculated to have been very low due to thick grass coverage.

The Effective Survey Coverage achieved during the survey is considered to have been insufficient to characterise the nature of artefact distribution based on a consideration of the field survey results alone. Accordingly, the assessment of the archaeological status of the Study Area is necessarily made via recourse to a consideration of the environmental context, test excavation results undertaken in nearby and comparable contexts and the nature of prior impacts to the land surface.

The environmental context has been assessed to have provided Aboriginal land users with a limited range of resources and an ephemeral water source only. Accordingly, the nature of land use is predicted to have been intermittent and infrequent. Such occupation is likely to have resulted in low levels of artefact discard. As discussed previously, test excavation conducted c. one kilometre south of the Study Area in a very comparable landform and

environmental context revealed an extremely low-density artefact distribution (verging on negligible). Furthermore, give the moderate to high levels of previous land impacts, any artefact presence in the Study Area would be generally highly disturbed. It is concluded that the archaeological potential and sensitivity of the Study Area is very low.

Archaeological test excavation has not been undertaken in respect of the proposal as it could not be justified (*cf*. NSW DECCW 2010a: 24). Effective Survey Coverage achieved during the survey was very low. However, given the high levels of previous disturbance and predicted low density of stone artefact distribution, subsurface test excavation is not warranted. The predictions regarding the nature of any undetected (subsurface) archaeology is made with relatively high confidence.

It is concluded there are no information gaps which are of a significant magnitude to warrant further consideration.

5. CULTURAL HERITAGE VALUES AND STATEMENT OF SIGNIFICANCE

The following significance assessment criteria is derived from the relevant aspects of ICOMOS Burra Charter (Australian ICOMOS 1999).

Aboriginal cultural heritage sites are assessed under the following categories of significance:

- Social or cultural value to contemporary Aboriginal people;
- Historical value;
- Scientific/archaeological value;
- Aesthetic value.

Aboriginal cultural significance

The Aboriginal community will value a place in accordance with a variety of factors including contemporary associations and beliefs and historical relationships. Most heritage evidence is highly valued by Aboriginal people given its symbolic embodiment and physical relationship with their ancestral past. It will almost certainly be the case that the value Aboriginal people feel for Aboriginal objects will differ to archaeological considerations.

Archaeological value

The assessment of archaeological value involves determining the potential of a place to provide information which is of value in scientific analysis and the resolution of potential archaeological research questions. Relevant research topics may be defined and addressed within the academy, the context of cultural heritage management or by Aboriginal communities. Increasingly, research issues are being constructed with reference to the broader landscape rather than focusing specifically on individual site locales. In order to assess scientific value sites are evaluated in terms of nature of the evidence, whether or not they contain undisturbed artefactual material, occur within a context which enables the testing of certain propositions, are very old or contain significant time depth, contain large artefactual assemblages or material diversity, have unusual characteristics, are of good preservation, or are a part of a larger site complex. Increasingly, a range of site types, including low density artefact distributions, are regarded to be just as important as high-density sites for providing research opportunities.

In order to assess the criteria of archaeological significance further, and also to consider the criteria of rarity, consideration can be given to the distribution of stone artefacts across the continent. There are two estimates of the quantity of accumulated stone artefacts in Australia (Wright 1983:118; Kamminga 1991:14; 2002). Wright estimated an average of 500,000 débitage items and 24,000 finished tools per square kilometre, which equates to a total of about 180 billion finished stone tools and four trillion stone débitage items in Australia. Kamminga's estimates, which were determined from a different set of variables, provide a conservative estimate of 200 billion stone tools and 40 million tonnes of flaking débitage (see Kamminga 1991:14; 2002). These two estimates are similar and suggest that the actual number of stone tools and items of flaking débitage in Australia is in the trillions. The stone artefacts distributed in the proposed activity area cannot, therefore, be considered rare.

Most stone artefacts found in Australia comprise flaking debris (termed débitage) from stone tool making. While it can be reasonably inferred from a range of ethnographic and archaeological evidence that discarded stone artefacts and flaking debris was not valued by the maker, in certain circumstances these objects may to varying degrees have archaeological research potential and/or Aboriginal social value. However, only in very exceptional circumstances is archaeological research potential high for sites (Kamminga, J. pers. comm. June 2009).

Aesthetic value

Aesthetic value relates to aspects of sensory perception. This value is culturally contingent.

5.1 Statement of Significance

The archaeological significance of the recorded Aboriginal artefact locales in the project area is set out in the table below.

Table 4 Archaeological significance assessment of Aboriginal object sites.

Site	Significance	Criteria
SU2/L1	Low local significance	Common site type Low educational value Low aesthetic value Low research potential: disturbed; predicted very low density.

Site	Significance	Criteria
SU2/L2	Low local significance	Common site type Low educational value Low aesthetic value Low research potential: disturbed; predicted very low density.
SU2/L3	Low local significance	Common site type Low educational value Low aesthetic value Low research potential: disturbed; predicted very low density.

6. THE PROPOSED ACTIVITY

In this section, the nature and extent of the proposed activity and any potential harm to Aboriginal areas, objects and/or places is identified.

6.1 Previous Impacts

The Study Area has undergone very high levels of prior disturbance associated with original land clearance, cultivation other forms of landscape modification. Accordingly, the archaeological context of Aboriginal objects/sites will be correspondingly disturbed, and this will act to lessen their value and significance.

6.2 Proposed Impacts

The GSF would generate electricity through the conversion of solar radiation to electricity using PV panels laid out across the proposed site in a series of modules, mounted on steel racks with piled supports. Additionally, a proposed battery-based storage facility is proposed. The development footprint is shown in Figure 9.

Other infrastructure on site would include electrical power conversion units, underground and/or above ground electrical cabling, telecommunications equipment, amenities and storage facilities, vehicular access and parking areas, along with security fencing and gates.

GSF will connect to the substation situated within the Site.

The proposed development would include, but not necessarily be limited to, the following elements:

- Solar arrays: solar panels supported by a mounting system installed on piles driven or screwed into the ground;
- A battery-based storage facility;
- Power Conversion Units (PCUs) inclusive of Inverters/Rectifiers, Ring Main Units, LV/MV step-up Transformers;
- Collector systems: above and/or below ground onsite cabling and electrical connections between the existing substation.
- Operation and maintenance (O&M) building including workshop, warehouse, offices, ablutions, and carpark;
- Site access and onsite access tracks;

- Fencing and security system;
- Meteorological stations;
- Vegetation buffers (if required) for visual screening; and
- Firebreaks.

In addition to the key components outlined above, there would be a temporary construction compound required to facilitate the construction and decommissioning phases of the proposed development.

Figure 9 The Development Footprint and Aboriginal object sites.

6.3 Type of Harm

An impact assessment is set out below in Table 5. The location of Aboriginal object sites in respect of the Development Footprint is shown in Figure 9.

Table 5 Impact assessment of Aboriginal object locales within the proposal area.

Aboriginal object site	Significance	Type of harm	Degree of harm	Consequence of harm
SU2/L1	Low local significance	direct	whole	total loss of value
SU2/L2	Low local significance	direct	whole	total loss of value
SU2/L3	Low local significance	direct	whole	total loss of value

7. AVOIDING AND/OR MINIMISING HARM

Ecologically Sustainable Development (ESD) is defined in the Protection of the Environment Administration Act 1991. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

(a) the precautionary principle,

(b) inter-generational equity,

(c) conservation of biological diversity and ecological integrity,

(d) improved valuation, pricing and incentive mechanisms.

The principles of ecologically sustainable development and the matter of cumulative harm have been considered for this project. The proposed impacts will take place within an area that has sustained a high level of prior impacts. The works would therefore occur in areas which have already received a certain level of impact and harm. Accordingly, considerations of ecologically sustainable development and cumulative impacts can be considered largely irrelevant in the matter at hand.

Avoidance or the mitigation of harm has not been considered as an option in relation to the proposed activities. The cultural and archaeological significance of the Study Area has not been assessed to be of sufficient significance to warrant the implementation of avoidance or mitigation strategies.

Proposed management and mitigation strategies are discussed below and presented in Table 6.

7.1 Management and Mitigation Strategies

Further Investigation

The field survey has been focused on recording artefactual material present on visible ground surfaces. Further archaeological investigation would entail subsurface excavation undertaken as test pits for the purposes of identifying the presence of artefact bearing soil deposits and their nature, extent, integrity and significance. Further archaeological investigation in the form of subsurface test excavation can be appropriate in certain situations. These

generally arise when a proposed development is expected to involve ground disturbance in areas which are assessed to have potential to contain high density artefactual material and when the Effective Survey Coverage achieved during a survey of a project area is low due to ground cover, vegetation etc.

No areas of the proposal area have been identified which warrant further archaeological investigation in order to formulate appropriate management and mitigation strategies.

No Aboriginal objects or survey units with potential conservation value have been identified to have a high probability of being present in the impact area. Accordingly, test excavation conducted under OEH's *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010: 24) is not necessary.

Conservation

Conservation is a suitable management option in any situation, however, it is not always feasible to achieve. Such a strategy is generally adopted in relation to sites which are assessed to be of high cultural and scientific significance but can be adopted in relation to any site type.

In the case at hand, the development of a conservation strategy could not be justified.

Mitigated Impacts

Mitigated impact usually takes the form of partial impacts only (i.e. conservation of part of an Aboriginal site or landform) and/or salvage in the form of further research and archaeological analysis prior to impacts. Such a management strategy is generally appropriate when Aboriginal objects are assessed to be of moderate or high significance to the scientific and/or Aboriginal community and when avoidance of impacts and hence full conservation is not feasible. Salvage can include the surface collection or subsurface excavation of Aboriginal objects and subsequent research and analysis. A strategy of mitigated impacts is not required.

Unmitigated Impacts

Unmitigated impact to Aboriginal objects can be given consideration when they are assessed to be of low archaeological and cultural significance and

otherwise in situations where conservation or limiting the extent of impacts is simply not feasible.

In the case at hand, unmitigated impact is considered appropriate in regard to the three Aboriginal object locales recorded and any undetected artefact distribution predicted to be present across the site.

Monitoring

Monitoring during construction for the purposes of identifying cultural material that may be uncovered during earth disturbance can be implemented as a management strategy. However, monitoring is a reactive rather than proactive strategy, and as such, is not an ideal management tool in cultural heritage management. Monitoring for artefacts is not a widely accepted method of management because sites of significance can be destroyed as monitoring is taking place and because it can result in lengthy and costly delays to development works if significant cultural material is uncovered. In the case at hand, the development of a monitoring strategy is not considered necessary or appropriate.

Table 6 Management and mitigation.

Aboriginal object site	Significance	Impacts	Management
SU2/L1	Low local significance	probable	Unmitigated impact
SU2/L2	Low local significance	probable	Unmitigated impact
SU2/L3	Low local significance	probable	Unmitigated impact

8. STATUTORY INFORMATION

The NPW Act provides statutory protection for all Aboriginal objects and Aboriginal Places.

An 'Aboriginal object' is defined as

> 'any deposit, object or material evidence (not being a handicraft for sale) relating to Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains'.

An Aboriginal place is an area declared by the Minister to be an Aboriginal place for the purposes of the Act (s84), being a place that in the opinion of the Minister *is or was of special significance with respect to Aboriginal culture*.

Part 6 of the National Parks and Wildlife Act 1974 (NPW Act) provides specific protection for Aboriginal objects and declared Aboriginal places by establishing offences of harm. Harm is defined to mean destroying, defacing, damaging or moving an object from the land. There are a number of defences and exemptions to the offence of harming an Aboriginal object or place. One of the defences is that the harm is carried out under an Aboriginal Heritage Impact Permit (AHIP).

However, under Section 4.41 of the Environmental Planning and Assessment Act 1979, the following authorisations are not required for State Significant Development that is authorised by a development consent granted after the commencement of this Division (and accordingly the provisions of any Act that prohibit an activity without such an authority do not apply):

- an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974.

9. RECOMMENDATIONS

The recommendations are made on the basis of:

- A consideration of the relevant legislation (see Section 8 Statutory Information).
- The results of the investigation as documented in this report.
- Consideration of the type of development proposed and the nature of proposed impacts.
- The discussion in Section 7 regarding impact mitigation and management.

The following recommendations are made:

1. No heritage constraints have been identified during the assessment as documented in this report.

2. The Study Area has been assessed to be of low heritage potential and sensitivity. Artefact density in the Study Area is assessed to be very low if not negligible. The three Aboriginal object locales recorded in the Study Area are of low significance and unmitigated impact is an appropriate management outcome.

3. No historic heritage items are listed on any relevant heritage schedule as present in the Study Area. No historic items or relics were found during the field survey.

4. No further archaeological investigations are required in respect of the proposal. No areas were identified that could be characterised as places with a high probability of possessing subsurface Aboriginal objects with high potential conservation value. Accordingly, archaeological test excavation has not been undertaken in respect of the proposal as it could not be justified (*cf*. NSW DECCW 2010a: 24).

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Wesson, S. 1994 An overview of the sources for a language and clan atlas of eastern Victoria and southern New South Wales.

Wesson, S. 200 An historical atlas of the Aborigines of eastern Victoria and far-eastern New South Wales. Clayton, Victoria.

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APPENDIX 1 GLOSSARY

Aboriginal object - A statutory term, meaning: '… any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains' (s.5 NPW Act).

Declared Aboriginal place - A statutory term, meaning any place declared to be an Aboriginal place (under s.84 of the NPW Act) by the Minister administering the NPW Act, by order published in the NSW Government Gazette, because the Minister is of the opinion that the place is or was of special significance with respect to Aboriginal culture. It may or may not contain Aboriginal objects.

Development area - Area proposed to be impacted as part of a specified activity or development proposal.

Harm - A statutory term meaning '… any act or omission that destroys, defaces, damages an object or place or, in relation to an object – moves the object from the land on which it had been situated' (s.5 NPW Act).

Place - An area of cultural value to Aboriginal people in the area (whether or not it is an Aboriginal place declared under s.84 of the Act).

Proponent - A person proposing an activity that may harm Aboriginal objects or declared Aboriginal places and who may apply for an AHIP under the NPW Act.

Proposed activity - The activity or works being proposed.

Study Area - The area that is the subject of archaeological investigation. Ordinarily this would include the area that is being considered for development approval, inclusive of the proposed development footprint and all associated land parcels. To avoid doubt, the Study Area should be determined and presented on a project-by-project basis. In this instance, the Study Area refers to the broad area (the Site) subject to assessment during this study, not all of which will be used for development.

APPENDIX 2 AHIMS SITE SEARCH

Office of Environment & Heritage
NSW GOVERNMENT

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Glenellen St
Client Service ID : 354792

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
55-6-0041	ABP/NSW 5	AGD	55	492840	6020080	Open site	Valid	Artefact : 4		
	Contact	Recorders	Joanne Bell					Permits		
55-6-0042	ABP/NSW 6	AGD	55	492800	6020120	Open site	Valid	Artefact : 1		
	Contact	Recorders	Joanne Bell					Permits		
55-6-0098	Drumwoord Road Test Ex	GDA	55	490400	6021900	Open site	Valid	Artefact : 10		46,103621
	Contact	Recorders	Mr.Oliver Brown					Permits	3918	
55-6-0034	BP 1 (Howlong)	AGD	55	494400	6021520	Open site	Valid	Artefact : -	Open Camp Site	100576
	Contact	Recorders	Laura-Jane Smith					Permits		
55-6-0035	BP 2 (Howlong)	AGD	55	495950	6022250	Open site	Valid	Artefact : -	Open Camp Site	100576
	Contact	Recorders	Laura-Jane Smith					Permits		
55-6-0036	BP 3 (Holwong)	AGD	55	495700	6022300	Open site	Valid	Artefact : -	Open Camp Site	100576
	Contact	Recorders	Laura-Jane Smith					Permits		
55-6-0003	Jindera;	AGD	55	489701	6021192	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	276,363
	Contact	Recorders	ASRSYS					Permits		
55-6-0004	Jindera;	AGD	55	492885	6022687	Open site	Valid	Artefact : -	Open Camp Site	54,276
	Contact	Recorders	ASRSYS					Permits		
55-6-0005	Jindera;	AGD	55	493809	6021691	Open site	Valid	Artefact : -	Open Camp Site	54
	Contact	Recorders	ASRSYS					Permits		
55-6-0006	Jindera;	AGD	55	494358	6021606	Open site	Valid	Artefact : -	Open Camp Site	54
	Contact	Recorders	ASRSYS					Permits		

Report generated by AHIMS Web Service on 03/07/2018 for Julie Dibden for the following area at Datum :GDA, Zone : 55, Eastings : 487000 - 498000, Northings : 6020000 - 6029000 with a Buffer of 50 meters. Additional Info : Archaeological assessment. Number of Aboriginal sites and Aboriginal objects found is 10

This information is not guaranteed to be free from error omission. Office of Environment and Heritage (NSW) and its employees disclaim liability for any act done or omission made on the information and consequences of such acts or omission.

Page 1 of 1

APPENDIX 3 CONSULTATION DOCUMENTS

Example of 1st Stage letters sent to agencies:

New South Wales ARCHAEOLOGY

ABN 53106044366

PO Box 2135
Central Tilba NSW 2546
Mob. 0427074901
www.nswarchaeology.com.au

1 August 2018

John Gilding
South West Region
Office of Environment and Heritage
PO Box 1040
Albury NSW 2640

Dear Sir

Re: Glenellen Solar Farm - Aboriginal Cultural Heritage Assessment

Glenellen Solar Farm Pty Ltd (the proponent) is investigating the potential to develop a solar farm located within the Greater Hume Shire local government area (LGA) approximately 3 km north-east of Jindera. The proponent is currently going through the process of preparing a Preliminary Environmental Assessment for obtaining Secretary's Environmental Assessment Requirements, however is commencing this heritage consultation process concurrently.

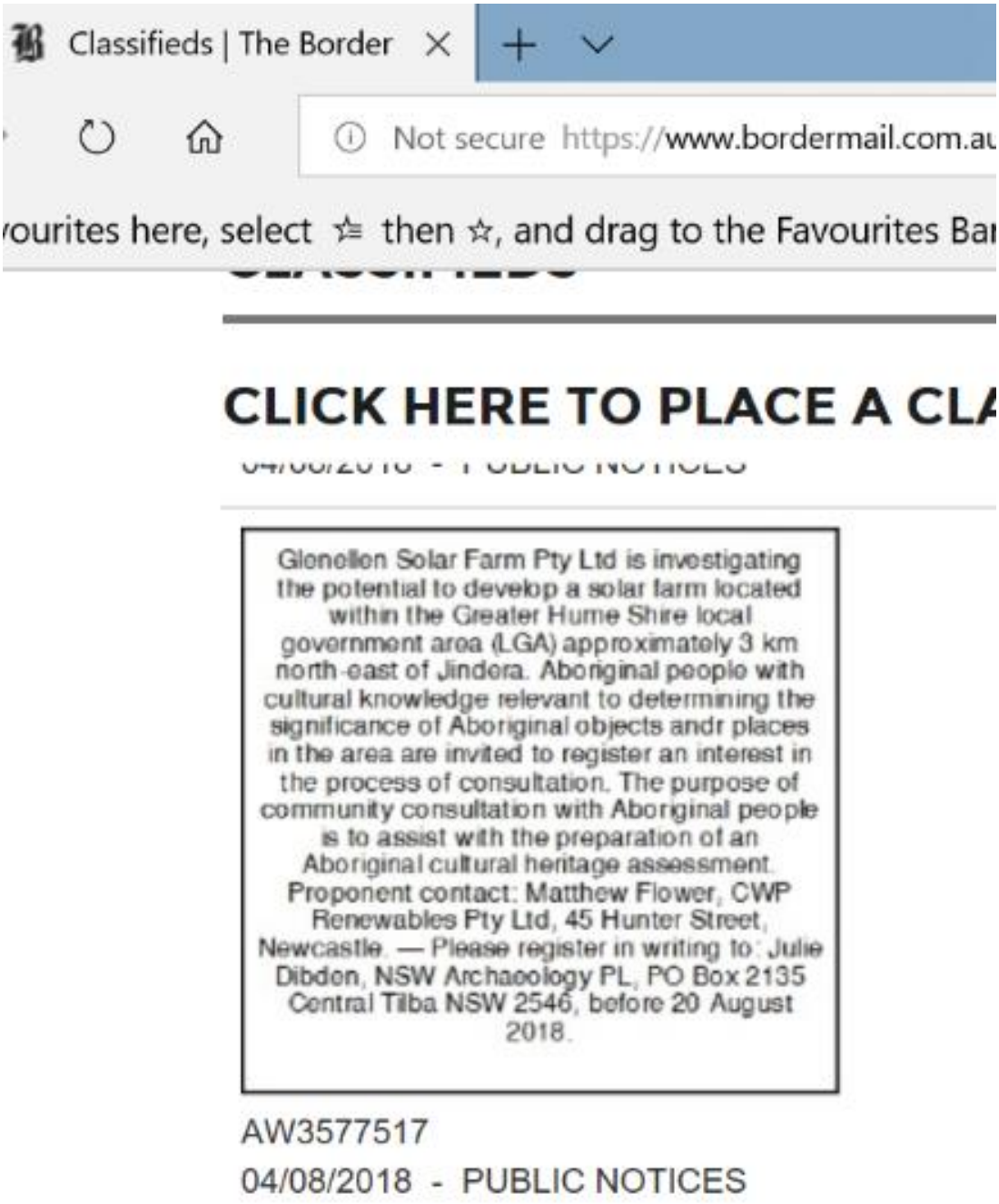
NSW Archaeology Pty Ltd is undertaking a process of consultation with Aboriginal people on behalf of the proponent according to the requirements stipulated in the former NSW DECCW *Aboriginal cultural heritage consultation requirements for proponents, 2010*. The purpose of Aboriginal community consultation is to assist the proponent in understanding Aboriginal people's views and concerns about the project, to understand cultural values present in the area, and to assist the NSW Office of Environment and Heritage (OEH) in providing terms of approval.

We are seeking to identify Aboriginal persons who hold cultural knowledge relevant to this project area and who may wish to register an interest in the process of community consultation. Those who choose to register will have the opportunity to provide culturally appropriate information and to comment on the cultural heritage significance of Aboriginal objects and the area. If you are aware of Aboriginal people or groups who you believe may wish to register an interest in the process of Aboriginal consultation please provide contact details to NSW Archaeology Pty Ltd on behalf of the proponent before the 14 August 2018.

Yours faithfully

Dr Julie Dibden
New South Wales Archaeology Pty Limited

Copy of Advertisement:



Example of 2nd batch of letters sent to potential Aboriginal stakeholders:

New South Wales
ARCHAEOLOGY

ABN 53106044366

PO Box 2135
Central Tilba NSW 2546
Mob. 0427074901
www.nswarchaeology.com.au

13 August 2018

Wagga Wagga Local Aboriginal Land Council
P.O. Box 6289
Wagga Wagga NSW 2650

Dear Sir / Madam

Re: Glenellen Solar Farm - Aboriginal Cultural Heritage Assessment

Glenellen Solar Farm Pty Ltd (the proponent) is investigating the potential to develop a solar farm located within the Greater Hume Shire local government area (LGA) approximately 3 km north-east of Jindera. The proponent is currently going through the process of preparing a Preliminary Environmental Assessment for obtaining Secretary's Environmental Assessment Requirements, however is commencing this heritage consultation process concurrently.

NSW Archaeology Pty Ltd is undertaking a process of consultation with Aboriginal people on behalf of the proponent according to the requirements stipulated in the former NSW DECCW *Aboriginal cultural heritage consultation requirements for proponents, 2010*. The purpose of Aboriginal community consultation is to assist the proponent in understanding Aboriginal people's views and concerns about the project, to understand cultural values present in the area, and to assist the NSW Office of Environment and Heritage (OEH) in providing terms of approval.

We are seeking to identify Aboriginal persons who hold cultural knowledge relevant to this project area and who may wish to register an interest in the process of community consultation. Those who choose to register will have the opportunity to provide culturally appropriate information and to comment on the cultural heritage significance of Aboriginal objects and the area.

The NSW OEH provided your details to us. If you wish to register an interest in the process of Aboriginal consultation please provide contact details to Julie Dibden, NSW Archaeology Pty Ltd on behalf of the proponent (Matthew Flower, Project Manager, CWP Solar Pty Ltd, 45 Hunter Street, Newcastle) before the 27 August 2018.

Yours faithfully

Dr Julie Dibden
New South Wales Archaeology Pty Limited

Documents provided to RAPS regarding project, proposed consultation process and assessment methods:

PROPOSED CULTURAL HERITAGE ASSESSMENT PROCESS
THE PROPOSED ACTIVITY
Glenellen Solar Farm (GSF)

CWP Renewables Pty Ltd (CWP), on behalf of Glenellen Solar Farm Pty Ltd (the proponent), is investigating the potential to develop a solar farm located within the Greater Hume Shire local government area (LGA) north-east of Jindera.

CWP are a long-established renewable energy developer, owner and asset manager. The company has over two decades of renewable energy development experience and offices in New South Wales (NSW), Queensland, South Australia and the Australian Capital Territory, with key development activities coordinated from the NSW base in Newcastle.

NSW Archaeology Pty Ltd has been commissioned to conduct an Indigenous heritage (archaeological and cultural) assessment of the project (the proposed activity area – see attached map). The land parcels involved in the project are:

> 3/DP411022, 3/DP1190444, 27/DP753342, 101/DP791421, 1004/DP1033823 and 1/DP588720

The proposed Glenellen Solar Farm (GSF) is a c. 200 MW utility scale electricity generation development. The project would be comprised of solar photovoltaic (PV) modules, steel racking and piled supports, electrical transformers, battery storage, electrical cabling, telecommunication equipment, security fencing and site office, maintenance buildings and car parking facilities. The identified land is currently used for grazing and/or cultivation by landholders included in the project. The footprint and scale of the PSF will be refined through the development of the Environmental Impact Assessment (EIA).

The site is 4km north east of Jindera, and 20km north of Albury in southern NSW (refer to attached figure). Access to the site is via the western part of Lindner Road, leading to Ortlipp Road on the north western side. Drumwood Road is on the south eastern side of the site. A TransGrid substation is located adjacent to the site on Ortlipp Road, which will serve as the grid connection point. The identified land is currently used for grazing and/or cultivation by landholders included in the project.

Preliminary studies indicate that the majority of the land is significantly altered from its native state, with extensive agricultural modifications. The

land is mostly non-native agricultural grassland with isolated trees. Some patches of native trees are present with varying prevalence of native species in the understorey, occurring mostly along the public road verges, and around the periphery of the land.

The drainage lines on the land are largely ephemeral with minimal bank delineation and limited riparian vegetation.

The landscape is relatively flat with minor undulations, with patches of remnant vegetation along roadsides, paddock edges, lower lying areas along drainage lines and scattered throughout paddocks. It is due to this low relief and current vegetation presence surrounding the land that the solar panel infrastructure should be largely screened from direct views.

PROPOSED CULTURAL HERITAGE ASSESSMENT PROCESS

This document is being provided to Registered Aboriginal Parties for the purposes of agreeing on outcomes relating to the assessment process.

The cultural heritage assessment process for this project would be conducted in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (NSW DECCW). The NSW Office of Environment and Heritage - OEH (formally DECCW) manages Aboriginal cultural heritage in NSW in accordance with the National Parks and Wildlife Act 1974. Part 6 of the Act provides specific protection for Aboriginal objects and Aboriginal places by administering offences for harming them without authorisation. When an activity is likely to impact Aboriginal objects or declared Aboriginal Places, approval of the OEH is required, issued in the form of an Aboriginal Heritage Impact Permit (AHIP) or via other forms of approval.

NSW OEH requires effective consultation with Aboriginal people because it recognises that:

- Aboriginal people should have the right to maintain culture, language, knowledge and identity;
- Aboriginal people should have the right to directly participate in matters that may affect their heritage; and
- Aboriginal people are the primary determinants of the cultural significance of their heritage.

The purpose of the NSW OEH Aboriginal Cultural Heritage Consultation Requirements for Proponents document (NSW DECCW 2010) is to facilitate positive Aboriginal cultural heritage outcomes by:

- affording an opportunity for Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project to be involved in consultation so that

information about cultural significance can be provided to NSW OEH to inform decisions regarding AHIP applications and approvals; and

- providing Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the project with the opportunity to participate in decision-making regarding the management of their cultural heritage by providing proponents with information regarding cultural significance and inputting into management options (NSW DECCW 2010).

The ACHCRP requirements outline four main consultation stages to be implemented in the course of consultation undertaken with Aboriginal people (these are outlined below). In summary the consultation process involves getting the views of, and information from, Aboriginal people and reporting these.

In order to fulfil the consultation requirements, NSW Archaeology Pty Ltd, on behalf of the proponent, proposes to implement the following procedure:

Stage 1 Notification of project proposal and registration of interest.
This stage is already underway and the aim is to identify, notify and register Aboriginal people who hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places in the proposal area.

- NSW Archaeology, on behalf of the proponent, has sought to identify the names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places. An advertisement has been placed in the local paper and letters have been written to various agencies.

- As we receive registrations of interest, NSW Archaeology is making a record of the names of each Aboriginal person or group who has registered an interest. Unless it is specified by a registered Aboriginal party that they do not want their names released, the list of names will be provided to the NSW OEH and the relevant Local Aboriginal Land Council.

- Where an Aboriginal organization representing Aboriginal people who hold cultural knowledge has registered an interest, a contact person for that organization must be nominated. Where Aboriginal cultural knowledge holders have appointed a representative to act on their behalf, this information must be provided in writing to NSW Archaeology.

Stage 2 Presentation of information about the proposed project

The aim of this stage is to provide registered Aboriginal parties with information about the scope of the proposed project and the proposed cultural heritage assessment process.

The proponent has engaged NSW Archaeology to conduct the consultation process. It is therefore the role of Julie Dibden, NSW Archaeology, to co-ordinate the assessment process. Aboriginal parties are invited to define their role, function and responsibility in this process.

- All registered Aboriginal parties are invited to identify, raise and discuss any cultural concerns, perspectives and assessment requirements (if any). In this regard registered Aboriginal parties should contact Julie Dibden, and this may be done in writing or by telephone.
- Provision of project information and proposed cultural heritage process is provided to registered Aboriginal parties as per this document and the accompanying *Methodology* document.
- If further information is required in regard to the proposal this will be provided to Aboriginal parties upon request. If necessary, additional information about the project will be provided; this may entail a project site visit.
- A record will be made that the proposed project information has been submitted. A record of any agreed outcomes and any contentious issues that may require further discussion to establish mutual resolution (if applicable) will be kept and a record will be provided to registered Aboriginal parties.
- All comments and feedback in regard to the Consultation Process and Project Methodology should be provided to NSW Archaeology within 28 days.

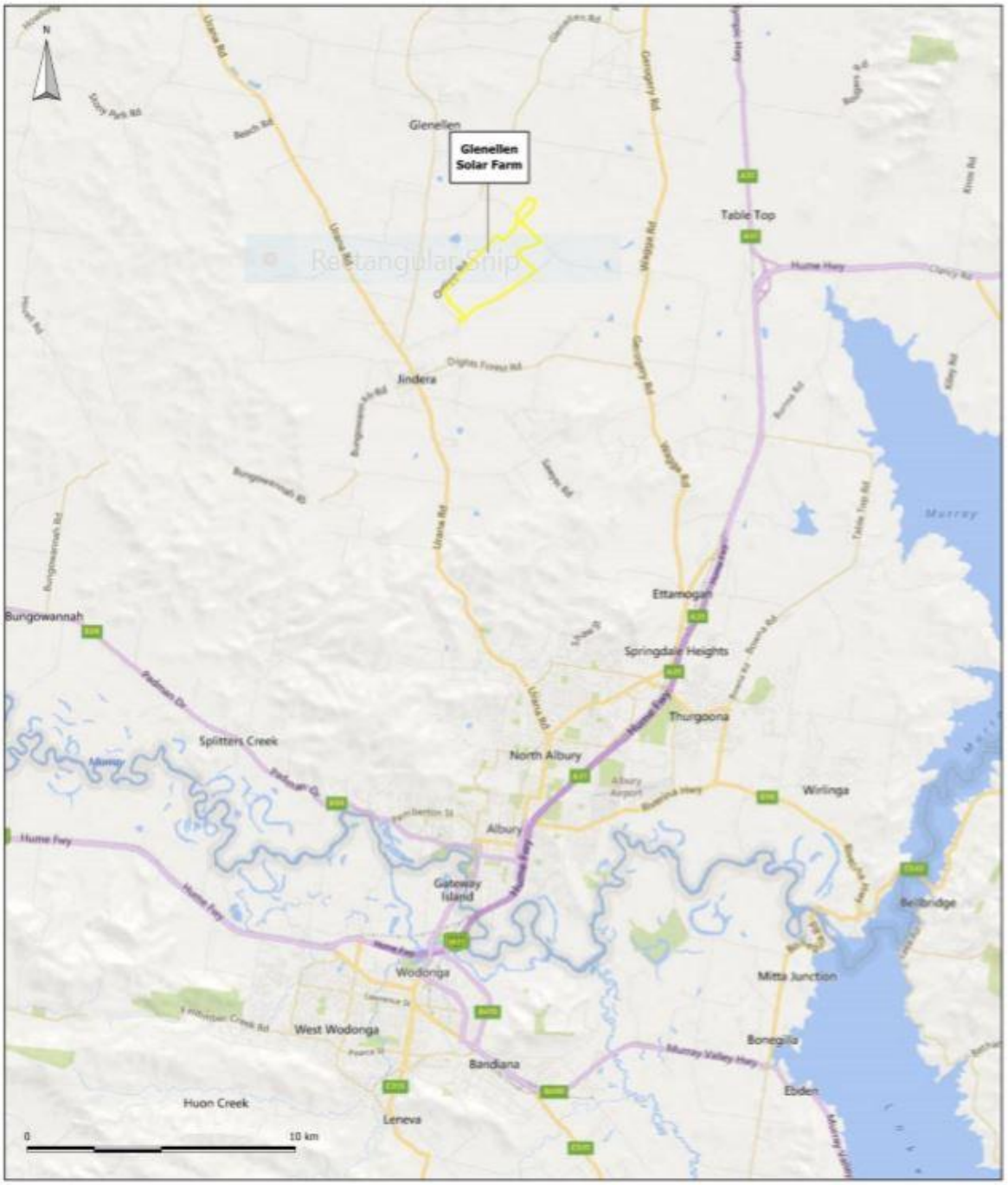
Stage 3 Gathering information about cultural significance
The aim of stage 3 is to facilitate a process whereby Aboriginal parties can contribute to culturally appropriate information gathering and the project methodology, provide information that will enable the cultural significance of Aboriginal objects and/or place in the proposal area to be determined, and to have input into the development of cultural heritage management options.

- A proposed methodology for the cultural heritage assessment will be provided to registered Aboriginal parties for review. Any comments in regard to the methodology should be provided to Julie Dibden, NSW Archaeology, within 28 days. Any protocols that registered Aboriginal parties wish to be adopted into the information gathering process and assessment methodology, and any other matters should be provided in writing or may be sought by the consultant.

- As a part of consultation, NSW Archaeology, on behalf of the proponent, seeks cultural information from registered Aboriginal parties to identify whether there are any Aboriginal objects or places of cultural value to Aboriginal people in the proposal area and, if so, to uncover knowledge about their context in order to reveal their meaning and significance. Registered Aboriginal parties who wish to contribute to this process should make contact with Julie Dibden (within 28 days) so that appropriate arrangements regarding collecting cultural knowledge can be made.
- If any information obtained is sensitive, appropriate protocols will be developed and implemented for sourcing and holding sensitive information.
- Registered Aboriginal parties are invited to identify, raise and discuss any cultural concerns, perspectives and assessment requirements by telephone or in writing to Julie Dibden, NSW Archaeology, within 28 days.
- All feedback received from registered Aboriginal parties will be documented in the Aboriginal cultural heritage assessment report as appropriate.

Stage 4 Review of Draft Cultural Heritage Assessment Report
The aim of this stage is to prepare and finalise an Aboriginal cultural heritage assessment report with input from registered Aboriginal parties.

- A draft report will be compiled which sets out a series of management options for consideration.
- The draft report will be provided to registered Aboriginal parties for review and comment.
- Any comments in regard to the report should be provided to Julie Dibden, NSW, within 28 days.
- After considering comments, the report will be finalised and copies will be provided to registered Aboriginal parties. The final report will include copies of any submissions made and the proponent's response to any submissions.


N
Glenellen
Glenellen Solar Farm
Table Top
Hume Hwy
Jindera
Murray
Ettamogah
Springdale Heights
Thurgoona
Burgowannah
Splitters Creek
North Albury
Albury
Wirlinga
Gateway Island
Wodonga
Mitta Junction
Bellbridge
West Wodonga
Bonegilla
Bandiana
Ebden
Huon Creek
Leneva
0
10 km

PROPOSED METHODOLOGY FOR THE INDIGENOUS HERITAGE (CULTURAL AND ARCHAEOLOGICAL) ASSESSMENT

Glenellen Solar Farm (GSF) - Aboriginal Cultural Heritage Assessment

CWP Renewables Pty Ltd (CWP), on behalf of Glenellen Solar Farm Pty Ltd (the proponent), is investigating the potential to develop a solar farm located within the Greater Hume Shire local government area **(**LGA) approximately 4 km north-east of Jindera.

NSW Archaeology Pty Ltd has been commissioned to conduct an Indigenous heritage (archaeological and cultural) assessment.

NSW Archaeology Pty Ltd is undertaking consultation with Aboriginal people on behalf of the proponent according to the requirements stipulated in the former NSW DECCW *Aboriginal cultural heritage consultation requirements for proponents, 2010***.**

NSW Archaeology Pty Ltd is a consultancy specialising in Indigenous cultural heritage management and aims to prepare assessments of a high standard to satisfy all stakeholders including the local Aboriginal community and the NSW Office of Environment and Heritage (NSW OEH).

The project will be conducted in accordance with the requirements of the OEH *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* and the *DECCW 2010 Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. In addition, the study is being undertaken following the requirements for *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (ACHCRP) (NSW DECCW 2010).

In accordance with the process as outlined in *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (ACHCRP) (NSW DECCW 2010), this methodology is being provided to all Aboriginal groups/individuals who have registered an interest in this process of consultation. The purpose of providing registered stakeholders with this methodology is for stakeholders to review and provide feedback to the consultant, including identification of issues/areas of cultural significance that might affect the methodology. Stakeholders are invited to make a written response to this proposed methodology within 28 days.

The methodology which is proposed to be implemented during this project is set out below.

It is proposed that the assessment of cultural heritage values of the project area will entail the following aspects as defined in the OEH *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*:

Review of background information: Definition and mapping of the physical landscape; reviewing historic values via recourse to written and oral histories and existing heritage data bases; and define the material evidence of Aboriginal land use via review of previous research, development of predictive model and a field inspection, survey and, if required, test excavation (the latter to be documented in an Aboriginal Cultural Heritage Assessment Report). Any information received from registered Aboriginal parties will be used in this process. Registered Aboriginal parties are invited to inform Julie Dibden in regard to areas, objects and places of cultural value in the proposed activity area.

Initiate ongoing consultation in accordance with the OEH's Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010. Information is sought from registered Aboriginal parties on whether there are any Aboriginal areas, objects or places of cultural value to Aboriginal people in the proposed activity area.

Identify and assess the cultural heritage values: Upon receipt of information that would enable the cultural significance of Aboriginal areas, objects and/or places in the proposed activity area to be determined, the range of social, historical, scientific and aesthetic values present across the Study Area would be identified, mapped, and assessed as to why they are important.

A field survey would be undertaken in accordance with the OEH Code of Practice.

If necessary, a program of test excavation may be carried out across the site to test the archaeological signature of different landform elements. The works wold be undertaken in accordance with the OEH Code of Practice. The following is an outline of a proposed methodology:

> The excavation would be conducted by hand, utilising spades and hand trowels. Test Squares would measure 0.5 x 0.5 sq m. The initial Test Square in each Test Transect would be excavated in successive spits of five centimetres, each subsequent Test Square in the remainder of each test Area/ASA would be excavated in ten centimetre spits. The depth of Test Squares is not expected to exceed 0.5m.
>
> All excavated sediment would be transferred into colour-coded and labelled buckets. All deposit recovered would be dry sieved through five millimetre mesh sieves onto tarps adjacent to the excavation. All stone determined or suspected to be humanly modified would be bagged according to individual Test Transect, Square and Spit.
>
> Buckets containing excavated stone materials will be transferred to a sorting table (see below).

On completion of excavation in each Test Transect, stratigraphy in all the Test Squares would be examined and recorded. At least one section face of each excavated square would be cleaned by trowel prior to recording and photography. Representative sections would then be recorded and photographed. Test Pit stratigraphy would be recorded using standard sedimentological descriptive terms and criteria (McDonald *et al*. 1998). Colour would be described using a Munsell Soil Colour Chart (Munsell 1992). A stratigraphic description of soil texture, coarse fragments and structure would be made. Sediment descriptions would note trends down the profile.

After recording stratigraphic details, each Test Square would be backfilled with excavated spoil collected on tarps. Each Test Square would then be rehabilitated with previously removed grass.

Sieving

All excavated deposit recovered will be dry sieved through 5 millimetre mesh sieves. All stone material retrieved in sieves will then be hand sorted by qualified archaeologists on sorting tables. All artefacts or stone suspected of being artefactual, including very small artefacts will be retrieved.

All stone determined or suspected to be humanly modified will be bagged and labeled according to individual Test Transect/Pit/Spit.

Care and control

All material would be stored at the office of NSW Archaeology Pty Ltd during analysis and then returned to country or the Care of the relevant Aboriginal group (to be determined) as per conditions of a Care and Control Permit, if relevant.

Analysis

All lithic material will be analysed by Julie Dibden. The analysis will entail inspection under low powered stereoscopic magnification, measuring and description according to technological attributes.

Inspection using magnification will be especially important given the anticipated presence of black chert and quartz lithic items in 5-20 mm size categories, a proportion of which would be expected to be non-artefactual, but only confirmed as such using microscopy.

The analysis will be geared towards answering the following questions:
- Artefact density.
- Technological and behavioural activities represented by the lithic material.
- The organisation and use of stone resources in the local area.

- Spatial variability in artefact distribution across the test area.
- Vertical integrity of deposits.
- The significance of the subsurface artefacts so that management recommendations can be developed in relation the proposed impacts.

To undertake an investigation of these issues a basic profile of the artefact assemblage will be developed from the recorded data. Assemblage content will be determined by recording and/or measuring a number of variables. Details of each artefact will be entered into an Excel spreadsheet on a PC. Each artefact will be designated an individual number and individually bagged. Subsequent analysis will be undertaken in order to investigate the nature and significance of the archaeological material.

Reporting

An excavation report will be prepared to NSW OEH standards in which the results of the excavation will be documented. In addition, appropriate management recommendations will be formulated. Aboriginal Site Impact Recording Forms will be completed and provided to NSW OEH.

Assess harm of the proposed activity: Identification of the nature of the proposed activity and any potential harm to Aboriginal areas, objects and/or places. This would take into consideration the principles of ecologically sustainable development (ESD).

Develop harm avoidance and/or minimisation strategies: Registered stakeholders would be invited to have input into the development of cultural heritage management options. The development of avoidance and/or minimisation strategies would be developed within an Aboriginal cultural heritage assessment report review process.

Documentation of Findings: An Aboriginal cultural heritage assessment report would be prepared. The report would be prepared in accordance with the report outline as set out in OEH's *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*.

A draft copy of the report will be provided to all Aboriginal groups or individuals who register an interest in this project for review and consideration of management options.

Upon review of this proposed methodology, registered stakeholders are invited to make submissions relating to the information gathering and assessment methodology, and any matters such as issues/areas of cultural significance that might affect, inform or refine the assessment methodology, to Julie Dibden within 28 days. All feedback received will be documented in the cultural heritage

assessment report, which will include copies of submissions received and the proponent's response to issues raised.

Appendix A – ELA Consultation Log (2020)

Date	Action	Organization
26/05/2020	ELA wrote to DPIE, providing an update regarding the ACHA process undertaken for the Glenellen Solar Farm and asking for advice regarding the methodology from updating the original ACHA prepared by NSW Archaeology and recommendations for mitigation measures for Aboriginal objects identified within the study area by NSW Archaeology.	Department of Planning, Industry and Environment (DPIE)
26/05/2020	ELA wrote to Albury LALC, providing an update regarding the ACHA process undertaken for the Glenellen Solar Farm and asking for advice regarding the methodology from updating the original ACHA prepared by NSW Archaeology and recommendations for mitigation measures for Aboriginal objects identified within the study area by NSW Archaeology.	Albury Local Aboriginal Land Council
04/06/2020	ELA wrote to OEH requesting contact information on any Aboriginal People with an interest in the proposed project / Holding cultural knowledge of the project area	Department of Planning, Industry and Environment (DPIE; formerly the OEH)
04/06/2020	ELA wrote to Albury LALC (CEO) requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area. We also invited them to register their interest in the project.	Deerubbin LALC
04/06/2020	ELA wrote to ORALRA requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area.	Officer of the Registrar of Aboriginal Land Right Act (ORALRA)
04/06/2020	ELA wrote to NTS Corp requesting contact information on any Aboriginal People with an interest in the proposed project t/ holding cultural knowledge of the project area.	Native Title Service Corporation (NTS Corp)
04/06/2020	ELA wrote to NNTT requesting contact information on any Aboriginal People with an interest in the proposed project / holding cultural knowledge of the project area.	National Native Title Tribunal (NNTT)
04/06/2020	ELA wrote to Greater Hume Shire Council requesting contact information on any Aboriginal people with an interest in the proposed project or	Greater Hume Shire Council

	who hold cultural knowledge relevant to the project area.	
04/06/2020	ELA wrote to the Local Land Services requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area.	Local Land Services
17/06/2020	ELA published a notice of Aboriginal stakeholder consultation for the project in the Border Mail newspaper.	Border Mail - ad ran on 17/06/2020
15/06/2020	Notice of Stakeholder consultation invitations	All RAPs
06/07/2020	ELA sent out draft Aboriginal cultural heritage report	All RAPs

Organizational responses

date	Action	Organisation
12/06/2020	Provided a list of Aboriginal People with a potential interest in the project	DPIE
10/06/2020	Based on the records held by the National Native Title Tribunal as at 05 June 2020, it would appear that there are no Indigenous Land Use Agreements, Scheduled or Registered Native Title Claims or Determined Claims over this LGA.	National Native Title Tribunal
	No response	Albury LALC
	No response	Officer of the Registrar of Aboriginal Land Right Act (ORALRA)
	No response	Native Title Service Corporation (NTS Corp)
	No response	Greater Hume Shire Council
	No response	Local Land Services

Invitations to Aboriginal stakeholders

Date	Contact organisation	Contact Person (Last Name)	Contact Person (First Name)	Action
01/06/2020	Yalmambirra			Sent out invitations to RAPS as per DPIE list
01/06/2020	Denise McGrath	McGrath	Denise	Sent out invitations to RAPS as per DPIE list
01/06/2020	Leonie McIntosh	McIntosh	Leonie	Sent out invitations to RAPS as per DPIE list
01/06/2020	Dan Clegg	Clegg	Dan	Sent out invitations to RAPS as per DPIE list
01/06/2020	Bundyi Aboriginal Cultural Knowledge	Saddler	Mark	Sent out invitations to RAPS as per DPIE list
01/06/2020	Liz Heta	Heta	Liz	Sent out invitations to RAPS as per DPIE list
01/06/2020	Miyagan Culture & Heritage	Carroll	Rob	Sent out invitations to RAPS as per DPIE list
01/06/2020	Yalmambirra			Sent out invitations to RAPS as per DPIE list
01/06/2020	Mungabareena Aboriginal Corporation	Cutmore	Michael	Sent out invitations to RAPS as per DPIE list
01/06/2020	Alice Williams	Williams	Alice	Sent out invitations to RAPS as per DPIE list

Registered Aboriginal Parties

Registered Aboriginal Party	Contact Name	Date of Registration
Bundyi Aboriginal Cultural Knowledge	Mark Saddler	Registered during the original 2018 consultation process, re-registered 15/06/2020
Albury District LALC	N/A	Registered during the original 2018 consultation process

Responses to Draft ACHAR

No responses were received from the project RAPs during the 28-day ACHAR review period.

Introduction Letters

Level 3
101 Sussex Street
Sydney NSW 2000
t: (02) 9259 3800

26 May 2020

Our ref: 20ARM-15523

Department of Planning, Industry and Environment
Level 2, 512 Dean Street
Albury NSW 2640
rog.southwest@environment.nsw.gov.au

To Whom It May Concern,

Glenellen Solar Farm Environmental Impact Statement – Aboriginal Heritage Background Information and Resumption of Stakeholder Consultation.

Eco Logical Australia (ELA) has been commissioned by Trina Solar to coordinate the State Significant Development (SSD) approvals process for the proposed Glenellen Solar Farm (SSD 9550), located within the Greater Hume Shire Local Government Area (LGA) approximately 3 km northeast of Jindera (Figure 1). A previous Environmental Impact Statement (EIS) was prepared for the site on behalf of CWP Renewables, the former developer in ownership of the Glenellen Solar Farm site. However, CWP Renewables sold the proposal to Trina Solar in 2020. Therefore, Trina Solar has engaged ELA to update the existing EIS, parts of which were previously prepared by ELA and parts of which, including the Aboriginal Heritage Assessment, were prepared by other environmental consultancies.

As part of the Secretary's Environmental Assessment Requirements (SEARs) originally issued for the proposed solar farm, an Aboriginal Cultural Heritage Assessment (ACHA) was prepared in 2018 by NSW Archaeology as part of the EIS. The ACHA prepared by NSW Archaeology identified three (3) isolated artefact sites within the area of the proposed works during site survey with representatives of the Albury District Local Aboriginal Land Council (LALC). Although three artefact sites were identified, the ACHA also identified a high degree of ground disturbance across the proposed development area due to a long history of agricultural land use within the area. The NSW Archaeology report concluded that the development area possessed low archaeological potential and recommended that no further Aboriginal heritage investigation was warranted. Additionally, the report did not recommend any mitigative measures in order to avoid impacting upon the three isolated artefact sites identified, due to these sites being assessed as having low scientific and archaeological value.

ELA has proposed to update the ACHA component of the EIS by providing updated database searches and mapping of known Aboriginal heritage sites within and surrounding the development area, as well as re-engaging the Registered Aboriginal Parties (RAPs) that were engaged by NSW Archaeology in 2018, including the Albury District LALC, in order to undertake a review of the updated ACHA and provide comment / recommendations on how to proceed with the project from an Aboriginal heritage perspective.

Although this project is considered SSD, with the Minister as the ultimate approval body, ELA understands that the Minister will be advised by the Department of Planning, Industry and Environment (DPIE) regarding the Aboriginal heritage component of the EIS, and whether or not the recommendations put forward in the ACHA constitute a sufficient assessment of Aboriginal heritage within the area and the developments potential to impact upon Aboriginal heritage. We therefore invite DPIE to provide comment on the approach proposed by ELA to update the ACHA component of the EIS to ensure that the level of Aboriginal heritage assessment prepared for the proposed solar farm is sufficient.

If you have any questions regarding this letter, I can be contacted on 02 9290 7055 or at daniel.claggett@ecoaus.com.au. Alternatively, ELA Senior Heritage Advisor Tyler Beebe can be contacted on 02 4910 3402 or at tylerb@ecoaus.com.au. I thank you for your attention in this matter

Regards,

Daniel Claggett
ELA Archaeologist

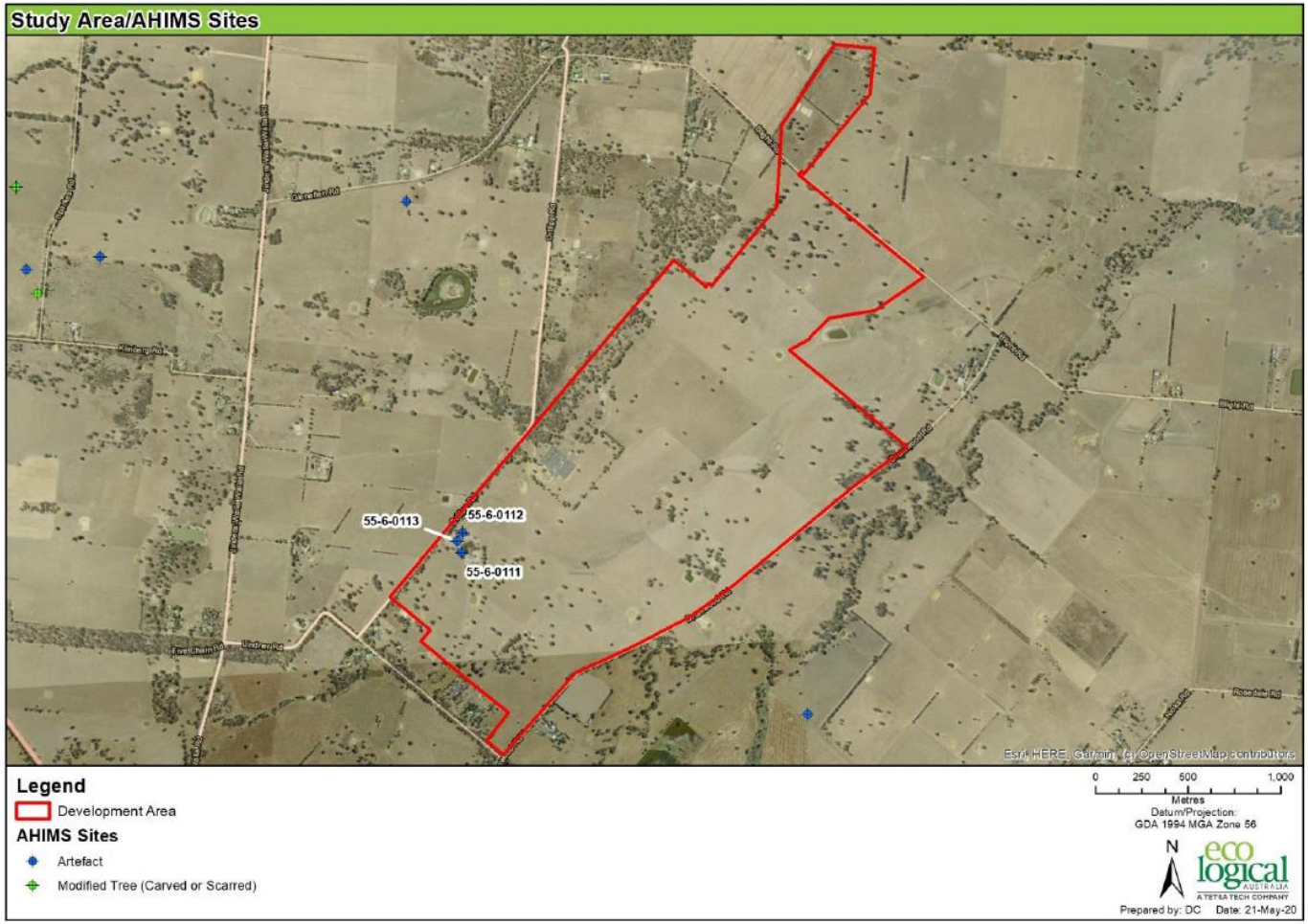


Figure 1: The proposed development area, including the location of the three artefact sites identified by NSW Archaeology (2018)

Level 3
101 Sussex Street
Sydney NSW 2000
t: (02) 9259 3800

26 May 2020

Our ref: 20ARM-15523

To Whom It May Concern,

Glenellen Solar Farm Environmental Impact Statement – Aboriginal Heritage Background Information and Resumption of Stakeholder Consultation.

Eco Logical Australia (ELA) has been commissioned by Trina Solar to coordinate the State Significant Development (SSD) approvals process for the proposed Glenellen Solar Farm, located within the Greater Hume Shire Local Government Area (LGA) approximately 3 km northeast of Jindera (Figure 1). A previous Environmental Impact Statement (EIS) was prepared for the site on behalf of CWP Renewables, the former developer in ownership of the Glenellen Solar Farm site. However, CWP Renewables sold the proposal to Trina Solar in 2020. Therefore, Trina Solar has engaged ELA to update the existing EIS, parts of which were previously prepared by ELA and parts of which, including the Aboriginal Heritage Assessment, were prepared by other environmental consultancies.

As part of the Secretary's Environmental Assessment Requirements (SEARs) originally issued for the proposed solar farm, an Aboriginal Cultural Heritage Assessment (ACHA) was prepared in 2018 by NSW Archaeology as part of the EIS, in which your organisation is listed as a Registered Aboriginal Party (RAP) who provided comment and review of the Draft Methodology and Draft ACHA documents. As you may recall, the ACHA prepared by NSW Archaeology identified three (3) isolated artefact sites within the area of the proposed works during site survey with representatives of the Albury District Local Aboriginal Land Council (LALC). Although three artefact sites were identified, the ACHA also identified as a high degree of ground disturbance across the proposed development area due to a long history of agricultural land use within the area. The NSW Archaeology report concluded that the development area possessed low archaeological potential and recommended that no further Aboriginal heritage investigation was warranted. Additionally, the report did not recommend any mitigative measures in order to avoid impacting upon the three isolated artefact sites identified, due to these sites being assessed as having low scientific and archaeological.

ELA has proposed to update the ACHA component of the EIS by providing updated database searches and mapping of known Aboriginal heritage within and surrounding the development area, as well as re-engaging your organisation in order to undertake a review of the updated ACHA and provide comment / recommendations on how to proceed with the project from an Aboriginal heritage perspective.

Therefore, please find accompanying this letter the ACHA prepared by NSW Archaeology for your comment and review. We invite your organisation to provide comment on the findings and recommendations of the NSW Archaeology ACHA to ensure that the level of archaeological and cultural heritage assessment prepared for the proposed solar farm is sufficient.

If you have any questions regarding this letter, I can be contacted on 03 9290 7055 or at daniel.claggett@ecoaus.com.au. I thank you for your attention in this matter.

Regards,

Daniel Claggett
ELA Archaeologist

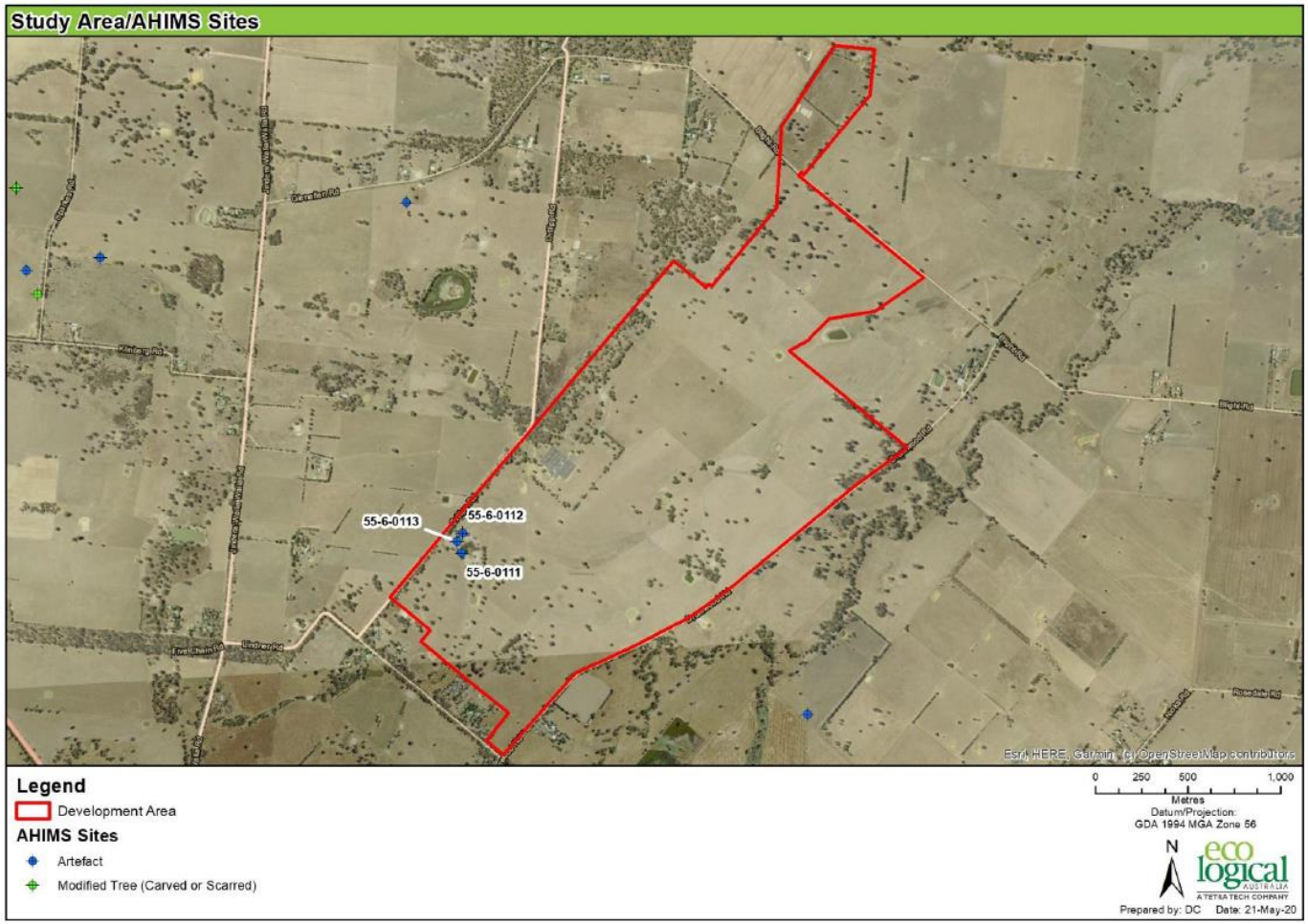


Figure 1: The proposed development area, including the location of the three artefact sites identified by NSW Archaeology (2018)

Claggett, Daniel

From: Andrew Fisher <Andrew.Fisher@environment.nsw.gov.au> on behalf of ROG South West Region Mailbox <rog.southwest@environment.nsw.gov.au>
Sent: Tuesday, June 2, 2020 12:31 PM
To: Claggett, Daniel
Cc: John Gilding
Subject: DPIE BCD Response RE: Glenellen Solar Farm EIS - ACHA Update and Resumption of Stakeholder Consultation

Hi Daniel,

Thank you for your email of 26 May 2020, and the corresponding letter, seeking advice from DPIE - BCD on ELA's proposed method for proceeding with the ACH components of the Environmental Impact Statement for Glenellen Solar Farm (SSD 9550).

Based on your correspondence it is understood that:

1. An assessment was undertaken originally (in 2018) by a consultancy named NSW Archaeology for the proponent CWP Renewables.
   The Albury and District LALC were consulted and engaged for the consultation component. Three Isolated Artefacts, were located during the field assessment. NSW Archaeology, in consultation with Albury LALC, concluded that these were of low significance. The activity area was impacted by prior land use, with little chance of further objects being present, or likely disturbed by the solar farm. NSW Archaeology concluded that no further assessment was required and no recommendations for mitigation, or management of the three objects were made as they were of low significance. Since this time, the EIS process has stalled between 2018 and now, and subsequently there has been a transfer from the previous proponent (CWP renewables) to the new proponent (Trina Solar), with ELA engaged as the agent to manage ACH issues.
2. ELA is proposing to update the ACHAR for the EIS by:
   a. Fresh AHIMS database search
   b. Re-engage with RAPs (Albury and District LALC) originally identified in 2018, and undertake and complete review and comments on ACHAR (stage 4 consultation process).

ELA request advice from DPIE-BCD whether, these proposals and the assessment and recommendations in the ACHAR are sufficient to address SEARs concerning ACH.

It should be qualified that, DPIE-BCD is not in a position to provide informed comment on the ACHAR itself, as we have not seen it. The only details we have are limited to the content of your correspondence. However, based on ELA's proposal in updating the ACHAR:

1. AHIMS database search are not considered current and sufficient to support assessments if they are older than 12 months. So the intent to update this is appropriate and supported by DPIE-BCD.
2. For consultation there needs to be a demonstrated continuous consultation process with Aboriginal people from the investigation stage, through preparation of the ACHAR and any subsequent applications (SSD/AHIP). As a general rule, gaps in consultation process of 6 months or more will not constitute continuous consultation.

Normally with a change of applicant and change of consultant we would recommend a new project and process be commenced. This would provide assurance for the new applicant and the new consultant in terms of the technical assessment and the consultation process.

Given the COVID-19 restrictions, we consider it appropriate that you can vary the consultation process for this project, given the work to date. You compile a current RAP list (including from request to DPIE-BCD) (effectively Stage 1), then provide a revised ACHA to all RAPs for comment, allowing 28 days (Stage 4). From this you will be able to demonstrate appropriate consultation and provide this as part of the EIS documentation.

As previously stated, DPIE-BCD cannot comment on the adequacy of the ACHAR having not seen it; however, based on your comments regarding management of the ACH in NSW Archaeology's report, this is unlikely to be endorsed by DPIE-BCD. ELA will need to ensure that the assessment by NSW Archaeology followed the 'Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW': https://www.environment.nsw.gov.au/research-and-publications/publications-search/code-of-practice-for-archaeological-investigation-of-aboriginal-objects-in-nsw.

A consideration for the Department is the adequacy of measures to avoid or reduce impacts. In this instance there is none. The rationale by NSW Archaeology of this being due to low significance is not in keeping with, nor does it address, the principles of ecologically sustainable development (ESD) (*National Parks & Wildlife Act 1974*, Objects of the Act, s2A(2)) . The precautionary principle, cumulative impacts, conservation, intergenerational equity etc. must be addressed.

We trust this advice is of assistance.

If you have any questions about this please contact John Gilding, SW Archaeologist on 03 5483 9118, otherwise myself.

Regards

Andrew Fisher
Senior Team Leader, Planning – South West

Biodiversity and Conservation | Department of Planning, Industry and Environment
T 02 6022 0623 | **M** 0427 562 844 | **E** andrew.fisher@environment.nsw.gov.au
PO Box 1040, 512 Dean St, Albury, NSW 2640
www.dpie.nsw.gov.au
Contact the South West Planning Team about biodiversity and Aboriginal cultural heritage planning and regulation matters by emailing roq.southwest@environment.nsw.gov.au.

NSW GOVERNMENT | Planning, Industry & Environment

The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

Consultation Stage 1 Detail

Level 3 101 Sussex Street Sydney NSW 2000
t: (02) 9529 3800

04 June 2020

Department of Planning, Industry and Environment
Level 2, 512 Dean Street
Albury NSW 2640
rog.southwest@environment.nsw.gov.au

To Whom It May Concern,

RE: Aboriginal Cultural Heritage Assessment – Glenellen Solar Farm Environmental Impact Statement

Eco Logical Australia (ELA) has been commissioned by Trina Solar to coordinate the State Significant Development (SSD) approvals process for the proposed Glenellen Solar Farm (SSD 9550), located within the Greater Hume Shire Local Government Area (LGA) approximately 3 km northeast of Jindera (Figure 1). A previous Environmental Impact Statement (EIS) was prepared for the site on behalf of CWP Renewables, the former developer in ownership of the Glenellen Solar Farm site. However, CWP Renewables sold the proposal to Trina Solar in 2020. Therefore, Trina Solar has engaged ELA to update the existing EIS, parts of which were previously prepared by ELA and parts of which, including the Aboriginal Heritage Assessment, were prepared by other environmental consultancies.

ELA has proposed to update the ACHA component of the EIS by providing updated database searches and mapping of known Aboriginal heritage sites within and surrounding the development area. In addition, and on the advice of the Aboriginal Heritage division of the Department of Planning, Industry and Environment (DPIE), ELA will also be restarting the Aboriginal consultation process that was undertaken in 2018 by NSW Archaeology, who were responsible for the preparation of the original ACHA.

Consultation will be undertaken in line with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010). In accordance with the requirements of the ACHA process, proponents must provide the opportunity for Aboriginal people who hold cultural knowledge relevant to the proposed project area to be involved in the assessment process.

As per Section 4.1.2 of the *Aboriginal cultural heritage consultation requirements for proponents* (2010) we would appreciate if you would provide us with a contact list of Aboriginal people registered with your organisation who may hold cultural knowledge relevant to the project area identified above. The project area falls within the Albury Local Aboriginal Land Council (LALC) and Greater Hume Shire Council Local Government Area (LGA). ELA has already contacted and will continue to contact Albury LALC directly as part of this consultation.

It would be appreciated if you could provide information on any Aboriginal people or organisations who we should invite to register for consultation. If you have any further questions in relation to the upcoming Aboriginal consultation process, I can be contacted on 02 9259 3772. I thank you for your attention in this matter.

Regards,

Daniel Claggett
ELA Archaeologist

Client Contact Details
Nalin Wickramasinghe

Trina Solar (Australia) Pty Ltd
Suite 44.05, Level 44, Governor Phillip Tower
1 Farrer Place,
Sydney, NSW 2000
P: 1300 874 627
E: nalin.wickramasinghe@trinasolar.com

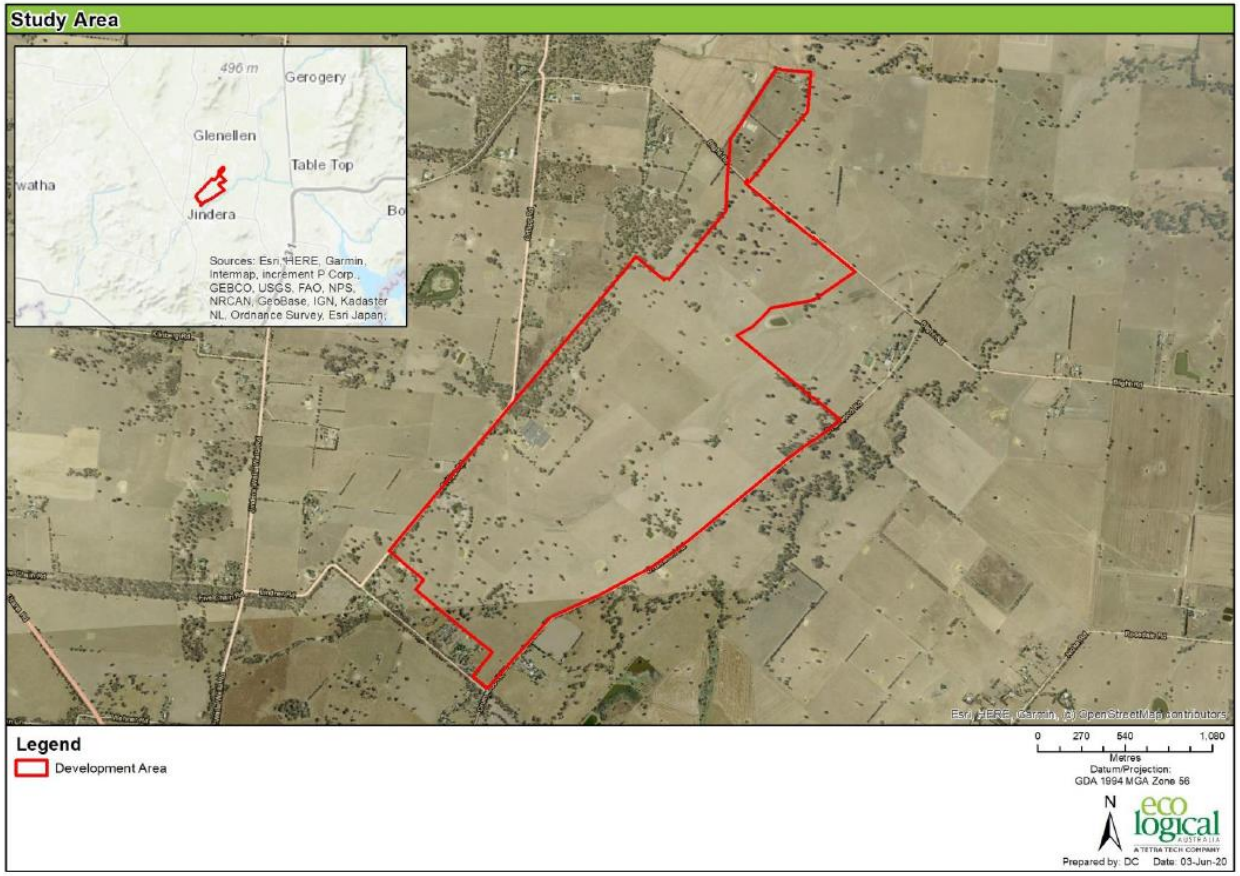


Figure 1: Location of the proposed Glenellen Solar Farm

Responses from organisations contacted in section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW 2010)

Planning, Industry & Environment

Our ref: DOC20/437682

Daniel Claggett

Archaeologist/Heritage Advisor
Eco Logical Australia (ELA)
Level 1, 436 Johnston Street
ABBOTSFORD VIC 3067

Via email: Daniel.Claggett@ecoaus.com.au

12 June 2020

Dear Daniel

Subject: **Registration of Aboriginal Interests – Glenellen Solar Farm Updated ACHA (SSD 9550), Jindera - Greater Hume LGA**

WRITTEN NOTIFICATION OF PROPOSAL AS REQUIRED UNDER DECCW ABORIGINAL CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010

Thank you for your correspondence dated 4 June 2020 about the above matter seeking comments from the Biodiversity and Conservation Division of the Department of Planning, Industry and Environment (The Department).

The Biodiversity and Conservation Division has statutory responsibilities relating to biodiversity (including threatened species, populations, ecological communities, or their habitats), Aboriginal cultural heritage and flooding.

Attached is a list of known Aboriginal parties for the Greater Hume local government area that the Department considers likely to have an interest in the development. Please note this list is not necessarily an exhaustive list of all interested Aboriginal parties. Receipt of this list does not remove the requirement of a proponent/ consultant to advertise in local print media and contact other bodies seeking interested Aboriginal parties, in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (April 2010).

Under Section 4.1.6. of the Consultation Requirements, you must also provide a copy of the names of each Aboriginal person who registered an interest to the relevant Department regional office and Local Aboriginal Land Council (LALC) within 28 days from the closing date for registering an interest.

Please note that the contact details in the list provided by the Department may be out of date as it relies on Aboriginal parties advising the Department when their details need changing. If individuals/companies undertaking consultation are aware that any groups contact details are out of date, or letters are returned unopened, please contact either the relevant stakeholder group (if you know their more current details) and/or the Department. AHIP applicants should make a note of any group they are unable to contact as part of their consultation record.

If you have any questions about this advice, please contact me via rog.southwest@environment.nsw.gov.au or 02 6022 0623.

Yours sincerely

Andrew Fisher

Senior Team Leader Planning

South West Branch

Biodiversity and Conservation Division

Department of Planning, Industry and Environment

ATTACHMENT A Registered Aboriginal Interests – Greater Hume Local Government Area

RE: SR20/516 - Native Title Search Request - Glenellen Solar Farm, Glenellen NSW - SR20/516

GS Geospatial Search Requests <GeospatialSearch@NNTT.gov.au>
To Claggett, Daniel

Reply | Reply All | Forward

Fri 05-Jun-20 8:55

UNCLASSIFIED

Native title search – *NSW Parcels – Lot 1004, DP1033823; Lot 1, DP588720; Lot 101, DP791421; Lot 27, DP753342; Lot 3, DP411022*
Your ref: *15523* - **Our ref:** *SR20/516*

Dear Daniel Claggett

Thank you for your search request received on 04 June 2020 in relation to the above area.

Please note: Records held by the National Native Title Tribunal as at 05 June 2020 indicate that the identified parcels appear to be freehold, and freehold tenure extinguishes native title.
The National Native Title Tribunal does not hold data sets for freehold tenure; consequently, we **cannot** conduct searches over freehold. For confirmation of freehold data, please contact the NSW Land and Property Information office or seek independent legal advice.

For further information, please visit our website.

Cultural Heritage Searches in NSW
The National Native Title Tribunal (the Tribunal) has undertaken steps to remove itself from the formal list of sources for information about indigenous groups in development areas. The existence or otherwise of native title is quite separate to any matters relating to Aboriginal cultural heritage. Information on native title claims, native title determinations and Indigenous Land Use Agreements is available on the Tribunal's website.

Interested parties are invited to use Native Title Vision (NTV) the Tribunal's online mapping system to discover native title matters in their area of interest. Access to NTV is available at http://www.nntt.gov.au/assistance/Geospatial/Pages/NTV.aspx
Training and self-help documents are available on the NTV web page under "Training and help documents". For additional assistance or general advice on NTV please contact GeospatialSearch@NNTT.gov.au

Additional information can be extracted from the Registers available at http://www.nntt.gov.au/searchRegApps/Pages/default.aspx

If you have any further queries, please do not hesitate to contact us on the free call number 1800 640 501.

Regards,

Geospatial Searches
National Native Title Tribunal | Perth
Email: GeospatialSearch@nntt.gov.au | **www.nntt.gov.au**

Advertisement published in the Border Mail on 17 June 2020

Notice·of·Aboriginal·Stakeholder·Consultation¶

Eco·Logical·Australia·(ELA)·has·been·engaged·by·Glenellen·Solar·Farm·Pty·Ltd·to·support·and·coordinate·the·State·Significant·Development·(SSD)·approvals·process·for·the·proposed·Glenellen·Solar·Farm,·located·in·the·Greater·Hume·Shire·Council·Local·Government·Area,·approximately·3·km·northeast·of·Jindera.·Consultation·for·this·project·began·in·2018·has·since·lapsed·and·shall·be·restarted·as·required·by·NSW·heritage·legislation.¶

This·notice·is·an·invitation·for·interested·Aboriginal·organisations·or·people·who·hold·cultural·knowledge·relevant·to·determining·the·significance·of·Aboriginal·object(s)·and/or·place(s)·in·the·area·of·the·proposed·project·to·register·an·interest·in·a·process·of·community·consultation·with·Trina·Solar.↵

Interested·Aboriginal·organisations·are·invited·to·register·their·interest·to·be·consulted·in·writing·to:¶

Daniel·Claggett,·Eco·Logical·Australia,·Level·1,·436·Johnston·Street,·Abbotsford·VIC·3067·E:·daniel.claggett@ecoaus.com.au·P:·03·9290·7055.¶

Expressions·of·interest·should·include·current·contact·details.·Closing·date·for·registration·is·1·July·2020↵

Please·note·Aboriginal·people·register·an·interest·will·have·their·details·forwarded·to·the·DPIE·and·Local·Aboriginal·Land·Council·(LALC)·unless·they·specify·that·they·do·not·want·their·details·released.¶

Please·note·that·under·DPIE·guidelines·registration·for·consultation·does·not·guarantee·employment.¶

Client·contact·details:·Nalin·Wickramasinghe,·Glenellen·Solar·Farm·Pty·Ltd,·c/-·Addsum·Accountants,·SUITE·1903·109·PITT·STREET,·SYDNEY·NSW·2000·Ph·02·9212·4881¶

Letters sent to Aboriginal people listed as having an interest in the Blacktown LGA as identified through section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW 2010)

Level 3
101 Sussex Street
Sydney NSW 2000
t: (02) 9259 3800

15 June 2020

Our ref: 20ARM-15523

To Whom It May Concern,

Glenellen Solar Farm Environmental Impact Statement – Notice of Aboriginal Stakeholder Consultation

Eco Logical Australia (ELA) has been commissioned by Glenellen Solar Farm Pty Ltd to coordinate the State Significant Development (SSD) approvals process for the proposed Glenellen Solar Farm, located within the Greater Hume Shire Local Government Area (LGA) approximately 3 km northeast of Jindera (Figure 1). A previous Environmental Impact Statement (EIS) was prepared for the site on behalf of CWP Renewables, the former developer in ownership of the Glenellen Solar Farm site. However, CWP Renewables sold the proposal to Trina Solar in 2020. Therefore, Glenellen Solar Farm Pty Ltd has engaged ELA to update the existing EIS, parts of which were previously prepared by ELA and parts of which, including the Aboriginal Heritage Assessment, were prepared by other environmental consultancies.

As part of the Secretary's Environmental Assessment Requirements (SEARs) originally issued for the proposed solar farm, an Aboriginal Cultural Heritage Assessment (ACHA) was prepared in 2018 by NSW Archaeology as part of the EIS. The ACHA prepared by NSW Archaeology identified three (3) isolated artefact sites within the area of the proposed works during site survey with representatives of the Albury District Local Aboriginal Land Council (LALC). Although three artefact sites were identified, the ACHA also identified as a high degree of ground disturbance across the proposed development area due to a long history of agricultural land use within the area. The NSW Archaeology report concluded that the development area possessed low archaeological potential and recommended that no further Aboriginal heritage investigation was warranted. Additionally, the report did not recommend any mitigative measures in order to avoid impacting upon the three isolated artefact sites identified, due to these sites being assessed as having low scientific and archaeological significance.

Based on the recommendations of the Department of Planning, Industry and Environment (DPIE), ELA is currently in the process of updating the ACHA component of the EIS by providing updated database searches and mapping of known Aboriginal heritage within and surrounding the development area, as well as restarting Aboriginal stakeholder consultation for the project, due to the original consultation period lapsing after a period of six months. In addition to these tasks, and on the advice of DPIE, ELA will be developing mitigation measures to curtail the impact the solar farm will have on the Aboriginal sites identified within the study area, as the original recommendation is not considered an acceptable outcome by DPIE or ELA.

This letter is an invitation for Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal objects and places in the area of the proposed project to register an interest in a process of community consultation with Trina Solar regarding the proposed solar farm.

Your contact details have been provided to ELA by DPIE as a person / or group who may have a cultural interest in the proposed project.

The purpose of the community consultation with Aboriginal people will be to assist Glenellen Solar Farm in understanding the cultural significance of the project area and to assist in the determination of acceptable mitigative measures to minimise the impact of the proposed solar farm on any archaeological and cultural values identified within the study area.

Interested Aboriginal organisations or people having cultural knowledge relating to this area are invited to register their interest to be consulted in writing to: Daniel Claggett, Eco Logical Australia, Level 1, 436 Johnston Street, Abbotsford VIC 3067 – E: daniel.claggett@ecoaus.com.au - T: 03 9250 7055 by: **Wednesday 01 July 2020.**

Please note under the consultation requirements your details will be forwarded to the DPIE and the Local Aboriginal Land Council (LALC) upon receipt of your registration of interest. If you do not wish to have your details forwarded on to the LALC please notify ELA when registering your interest in the proposed project. In addition, also note that under DPIE guidelines registration for consultation does not guarantee employment.

Regards,

Daniel Claggett
Archaeologist

Client Contact Details
Nalin Wickramasinghe

Glenellen Solar Farm Pty Ltd
c/- Addsum Accountants

SUITE 1903

109 PITT STREET

SYDNEY NSW 2000
02 9212 4881
E: nalin.wickramasinghe@trinasolar.com

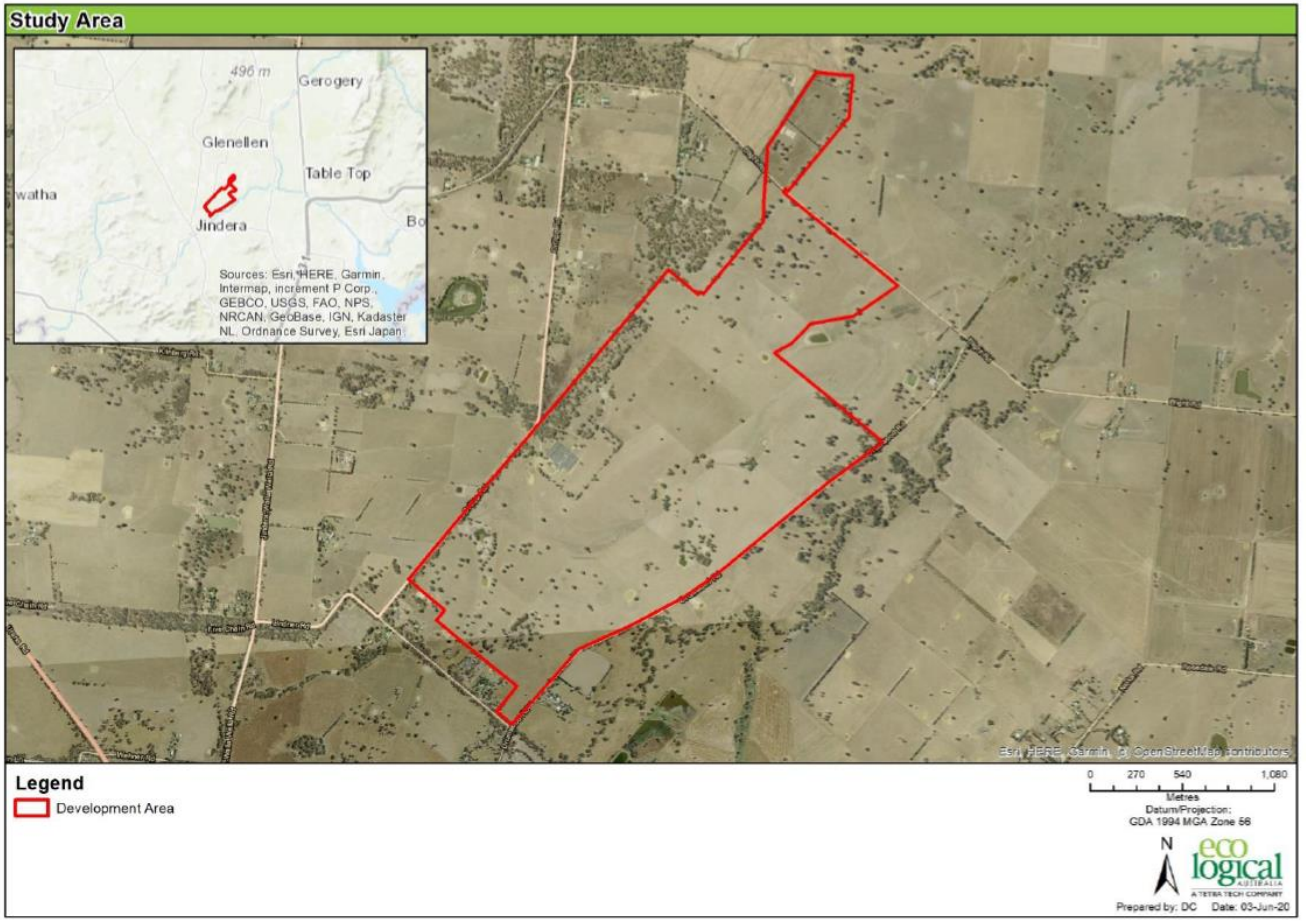


Figure 1: Location of the proposed Glenellen Solar Farm

RE: Notification of Aboriginal Stakeholder Consultation - Glenellen Solar Farm, Glenellen NSW

MS Mark Saddler <marksad@live.com.au>
To Claggett, Daniel

Yamma (hello) Daniel,

This is just a quick email to advise you of my continuing interest in the Glenellen Solar Farm.

Please keep me informed on what is happening.

Guwayu (Safe Travels)

Mark Saddler,
Cultural Awareness,
School & Tour Programs,
Bundyi Cultural Tours,
Web Page: www.bundyiculture.com.au
Facebook Page: https://www.facebook.com/WiradjuriMob/
You Tube Channel:
https://www.youtube.com/channel/UCqQObJ3e8u_WoV7N9xZ2JzA
Ph 0412 693 030

REGIONAL Tourism Awards

COUNTRY & OUTBACK AND RIVERINA MURRAY
GOLD 2019
Aboriginal & Torres Strait Islander Tourism

I respectfully acknowledge the traditional custodians of my land "The Wiradjuri people"

RAP Responses to Draft ACHAR

No responses were received from the project RAPs during the 28-day ACHAR review period.

Appendix B - ELA AHIMS Search (2020)

Office of Environment & Heritage
NSW GOVERNMENT

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 15523
Client Service ID : 506767

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
55-6-0041	ABP/NSW 5	AGD	55	492840	6020080	Open site	Valid	Artefact : 4		
	Contact	Recorders	Joanne Bell					Permits		
55-6-0042	ABP/NSW 6	AGD	55	492800	6020120	Open site	Valid	Artefact : 1		
	Contact	Recorders	Joanne Bell					Permits		
55-6-0068	mod tree 5	AGD	55	498375	6021408	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	Contact T Russell	Recorders	Mr.Graham Moore					Permits		
55-6-0073	Sargent Rd - mm7	GDA	55	498413	6020640	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	Contact T Russell	Recorders	Mr.Michael Mulvaney					Permits		
55-6-0098	Drumwoord Road Test Ex	GDA	55	490400	6021900	Open site	Valid	Artefact : 10		46,103621
	Contact	Recorders	Mr.Oliver Brown					Permits	3918	
55-6-0008	Jindera;	AGD	55	494382	6019229	Open site	Valid	Artefact : -	Open Camp Site	54
	Contact	Recorders	ASRSYS					Permits		
55-6-0034	BP 1 (Howlong)	AGD	55	494400	6021520	Open site	Valid	Artefact : -	Open Camp Site	100576
	Contact	Recorders	Laura-Jane Smith					Permits		
55-6-0035	BP 2 (Howlong)	AGD	55	495950	6022250	Open site	Valid	Artefact : -	Open Camp Site	100576
	Contact	Recorders	Laura-Jane Smith					Permits		
55-6-0036	BP 3 (Holwong)	AGD	55	495700	6022300	Open site	Valid	Artefact : -	Open Camp Site	100576
	Contact	Recorders	Laura-Jane Smith					Permits		
55-6-0003	Jindera;	AGD	55	489701	6021192	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	276,363
	Contact	Recorders	ASRSYS					Permits		
55-6-0004	Jindera;	AGD	55	492885	6022687	Open site	Valid	Artefact : -	Open Camp Site	54,276
	Contact	Recorders	ASRSYS					Permits		
55-6-0005	Jindera;	AGD	55	493809	6021691	Open site	Valid	Artefact : -	Open Camp Site	54
	Contact	Recorders	ASRSYS					Permits		
55-6-0006	Jindera;	AGD	55	494358	6021606	Open site	Valid	Artefact : -	Open Camp Site	54
	Contact	Recorders	ASRSYS					Permits		
55-6-0007	Jindera;	AGD	55	494382	6019229	Open site	Valid	Artefact : -	Open Camp Site	54
	Contact	Recorders	ASRSYS					Permits		
55-6-0091	Sargent Rd 2	GDA	55	498377	6020714	Open site	Valid	Modified Tree (Carved or Scarred) : -		

Report generated by AHIMS Web Service on 20/05/2020 for Daniel Claggett for the following area at Datum :GDA, Zone : 55, Eastings : 487000 - 498000, Northings : 6020000 - 6029000 with a Buffer of 1000 meters. Additional Info : EIS. Number of Aboriginal sites and Aboriginal objects found is 47

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 15523

Client Service ID : 506767

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
	Contact	Recorders	Office of Environment & Heritage					Permits		
55-6-0111	Glenellen SF Survey Unit 2/Locale 1	GDA	55	491191	6023855	Open site	Valid	Artefact : -		
	Contact	Recorders	Doctor.Julie Dibden,NSW Archaeology Pty Ltd					Permits		
55-6-0112	Glenellen SF Survey Unit 2/Locale 3	GDA	55	491203	6023961	Open site	Valid	Artefact : -		
	Contact	Recorders	Doctor.Julie Dibden,NSW Archaeology Pty Ltd					Permits		
55-6-0113	Glenellen SF Survey Unit 2/Locale 2	GDA	55	491171	6023918	Open site	Valid	Artefact : -		
	Contact	Recorders	Doctor.Julie Dibden,NSW Archaeology Pty Ltd					Permits		
55-6-0129	Jindera 487613	GDA	55	487613	6026809	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Mark Saddler					Permits		
55-6-0114	Jindera 487530	GDA	55	487529	6025742	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,Mr.Mark Saddler,NGH Heritage - Fyshwick					Permits		
55-6-0115	Jindera 488918	GDA	55	488918	6025967	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	Contact	Recorders	Mr.Mark Saddler					Permits		
55-6-0116	Jindera 488995	GDA	55	488995	6025387	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	Contact	Recorders	Mr.Mark Saddler					Permits		
55-6-0117	Jindera 488942	GDA	55	488942	6025519	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,Mr.Mark Saddler,NGH Heritage - Fyshwick					Permits		
55-6-0118	Jindera 487666	GDA	55	487566	6025996	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,Mr.Mark Saddler,NGH Heritage - Fyshwick					Permits		
55-6-0119	Jindera 487828	GDA	55	487828	6025972	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Mark Saddler					Permits		
55-6-0120	Jindera 487973	GDA	55	488040	6025952	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,Mr.Mark Saddler,NGH Heritage - Fyshwick					Permits		
55-6-0121	Jindera 488172	GDA	55	488140	6026065	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,Mr.Mark Saddler,NGH Heritage - Fyshwick					Permits		
55-6-0122	Jindera 488179	GDA	55	488149	6026428	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,Mr.Mark Saddler,NGH Heritage - Fyshwick					Permits		
55-6-0123	Jindera 488004	GDA	55	488004	6026417	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Mark Saddler					Permits		
55-6-0124	Jindera 487595	GDA	55	487595	6026504	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Mark Saddler					Permits		
55-6-0125	Jindera 488212 duplicate of 55-6-0126	GDA	55	488150	6027345	Open site	Valid	Artefact : -		

Report generated by AHIMS Web Service on 20/05/2020 for Daniel Claggett for the following area at Datum :GDA, Zone : 55, Eastings : 487000 - 498000, Northings : 6020000 - 6029000 with a Buffer of 1000 meters. Additional Info : EIS. Number of Aboriginal sites and Aboriginal objects found is 47

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 15523

Client Service ID : 506767

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
	Contact	Recorders	Mr.Matthew Barber,Mr.Matthew Barber,Mr.Mark Saddler,NGH Heritage - Fyshwick					Permits		
55-6-0126	Jindera 488156 duplicate of 55-6-0125	GDA	55	488156	6027395	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Mark Saddler					Permits		
55-6-0142	Jindera Scarred Tree	GDA	55	489213	6020956	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	Contact	Recorders	Mr.Kyle Moffitt					Permits		
55-6-0149	Jindera Solar IF 1	GDA	55	488031	6025567	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0150	Jindera Solar IF 2	GDA	55	489344	6025566	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0151	Jindera Solar IF 3	GDA	55	491009	6025760	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0152	Jindera Solar IF 4	GDA	55	488592	6026169	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0153	Jindera Solar IF 5	GDA	55	488565	6026351	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0154	Jindera Solar IF 6	GDA	55	488225	6026223	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0155	Jindera Solar IF 7	GDA	55	488116	6026227	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0156	Jindera Solar IF 8	GDA	55	487656	6025679	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0157	Jindera Solar IF 9	GDA	55	487601	6026201	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0158	Jindera Solar IF 10	GDA	55	487943	6026509	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0159	Jindera Solar IF 11	GDA	55	487659	6027137	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0160	Jindera Solar AFT 2	GDA	55	488124	6025390	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0161	Jindera Solar AFT 3	GDA	55	488001	6025549	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
55-6-0162	Jindera Solar AFT 1	GDA	55	487948	6026853	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		

Report generated by AHIMS Web Service on 20/05/2020 for Daniel Claggett for the following area at Datum :GDA, Zone : 55, Eastings : 487000 - 498000, Northings : 6020000 - 6029000 with a Buffer of 1000 meters. Additional Info : EIS. Number of Aboriginal sites and Aboriginal objects found is 47

Appendix C - Community Collection Methodology, Glenellen Solar Farm

The Registered Aboriginal Parties (RAPs) will be provided with an opportunity to collect Aboriginal objects within the land illustrated in **Figure 1** in accordance with the conditions issued by the Minister in their determination of this ACHA. As a means of mitigation, Raps will be invited to participate in community collection of artefacts for the following Aboriginal sites:

AHIMS ID	**Site Name**
55-6-0111	Glenellen SF Survey Unit 2/Locale 1
55-6-0112	Glenellen SF Survey Unit 2/Locale 3
55-6-0113	Glenellen SF Survey Unit 2/Locale 2

The Community Collection will proceed in accordance with the following methodology:

1. The location of each Aboriginal object will be recorded by a GPS or Total Station and each Aboriginal object will be individually bagged for cataloguing.
2. The attributes of each Aboriginal object collected will be recorded as specified in the AHIMS Feature Recording Form and Feature Recording Table – Artefact.
3. Aboriginal objects will be bagged, labelled and catalogued in accordance with Requirement 26 of the DECCW (2010) *Code of Practice for archaeological investigation of Aboriginal objects in NSW*.
4. Completed AHIMS site impact forms will be submitted to AHIMS for each site subject to Community Collection within 4 months of the completion of the collection.
5. Artefact repatriation / reburial of the Aboriginal objects collected in the field will be undertaken in an area that will not be impacted by the proposed works, as recommended by Requirement 16b of the *Code of Practice for archaeological investigation of Aboriginal objects in NSW.* The exact location that the reburial will take place in will be determined in consultation with the proponent and the Registered Aboriginal Parties, in order to ensure reburial in an area that will not be subject to ground impacts by the proposed works.

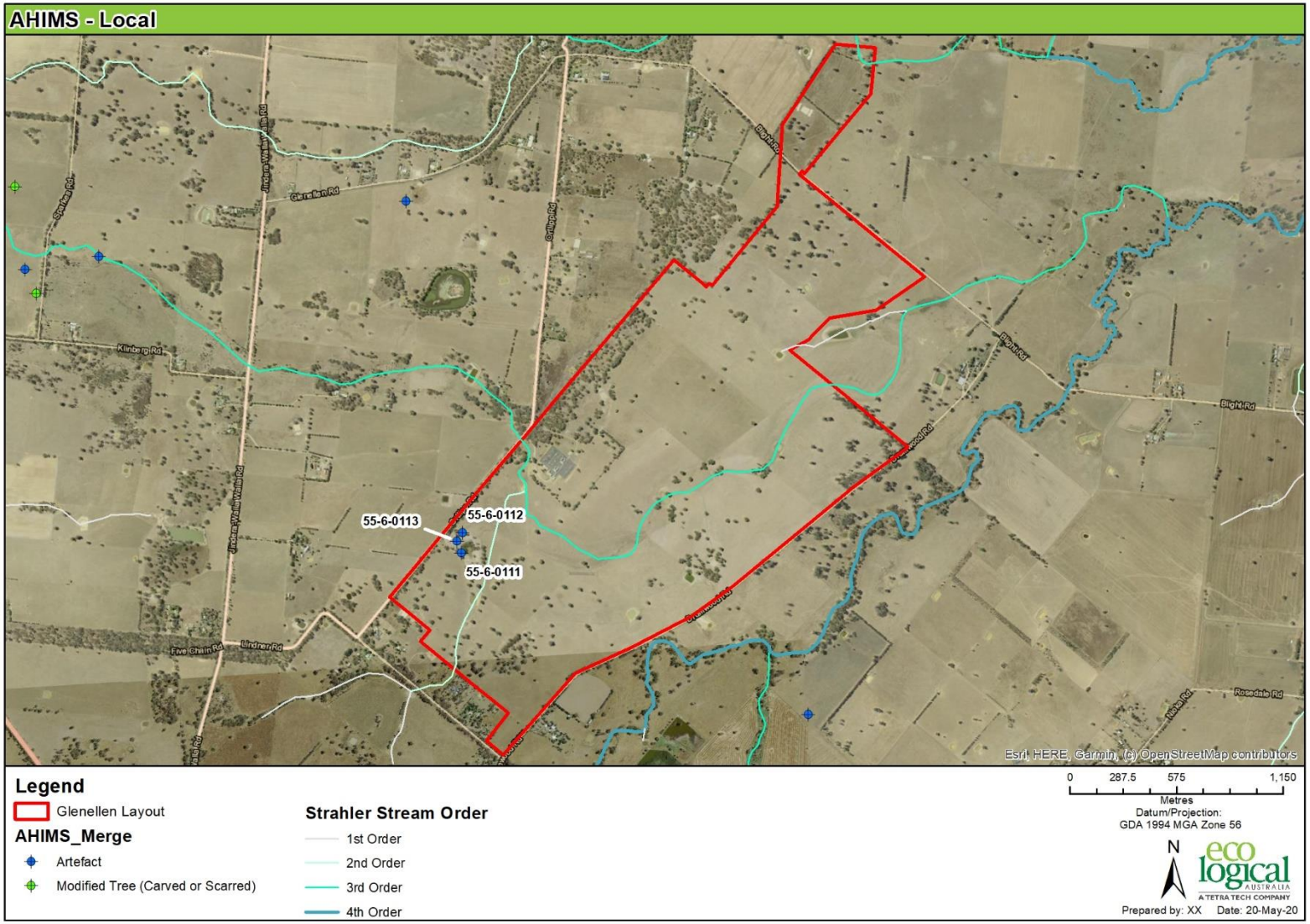


Figure 1: The southern portion of the study area, highlighting the sites recommended for community collection