

'Windialla'

561 Wargeila Road,
YASS. NSW 2582

4 October, 2023

Director,
Energy Assessments,
Development Assessment,
Department of Planning and Environment,
Locked Bag 5022,
PARRAMATTA. NSW 2124

Dear Sir/Madam,

SUBMISSION: ENVIRONMENTAL IMPACT STATEMENT – HUMELINK PROJECT – SSI-36656827

I hereby submit my objection to the HumeLink Project on the grounds as follows:

1. BIODIVERSITY

Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and Biodiversity Conservation Act 2016 (BC Act)

On 6 February, 2023 Ecology Consulting provided a biodiversity site assessment of my property on Wargeila Road, Yass. This assessment was conducted to ascertain conservation values of the property with focus on the impacted area within the proposed HumeLink Transgrid easement.

The impact area of the easement through the study area would impact approximately 51.27 ha of the total property size of 249 ha.

Four vegetation zones were determined according to the broad condition of the canopy and groundcover layer. (Annexure A: Figure 4: Vegetation zones within the impact zone)

Zone 1 – Low to moderate quality. Yellow Box (*Eucalyptus melliodora*), Blakely's Red Gum (*E. blakelyi*) and Inland Scribbly Gum (*E. rossii*). Understorey vegetation is primarily grassy and consists of mixed exotic and native species with a low species richness but a high abundance of some species such as Blown Grass (*Lachnagrostis filiformis*). Native forb coverage is low in abundance and richness across this zone. Moderate to high presence of exotic forbs and grasses across this zone.

Zone 2 – Moderate quality. The canopy layer is minimal, consisting of scattered Yellow Box (*Eucalyptus melliodora*), Blakely's Red Gum (*E. blakelyi*), Apple Box (*E. bridgesiana*) and limited Inland Scribbly Gum (*E. rossii*). Understorey vegetation is primarily grassy in formation and mostly native in composition, with dominant species including Wallaby Grasses (*Rytidosperma* spp.), Spear-grasses (*Austrostipa* spp.), and Native Lovegrasses (*Eragrostis* spp.). Some exotic forbs and grass species are present but at low-moderate abundances.

Moderate abundance and richness of native forbs.

Zone 3 – Moderate to high quality. Vegetation contains patches of mixed Box-Gum Woodland species such as Yellow Box (*E. melliodora*), Blakely's Red Gum (*E. blakelyi*), Apple Box (*E. bridgesiana*). Some areas contain minor midstory vegetation in the form of Hoary Guinea Flower (*Hibbertia obtusifolia*) and Daphne Heath (*Brachyloma daphnoides*). Understorey is mostly native and with a low abundance of exotic grasses and forbs. There is moderate to high diversity of both native grasses and forbs. This zone extends over the PCTs: 3376 Southern Tableland Box-Gum Woodland, and 3747 Southern Tableland Western Hills Scribbly Gum Forest.

Zone 4 – **High quality**. Vegetation consists of remnant woodland comprised of mixed Box-Gum Woodland species: Yellow Box (*E. melliodora*), Blakely's Red Gum (*E. blakelyi*), Apple Box (*E. bridgesiana*). A high diversity of understorey native forbs and grasses that meet the vegetation requirement for the Commonwealth listing (EPBC Act). Also encompasses some of the BV-mapped **Fairy Hole Creek** (Figure 9). Some exotic species are present with this zone. (Annexure B: Figure 9 - Biodiversity Value Mapping)

Threatened Ecological Communities

Initial field inspections found that vegetation Zone 4 supports the following Threatened Ecological Communities (TEC) listed as Critically Endangered under both Commonwealth (EPBC Act) and NSW (BC Act) legislation:

- . White Box -Yellow Box -Blakely's Red Gum Grassy Woodland and Derived Native Grassland.

Vegetation in Zone 3 also supports the following Threatened Ecological Communities (TEC) listed as Critically Endangered under NSW legislation (BC Act):

- . White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South East Corner and Riverina Bioregions (Box-Gum Woodland).

Box-Gum Woodland TEC is listed as Critically Endangered under both Commonwealth legislation (EPBC Act) and NSW legislation (BC Act) with each legislation having slightly different definitions and condition requirements of the community. Only Zone 4 meets the vegetation condition requirements to support Box-Gum Woodland under the Commonwealth definition. Some patches in Zones 2 and 3 meet the vegetation requirements to support Box-Gum Woodland under the NSW definition. Zone 1 contains a very minor amount of NSW defined BGW, present along the Buggali Road. Despite this, most of the zone is composed of exotic vegetation. (Annexure C: Figure 5: Box-Gum Woodland (EPBC) east of Fairy Hole Creek with the proposed impact area.) (Annexure D: Figure 6: Box-Gum Woodland (EPBC) west of the Fairy Hole Creek with the proposed impact area.)

Fauna

The property is situated with a historically, heavily cleared, agricultural landscape and contains some of the few remaining extensive stands of native woodlands, forests, and grasslands and a corresponding large amount of habitat for a variety of fauna species.

There is a high likelihood that threatened species known to occur in the area would utilise habitats available in the property as follows:

- White-winged Chough (*Corcorax melanorhamphos*)
- Grey Fantail (*Rhipidura albiscapa*)
- Wedge-tailed Eagle (*Aquila audax*)
- Magpie (*Gymnorhina tibicen*)
- Magpie-lark (*Grallina cyanoleuca*)
- Echidna (*Tachyglossus aculeatus*)
- Eastern Galah (*Eolophus roseicapilla*)
- Crimson Rosella (*Platycercus elegans*)
- Eastern Rosella (*P.eximius*)
- Willy Wagtail (*Rhipidura leucophrys*)
- Australian Raven (*Corvus coronoides*)
- Sulphur Crested Cockatoo (*Cacatua galerita*)
- Eastern Grey Kangaroo (*Macropus giganteus*)

Habitat

There is a high diversity of native grass species and localised areas of high native forb diversity. Exotic pasture species were observed throughout the entire study area, however these occurred in varying abundances. Canopy vegetation consists mostly of Box-Gum associated species such as a Yellow Box (*Eucalyptus melliodora*) Blakely's Red Gum (*E. blakelyi*), Apple Box (*E. bridgesiana*) as well as some areas of Inland Scribbly Gum (*E.rossii*) in the west of the study area. Given the extent of historic clearing in agricultural landscapes in the region, these remnant stands provide critical high-quality habitat for a range of non-threatened and threatened species with the area. (Annexure E: Table 8 – Habitat for native and threatened flora and fauna)

Valuable habitat is also present with the property in the form woody debris and surface rock. A moderate to high amount of wooden debris is present within Zones, 1, 2 and 3 in the form of leaf litter from present canopy trees, or large fallen timber (either limbs or dead trees). These zones also contain moderate to high amounts of exposed surface rock as well as some areas of rocky outcrop. (Annexure F - Figure 7: Rocky habitat within the study area)

Most surface rock within the study area is imbedded with the sediment and was unable to be shifted.

Valuable habitat types observed on site:

- old growth native woodland with large hollow-bearing trees
- other native woodland
- native pasture or grassland with >50% native groundcover
- rocky outcrops
- farm dams and creek
- koala habitat trees (Note: if the site falls within a region subject to Koala Habitat and the area to be cleared is > 1 ha, SEPP 44 may apply)
- habitat that is likely to be suitable for/attractive to other threatened species

Consider other mammals, birds, reptiles, and flora – e.g, orchids

Land Use

Most of the land within the property is dedicated to commercial grazing. As such, some paddocks have been sown with exotic pasture grass species and had super-phosphate applied. This has modified the understorey vegetation composition over some parts of the property, primarily the residences lot.

Despite this, the majority of the impact area is comprised of native vegetation in the form of grasses, forbs, and trees that are associated with the PCT's observed in the impact area. The eastern and south-western parts of the study area displayed less modification in the way of grazing pastoral sowing, and nutrient enrichment. (Annexure G: Figure 3, BAM plot map Fairy Hole Creek)

Five water dams will be impacted by the proposed HumeLink transmission route through the centre of the property and because they are within the easement footprint would not require landowner permission for use by Transgrid for construction purposes.

Conservation Values

Fairy Hole Creek intersects the east section of the property and is mapped on the NSW Biodiversity Values Map (BVM) as Biodiverse Riparian Land. This creek occurs within the proposed impact area. This section of the study area also contains the highest condition vegetation, which includes a 2.59 ha patch of Box-Gum Woodland which is protected and listed as a Critically Endangered Ecological Community under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and NSW Biodiversity Conservation Act 2016 (BC Act).

HumeLink Transgrid EIS has failed to address the significant ecological impacts the construction of the overhead transmission line will have on the Biodiversity values of the Fairy Hole Creek and other environmentally valuable land. I have offered to share the Biodiversity Assessment Report with Transgrid Project employees, but was told that they are "not recognising any reports done by privately engaged Ecology Experts."

2. ROUTE AND CORRIDOR DEVELOPMENT PROCESSES

Transgrid's evaluation of the corridor options is not in line with industry best-practice and instead preferenced an in-house desk-top methodology.

The Feasibility Study to determine the location of the proposed corridor was flawed from the start when Transgrid admitted there was no agricultural expertise with the project's technical working group who carried out the desk-top feasibility study.

To make an informed decision on the best fit easement corridor, the Minister must be confident Transgrid has:

- met industry standards in its application of a constraints matrix
- used accurate and up-to-date data
- comprehensively assessed the associated costs, benefits and risks
- conducted effective engagement with relevant communities
- completed a preliminary social impact assessment prior to selection of the easement corridor

I believe that none of these requirements have been adequately delivered by Transgrid's project team and that they were not frank and forthright with relevant information when they attended on property visits during the period 25 May, 2020 to 11 October, 2022.

Transgrid employees failed to advise me that I was able to have a route refinement assessment undertaken through my property east to the Bango Nature Reserve.

Repeated verbal and email requests by myself were met with contemptuous disregard by Transgrid.

Transgrid led me to believe that the HumeLink transmission line assessment criteria would be determined on a route that minimises net impact in accordance with Transgrid guiding principles to the route selection process including:

- keeping the transmission line as straight as possible
- selecting the shortest possible route between two substations; and
- where possible paralleling existing transmission easements or using public land.

In conjunction with these principles, Transgrid uses a constraints mapping process that considers, social considerations, environmental considerations, land use considerations, network resilience and cost.

'Transmission line easements will be located parallel with existing transmission lines or road corridors, or along property boundaries, where possible, to reduce potential fragmentation of properties and disturbance to existing land uses.'

Transgrid transmission line easement route selection failed to meet any of the abovementioned statement criteria.

There has not been transparent, genuine consultation with myself as a stakeholder and the neighbouring residents of Zouch Road, Wargeila Road and Fairy Hole Road.

3. LANDSCAPE CHARACTER AND VISUAL IMPACT

Transgrid Humelink EIS – TR 8 Landscape Character and Visual Impact Assessment page 56,

- . Black Range to Yass landscape character area *'There is an area of rural lifestyle residential blocks in this landscape, along Wargeila and Fairy Hole roads, north of Yass.'*

Failure to take into consideration the fifteen residences of the Zouch Road, Yass, is a major omission of the Transgrid HumeLink EIS.

My repeated requests to Transgrid to provide the methodology used to map the easement route through the centre of my property, fragmenting the property and rendering the property useless for agricultural production have not been forthcoming.

A HumeLink Transgrid Project employee provided me with an email and attached a map dated 9 November, 2022 which advised that the transmission line distance from my residence was 360 metres. Yet in the EIS Appendix G /14 the measurement is stated at a 269 metre distance from project footprint.

Similarly, the distance from the resident at 6 Zouch Road, Yass is also misrepresented in the same email and map at a distance of 351 metres. Yet in the EIS it is stated at 270 metres from the project footprint, with a disclaimer of *'intervening vegetation (around dwelling) and 'no potential moderate or high visual impact'*.

I refute the assertion stated in the HumeLink EIS as being accurate in relation to the statement of *'intervening vegetation'* rendering *'no potential moderate or high visual impact'* when in fact the vegetation mentioned in relation to 6 Zouch Road consists of a sparse scattering of eucalyptus trees no more than 10 metres in height along the Wargeila Road, compared to transmission towers of up to 80 metres in height.

In the same TR 8 report in relation to my property, Transgrid state that *'no property visits undertaken and only 'Potential moderate or higher visual impact.'*

This statement is completely false and misleading. Firstly, two Transgrid place Managers had visited my property on several occasion and spoke to my husband.

Secondly, I engaged a private advisory Consultant to investigate and report on the impact of the HumeLink corridor through my property which resulted in the HumeLink Easement corridor being assessed as *'high impact zone'*.

The visual impact of my property should not be confined to *'around dwelling'* as described in the HumeLink Project EIS. Visual impact assessments have not taken into consideration the primary use of the land which is farming and this requires the presence of the landowners and employees to habitat the entire property at various times.

The photograph of my property in TR 8 HumeLink Landscape Character and Visual Impact Assessment page 57, Figure 6-5 Undulating Rural Hills and Ridges Landscape, Character Images is a photograph taken from the Wargeila Road towards the south eastern side of my property and is not a true and accurate representation of the actual visual impact. The photograph has been altered to exclude the residential dwellings of the Zouch Road and beyond to Fairy Hole Road which are clearly visible from this viewpoint.

Transgrid in their HumeLink Project EIS have attempted to *'minimise'* the visual impacts on my property and the residences on Zouch, Wargeila and Fairy Hole Roads.

The *'view points'* selected by Transgrid for assessing the visual and landscape character of the HumeLink Project is not representative of the landscape character zones and requires re-assessment of my property and the other impacted properties of 6, 41, 61 Zouch Road and the other residences in the HumeLink Project easement vicinity which have not been included in the EIS.

The Yass Valley Council Strategic Planning Statement. (TR8 HumeLink – Landscape Character and Visual Impact Assessment 3.2.4 page 22, states:

'It defines the special characteristics which contribute to Yass Valley's identity and recognises the shared community values to be maintained and enhanced.'

'The vision for Yass Valley is: to build and maintain sustainable communities while retaining the region's natural beauty'.

Yass Valley Local Environmental Plan 2013

'The Yass Valley LEP aims to 'protect high quality agricultural land', protect and enhance the character of each of the villages in Yass Valley and minimise land use conflicts (NSW Government 2013, cl.1.2(2b,g,k).

The large number of residences on Zouch Road, Wargeila Road and Fairy Hole Road combined could be defined as being a 'village' (Oxford dictionary: a rural settlement that is much smaller than a town) and would compare in size to the villages of Bowning, Goondah, Binalong, Dalton and Jerrawa.

The HumeLink Project in its current proposed form would not be in keeping with the characteristics which contribute to the Yass Valley's identity of *'maintaining sustainable communities while retaining the region's natural beauty and the protection of high quality agricultural land.'*

HumeLink Landscape and visual impact assessment Attachment D – Potential visibility (Burrinjuck to Yass and Jerrawa) page 5, and

Attachment H – Visibility of transmission line structures with 2 kilometres (Woolgarlo to Yass and Bango, page 12 and,

Attachment J – Private dwelling assessment (Woolgarlo to Yass and Bango)

Transgrid maps marked as Attachment D and H, do not have one area marked in the colour indicated as 'high visibility' for the area location of my property and surrounds which I consider to be of 'high visibility' and therefore require re-assessment in the EIS.

Transgrid map marked as Attachment J, indicated my dwelling as having *'moderate potential visual impact'* when the proposed 80 metre high 'strainer tower' for directional change is 269 metres from the southern side of my dwelling which has windows of the kitchen, dining room and sun room on that side and the transmission tower will be located on the top of an adjacent hill.

Assessment for the visual impact of the same strainer tower on 6 Zouch Road is absent from the map, when this dwelling is only 270 metres from the 80 metre high strainer tower crossing the Buggali Road directly in front of this residence.

This indicates a lack factual credibility on the part of HumeLink Transgrid EIS.

4. NOISE AND VIBRATION TECHNICAL REPORT – EIS TR 9

Reference - NSW Environment Protection Authority (Noise Policy for Industry) (EPA 2017)

Transgrid Executive Report states that noise > 20 dB is Highly Intrusive.

HumeLink noise and vibration impact assessment, worse-case daytime transmission line construction noise impacts map, Attachment G.3, page 25 of 36, states *my property and 6 Zouch Road are identified as potentially impacted receivers as 11 -20 dB 'moderatively intrusive'.*

This assessment is flawed as *'brake and winch'* pads will be required for the two road crossing and directional change strainer tower construction across Buggali and Wargeila Roads, being a distance of 269 metres and 270 metres respectively from the transmission line footprint delivering noise and vibration to both dwellings.

HumeLink Environmental Impact Statement 4-13 states:

Stringing of the transmission lines. Once the structure is erected and secured, the transmission line would be strung by either ground pulled draw wire (with brake and winch sites), helicopter or line stringing drone.

The area required for the construction of each transmission line structure would require access for assembly and stringing work. At a typical site, this would include a temporary area of up to 50 metres by 70 metres at each transmission line structure location.

Where a transmission line structure is proposed to allow for a direction change of the transmission line, additional areas of 50 metres by 50 metres would be required to allow for brake and winch sites. Brake and winch sites needed for this activity are typically located about 150 metres away from the structure.

Brake and winch locations have been identified as impacting receivers when they are within 600 metres. Both my residence and 6 Zouch Road are well within the 600 metre location.

My residence has been identified as having a *'brake and winch'* pad near the dwelling which will be impacted by *'noise and vibration'*. The family cemetery, my father's grave site which is in the vicinity of the residence has not been identified in any vibration impact assessments reports, construction blasting, or any other impacts from the construction of the transmission line using vibration intensive equipment.

This is clearly, another flaw in the HumeLink Project EIS and requires further investigation and an assessment report is requested.

5. NEGATIVE CUMMULATIVE IMPACTS

I believe that not enough impact assessment has been done on this subject. My property is already burdened by a 330kV and 132 kV transmission line.

Currently under construction is the Rye Park Wind Farm which is visible from my property to the east and the noise accumulation from this site when operational together with the 330 kV transmission line and the proposed HumeLink 500 kV overhead transmission line will exceed noise limits at dwellings enforced by the NSW Environmental Protection Authority (Noise Policy for Industry (EPA 2017)).

Operational impacts from the transmission lines HumeLink EIS 7.2 page 63 states:

The project footprint is located around 4.5 kilometres north of Yass and is otherwise generally distant to any major towns. The majority of sensitive receivers potentially impacted by operational noise from the project transmission lines are scattered rural residences surrounding the transmission line route.

This statement is flawed and frankly offensive for the following reasons:

1. It implies that rural communities are not as important as city dwellers and will be less impacted by the operational transmission lines because they are 'rural'.
2. That the impacted rural people are 'scattered rural residences surrounding the transmission line route'.
3. It attempts to minimise the impacts on residents of my rural community by implying something which is false and misleading.

From my observation of the various maps in the EIS and my ground knowledge in particular, the residences located in my rural area north of Yass which are at a distance of less than 4.5 kilometres from Yass and are not 'scattered rural residences' as described in the EIS but are quite compacted in the area constrained by the Wargeila, Fairy Hole and Zouch Roads.

Operational transmission line noise has been defined as a 'transmission line noise impact' up to 470 metres from the easement, well within the Transgrid map measurement to my residence and that of several residents on Zouch and Wargeila Roads.

10/17

The EIS 25-9 states:

In addition, given the types of combined cumulative impacts that could occur during construction, there is potential 'for construction fatigue' to be experienced by receivers near the project. However, with the implementation of mitigation and management measures for the project (refer to Section 25.7.3) and the implementation of similar measures described by EnergyConnect and Gregadoo Solar Farm it is expected that the combined impacts that could potentially result in construction fatigue would be managed.'

Construction fatigue was discussed at a CCG Meeting when a Transgrid Project Manager said "if you get sick of us during construction we will go away for a month or two and leave the site and then come back at a later time."

This statement demonstrates the total lack of comprehension by Transgrid which has been evident throughout the process of dealings with Transgrid on the HumeLink transmission line.

This sort of disruption to an agricultural business operation would be totally implausible and only demonstrates the lack of understanding by Transgrid employees. An agricultural business is 'not child's play' and involves intensive farming operations all year round to manage crops, pastures and livestock.

The absence of 'agricultural expertise' from the HumeLink Transgrid Project Team has been clearly evident from the start of this project all the way through to the EIS.

The transmission tower structures will have significant negative impacts on current and future production capacity due to many factors including, but not limited to:

- a) height restrictions on farming machinery and the preclusion of use of larger, more efficient agricultural machinery.
- b) no-go areas on farms for aerial pasture management i.e. fertiliser application.
- c) reduction in property values by 50 per cent.
- d) interference with drones used in farming and livestock management
- e) increased biosecurity risks
- f) restrictions on controlling fire near transmission lines on farms
- g) visual amenity impacts due to the high visibility of the infrastructure on the landscape
- h) restrictions to the adoption of future technologies such as virtual fencing, animal welfare collars and yield mapping

i) The destruction of valuable environmental habitat and productive farmland

In my instance every paddock on my farm will be impacted by the transmission line route through the centre of a 249 hectare property producing sheep for superfine wool.

HumeLink EIS – Landscape Character and Visual Impact Assessment, page 144 assesses my property as having ‘moderate’ potential visual impact.

This cannot be an accurate assessment as the location address is described as ‘Wargalla Road’ which is incorrect spelling and states reasoning as:

- *some intervening landform and vegetation*
- *existing view to existing transmission lines*
- *project footprint beyond existing transmission lines with a change in direction*

The transmission line towers will be located on the top of a hill, 269 metres from my dwelling with three sparsely separated 15 metre tall eucalyptus trees diagonally positioned on the western side of Wargeila Road, then the route changes direction and diagonally ascends up another hill across Buggali Road with no trees intervening in the line of sight.

This EIS Landscape Character and Visual Assessment impact statement requires further investigation by Transgrid as it is not factual and should reflect the true impact.

HumeLink EIS – 8.0 Cumulative Impact. 8.1 Cumulative Landscape Character and visual impacts. Page 154 states:

Project: – Rye Park Wind Farm

Description: – Rye Park Wind Farm is located to the north-west of Yass.

Cumulative impacts: - Potential cumulative visual impact: Rye Park Wind Farm would be seen sequentially and together with HumeLink in areas east of Bango Nature Reserve. As this area is fairly remote, the projects would be seen from sections of Bushs Road and Coolalie Road and from nearby rural properties.

These statements above are factually incorrect and lack accurate assessment for the following reasons:

1. The Rye Park Wind Farm is located north-east of Yass. Not north-west as stated.
2. The Rye Park Wind Farm turbines currently being constructed, together with the 330kV transmission line are currently visible from **Wargeila, Buggali, Fairy Hole and Zouch Roads** to the **west** of Bango Nature Reserve and will be seen sequentially with the HumeLink transmission line.

This assessment report fails to mention the four roads listed which currently have visibility of the yet to be completed Rye Park Wind Farm and once again attempts to minimise the visual impacts on the landscape by not taking into account the residences on these roads which

are not even acknowledged in the HumeLink EIS and are not '*fairly remote*' as stated by Transgrid and they are within walking distance of Yass.

It demonstrates a very superficial knowledge of the area impacted the the HumeLink transmission lines and the Rye Park Wind Farm.

An accurate EIS assessment cannot be achieved when too much 'desk top' analysis has been undertaken by Transgrid.

6. BUSHFIRE RISKS

The bushfire risk for the dead end Zouch Road residences is unacceptable. The 330 kV transmission line crosses Zouch Road diagonally at the entrance to Wargeila Road and then crosses Wargeila Road approximately 500 metres to the south. The proposed HumeLink 500 kV transmission line crosses Wargeila Road 250 metres to the north.

The RFS state that there is a 25 metre exclusion zone around overhead transmission lines during smoke and fire events due to the possibility of the lines producing an electrical arc which can electrocute someone.

Also, prohibited are fighting bushfires with aircraft or drones.

Effectively residences on Zouch Road have no escape route either north or south in a bushfire.

In January, 2017 birds were electrocuted by a transmission line at a wind farm near Canberra starting a fire which burnt out 3,400 hectares and caused millions of dollars of damage.

During this fire event a 950 hectare property near Bungendore, had 880 hectares burnt out in under an hour.

This factor about Zouch Road has not been adequately addressed in the HumeLink EIS and needs to be carefully assessed as human lives are at stake.

7. AIR QUALITY- DUST CONTAMINATION DURING CONSTRUCTION

Contamination of drinking supply water by airborne dust particles from the construction of access roads, construction of tower pads, construction of brake and winch pads which all require the bull dozing of vegetation exposing the soil underneath.

Dual access roads measuring four metres wide with one metre batters on each side to carry a 280 tonne crane and seventeen concrete trucks to each of the 850 tower sites along the 360 kilometre transmission line.

Rural residents rely on water collected from house and shed rooves and contained in water storage tanks for household domestic use and water for stock.

The contaminates in the soil from old disused sheep dips containing carcinogenic products imbedded in the soil would be disturbed and distributed through the airborne dust particles and settling on these roof structures during the construction of the HumeLink Project over the three year construction period and beyond and would contaminate the water supplies and render them unfit for human consumption for a lengthy period which I consider to be unreasonable and unacceptable.

The Yass district prides itself on the production of superfine merino wool. Wool quality can be contaminated by dust particles degrading the wool clip and consequent loss of value.

The HumeLink EIS fails to adequately address the issues associated with airborne dust contamination, particularly when there are carcinogenic contaminates on site. Transgrid contends to mitigate the impact with a few water trucks dampening the roads which they believe will eliminate the problem.

This dangerous impact requires further investigation and analysis by Transgrid.

8. UNDERGROUNDING HUMELINK TRANSMISSION LINES

The benefits of constructing the HumeLink transmission lines underground far outweigh the catastrophic impacts of an overhead transmission construction for the reasons stated below:

1. Easement reduced from 70 metres for overhead transmission lines to 15 metres wide for underground with the ability to replant vegetation.
2. Trench depth of 1.5 metres compared to tower footing holes to a depth of 22 metres which could actually drill into underground water streams creating a water bore.
3. Greater scope for transmission route alternatives to avoid impacted residents and environmentally sensitive land.
4. Underground transmission lines routes are able to horizontal directional drill for up to 1 kilometre to avoid soil and water impacts.

HumeLink Project corridor is within 40 metres of the high bank crossing of Fairy Hole Creek. The HumeLink EIS does not even address the control measures that would be implemented to mitigate any impacts of soil erosion and sediment control in accordance with the DPI Guidelines for Controlled Activities on Waterfront Land (2018) for the Fairy Hole Creek.

9. SOCIAL IMPACT

Prior to the corridor route selection there was no social impact assessment conducted for the HumeLink Project by Transgrid. Transgrid naively thought they could just parallel the

existing 330kV transmission line which was built some 60 years prior at a very different time when social, economic and environmental concerns were not at the forefront of the Community and there were vast uninhabited swaths of open countryside land to build on.

It is a very different society and environment that we live in today.

Transgrid have stated that the social impact assessment will be done as part of the EIS.

This statement in itself suggests that Transgrid were in such a hurry to get this Project approved that they failed to take into consideration that community consultation was a requirement of today's society.

In order to get the relevant information about the HumeLink Project I had to become a member of the Community Consultation Group (CCG). Prior to this I was unaware of many of the facts relating to the project.

Community consultation has been lacking on this project. At a CCG meeting on 23 May, 2023 Transgrid informed us that the 4,322 neighbouring properties along the route would be 'door knocked' and advised of the HumeLink Project.

At a subsequent CCG Meeting on 2 August, 2023 Transgrid advised that the method of contacting the 4,322 neighbouring households was now being done by telephone, email, letterbox drop, letters in the post.

Therefore, no one was 'door knocked' as promised by Transgrid and there is no guarantee that all the neighbouring residents to the transmission line have in fact been fully informed about the proposed HumeLink transmission line.

- iii TR07 HumeLink – Social Impact Assessment states:

State Significant Infrastructure (SSI) projects that occur across large area can have the potential to cause social impacts, both negative and positive. The project has been designed (and will continue to be designed) to minimise or avoid negative social impacts. Remaining negative impacts have been identified and can be appropriately mitigated.

Yass Valley has in the past 20 years seen an influx of residents who live in Yass and the regions and commute to Canberra for employment putting pressure on the already limited housing stock.

Yass is also roughly the middle point between Melbourne and Sydney via the Hume Highway which means that the Motels are mostly fully occupied on a regular basis.

The medical facilities at the Yass Hospital are antiquated and there is no resident doctor at the facility. Emergency events require assistance at the Canberra hospitals and it is likewise

for childbirth, all medical events requiring an operation. The local medical centres are already operating to full capacity.

Social Licence

The HumeLink Transgrid EIS – 5.3.8 Social licence and legacy states:

In general, stakeholder feedback was positive regarding the project especially if it meant jobs for local workers. There was an understanding that there was greater benefit of the project in terms of national infrastructure but that there was also an effect on local landowners and the town.

The reality of this is that the unemployment rate is at a ten year low, as such a new large project is likely to be inflationary and lead to more labour shortages which already exist in the Yass district.

Therefore, local employment opportunities are likely to be minor with Transgrid work crews bought in from outside the area putting more pressure on what is already a housing and accommodation shortage in the area.

CONCLUSION

Local landowners along the route have expressed disappointment with both the lack of consultation and their belief that Transgrid failed to explore a transmission route that would be more direct and would use public land.

There is a perception that Transgrid have not acted with transparency since introducing the project to the community.

Lack of transparency and publicly available information since the proposal was first introduced has led to a frustrating period for landowners.

There is a significant level of distrust with the community from those prior dealings with Transgrid on the HumeLink Project.

The NSW Environmental Planning and Assessment Act 1979 (EP&A Act) defines the environment as including 'all aspects of the surrounds of human, whether affecting any human as an individual or in his or her social groups'.

The objectives of the EP&A Act include:

Objective (b): To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about the environmental planning and assessment.

The objective of the EP&A Act have not been met by the Humelink Transgrid Project and it is for the reasons stated in my submission of objection to this project that I urge the Minister to not approve the Project in its current form and that to achieve the Government's clean energy policy, undergrounding the Humelink transmission lines is the only solution.

Yours sincerely,



LIST OF ANNEXURES INCLUDED – ENVIRONMENTAL IMPACT STATEMENT – HUMELINK

SSI - 36656827

ANNEXURE A: FIGURE 4: VEGETATION ZONES WITHIN THE IMPACT ZONE (MAP)

ANNEXURE B: FIGURE 9: BIODIVERSITY VALUE MAPPING

ANNEXURE C: FIGURE 5: BOX-GUM WOODLAND (EPBC) EAST OF FAIRY HOLE CREEK WITH PROPOSED IMPACT AREA

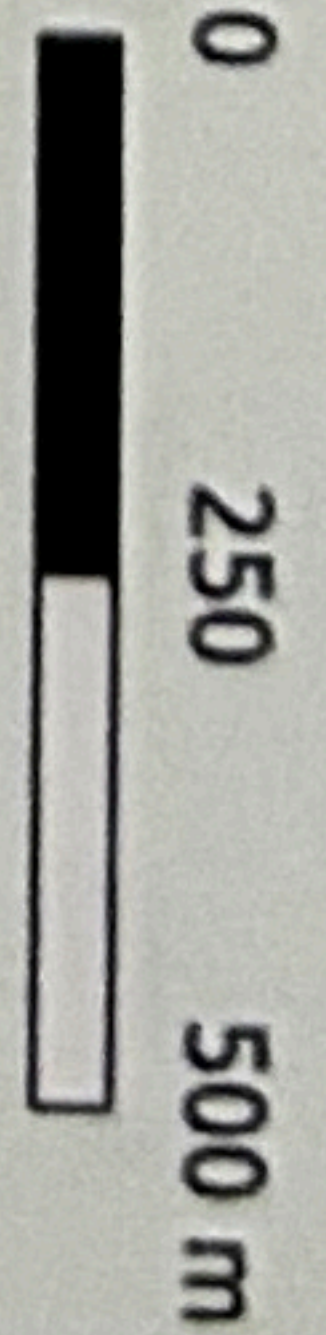
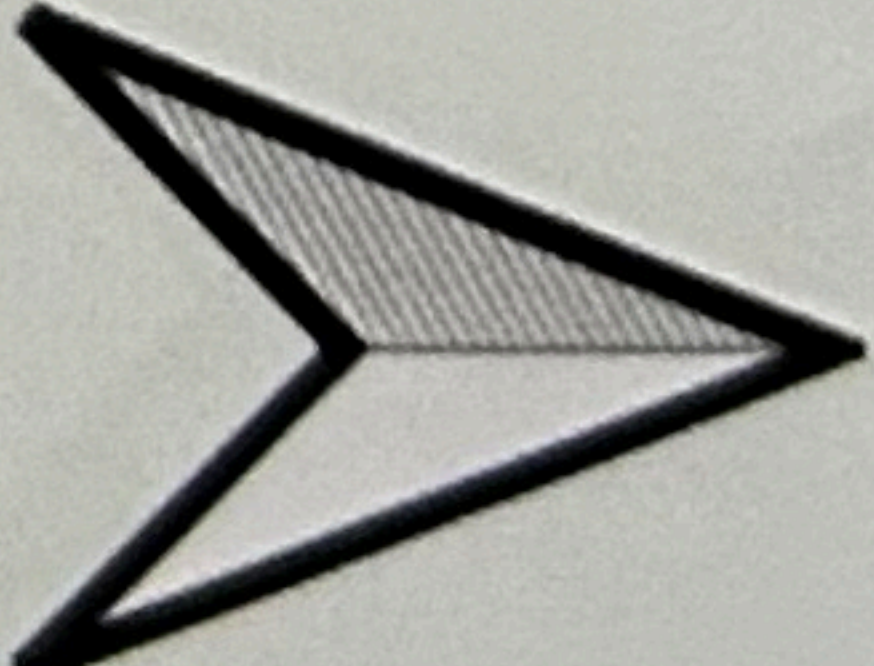
ANNEXURE D: FIGURE 6: BOX-GUM WOODLAND (EPBC) WEST OF FAIRY HOLE CREEK WITH THE PROPOSED IMPACT AREA

ANNEXURE E: TABLE 8: HABITAT FOR NATIVE AND THREATENED FLORA AND FAUNA.

ANNEXURE F: FIGURE 7: ROCKY HABITAT WITHIN STUDY AREA

ANNEXURE G: FIGURE 3: BAM PLOT MAP FAIRY HOLE CREEK

FIGURE 4: VEGETATION ZONES WITHIN THE IMPACT ZONE



Legend

- Study area
- Proposed easement
- PCTs within impact zone
- Zone 1
- Zone 2
- Zone 3
- Zone 4



Date: 06/02/2023

Projection: GDA 1994 MGA zone 55

Imagery: ESRI Satellite
(ArcGIS/World_Imagery)

FIGURE 9: BIODIVERSITY VALUE MAPPING



Legend

- Study area
- Lot
- Proposed easement
- Biodiversity Values**
- Biodiversity Values
- Biodiversity Values added in the wet wet

0 250 500 m

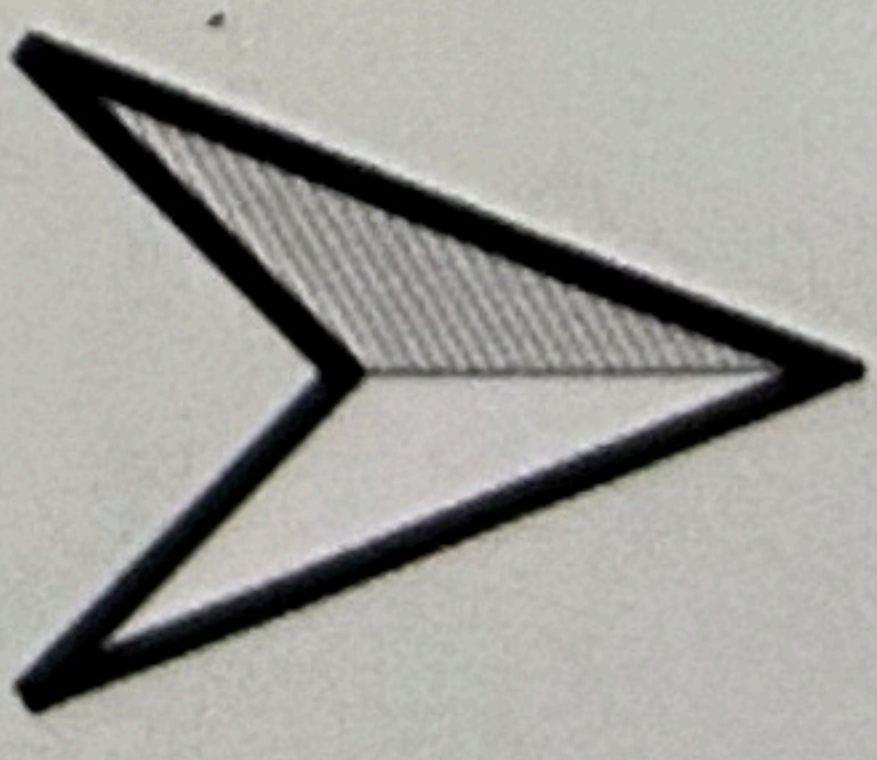


FIGURE 5: BOX-GUM WOODLAND (EPBC) EAST OF FAIRY HOLE CREEK WITH THE PROPOSED IMPACT AREA



FIGURE 6: BOX-GUM WOODLAND (EPBC) WEST OF FAIRY HOLE CREEK WITH THE PROPOSED IMPACT AREA.

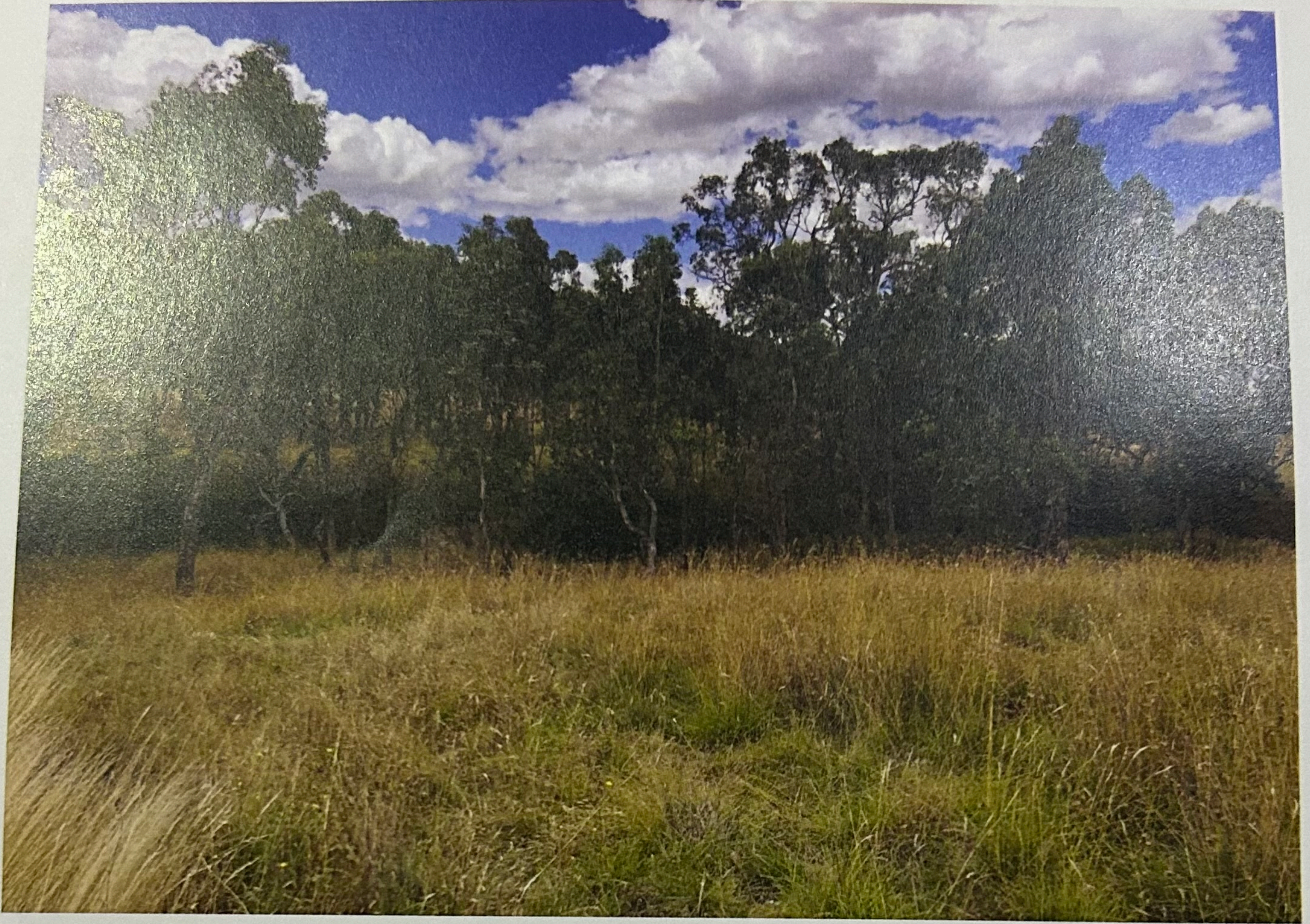


TABLE 8: HABITAT FOR NATIVE AND THREATENED FLORA AND FAUNA

Potential habitat for threatened flora and fauna	
Approximate area of proposed impact area covered by native vegetation (ha or %)	65%
Valuable habitat types observed or known on site:	-
• old growth native woodland with large hollow-bearing trees	<input checked="" type="checkbox"/>
• she-oak (Casuarina or Allocasuarina) woodland	<input type="checkbox"/>
• other native woodland	<input checked="" type="checkbox"/>
• native pasture or grassland with >50% native groundcover	<input checked="" type="checkbox"/>
• rocky outcrops	<input checked="" type="checkbox"/>
• a farm dam, creek, river, or other wetland	<input checked="" type="checkbox"/>
• koala habitat trees <i>Note: if the site falls within a region subject to the Koala Habitat and the area to be cleared is >1 ha, SEPP 44 may apply.</i>	<input checked="" type="checkbox"/>
• habitat that is likely to be suitable for/attractive to other threatened species <i>Consider other mammals, birds, reptiles, and flora—e.g., orchids</i>	<input checked="" type="checkbox"/>

FIGURE 7: ROCKY HABITAT WITHIN THE STUDY AREA



TABLE 8: HABITAT FOR NATIVE AND THREATENED FLORA AND FAUNA

Potential habitat for threatened flora and fauna	
Approximate area of proposed impact area covered by native vegetation (ha or %)	65%
Valuable habitat types observed or known on site:	-
• old growth native woodland with large hollow-bearing trees	<input checked="" type="checkbox"/>
• she-oak (Casuarina or Allocasuarina) woodland	<input type="checkbox"/>
• other native woodland	<input checked="" type="checkbox"/>
• native pasture or grassland with >50% native groundcover	<input checked="" type="checkbox"/>
• rocky outcrops	<input checked="" type="checkbox"/>
• a farm dam, creek, river, or other wetland	<input checked="" type="checkbox"/>
• koala habitat trees <i>Note: if the site falls within a region subject to the Koala Habitat and the area to be cleared is >1 ha, SEPP 44 may apply.</i>	<input checked="" type="checkbox"/>
• habitat that is likely to be suitable for/attractive to other threatened species <i>Consider other mammals, birds, reptiles, and flora—e.g., orchids</i>	<input checked="" type="checkbox"/>

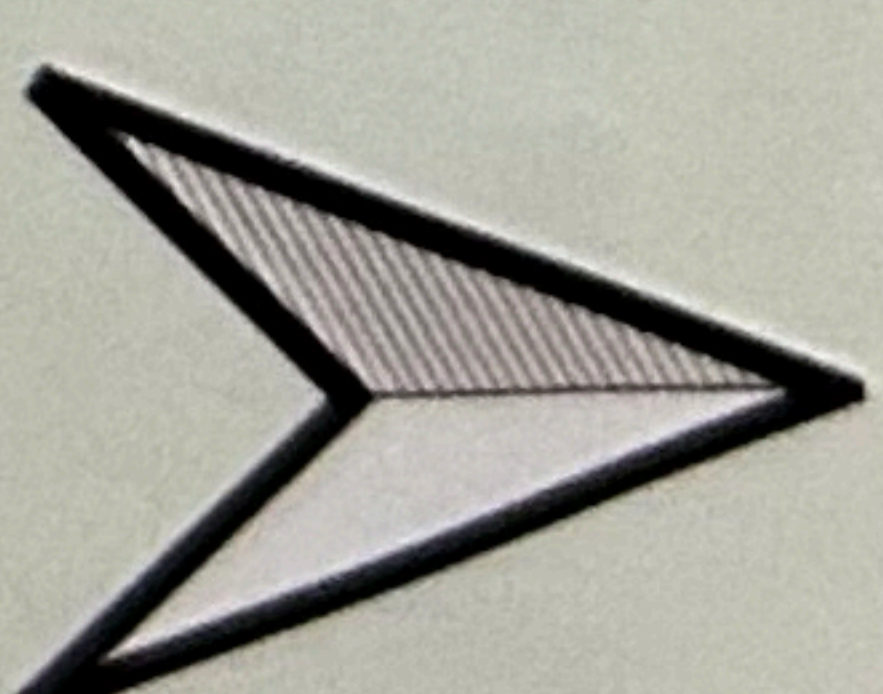
FIGURE 7: ROCKY HABITAT WITHIN THE STUDY AREA



FIGURE 3:





BAM
PLOT
LOCATION



0 250 500 m

Legend

-  Study area
-  BAM plot



Date: 26/02/2023

Projection: GDA 1994 MGA zone 55

Imagery: ESRI Sattelite
(ArcGIS/World_Imagery)