

# HUME HIGHWAY DUPLICATION STURT HIGHWAY TO HOLBROOK

## MODIFICATION REPORT YARRA YARRA TO HOLBROOK PROJECT APPROVAL 06\_0248

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## Abbreviations

DECC	NSW Department of Environment and Climate Change (formerly the Department of Environment and Conservation, incorporating the Department of Natural Resources)
DoP	NSW Department of Planning (formerly the Department of Infrastructure, Planning and Natural Resources)
EA	Environmental Assessment
KNC	Kelleher Nightingale Consulting
MCoA	Minister's Conditions of Approval
NHA	Northern Hume Alliance
NSW	New South Wales
RTA	NSW Roads and Traffic Authority
SoC	Statement of Commitments

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# 1 Introduction

## 1.1 Background

The Roads Traffic Authority of NSW (RTA) have Department of Planning Approval to duplicate five sections of the Hume Highway between its junction with the Sturt Highway to the north of Albury (the Hume Highway Duplication). The Northern Hume Alliance (NHA) have been appointed by the RTA to design and construct the four northern sections:

- Sturt Highway to Tarcutta (N1)
- Kyeamba Hill (N2)
- Little Billabong (N3)
- Yarra Yarra to Holbrook (N4)

The existing two-lane single carriageway will be upgraded to four lane dual carriageway. This report refers to Approved Project Yarra Yarra to Holbrook (06\_0248). Yarra Yarra to Holbrook involves the duplication of the single carriageway 98 kilometres south of Gundagai to approximately 110 kilometres south of Gundagai (the Approved Project). A site location plan is provided as **Figure 1**.

The Approved Project was the subject of Environmental Assessment (EA) prepared in accordance with the process and requirements of Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act), which detailed the environmental issues associated with the proposal, including mitigation measures to address potential impacts. On 10 October 2006 the Director- General's requirements were issued in respect to the proposal pursuant to Section 75F of the EP&A Act. The project was approved by the Minister for Planning on 29 August 2007.

This Modification Report identifies two changes to alignment and resultant increased environmental impacts that were not addressed in the Concept Approval (06\_0314) or the Environmental Assessment (06\_0248) for the Yarra Yarra to Holbrook duplication project. These changes are:

- Design development around chainage 108700 has resulted in a new impact on artefact scatter YY15.
- Chainage 101100 – 101400. Development of north bound bridge design has resulted in impacts on non-Aboriginal heritage items H103 (track/ scatter), H104 (bridge), H105 (track) and H204 (road remnant). The Approved Project design

These changes in alignment are generally consistent with the overall Hume Highway Duplication Project(s) and if approved under Part 3a (75W) of the EP&A Act are permissible within the relevant land use zonings.

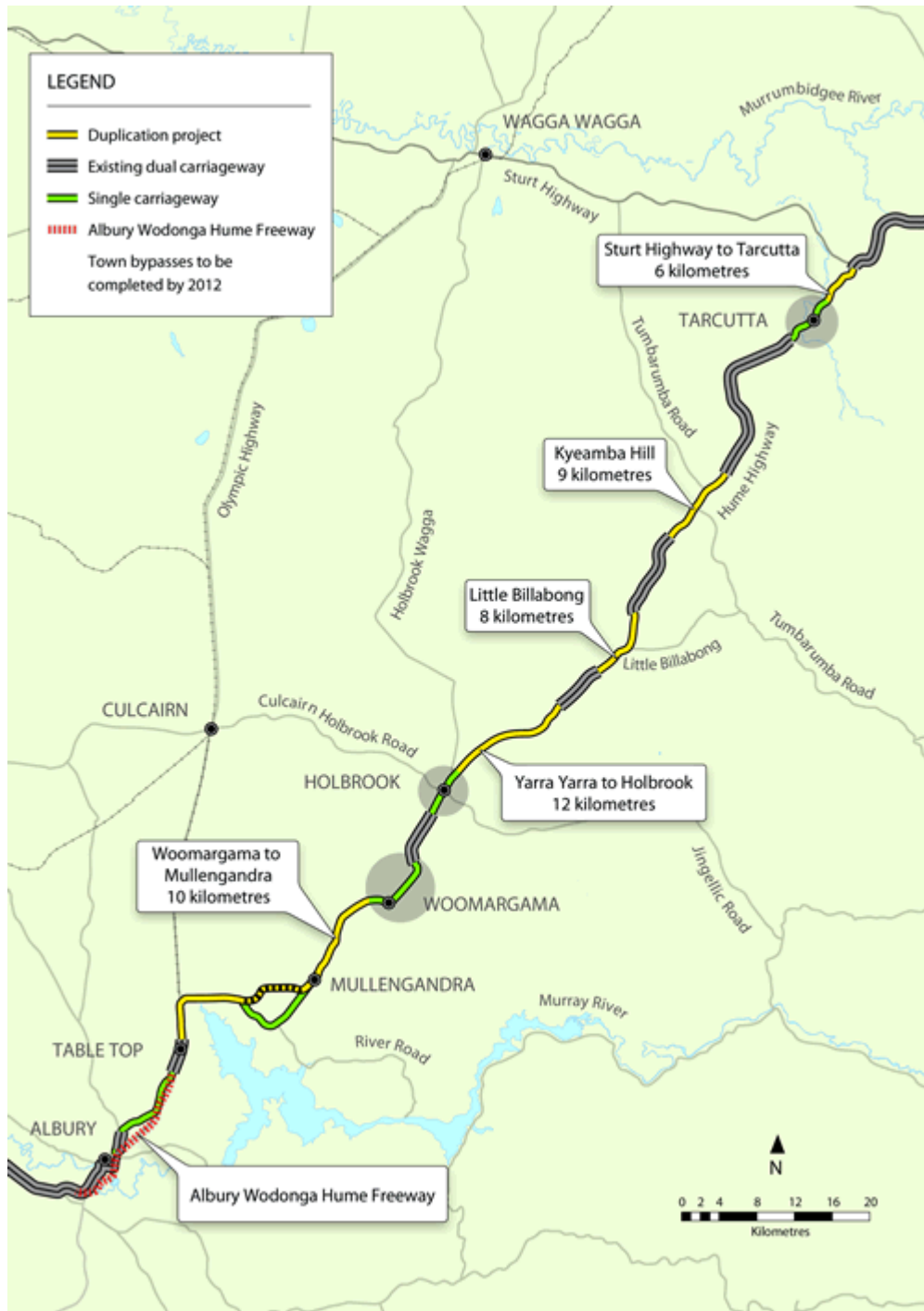


Figure 1 - Hume Highway Duplication Project

## 1.2 Purpose and Objective of the Modification Report

Following approval of the project, the Northern Hume Alliance (on behalf of the RTA) have gone through a process of detailed design development.

NHA have carried out a consistency assessment (see **Appendix A**) to assess the consistency of the NHA alignment with the Approved N4 Project.

This report identifies previously unidentified impacts on Aboriginal and non-Aboriginal heritage items due to changes in design. These impacts were assessed for consistency and are considered to be inconsistent with the Minister's Conditions of Approval and Statement of Commitments.

The current alignment results in a new impact on one Aboriginal site (artefact scatter) YY15 and four non-Aboriginal sites identified in the Environmental Assessment as H103 – track/scatter, H104 – bridge, H105 – track and H204 – road remnant.

This report relates specifically to the changes in road alignment that have resulted in new impacts on heritage.

Section 75W of the EP&A Act regulates the modification of an approval for a project under Part 3A. It provides that the proponent may request the Minister for Planning to modify a project approval where the proponent intends to modify the project so that it would be inconsistent with that approval. This report has been prepared as supporting documentation for that application.

The request for the Minister for Planning's approval is to be lodged with the Director-General of the Department of Planning. The Director-General may notify the proponent of EA requirements with respect to the Proposed Modification. The objectives of this report are to:

- Assess the environmental impacts of the proposed modification to the satisfaction of the Director General of the Department of Planning
- Comply with all statutory requirements.

The Minister may modify the approval (with or without conditions) or disapprove of the modification, in accordance with Section 75W(4) of the EP&A Act.

## **2 Description of the Approved N4 Project**

The primary objective of the Approved Project is to duplicate the existing single carriageway sections of the Highway at Yarra Yarra to Holbrook. It is located within the Greater Hume Shire local government area on the Hume Highway approximately 98 kilometres south of Gundagai to approximately 110 kilometres south of Gundagai.

The Hume Highway is a route of strategic national significance serving intrastate and interstate users, and is the main road transport corridor linking Sydney and Melbourne. The limitations of the existing highway in providing an efficient, integrated and safe transport link has led the Australian government to include the Hume Highway Duplication as part of the AusLink Program.

The Approved project would primarily involve the construction of a second carriageway to provide dual carriageway conditions between Stations (Stn) 98300 and 109660 south of Gundagai. In general the existing highway would be retained as the new two lane northbound carriageway, and the Proposal would be constructed on the eastern side of the existing highway and form the new two lane southbound carriageway. Three portions however of the existing highway will be fully upgraded as part of the north bound carriageway works.

The work would begin approximately 2.1 kilometres north of the intersection with Mirrabooka (Stn 100400) and finish with a connection to the future Holbrook Bypass proposal (Stn 109600).

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### **3 Description and Justification of Changed Alignment**

The detailed design of the Highway duplication has taken into account a range of design parameters not fully considered in the RTA concept design, as the Approved Project design was in early stages of development. Design development has incorporated elements such as alignment, batter slopes, geometry, drainage, property access and other requirements. Together these elements of detailed design development have resulted in a somewhat changed alignment design to the Yarra Yarra to Holbrook Project.

The impact of the alignment change is an increase in the construction footprint resulting in additional environmental impacts around Aboriginal heritage site YY15 and non-Aboriginal heritage sites H103, H104, H105 and H204.

Total avoidance of impacts on these items was not possible due to the geometric design requirements necessary to achieve a safe operating highway (to current RTA road safety design standards) whilst also minimising environmental impacts throughout the adjoining areas of the road corridor. The dispersed nature of Aboriginal and non Aboriginal sites located along the Hume Highway, as well as safety and other environmental considerations, makes avoidance of these items difficult.

At YY15, impact changes are due to standard design development. The Approved Project alignment design had two standalone cut and fill elements for the new south bound and north bound upgrade at Chainage 107300 and 108700. NHA has consolidated these into a single large cut and associated fills which has reduced impacts on Box-Gum Woodland. The Approved Project batter geometry also hadn't been fully developed and design development of batter geometries has increased the impacts on YY15.

The impacts on H103, H104, H105 and H204 are the result of the upgrade of the north bound bridge over Yarra Yarra Creek. The RTA concept had no design for the north bound bridge. A new bridge was required to replace the current substandard bridge and provide geometric improvement on the approach and departure of the new bridge, predominantly for road safety and to meet design standards.



## 4 Assessment of Consistency with Approved Project

### 4.1 Review of the Conditions of Approval

**Appendix A** provides a review of the changed alignment against the Minister's Condition's of Approval and Final Statement of Commitments for the Approved Project (Concept Approval (06\_0314) and Yarra Yarra to Holbrook (06\_0248)). The following table addresses the Minister's Conditions of Approval (MCoA) and Statement of Commitments (SoCs) where the changed alignment was determined to be inconsistent with the Approved Project.

**Table 1: Consistency of Changed Alignment with MCoA's and SoC's**

Condition of Approval	Comment
<b>McoA – Yarra Yarra to Holbrook (06_0248)</b>	
<b>Aboriginal Heritage</b> 2.7 - The Proponent shall salvage, through surface collection, identified artefacts from sites YY8, YY9, YY10, YY13, YY16 and YY18 in consultation with the DECC and the relevant Aboriginal stakeholders prior to the commencement of construction works that may impact on this site.	<p>The revised design does present a new impact on Aboriginal heritage, at YY15, which was not identified in the MCoA.</p> <p>The proposed mitigation measure for YY15 is salvage through surface collection. This mitigation measure has been developed in consultation with DECC and Aboriginal stakeholders in accordance with the RTA Aboriginal Cultural Heritage Report (ACHR).</p>
2.11 - Prior to the commencement of construction work in proximity to the following items, the Proponent shall complete all excavations and/or archival recordings, including photographic records, for H006, H007, H008, H202, H203, H302, H303, H305, H304 and H306. This shall be undertaken and completed in accordance with the guidelines issued by the Heritage Council of NSW. The areas containing these items shall be	<p>All archival recording has been complete for items H006, H007, H008, H202, H203, H302, H303, H305, H304 and H306.</p> <p>The changed road alignment has resulted in new impacts on H104 – bridge, H105 – track, and H204 – road remnant and the proposed mitigation is for archival recording. The</p>

Condition of Approval	Comment
<p>clearly identified and fenced until the completion of the archaeological excavations and/or archival recordings.</p> <p>Any excavation work required for these items shall be overseen by a suitably qualified archaeologist and in accordance with the research design and archaeological excavation methodology that have been developed in consultation with the NSW Heritage Office prior to commencing any archaeological excavation. The Construction Heritage Management Plan required by this approval shall be suitably updated to incorporate the mitigation and management measures associated with the excavation works.</p> <p>Within six months of completing the above work, the Proponent shall submit a report on findings of the excavations and archival recordings to the Heritage Council of NSW, the local Council and the local Historic Society. This report shall nominate an agreed repository for the relics salvaged from any excavations along the proposed corridor.</p>	<p>NSW Heritage Office have reviewed the proposed changes in impacts and mitigation measures and have raised no objections to the proposed changes on heritage grounds.</p> <p>The revised design also presents a new impact on H103 (track scatter), which was not identified in the MCoA. This site was part of specific heritage investigations into H009 (Garryowen) due to the relationship between the items. As a result of research, the recommendation for item H103 is for the presence of a qualified archaeologist during initial ground breaking activities. This mitigation has been developed in consultation with the Heritage Office in accordance with the MCoA, see <b>Appendix F</b>. The RTA</p>
Statement of Commitment	
Aboriginal Heritage	
<p>AH2 - Test excavation will be undertaken for the following Aboriginal heritage items: T-PAD-I, K3, K10, K-PAD-6, K-PAD-8, K-PAD-9, LB3, LB4, LB-PAD-3, YY7, YY14, YY17, M-PAD-I, M-PAD-3 and LB-PAD-1 and LB-3 (if impacted) and any additional management and mitigation measures will be developed in consultation with Aboriginal stakeholders and DECC.</p>	<p>This commitment does not have provisions for new impacts on YY15. Please refer to comment above for MCoA 2.7 for further details on impacts and proposed mitigation.</p> <p>Mitigation measures have been developed in consultation with DECC and Aboriginal Stakeholders, consistent with the approach outlined in SoC AH1.</p>

## **4.2 Consistency**

The consistency assessment (**Appendix A**) determined that the changes to the design of the Yarra Yarra to Holbrook Project are generally considered to be consistent with the objectives and function of the Hume Highway Duplication Project, as approved by the Minister for Planning (Yarra Yarra to Holbrook (06\_0248)). The proposed design changes are also considered to be generally consistent with the objectives, functions and Conditions of Approval of the Concept Approval (06\_0314).

The resulting environmental impacts of the proposed alignment (resulting from design development) are however considered to be inconsistent with those identified in the Environmental Assessment – Yarra Yarra to Holbrook (Connell Wagner and Parsons Brinkerhoff, 2007), the revised Statement of Commitments and the Minister's Conditions of Approval (Yarra Yarra to Holbrook) for particular impacts on heritage.

As such, the changes in Yarra Yarra to Holbrook alignment design are considered to be inconsistent with the Approved Project (Yarra Yarra to Holbrook), and a request to modify the Approved Project is sought from the Minister of Planning in accordance with Section 75W of the EP&A Act.

## 5 ENVIRONMENTAL ASSESSMENT

### 5.1 Aboriginal Heritage

#### 5.1.1 Impacts of the Approved Project

The Aboriginal survey carried out for the EA identified 19 sites (including scar trees, artefact scatters and isolated finds) within the study area of Yarra Yarra to Holbrook. Site types found within the study area are associated with former high density Aboriginal occupation, deposition along creek lines and remnant old growth trees. Artefact scatters are found where the study area is in proximity to creek lines. Of the 19 sites identified, nine sites (artefact scatters and isolated finds) were to be impacted by the Approved Project, as per the MCoA (Yarra Yarra to Holbrook) 2.7 and 2.8.

#### 5.1.2 Impacts of the Changed Project

The changed alignment at chainage 108700 results in an additional impact upon one site (artefact scatter) YY15. The changed alignment would not decrease any impacts to any affected Aboriginal heritage items.

**Table 2:** Aboriginal Heritage Sites – N4 - Consistency with Approved Project

Site no.	Description	Significance	Approved Project Impact	Impact Consistent with Approved Project
YY1	Artefact Scatter	High	No Impact	Yes
YY2	Isolated Find	Moderate to High	No Impact	Yes
YY3	Artefact Scatter	Moderate	No Impact	Yes
YY4	Scarred Tree	Moderate to High	No Impact	Yes
YY5	Scarred Tree	Moderate to High	No Impact	Yes
YY6	Scarred Tree	Moderate to High	No Impact	Yes
YY7	Artefact Scatter	Moderate to High	Will be impacted	Yes
YY8	Artefact Scatter	Moderate	Will be impacted	Yes
YY9	Isolated Find	Low to Moderate	Will be impacted	Yes
YY10	Isolated Find	Low to Moderate	Will be impacted	Yes
YY11	Scarred Tree	Moderate to High	No impact	Yes
YY12	Scarred Tree	Moderate to High	No impact	Yes
YY13	Isolated Find	Low to Moderate	Will be impacted	Yes
YY14	Artefact Scatter	High	Will be impacted	Yes
YY15	Artefact Scatter	Moderate	No impact	<b>No</b>
YY16	Artefact Scatter	Moderate	Will be impacted	Yes
YY17	Artefact Scatter	High	Will be impacted	Yes
YY18	Artefact Scatter	Moderate to High	Will be impacted	Yes
YY19	Scarred Tree	Moderate to High	No impact	Yes

### 5.1.3 Mitigation strategy

Prior to construction commencing in proximity to YY15, salvage through surface collection is required. This mitigation measure was developed in consultation with the Project Archaeologist, DECC and Aboriginal stakeholders.

Salvage will be undertaken in accordance with the Construction Heritage Management Plan as required by the Minister's Conditions of Approval. Salvage would be undertaken in accordance with the methodology described in Appendix C of the *Hume Highway Upgrade Duplication Project; Aboriginal Cultural Heritage Report - Test Excavations Results, Assessment and Management Measures* (RTA July 2007).

No additional archaeological work is recommended for any other archaeological sites or features within the N4 section.

## 5.2 Non-Aboriginal Heritage

### 5.2.1 Impacts of the Approved Project

The non-Aboriginal survey carried out for the EA identified 31 sites (including those of archaeological, built and landscape heritage) within the study area at Yarra Yarra to Holbrook. Of these 31 sites, 12 would be impacted by the Approved Project. .

### 5.2.2 Impacts of the Changed Project

The changed alignment results in an additional impact upon four sites; H103, H104, H105 and H204 between chainages 101100 – 101400, as the result of the north bound bridge. The changed alignment would not decrease any impacts to any affected non-Aboriginal heritage items.

**Table 3:** Non-Aboriginal Heritage Sites – N4 - Consistency with Approved Project

Site no.	Description	Significance	Approved Project Impact	Impact Consistent with Approved Project
H001	Structural remains	Local	Nil	Yes
H002	Earthen farm dam (stream feeder)	Local	Nil	Yes
H003	Artefact scatter	Local (potential State)	Direct	Yes
H004	Earthen farm dam	Local	Nil	Yes
H005	Earthen farm dam	Local	Nil	Yes
H006	Earthen farm dam	Local	Direct	Yes
H007	Earthen farm dam	Local	Direct	Yes
H008	Earthen farm dam	Local	Direct	Yes
H009	Platform scar	Local (potential state)	Direct	Yes
H100	Track	Local	Nil	Yes
H101	Artefact scatter	Nil (visible)	Nil	Yes
H102	Track	Local (potential state)	Nil	Yes

<b>H103</b>	Track/scatter	Local (potential state)	Nil	<b>No</b>
<b>H104</b>	Bridge	Local	Nil	<b>No</b>
<b>H105</b>	Track	Nil	Nil	<b>No</b>
<b>H107</b>	Earthen farm dam	Local	Nil	Yes
<b>H109</b>	Earthen farm dam	Local	Nil	Yes
<b>H110</b>	Earthen farm dam	Local	Nil	Yes
<b>H111</b>	Earthen farm dam	Local	Nil	Yes
<b>H112</b>	Earthen farm dam	Local	Nil	Yes
<b>H201</b>	Stockyard	Local	Minimal	Yes
<b>H202</b>	'Beenley' property	Local	Moderate	Yes
<b>H203</b>	Road remnant	Local	High	Yes
<b>H204</b>	Road remnant	Local	Minimal	<b>No</b>
<b>H301</b>	Roadside planting	Local	Minimal	Yes
<b>H302</b>	Plane trees	Local	Moderate	Yes
<b>H303</b>	Poplars	Local	Moderate	Yes
<b>H304</b>	Cultural planting	Local	High	Yes
<b>H305</b>	Locust trees	Local	Moderate	Yes
<b>H306</b>	Deciduous trees	Local	Moderate	Yes
<b>H307</b>	Orchard pear trees	Local	Minimal	Yes

### 5.2.3 Mitigation strategy

Items H104, H105 and H204 are of local significance. The proposed measure to mitigate the impacts on these sites is for archival recording prior to commencement of construction work in proximity to the items. Archival recording has been complete for these items. The Heritage Office have reviewed the proposed changes in impacts and have raised no concerns or objections based on heritage grounds (refer to **Appendix F**)

Site specific research has been carried out for H103 (as part of the research into H009 – 'Garryowen'). The research indicated that there was very little evidence that Garryowen existed as a functioning village, beyond the gazettal of the township. The research design and excavation methodology for these items is currently with the Heritage Office for review, as per MCoA 2.10.

The proposed mitigation for this site is for the presence of a suitably qualified archaeologist during the initial groundbreaking activities. The RTA Archaeology and Heritage Adviser has discussed this proposal with Senior Archaeologist, Heritage Office, who raised no objection. See **Appendix F** for evidence on Heritage Office consultation regarding this proposal.

## 6 ENVIRONMENTAL SAFEGUARDS

The NHA propose that the Conditions of Approval that apply to the Approved Project will also apply to the changed alignment. It is submitted that the Conditions of Approval are for the most part comprehensive, and would be adequate to manage the change of location, magnitude and extent of potential adverse environmental impacts that could be caused by the proposed changes to the Approved Project. Minor amendments to the Conditions of Approval should be considered in relation to new impacts on Aboriginal and non-Aboriginal heritage caused by the proposed changes, as outlined below.

**Table 2: Proposed Amendment to Minister’s Conditions of Approval**

MCoA Approved Project	Proposed amendment to MCoA
<p><b>Aboriginal Heritage</b></p> <p>2.7- The Proponent shall salvage, through surface collection, identified artefacts from sites YY8, YY9, YY10, YY13, YY16 and YY18 in consultation with the DECC and the relevant Aboriginal stakeholders prior to the commencement of construction works that may impact on this site.</p>	<p>YY15 should be added as a site to MCoA 2.7. Salvage through surface collection to be included as a proposed mitigation.</p>
<p><b>Non-Aboriginal Heritage</b></p> <p>2.10 - Prior to the commencement of construction, the Proponent shall complete site specific heritage investigations for Site H003 and Site H009 and shall investigate the options to avoid or minimise the impacts on this site in the final design of the alignment.</p> <p>Should excavation and/or archival recordings be required for this site as a result of the investigation, the Proponent shall undertake these works in the same manner as required by condition 2.11 of this approval.</p> <p>2.11 - Prior to the commencement of construction work in proximity to the following items, the Proponent shall complete all excavations and/or archival recordings, including photographic records, for H006, H007, H008, H202, H203, H302, H303, H305, H304 and H306. This shall be undertaken and completed in accordance with the guidelines issued</p>	<p>H103 should be added to MCoA 2.10. The presence of a qualified archaeologist during groundbreaking activities to be included as a proposed mitigation.</p> <p>H104, H105 and H204 should be added to MCoA 2.11. Archival recording should be included as proposed mitigation.</p>



<p>by the Heritage Council of NSW. The areas containing these items shall be clearly identified and fenced until the completion of the archaeological excavations and/or archival recordings.</p> <p>Any excavation work required for these items shall be overseen by a suitably qualified archaeologist and in accordance with the research design and archaeological excavation methodology that have been developed in consultation with the NSW Heritage Office prior to commencing any archaeological excavation. The Construction Heritage Management Plan required by this approval shall be suitably updated to incorporate the mitigation and management measures associated with the excavation works.</p> <p>Within six months of completing the above work, the Proponent shall submit a report on findings of the excavations and archival recordings to the Heritage Council of NSW, the local Council and the local Historic Society. This report shall nominate an agreed repository for the relics salvaged from any excavations along the proposed corridor.</p>	
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The changed alignment would be carried out in accordance with the Conditions of Approval granted for the Concept Approval (06\_0314); the *Hume Highway Duplication Concept Plan, Sturt Highway to Tarcutta, Kyeamba Hill and Little Billabong Environmental Assessments - Submissions Report and Revised Statement of Commitments* and the *Yarra Yarra to Holbrook – Hume Highway Duplication - Environmental Assessment* (Connell Wagner and Parsons Brinkerhoff, 2007). The proposed additional environmental safeguards specific to the proposed changes are shown in **Table 3**.

**Table 3: Proposed Amendment to Statement of Commitments**

Objective	Commitment	Timing
<b>Aboriginal Heritage</b>		
Minimise impact on Aboriginal heritage items	Prior to construction commencing in proximity to YY15, salvage through surface collection would be required in accordance with the Construction Heritage Management Plan	Pre-Construction



## 7 CONSULTATION

### 7.1 Consultation with Stakeholders

The Northern Hume Alliance (on behalf of the RTA) has consulted the relevant regulatory agencies / stakeholders prior to completing this document in order to identify any specific issues they may have with the proposed changes.

DECC were given the opportunity to comment on the proposed mitigation and raised no concerns. Consultation with Aboriginal Stakeholders was carried out as per the NHA Aboriginal Heritage Management Plan (developed to meet MCoA 4.2 (b) (ii)). Stakeholders registered to the Project were advised of the impact via telephone. All stakeholders, including those contacted by telephone, were provided with a report detailing the proposed impacts and mitigation measures, and were given the opportunity to provide comment. No issues or objections were raised.

The Heritage Office was also provided an opportunity to comment on the proposed changes in impacts and mitigation measures and raised no concerns.

**A summary of the consultation undertaken as part of this report preparation is provided in Error! Reference source not found..**

**Table 6: Summary of Consultation**

Summary of Issues	Report Reference
<b>NSW Department of Environment and Climate Change</b>	
No issues were raised. DECC endorse the proposed mitigation of a surface collection at YY15.	<b>Section 5.1.3, Appendix C</b>
<b>Aboriginal Stakeholders</b>	
No issues were raised.	<b>Appendix D</b>
<b>Department of Primary Industries</b>	
DPI were consulted regarding the overall bridge design at Yarra Yarra bridge. DPI raised no objections to the proposal providing a few conditions are adhered to. NHA will ensure that all conditions are met during construction.	<b>Appendix E</b>
<b>Heritage Office</b>	
No objections to the proposed changes at H104, H105 and H204 on heritage grounds. The RTA Aboriginal and Heritage Adviser has discussed alterations to the research design and excavation methodology for H103 with the Senior Archaeologist, Heritage Office, who raised no concerns with the proposal.	<b>Appendix F</b>

## **8 Conclusion**

Following the review of the detailed design for the N4 Section of road duplication at Yarra Yarra to Holbrook, the NHA process of detailed design has resulted in new impacts on Aboriginal and non-Aboriginal heritage, not previously identified in the EA or the MCoA, deemed inconsistent with the Project Approval (Yarra Yarra to Holbrook).

Section 75W (2) of the EP&A Act provides that the Minister for Planning's approval for the modification is required if the project as modified would not be consistent with the existing approval.

NHA has assessed the environmental impacts associated with the proposed changes in alignment at Yarra Yarra to Holbrook in order to assess whether approval from the Minister for Planning is required to modify the Minister's Conditions of Approval for the Hume High Upgrade project under Section 75W of the EP&A Act.

NHA considers that the proposed change to the Project is generally consistent with the description and assessment of the Project in the Environmental Assessment; however the changed alignment in the vicinity of chainages 108700 and 101100 - 101400 do result in impacts that are inconsistent with the Minister's Conditions of Approval. As such the NHA seek approval from the Minister for Planning for the changed alignment in these specific areas as outlined in this report.

## **APPENDIX A – CONSISTENCY ASSESSMENT**

**APPENDIX B – RELEVANT SHEETS FROM ENVIRONMENTAL CONSTRAINTS  
DRAWINGS**

## **APPENDIX C – CONSULTATION WITH DECC**

## **APPENDIX D – CONSULTATION WITH ABORIGINAL STAKEHOLDERS**

**APPENDIX E – CONSULTATION WITH DEPARTMENT OF PRIMARY INDUSTRIES**

## **APPENDIX F - CONSULTATION WITH HERITAGE OFFICE**