

11 October 2023

Anthony Ko
Energy Assessments
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Via NSW Planning Portal

SUBMISSION – SSI 36656827 CRITICAL STATE SIGNIFICANT INFRASTRUCTURE - HUMELINK

Dear Mr Ko

I refer to the aforementioned matter and make particular reference to the recent exhibition of the Critical State Significant Infrastructure project lodged by Humelink with the New South Wales Department of Planning and Environment – Major Projects division.

1. The Proposal

Council has reviewed the exhibition material including the project merits and supporting consultancy reports made available via the New South Wales Planning Portal. Council understands that the project can be summarized into four main categories, being: Transmission Line Infrastructure, Substation Infrastructure, Ancillary Infrastructure and Construction facilities and associated enabling works.

The components of these four categories included within the project description consist of:

1.1 Transmission Line Infrastructure

- (i) Proposed 500kV transmission lines in 70m – 130m wide easements, with lattice steel structures between 50m and 70m high spaces between 300m and 600m.
- (ii) Proposed 330kV transmission line between Wagga and Gugaa – 60m wide easement, with transmission lattice steel structures between 24m and 50m high.

1.2 Substation Infrastructure

- (i) Proposed new 500kV Gugaa Substation.
- (ii) Proposed expansion of existing substations at Bannaby and Gregadoo
- (iii) Future Maragle Substation associated with the Snowy Hydro 2.0 Project.

1.3 Ancillary Infrastructure

- (i) Utilisation of existing roads and access tracks (with upgrades as required), new access tracks and crossings.
- (ii) Fibre optic connections between transmission line structures and the Rye Park Wind Farm substation.
- (iii) Telecommunications facilities.

1.4 Construction Facilities and enabling works

- (i) Proposed 14 construction compounds to assist in the delivery of construction works.
- (ii) Temporary Accommodation Facilities for 200 itinerant workers.
- (iii) Aerial landing pads.

2. Submission

Snowy Valleys Council supports in principle the development of key infrastructure in New South Wales that assists in the delivery of renewable energy sources to both increase energy supply options within the State of New South Wales but also to guarantee electrical supply reliability.

The Humelink proposal provides important enabling infrastructure to support the Snowy Hydro renewable energy project and deliver upon crucial commitments of the Australian Government to reduce climate change emissions to achieve net zero by 2050. Whilst Council in principal supports the expansion of clean energy initiatives such as Snowy Hydro 2.0, including the development of network infrastructure around sustainable and renewable energy projects, it has a number of concerns in relation to the current Critical State Significant Infrastructure Proposal being considered.

2.1 Expected Impacts

2.1.1 Accommodation Facilities.

Similar to other regional centres, Snowy Valleys Local Government Area is experiencing unprecedented shortages in both residential housing accommodation and low vacancy rates in its tourist and visitor accommodation providers within the town centres. These shortages are creating upward pressures on housing and rental costs with demand outstripping supply.

Whilst it is acknowledged that the development is seeking to provide a standalone temporary accommodation facility for up to 200 workers, Council has concerns that contractors and subcontractors to the Humelink project may seek to supplement this accommodation option by utilizing existing depleted housing and accommodation stock outside of the proposed accommodation which will have a detrimental effect on both the local community and more broadly the regional economy.

The town centre of Tumbarumba has been recently impacted by the effects of subcontractors associated with Humelink utilizing up to half the accommodation offering at the Tumbarumba Caravan Park. Largely contractors associated with renewable energy projects in the region are continuing to contribute to these shortages in accommodation which is impacting on tourism and seasonal workers frequenting the region. This has also had detrimental effect on the regions' ability to attract skilled and professional labour to the area due to accommodation shortages.

The site for the proposed accommodation has been identified in a location which is isolated from the main towns and villages where it is expected that the region will receive minimal benefit from the proposed development. The site is expected to place pressure on local road networks and is expected to be constrained by way of its isolation to reticulated water supplies and also sewerage disposal.

The location of the subject accommodation facility represents a missed opportunity which stems from a loss of social enrichment and connection of the workforce with the local community, a missed opportunity for local retail expenditure by the workforce investing in local communities and the diminished potential for legacy benefit through the donation of facility infrastructure to the community at time of decommissioning.

Whilst Council recognizes that an accommodation facility is required to house the workforce, Council is of the view that such a facility should be located within the town centre so social and economic benefits from the facility can be leveraged within the town centre and the local community. Council has identified a site on the fringe of Tumbarumba being the town common on Alfred Street, Tumbarumba which could be exploited for this purpose to enable these opportunities as outlined to be realized or alternatively additional investment could be made in the local caravan parks and accommodation providers which would have a similar net benefit.

2.1.2 Undergrounding versus Overhead aerial infrastructure.

Council has adopted a position that it rejects and vehemently opposes the use of overhead wires and lattice towers within the Snowy Valleys Local Government Area. This position has been made resolute in its recent evidence provided to the New South Wales Public Enquiry into Undergrounding of electrical infrastructure associated with Humelink.

Council has provided a copy of the written submission (Annexure 1) which should be considered as part of the assessment of the critical infrastructure proposal for Humelink.

Council stands by the evidence provided in the submission that the undergrounding is feasible, practical and should be pursued to optimize the project outcomes, minimize future maintenance obligations and to ensure that the Snowy Valleys community is protected from avoidable adverse impacts associated with the construction of overhead transmission lines.

2.1.3 Community Enhancement Fund (CEF)

It is widely recognized that the development as proposed will have profound social, economic and environmental impacts on the Snowy Valleys Community. Those impacts will have the greatest effect on the community during the construction phase of the development but will also have a measurable and lasting impact over the lifespan of the project.

Council had commenced preliminary discussions with the proponent prior to lodgment of the application with the Department to ascertain an appetite for the establishment of a community enhancement fund, a fund that would provide an annual indexed monetary contribution to Council for community projects and associated social infrastructure. The proponent was not

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adverse the establishment of the fund and was open to the notion of how the mechanics of such fund could operate to the benefit of the local community.

In pursuit of the establishment of such fund, should the application be determined by way of approval, Council requests that the Department apply a condition to any proposed consent that commits the proponent to the establishment of a community enhancement fund, with an annual indexed contribution payable to Council. The contribution payable should be 1 per cent of capital cost of the development (\$4.89 Billion) with payments made equally over the proposed 20 year lifespan of the project and indexed annually from the base year 1 of the first payment. The apportionment of expenditure within the Snowy Valleys Local Government Area should form the basis of the 1 per cent calculation. In summary, the CEF equation for the calculation of the contribution should include:

$1\% \times (\text{Capital Investment Value of the Project apportioned within Snowy Valleys Council Local Government Area} / 20) = \text{Year 1 CEF payment.}$

The contribution amount for year 2 and beyond would be Year 1 contribution amount multiplied by the consumer price index (Sydney) all categories. Whilst the project life is expected to be 20 years, Council argues that the CEF should continue for the life of infrastructure should the project extend beyond the stated 20 year timeframe. Such contributions should continue to be levied and be indexed annually.

The Community Enhancement Fund will be an important step to ensure that the project provides a positive contribution and legacy for the Snowy Valleys Community in the delivery of programs and projects to offset a portion of the expected impacts of the development.

2.1.4 Landscape Visual Amenity Impacts

The development as proposed will have irreversible impacts on the natural environment and landscape visual amenity as the project advances, unless the transmission lines are placed underground. The proponent has identified within the EIS that considerable land clearing will be required to create 70 to 140m wide easements for the lattice towers and transmission lines. The path of the infrastructure will create significant alteration to the natural landscape and the erection of structures will have a permanent modification to the Snowy Valleys vistas within the region. The Department should consider as part of the assessment of the proposal a detailed landscaping plan that seeks to provide additional landscaping opportunities of local endemic species within important view corridors from main roads, walking trails and vantage points throughout the proposed disturbance areas.

The application identifies that the development will predominately be located within the Bargo State Forest which will intersect with the historic Hume and Hovel hiking track which has been identified as a key piece of tourist infrastructure in the Tracks and Trails Masterplan adopted by Council in 2023. Being a destination trail within the Snowy Valleys, it is expected that the proposed development will have significant visual and environmental impacts on the integrity of the trail. The proposal does not indicate how these impacts will be appropriately managed nor does it address the likely impacts on tourism as a result of the development.

2.1.5 Compensation for land owners and loss of viable agricultural land

It is understood that the proponent will be seeking to provide easements through private agricultural lands throughout the project areas. Should the proponent seek compulsory acquisition or register easements restricting the use of the land along any infrastructure route,



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Council requests that landowners be fairly compensated for the loss in value and agricultural viability of the land. Council suggests that a transparent framework be established to enable both upfront payments and also ongoing compensation payments for the life of the project for the duration of the lifespan of the project.

Council acknowledges that the project will have a considerable impact on the viability of some farming operations through restrictions placed on agricultural lands affected by transmission lines and tower infrastructure. The local government area has a strong livestock farming agricultural industry and appropriate protections should be implemented to ensure that farming operations are not impacted, impaired or sterilized as a result of the proposal.

2.1.6 Biodiversity Offset Credits

Notwithstanding the requirements of the *Biodiversity Conservation Act 2016*, Council acknowledges that the land clearing associated with the project is likely to require payment of a considerable offset credit to the New South Wales State Government.

Council requests that any payments made should be re-invested in projects within the Local Government Area to ensure that there is no net loss in biodiversity as a result of the project construction and future vegetation management.

2.1.7 Biosecurity

Council partners with the New South Wales Department of Primary Industry in the administration of the Weeds Action Plan (WAP) Partnership, a successful program that targets noxious and environmental weed threats throughout the Southern Region. Council has been undertaking significant work within the defined project area in both working with landholders to identify and control weeds species and has been undertaking inspections of roadsides and employing appropriate control measures where necessary.

Council requests that the Department ensures that the WAP program is not compromised as part of the development through imposing conditions should the development be approved requiring the control of existing weeds in the project areas and emerging weeds on any disturbed areas as part of the construction process. Council also requests that conditions are imposed to prevent the migration of weeds through the movement of materials and placement of materials stockpiles and the trafficking of seeds and seed related materials on construction vehicles and vehicle tyres on any proposed traffic routes for the development.

2.1.8 Natural Hazards

Council has concerns with respect to the provision of above ground infrastructure and its proposed route locations within high risk bushfire prone areas. Whilst it is understood that the proponent is required to manage vegetation in and around the project pathways, Council still has concerns with respect to the potential for bushfire risk as a result of fallen or damaged infrastructure that could lead to potential catastrophic fire events similar to those experienced in the Dunns Road fire in 2019/2020 fire season.

With significant portions of the Local Government Area designated as bushfire prone and approximately half of the shire as both State and private sustainable forest plantations, Council request that the proponent provide assurances to the community that the infrastructure poses no increased fire risk threats within Snowy Valleys and appropriate hazard reduction and risk assessments are employed to lower any such threat.

2.1.9 Road Asset Infrastructure

Council has identified that the subject development will impact three state highways being the Snowy Mountains Highway, Batlow Road and Gocup Road. It is expected that there will be four regional roads impacted including Elliot Way, Tooma Road, Wee Jasper Road and Wondolga Road and 18 local roads. (See Attachment 2 that provides a map of impacted road networks)

Council acknowledges that State Roads are designed for higher traffic volumes with more heavy vehicle usage and are considered to be of less of a concern in relation to additional construction traffic than Local and Regional Roads. Council also notes that the state highways are controlled by Transport for New South Wales who have greater capacity to remediate pavements should they fail as a result of additional traffic loads.

The Regional Roads throughout the Snowy Valleys Local Government Area have already been heavily impacted by Natural Disasters since 19-20 and have required significant investment by Council to ensure that the roads are safe and trafficable for all road users.

Snowy Valleys Council is the Local Roads Authority under the *Roads Act 1993*, and is responsible for all aspects of management and maintenance of local roads in the Local Government Area. In 2023-2024 financial year period, Council will spend \$4.4million on the maintenance and reconstruction of its local road network which is approximately 10 percent of its adopted annual budget.

Most of the local roads throughout the Local Government Area have relatively low levels of traffic and are designed and maintained for this level of use. The condition of these roads will deteriorate quickly through heavy construction vehicle usage associated with the Hume Link Project which will compromise road quality and safety and have a significant impact on Council's ability to maintain the roads with limited financial and resourcing capacity.

Council recognises that it maintains its local roads network in a fit for purpose condition and that a detailed dilapidation report needs to be prepared by the proponent in collaboration with Council and is agreed upon by both parties prior to the project construction commencing. The Department should apply a condition to any proposed consent placing an obligation on the proponent to lodge with Council a security bond over all identified road networks associated with the project to ensure that any damage will be remedied within an appropriate timeframe at the cost of the proponent.

Council is of the view that necessary road upgrades that need to be undertaken, should be done so prior to the commencement of construction. These upgrades need to be approved by Council via a section 138 permit including submission of detailed design plans including pavement details, road geometry and drainage so that a proper assessment of the traffic impacts and flow on effects can be assessed. Such assessment will be made in relation to the broader context of Councils road network and ongoing maintenance obligations.

Council remains particularly concerned with the local road network and specifically in the case where there is the increase in wear and tear due to the increase in heavy vehicle traffic particularly concrete, sand, gravel and water trucks. The supply and delivery of materials to the construction sites including steel and construction equipment remains a tangible issue for Council. The proponent proposes to mitigate these impacts by undertaking dilapidation surveys of all local roads to determine the current condition and conducting a post construction assessment to determine any road damage and undertake the necessary repairs.

Council insists that should the development be granted approval; a condition of consent should be applied that places an obligation on the proponent to maintain and repair local roads throughout the construction phase to ensure the roads remain fit for purpose for all other road users.

The proponent should be required to undertake regular inspections and repairs throughout the construction phase not just at the completion of construction. As the roads authority, Council should have ultimate jurisdiction under the provisions of the *Roads Act 1993* and supported by conditions of development consent to direct that the proponent maintain the road to Council's standards in the event that the road should be damaged or be required to be repaired as a result of additional traffic loading.

It is envisaged that Council will be required to allocate additional financial resources being considerably more on the maintenance of its local road network that is used by Hume Link construction traffic for the next 4-5 years. Council maintains that it should be compensated for the additional costs it incurs as a result of this development. Council also upholds that all road works should be undertaken in accordance with Council's *Roads Management Policy*.

In addition to the commitment to prepare a dilapidation report on the existing condition of the road surface, the report is required to include existing structural conditions of the pavement of Local Roads to be used by construction traffic. This must involve a Geotech investigation at the pre-construction stage. The investigation shall also examine anticipated impacts during the construction phase and recommend mitigation measures that should be included as repair work commitments, in the proposed Traffic and Transport Management Plan (which Council notes should be a 'Construction Traffic Management Plan').

The Traffic and Transport Management Plan is to include a commitment that any damage caused by construction traffic movements during the construction phase shall be progressively repaired at no cost to Council. In addition, at the completion of works, a joint assessment between Council staff and the contractor be undertaken of the local roads used during construction to assess any damage caused by construction traffic.

The proponent shall be conditioned to provide a site map showing locations of proposed construction compounds and their accessways and any carparking areas that might be proposed for employees parking spaces. The proponent shall provide a commitment to remove the compounds and parking areas at the completion of construction and remediate these sites to their pre-construction condition.

Council is currently negotiating a 'Road Maintenance Agreement' with Transgrid for the Snowy 2.0 Transmission connection project. A similar 'Road Maintenance Agreement' will need to be established for all the Local Roads impacted by the Hume Link Project. This agreement specially deals with the condition and maintenance of Council roads utilised by the project, before during and after construction. The agreement must also cover the repair and make good of the construction compounds that are used by the proponent to facilitate all aspects of the construction of the project.

The agreement will ensure that Council's roads and ancillary areas used for construction are maintained during the construction period and handed back to Council after works are complete to Council's standards.

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2.1.10 Communications Assets

Council understands that the proposal is within 15 metres of Council's Communications and broadcast tower at Mt Snubba in Batlow. This communications asset provides UHF communication for local government staff including communications during times of emergency, television and radio services to the Batlow Region. The tower has recently been replaced following the 2019/2020 bushfires and Council advises that the proposed route could potentially reduce the catchment coverage area serviced by the critical radio and telecommunications services.

2.1.11 Local Procurement Considerations

The application identifies that the proponent will source local supplies and materials from local businesses within the project catchment area where possible, noting that specialist materials and supplies are likely to be delivered to site through the performance of contracts outside of the project area.

Council suggests that a local supplier preference policy be developed by the proponent to assist in the provision of regional micro economy stimulus, through local procurement of trades, services and goods where possible. Council notes that any such policy should also ensure that 'boom bust' economic cycles are mitigated which can result due to short term investment in upscaling of businesses where significant investment is made in broadening capacity to deal with heightened demand that will likely cause financial difficulty for business when the project construction is completed. Mitigation of such cycles can occur when demands for goods and services are spread across businesses throughout the region without the reliance upon a limited number of suppliers.

2.1.12 Increased demand on local services

Council expects that the project will impose additional demands on already limited professional services within the town centres of Snowy Valleys Local Government Area. Council currently has two professional medical services in Tumbarumba being Roths Corner and the Tumbarumba Medical Centre and three medical service providers in Tumut being the Fitzroy Medical Centre, Tumut Family Medical and Connection Medical. There is also one medical facility in the town centre of Adelong being the Adelong Medical Centre. The application needs to identify how these services will not be impacted on as a result of the proposed work force including contractors and subcontractors residing in the area.

Council is experiencing existing strains on the provision of emergency services within the Local Government Area. Recently, Council has been subject to frequent and prolonged periods of no ambulance resource availability as a result of existing resource deployment to remote areas and lack of professional officer availability within the area.

Council requests the Department seek information from the applicant on the provision and deployment of emergency services to its workforce particularly in the case existing services are either not available or could be potentially subjected to long wait times in terms of deployment of resources. Council expects that the subject development should not create any additional demands on services to the detriment of the Snowy Valleys Community.

Council thanks the Department for the opportunity to provide comment on the merits of the subject proposal and looks forward to the proponent addressing any concerns raised in the assessment and determination of the project.



Please do not hesitate to contact me should you require additional information at 1300 275 782 or by email at info@svc.nsw.gov.au

Yours Sincerely,



Steven Pinnuck
INTERIM GENERAL MANAGER

Enc: SVC written submission; Snowy Valleys LGA impacted road network



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ATTACHMENT 1 –

Written submission provided to the NSW Parliamentary Enquiry into the undergrounding of transmission lines associated with Humelink.

ATTACHMENT 2

Impacted road network of the Snowy Valleys Local Government Area

