

#59

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Our reference : DOC 08/44711
Contact : Contact Robert Taylor 68835 354

Dinuka McKenzie
Major Infrastructure Assessments
Department of Planning
GPO Box 39
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Dear Ms. McKenzie

Proposed Queensland – Hunter Gas Pipeline (Major Project Application: 06_0286)

I refer to the Project Application and accompanying information provided for the proposed Queensland Hunter Gas Pipeline received by the Department of Environment and Climate Change (DECC) on 18 September 2008. DECC notes that the Environmental Assessment (EA) is on public exhibition, and provides the following submission to the proposal. Please note that this advice is in addition to previous advice provided to the Department of Planning (DoP) on 19th June 2008.

DECC understands that the proponent is seeking a concept approval for the proposed pipeline and that consequently the EA does not contain a sufficiently detailed impact assessment for DECC to provide detailed comment on the likely environmental impacts at any particular locality.

Aboriginal Cultural Heritage

The Aboriginal cultural heritage assessment uses predictive modelling and locations of known sites to identify areas with differing levels of impact. It also indicates that oral histories will be collected so that culturally significant sites can be identified. Several high impact sites are identified where avoidance is committed to and a range of site types are listed where avoidance will occur through changing the location of the pipeline within the 200 m corridor. Survey of areas predicted to have a higher likelihood of containing these site types will be undertaken so that their location can be highlighted and hence avoidance then be adopted.

Some relevant past Archaeological studies (e.g those relating to mining developments in the Boggabri/Gunnedah basin) do not appear to have been considered in the predictive modelling. It is considered that the modelling could be improved significantly by a more comprehensive consideration of past work.

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The assessment raises the issue of cumulative impact of loss of many artefact scatters and proposes to undertake a strategic program of excavations across different landscape types so that a better understanding of the extent and patterning of this material and the extent of its loss from the development will be achieved. DECC understands that they would only to be situated within the 30 m impact zone. Given there would still be some disturbance of subsurface material above that expected from the development works themselves, it is important that there is support from the Aboriginal community.

The assessment so far has focused on Archaeological significance. DECC understands that the oral histories study will be undertaken and recommends that final details on protocols adopted in relation to avoidance, constraints and mitigation measures is informed by the oral histories. The mapping of sensitivity provided with the assessment contained no contextual details (e.g. towns, roads, woody vegetation, topography) and this information should be available for any future discussions with the community regarding constraints.

When final details are determined DECC encourages the proponent, wherever possible, to involve members of the relevant community in any on ground assessment, mitigation and monitoring, including moving objects out of the 30m construction corridor. Any sites identified during on ground assessment must be notified to DECC as a requirement under s91 of the NP&W Act.

Biodiversity

DECC notes that issues raised in the adequacy review and a subsequent meeting with Queensland – Hunter Gas Pipeline on 22 September 2008 have generally been addressed in the EA. The proposed management measures (including avoiding and mitigating impacts), offset strategy and Statement of Commitments adequately address most biodiversity issues raised by DECC.

Despite the avoidance and minimisation measures adopted by the proponent it appears inevitable that some clearing of vegetation and associated edge effects will lead to biodiversity losses and therefore offsets would be appropriate. DECC acknowledges that, as the exact route has not been determined, biodiversity loss cannot yet be quantified. The proposed detailed biodiversity offset strategy outlined in Chapter 9.6 of the EA should incorporate a methodology that enables use of available offsetting tools. The Biobanking calculator, while not compulsory, is an appropriate tool that could be used to inform quantification of offset requirements. This should involve minimal extra work for the proponent, simplify offset negotiations and is consistent with the further program of surveys that the proponent is committed to. Offset conservation areas should be amalgamated into nodes enabling offsetting of "like for like" and to reduce potential fragmentation of the areas set aside for conservation.

In outlining the route of the pipeline through the Newcastle area including Kooragang Island, Chapter 4.3.17 of the EA states that the final location of the pipeline will be, "guided by Kooragang Island Conservation Officers." It is unclear who is being referred to in this statement, but it would be appropriate that consultation about detailed route selection include DECC's Parks and Wildlife Group which manages a significant proportion of the land adjacent to the infrastructure corridor.

Pollution Control

The DECC letter dated 19 June 2008 highlighted a number of areas that will need to be considered in further detailed assessment provided as part of final project approval and/or consequent detailed design, final route selection and development of Construction Environmental Management Plans incorporating noise, vibration, blasting, air quality, protection of surface and groundwater quality.

As highlighted in the previous letter, the key issues will be avoiding/mitigating impacts around major water crossings, management of construction noise/ vibration and blast impacts, particularly in sensitive receptor locations within the identified major impact zones; and incorporating appropriately designed and maintained temporary and permanent sediment and erosion controls, including minimising as far as practicable the length of open trench at any one time.

Yours sincerely,


JOSHUA GILROY
Director North West Branch
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9.11.08