



Our ref: DOC20/450469

Your ref: SSD8703

Natasha Homsey,
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Dear Ms Homsey,

Subject: Springdale Solar Farm Response to Submissions Report -

Biodiversity Conservation Division (BCD) have reviewed the Response to Submissions report and provide comments on the biodiversity and Aboriginal cultural heritage assessments. Please note this advice does not contain the Matters National Environmental Significance (MNES) assessment.

Review of the Biodiversity Development Assessment Report (BDAR)

The key biodiversity concerns raised in our previous correspondence have all been addressed in the revised BDAR. These concerns were in relation to:

1. Shading of Golden Sun Moth Habitat (GSM) as a result of the landscape plan
 - o BCD agrees with the assumption that shading impacts are directly proportional to the vertical height of adjacent vegetation, at a 1:1 ratio, given the evidence available. BCD is therefore satisfied that the minimum 15 m screen planting offset which has been applied regardless of the direction to the GSM habitat, will be sufficient to protect GSM habitat from the indirect impacts of shading.
2. Protection of remnant Superb Parrot habitat by retaining Hollow Bearing Trees (HBTs)
 - o The BDAR shows that solar array has been modified in the south eastern corner to ensure retention of Superb Parrot breeding habitat
3. Commitment to developing a Biodiversity Management Plan (BMP) to protect remnant Striped Legless Lizard (SLL) habitat
 - o BCD commends the Applicant for avoiding all SLL habitat. Additionally, the Applicant has committed to developing a Striped Legless Lizard management plan as a subplan to the BMP in consultation with BCD in Section 2.1.2 which will facilitate avoidance of impacts from the construction phase and address ongoing indirect impacts arising from weeds.

Attachment 1 details matters in the BDAR that require clarification or further information.

Aboriginal cultural heritage

As previously advised, our key concern is that the Aboriginal cultural heritage assessment in the EIS did not include test excavation and as a result there is insufficient understanding of the values that may be impacted by the project. As test excavations have still not been undertaken since

August 2018 the impacts to Aboriginal cultural heritage values remains unknown. Significant cultural values of the Springdale area have also been raised by Ngunawal and Ngambri Elders following the assessment.

Testing upfront was recommended because the ACHAR stated that what is on the surface is not indicative of subsurface potential. Testing would also inform the potential of the area and whether future salvage is required and would allow the proponent to redesign the array and any associated infrastructure to avoid any significant objects or sites.

Detailed comments regarding Aboriginal cultural heritage are outlined in Attachment 2.

Yours sincerely



Michael Saxon 18/6/2020

Director

South East, Biodiversity Conservation Division

Enclosure: Attachment 1 – Review of the revised Springdale BDAR; Attachment 2 – BCD comments on the Response to Submissions Report for Springdale Solar Farm and Aboriginal cultural heritage matters

Attachment 2 – BCD comments on the Response to Submissions Report for Springdale Solar Farm and Aboriginal cultural heritage matters

The key issues raised in our previous correspondence that have not been adequately addressed in the Response to Submissions Report (RTS) are:

Undertake subsurface archaeological test excavations prior to project approval

As previously advised we recommend that subsurface archaeological test excavation be undertaken across all areas that will be impacted by the solar farm, including ancillary infrastructure, prior to approval to inform the design of the solar farm.

AECOM acknowledged poor visibility occurred during the archaeological survey and in response stated within the 2018 assessment report that a program of archaeological test excavation was necessary to *“adequately characterise the Aboriginal archaeological record of the proposal site”*. We support this recommendation as test excavations contribute to the understanding of the Aboriginal cultural heritage values of the area and they inform both avoidance and harm mitigation measures for the proposed activity.

Given the time since the archaeological survey was undertaken - test excavations could have already been undertaken to identify constraints and help inform the footprint design. The proposed management and mitigation measures outlined in the RTS, such as leaving test excavations to post-approval, should not take the place of appropriate upfront assessment.

We note that Ngunawal and Ngambri Elders raised concerns about the impacts of the Springdale Solar Farm on cultural values in the area after the 2018 assessment was completed. Undertaking the test excavations prior to approval may assist in addressing these concerns in understanding the nature and extent of all cultural values in the area before impact occurs. We recommend the proposed management measures in Table 8.0 include a commitment to undertaking consultation with the Aboriginal community about the cultural significance of the Springdale area.

A subsurface archaeological salvage program should be conducted after subsurface test excavation has been completed

We note that the RTS makes several references to the archaeological salvage program. The mitigation measures proposed for Aboriginal cultural heritage outlined in Table 8.0 (page 143) needs to be updated to reflect that test excavations are a separate process to the proposed archaeological salvage program. Test excavation is part of an assessment process in order to determine the presence and significance of Aboriginal objects. The results of the test excavations, and a consideration of redesigning the footprint to avoid impacts, should determine whether surface and subsurface salvage is needed and how it should be carried out. Table 8.0 needs to include a commitment to considering the results of the testing before recommending salvage. It should not be assumed that salvage should automatically occur following test excavations.