



**DEVELOPMENT ASSESSMENT REPORT
DA 047-11-2011**



**Relocation of existing snowmaking
infrastructure, Smiggin Holes**

Proposed by Perisher Blue Pty Ltd

Part 4 of the
Environmental Planning and Assessment Act 1979

February 2012

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NSW Department of Planning and Infrastructure
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1 EXECUTIVE SUMMARY

This report is an assessment of development application DA 047-11-2011 under the provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation), and *State Environmental Planning Policy (Kosciuszko National Park – Alpine Resorts) 2007* (the Alpine SEPP).

Proposal

The applicant, Perisher Blue Pty Ltd, seeks development consent to modify some of the existing snowmaking infrastructure on the ski slopes of Smiggin Holes.

It is proposed to relocate one snowmaking hydrant and install another new snowmaking hydrant adjacent to Zoe's Carpet, and relocate five snowmaking hydrants and remove one snowmaking hydrant adjacent to the Captain Cook J-bar. This will involve excavating lateral trenches for the placement of water and electricity to service the new hydrant locations, excavation of pits at the new hydrant locations for service connections, reinstating and profiling the ground where the hydrants have been removed, and rehabilitating any disturbed ground.

This is so that any above-ground services can be minimised and hydrants can be relocated away from the centre of the ski runs. This will provide a safer environment for skiers and snowboarders, as well as reducing hazards for oversnow vehicles.

Consent authority

Under the provisions of the Alpine SEPP, the Minister for Planning and Infrastructure is the consent authority for development within the NSW alpine resorts.

Permissibility

Pursuant to cl 11 of the Alpine SEPP and the Perisher Range alpine resort land use table, 'snow-making infrastructure' is permissible with consent.

Consideration and key matters

The proposal has been considered against the relevant matters for consideration and the key matters arising from this assessment are outlined below.

Construction activities

The lower slopes of Smiggin Holes are very wet due to the current wetter-than-usual summer period. As the works are nominated to be undertaken prior to winter 2012, it will be important that construction vehicles and machinery limit the number of movements required through the wet areas, and are confined to a defined route to minimise any impacts. The applicant has adequately addressed this by proposing access from the top of the ski slope over drier land, and minimising vehicle and machinery movements through wet areas to essential construction movements only. A condition has also been incorporated into Schedule 2, requiring the construction access corridor to be roped (avoiding wet areas where possible) and approved prior to works commencing, and that any construction activities are confined to this roped corridor.

The hydrant locations in the north project area are adjacent to areas of native vegetation and trees. These areas will be fenced and protected prior to work commencing to ensure that construction vehicles and machinery do not inadvertently enter into these areas.

Visual

The relocation of hydrants adjacent to stands of vegetation and trees, and the removal of one hydrant, will reduce the prominence of the snowmaking infrastructure within the landscape, and therefore improve visual amenity.

Rehabilitation

The trenches will be rehabilitated using the sod replacement technique. Where the hydrants are to be removed and the slope profiled, these areas are proposed to be seeded using either, or a mix of, *Chewings* and *Poa*, and mulched to maintain an erosion resistant ground. This is considered an appropriate outcome and will be supplemented by native tubestock plantings at sites N-H4, N-H5 and N-H6 as recommended by the NSW Office of Environment and Heritage (OEH).

Consultation

The proposal was referred to the OEH pursuant to cl 17 of the Alpine SEPP. The OEH advised that the proposal is permissible under the licence held by the applicant, any impacts as a result of the proposal should be minimal provided the environmental management measures outlined in the Statement of Environmental Effects are adhered to, the site of the proposed works is not identified as being within an area of Aboriginal cultural heritage, and there is no municipal infrastructure within the proposed work sites. The OEH also made a number of recommendations which have been incorporated into the conditions contained in Schedule 2 as appropriate.

Neighbouring properties were notified of the proposal and provided the opportunity to make comments between 16 November and 29 November 2011. No submissions were received.

Conclusion

The proposed development is permissible with consent, has been assessed against the relevant statutory considerations including s 79C of the EP&A Act and the Alpine SEPP, the OEH have been consulted on the proposal, and it is concluded that the proposed modification to snowmaking infrastructure on the Smiggin Holes ski slopes is appropriate. This will provide a safer environment for skiers and snowboarders, as well as reducing hazards for oversnow vehicles. Construction activities can be appropriately managed to minimise any impacts, visual amenity will be improved, and the sites can be appropriately rehabilitated. Development application DA 047-11-2011 is therefore recommended for approval subject to the imposition of conditions contained in Schedule 2.

2 BACKGROUND

2.1 Locality

The Perisher Range alpine resort is located within Kosciuszko National Park, approximately 35 kilometres from Jindabyne. Smiggin Holes forms part of the Perisher Range alpine resort.

The proposed works are to be undertaken on the ski slopes of Smiggin Holes, adjacent to the Captain Cook J-bar and Zoe's Carpet.

2.2 Site description

The works are proposed on the ski slopes of Smiggin Holes, in two areas:

South area – This area is to the skier's right of Zoe's Carpet. The area is highly modified and disturbed, comprises primarily of exotic species although there are some small areas where native species are beginning to regenerate, particularly in the wet areas.



North area – This area is to the skier's right of the Captain Cook J-bar. The area has been previously disturbed, but is regenerating with native species. The lower area of the slope is generally wet and Sphagnum is common throughout.



2.3 Background to the proposal

Natural snow cover on the Smiggin Holes ski slopes is prejudiced by its relatively low elevation, as well as the general wetness of this area. Snowmaking is therefore important to ensure an adequate snow cover for the operation of this area of the resort.

During the winter season, mobile snow guns are connected to the existing snowmaking hydrants using above-ground hoses and power cables, usually at a distance for operational or safety reasons. This proposal seeks to relocate the hydrants closer to where the mobile snow guns are usually located so that any above-ground services can be minimised and hydrants can be relocated away from the centre of the ski runs. This will provide a safer environment for skiers and snowboarders, as well as reducing hazards for oversnow vehicles.

3 THE PROPOSED DEVELOPMENT

3.1 Overview

The applicant is seeking development consent to relocate a number of snowmaking hydrants on the ski slopes at Smiggin Holes.

The estimated cost of works is \$4,500.

3.2 North area

To the skier's right of the Captain Cook J-bar, it is proposed to relocate five hydrants further to the skier's right and closer to the edge of the formed ski run, and remove one hydrant altogether.

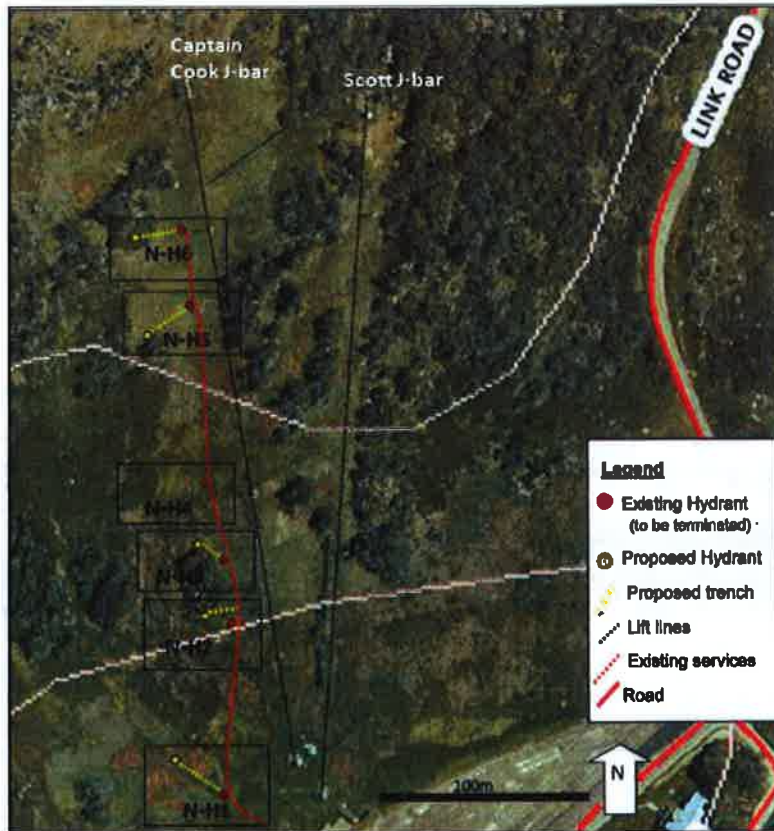


Figure 1: Overview of the north area of the proposal (source: SEE).

3.3 South area

To the skier's right of Zoe's Carpet, it is proposed to relocate one hydrant closer to the formed ski run and install a new hydrant adjacent to the lift hut.



Figure 2: Overview of the south area of the proposal (source: SEE).

3.4 Lateral trenches and service connections

Each new hydrant will need to be connected with the existing snowmaking services. This will involve:

Lateral trench - Excavating a lateral trench (between 12 and 25 metres in length, and approximately 300mm wide and 500mm deep) from the location of the new hydrant to the snowmaking main and placement of a 50mm water pipe and 50mm conduit for the power cable within the trench line; and

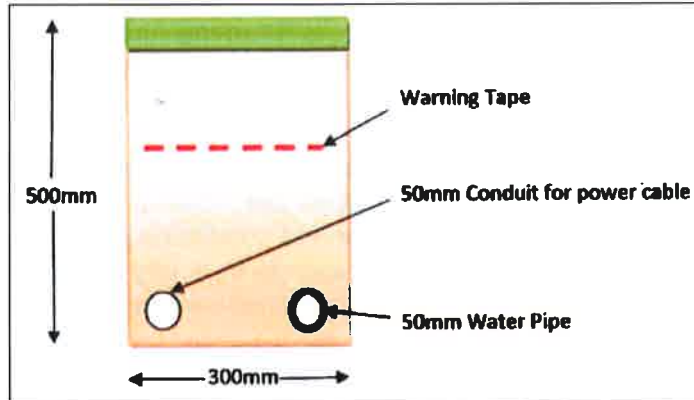


Figure 3: Trench cross-section (source: SEE).

Service connection – At the junction between the new services and the existing services, a pit 300mm wide, 600mm deep and 800mm long will be required to enable the services to be connected.

3.5 Hydrant removal and slope profiling

Hydrants will be either removed and relocated to the edge of the ski runs, or terminated in-situ. Once the hydrants have been removed or terminated, the site will need to be filled and shaped to match the existing slope profile to ensure the remaining services are at a sufficient depth for protection. This will involve:

- sod removal of vegetation and topsoil;
- placement of any additional soil required (to be sourced from the Smiggin Holes stockpile site and will be a maximum of 0.5 cubic metres at any one site); and
- rehabilitation and stabilisation using the sods.



Figure 4: Photo of a hydrant.

4 STATUTORY FRAMEWORK

4.1 Development assessment

The application has been made and assessed pursuant to Part 4 of the EP&A Act and the EP&A Regulations.

4.2 Statement of permissibility

'Snowmaking infrastructure' is permissible with consent pursuant to cl 11 of the Alpine SEPP and the Perisher Range Alpine Resort land use table.

4.3 Statutory considerations

The proposal has been considered against the relevant statutory considerations, including:

- the principles of Ecologically Sustainable Development (ESD);
- the objects of the EP&A Act;

- ss 5A and 79C of the EP&A Act; and
- the Alpine SEPP.

The full assessment is provided in Appendix A and a discussion of the key matters arising from these considerations is provided in section 6 of this report.

5 CONSULTATION

5.1 NSW Office of Environment and Heritage

The proposal was referred to the OEH pursuant to cl 17 of the Alpine SEPP. The comments made by OEH are discussed in detail in section A.3 of Appendix A, but can be broadly summarised as:

- impacts from the proposed development should be minimised if the environmental management of construction is carried out as described in the Statement of Environmental Effects and their recommended conditions pertaining to rehabilitation, providing a means for small mammals to escape from any open excavations, and machinery being regularly maintained and manoeuvred to prevent the spread of exotic vegetation;
- the site of the proposed works is not identified as being within an area of Aboriginal cultural heritage, although it is recommended that a condition be imposed on any consent granted requiring works to cease and OEH be contacted should any Aboriginal objects be uncovered during construction;
- the proposal is permissible under the licence held by the applicant; and
- there is no municipal infrastructure within the proposed work site.

These comments and the recommended conditions have been incorporated into the conditions contained in Schedule 2 as appropriate.

5.2 Neighbouring properties

Neighbouring properties were notified of the proposal and provided the opportunity to make comments between 16 November and 29 November 2011. No submissions were received.

6 CONSIDERATION

The proposal has been considered against the relevant matters for consideration and a full assessment is provided in Appendix A. The following is a discussion of the key matters arising from this assessment.

6.1 Construction activities

The lower slopes of Smiggin Holes are very wet due to the current wetter-than-usual summer period. As the works are nominated to be undertaken prior to winter 2012, it will be important that construction vehicles and machinery limit the number of movements required through the wet areas, and are confined to a defined route to minimise any impacts.

Construction vehicles and machinery proposed to be used for the project are a 7-tonne excavator, HD carriers, 4WD vehicles and quad bikes.

For the south area of the project, access will be from the existing and formed roads with the trench and new hydrant locations within close proximity to these roads. Only a very short construction access corridor will be required across the wet slope, and will be restricted to essential construction movements only. This is considered an appropriate outcome and conditions have been incorporated in Schedule 2 to this effect.

The applicant originally proposed access to the northern project area from the Smiggin Holes car park, across the base of the ski slopes. Given the wetter than usual current summer period, the applicant revised the proposed access arrangements for this area, and it is now proposed to use the Link Road and the existing formed track to the top of the Captain Cook J-bar station as the primary access. This will ensure there are few vehicle or machinery movements across the wet area at the base of the Smiggin Holes ski slopes. This is considered an appropriate outcome, and a number of conditions have been incorporated into Schedule 2 to further minimise any impact that may result from construction activities. This includes requiring the construction access corridor to be roped (avoiding wet areas where possible) and approved prior to works commencing, and that any construction activities are confined to this roped corridor.

The hydrant locations in the north project area are adjacent to areas of native vegetation and trees. To ensure that these areas are not impacted during construction, a condition has been included in Schedule 2 requiring these areas to be appropriately roped off and protected prior to works commencing. This will ensure that construction vehicles and machinery do not inadvertently enter into these areas.

6.2 Visual

The relocation of hydrants adjacent to existing infrastructure, and the removal of one hydrant, will reduce the prominence of the snowmaking infrastructure within the landscape, and therefore improve visual amenity.

6.3 Rehabilitation

The trenches will be rehabilitated using the sod replacement technique. This appears to have been working well in other areas of the resort and has the advantage of maintaining the existing vegetation and seed bank within the topsoil.

Where the hydrants are to be removed and the slope profiled, these areas are proposed to be seeded using either, or a mix of, *Chewings* and *Poa*, and mulched to maintain an erosion resistant ground. The OEH have recommended that some native species tubestock also be planted at sites N-H4, N-H5 and N-H6. This has been incorporated into the conditions in Schedule 2.

7 CONCLUSION

The proposed development is permissible with consent, has been assessed against the relevant statutory considerations including s 79C of the EP&A Act and the Alpine SEPP, the OEH have been consulted on the proposal, and it is concluded that the proposed modification to snowmaking infrastructure on the Smiggin Holes ski slopes is appropriate. This will provide a safer environment for skiers and snowboarders, as well as reducing hazards for oversnow vehicles. Construction activities can be appropriately managed to minimise any impacts, visual amenity will be improved, and the sites can be appropriately rehabilitated. Development application DA 047-11-2011 is therefore recommended for approval subject to the imposition of conditions contained in Schedule 2.

8 DELEGATIONS

It is considered that Daniel James, Team Leader, Alpine Resorts Team has the delegation to exercise the function as a consent authority, as provided by the Minister for Planning and Infrastructure pursuant to s 23 of the *Environmental Planning and Assessment Act 1979*. This exercise of delegations is considered to be appropriate and in accordance with the *Instrument of Delegation* dated 14 September 2011.

9 RECOMMENDATION

It is recommended that Daniel James, Team Leader, Alpine Resorts Team as delegate for the Minister for Planning and Infrastructure, under the *Instrument of Delegation* dated 14 September 2011, pursuant to s 80(1)(a) of the *Environmental Planning and Assessment Act 1979* and State Environmental Planning Policy (Kosciuszko National Park – Alpine Resorts) 2007:

- (i) grant consent to **DA 047-11-2011** for the relocation of existing snowmaking infrastructure within the Smiggin Holes resort area, subject to the conditions of consent (refer to **Schedule 2**); and
- (ii) sign and date the *Notice of Determination* for DA 047-11-2011 (refer to **Notice of Determination**).

Prepared by:

Approved by:



17/2/2012

Erin Fuller
Senior Planner
Alpine Resorts Team

Daniel James
Team Leader
Alpine Resorts Team

**Determined as Delegate of the Minister for
Planning and Infrastructure**

Appendix A – Statutory Assessment & Consideration

A1 ECOLOGICALLY SUSTAINABLE DEVELOPMENT

The Department has considered the proposed development against the five principles of ESD set out in s 3 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act):

Integration principle – The relocation of the hydrants to the edge of the ski runs will not only result in safety and operational improvements, but will also improve visual amenity, without an adverse environmental, economic or social impact.

Precautionary principle – The proposal does not pose a threat of serious or irreversible environmental damage. The sites have previously been disturbed and modified and can be appropriately rehabilitated.

Inter-generational principle – The proposal will not adversely impact upon the health, diversity or productivity of the environment for future generations.

Biodiversity principle – The proposal will not result in a loss of biodiversity. Adjoining native vegetation will not be disturbed.

Valuation principle – The applicant has recognised the value of the adjoining native vegetation and has provided a site environmental management plan to protect these areas.

A2 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

Objects

The objects of the EP&A Act provide an overarching framework that informs the purpose and intent of the legislation and gives guidance to its operation. The consideration and determination of a development application under Part 4 must be informed by the relevant provisions of the EP&A Act, consistent with the objects.

The proposal is considered consistent with the objects of the EP&A Act in that there will not be an adverse environmental impact, the proposal is consistent with the principles of ESD and will contribute to the orderly development of the resort.

Section 5A – Significant effect on threatened species, populations or ecological communities, or their habitats

The environmental assessment undertaken concludes that the project sites do not provide habitat for threatened species or ecological communities, given that the project is limited to previously disturbed and heavily modified areas. There are adjacent areas of previously undisturbed heath that may provide suitable habitat for threatened species, although it is not proposed to disturb any of these areas as part of the development. Protection of these areas during construction has been reinforced by way of a condition contained in Schedule 2.

Section 79C(1) - Matters for consideration - general

In determining a development application, a consent authority must take into consideration the matters referred to in s 79C(1) of the EP&A Act as are of relevance to the development:

S 79C(1)(a)(i) the provisions of any environmental planning instrument
The only environmental planning instrument applicable to the proposal is State Environmental Planning Policy (KNP – Alpine Resorts) 2007. See section A3 for an assessment of the proposal against this Policy.
S 79C(1)(a)(ii) the provisions of any proposed instrument
None are applicable to the proposal.

S 79C(1)(a)(iii) the provisions of any development control plan
See discussion against the Perisher Range Resorts Master Plan under the Alpine SEPP in section A3.
S 79C(1)(a)(iiia) the provisions of any planning agreement
None are applicable to the proposal.
S 79C(1)(a)(iv) the provisions of any regulations
Cl 92 of the <u>EP&A Regulation 2000</u> – Any demolition will need to comply with Australian Standard AS 2601-1991 The demolition of structures.
S 79C(1)(a)(v) any coastal zone management plan
The subject site is not within the coastal zone.
S 79C(1)(b) the likely impacts of that development
<p><u>Context, setting and visual</u> – Smiggin Holes ski slopes have previously been modified and contain significant lifting and snowmaking infrastructure. Relocation of the hydrants from the middle of the ski run to adjacent to existing vegetation and trees will actually result in an improved visual outcome as the hydrants will not be as visually prominent within the landscape.</p> <p><u>Access, transport and traffic</u> - The proposal will not impact upon traffic management within the Resort. Construction access for the south project area is available from the Smiggin Holes car park and the existing road to the Smiggin Holes Lift Workshop. Construction access for the north project area is available from the Link Road and the existing formed track to the top of the Captain Cook J-bar.</p> <p><u>Public domain</u> - The proposal will not adversely impact upon any public spaces. Relocation of the hydrants to the edge of the formed ski runs will actually improve safety for skiers and snowboarders.</p> <p><u>Utilities and energy</u> – The proposal is not expected to place an unreasonable or increased demand on any utilities or energy supplies.</p> <p><u>Heritage</u> – The proposal will not impact on any European heritage items. See comments below from OEH in regard to Aboriginal cultural heritage.</p> <p><u>Other land resources</u> – The proposal is not envisaged to impact on any valuable land resources.</p> <p><u>Water</u> – The proposed works are not located within a riparian corridor. The relocation of the hydrants is not expected to increase water usage for snowmaking as there will be no overall increase in the number hydrants.</p> <p><u>Soils</u> - The proposal includes site environmental management measures that will be implemented during construction to prevent erosion and control sediment during construction.</p> <p><u>Noise, vibration, air and microclimate</u> – Impacts in this regard will be small-scale and short-term during construction and involve primarily noise and vehicle emissions. However, the development sites are located a reasonable distance from any buildings that provide accommodation for visitors and any impact on visitors in this regard is considered minimal.</p> <p><u>Flora and fauna</u> – The proposal involves the disturbance of primarily previously disturbed ground which is dominated by exotic species mixed with regenerating native species in</p>

some of the wet areas. To minimise any impacts in this regard, a condition has been incorporated into Schedule 2 requiring the construction access corridor to be roped, avoiding wet areas as much as possible, and no construction activities are permitted outside of this construction access corridor. A condition has also been included in Schedule 2 requiring that any adjoining native vegetation is protected during construction.

Waste – Any waste generated will be during construction only. A condition has been included in Schedule 2 providing for the appropriate containment of waste on site.

Natural hazards – There are no known natural hazards that would restrict the development.

Social impact – The relocation of the snowmaking hydrants is not envisaged to have any adverse social impacts.

Economic impact – The proposal will generate the equivalent of 0.12 of a job during construction only. No adverse economic impact is envisaged as a result of the proposal.

Site design and internal design – Relocating the snowmaking hydrants to the edge of the ski run will improve safety for skiers and snowboarders and reduce hazards and obstacles for oversnow vehicles.

Construction – The applicant has provided a Site Environmental Management Plan for the proposal which is appropriate for the development and is supplemented by the conditions contained Schedule 2. A condition has been included in Schedule 2 requiring a copy of this plan to be on site at all times for all works.

Cumulative impacts – The proposal will not result in any additional snowmaking hydrants and relocating these hydrants to the edge of the ski run will reduce their prominence in the landscape.

S 79C(1)(c) the suitability of the site for the development

The site is considered suitable for the proposal as the proposed works will be undertaken within a previously disturbed and modified area and will have minimal impact on the environment.

S 79C(1)(d) any submissions made in accordance with the Act or the regulations

Neighbouring properties were notified of the proposal and provided the opportunity to make comments within a 14 day period. No submissions were received.

S 79C(1)(e) the public interest

The proposal is considered in the public interest as it will result in operational, safety and visual improvements on the ski slopes without any adverse environmental impacts.

A3 ENVIRONMENTAL PLANNING INSTRUMENTS

State Environmental Planning Policy (Kosciuszko National Park – Alpine Resorts) 2007

CI 2 – Aim and objectives:

The proposal is:

- consistent with the aim of the Alpine SEPP in that it is consistent with the ESD principles; and
- consistent with the objectives of the Alpine SEPP in that it will improve resort operation without adversely impacting on the natural or cultural environment.

Cl 11- Land use table
The land use table for the Perisher Range Alpine Resort provides that 'snow-making infrastructure' is permissible with consent.
Cl 14(1) – Matters to be considered by consent authority
(a) the aim and objectives of this policy, as set out in clause 2,
See discussion above under cl 2.
(b) the conservation of the natural environment and any measures to mitigate environmental hazards (including geotechnical hazards, bush fires and flooding,
No mitigation measures are proposed in regard to any environmental hazards.
(c) the cumulative impacts of development on existing transport, effluent management systems, waste disposal facilities or transfer facilities and existing water supply:
The proposal will not influence the number of people visiting the resort.
(d) any statement of environmental effects,
The SEE and additional information supplied are considered adequate to enable a full and proper assessment of the proposal.
(e) the character of the alpine resort,
The proposal will not significantly alter the character of the resort.
(f) the Geotechnical Policy – Kosciuszko Alpine Resorts,
The applicant has described the proposed excavations as minor, reaching a maximum depth of 0.6 metres. As the excavations are a maximum of 25 metres in length, not contiguous and a maximum of 0.6 metres in depth, the works are considered exempt under the Department's Geotechnical Policy.
(g) any sedimentation and erosion control measures,
The applicant has submitted a Site Environmental Management Plan which is considered appropriate for the proposed works.
(h) if stormwater drainage works are proposed,
No stormwater drainage works proposed.
(i) any visual impact of the proposed development, particularly when viewed from the Main Range,
The site is not visible from the Main Range. Relocation of the hydrants from the middle of the ski run to adjacent to existing vegetation and trees will result in an improved visual outcome as the hydrants will not be as visually intrusive within the landscape.
(j) any significant increase in activities, outside of the ski season,
The proposal will not result in an increase in activities during or outside the ski season.
(k) if the development involves the installation of ski lifting facilities,
The proposal does not involve the installation of new ski lifting facilities.
(l) if the development is proposed to be carried out in Perisher Range Alpine Resort:
(i) the document entitled Perisher Range Resorts Master Plan...
(ii) the document entitled Perisher Blue Ski Slope Master Plan...
The proposed works are consistent with the above plans. The PBSSMP shows both of these locations as areas for snowmaking.

(m) if the development is proposed to be carried out on land in a riparian corridor:	
The proposed works are not within any riparian corridor.	
CI 17 – Development applications referred to the Department of Environment, Climate Change and Water (DECCW)	
DECCW is now the NSW Office of Environment and Heritage, who provided the following comments:	
<p><u>Leasing</u> - The proposal is permissible under the licence held by the applicant.</p> <p><u>Municipal services</u> – There is no municipal infrastructure in the proposed work site.</p> <p><u>Flora and fauna</u> – Impacts from the proposed development should be minimised if the environmental management of construction is carried out as described in the SEE and the recommended conditions provided by OEH. These recommended conditions pertain to rehabilitation, protection of adjacent vegetation and areas of regenerating sphagnum and <i>Astelia</i>, any excavations left open overnight must be left so that trapped mammals may escape, and machinery should be regularly cleaned and manoeuvred in a manner to prevent the spread of exotic vegetation.</p> <p>It should be noted that OEH refer to the applicant proposing the use of Sterile Rye Corn which is not the case. The applicant proposes to use seed of <i>Chewings</i> and <i>Poa</i> species only, depending on the location.</p> <p><u>Aboriginal cultural heritage</u> – The site of the proposed works is not identified as being within an area of Aboriginal cultural heritage potential. However, it was recommended that a condition be imposed so that in the event that an Aboriginal object/s is uncovered during construction, works impacting the object/s is to cease immediately and NPWS is contacted for an assessment of the site.</p>	
The comments and recommended conditions have been incorporated into the conditions contained in Schedule 2 as appropriate.	
CI 26 – Heritage conservation	
European Heritage	The proposal will not impact on any statutory listed European heritage items.
Aboriginal Heritage	See comments above from OEH.