

Department of Planning & Environment
LOCKED BAG 5022
PARRAMATTA NSW 2124
Attn : Rose-Anne Hawkeswood

APPLICATION	DE-2021/188
Date	18 January 2022

Dear Rose-Anne,

I write in reference to the below State Significant Infrastructure Modification Application:

Development	Eastern Gas Pipeline - Mod 2 - Transfer of Pipeline Segment - SSI-9973-Mod 2
Location	Lot 1 Springhill Road, SPRING HILL NSW 2500

Thank you for the opportunity to provide comment on the proposal. The modification report has been reviewed by relevant Council officers and the following advice is provided for your consideration in the assessment of the application:

1. Environmental matters

Council's Environmental officers consider there to be no significant changes to the project which would change its expected environmental impacts. As such, no concerns are raised in this regard and there are no recommended changes to the existing consent conditions.

2. European heritage matters

The route comes within close proximity to the listed archaeological site for the former Berkeley House (#6519) which it is noted and mapped as an irregular dot rather than being based on previous archaeological investigations.

The Modification Report notes that a 2018 GHD Heritage Report was prepared that considers historic archaeological potential under the NSW Heritage Act 1977 as per the SEARs recommendations. It is noted this report has not been provided with the modification and Council's Heritage staff are unable to locate it on the previous file.

An updated Heritage Report has been provided (Appendix B) to support the modification that notes there will be no additional heritage or historic archaeological impacts.

3. Aboriginal Heritage

The original proposal was accompanied by an Aboriginal Due Diligence Report and archaeological survey prepared by Biosis.

The Report noted that a representative of the ILALC was present during the 2018 survey, however it is noted that broader community consultation is not required under the Due Diligence Code. The updated Report notes no additional consultation has been undertaken with ILALC or Heritage NSW for the modification. Additional consultation to keep the community informed of changes to the proposal is recommended.

It is noted that the pipeline will predominantly follow the route of an existing pipe, which has been heavily disturbed during construction, except for in 4 areas. The area has been assessed a low archaeological potential and no further work is recommended by Biosis.

Heritage NSW should be asked to provide comment on the Biosis Due Diligence Report and updated Heritage Report, in particular the appropriateness of relying on the Due Diligence code of practice for the construction of the pipeline under the NSW Heritage Act 1977.

We would recommend that the following additional information is sought from the applicant and that it is carefully considered in finalisation of assessment of the modification application:-

1. GHD 2018 Heritage Report be provided to Council;
2. The advice of the Heritage NSW should be sought in relation to the use of Due Diligence for the construction of the pipelines and updated Heritage Report in regard to the modified proposal;
3. Comments from Heritage NSW should be sought on potential non-Aboriginal archaeology and the updated Heritage Report;
4. The application should be notified (if it was not already) to the Local Aboriginal Community for comment and input to ensure the Cultural Significance of the area is properly considered in the assessment of the application;
5. ILALC should be consulted with by the proponent and any comments addressed in the updated Heritage Report;
6. Any comments from Heritage NSW should be provided to Council.

ooo0ooo

Council trusts this information is of assistance and thanks you for the opportunity to comment

This letter is authorised by

Theresa Whittaker

Senior Development Project Officer

Wollongong City Council

Telephone (02) 4227 7111