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3rd October 2023

Re: New Request for Advice - HumeLink (SSI-36656827)

Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Anthony,

The Department of Planning and Environment (DPE) is in receipt of the **New Request for Advice - HumeLink (SSI-36656827)**. Wagga Wagga City Council has been requested to provide advice for consideration for the proposal, including details of any key issues and assessment requirements.

Gregadoo Waste Management Centre

Context

Gregadoo Waste Management Centre (GWMC) is the waste disposal facility for Wagga Wagga LGA and has greater significance in the Region able to accept waste types which other Riverina and Far West facilities are not licenced to take. The nearest publicly available facility able to take the waste types comparable to Wagga Wagga is Kemps Creek in Sydney.

GWMC is directly adjacent the Wagga Wagga 330Kv Substation to the east across Boiling Down Road and has waterways identified in the Energy Connect EIS that have significance and classified as being Groundwater Dependant Ecosystems. Boiling Down Creek joins with Crooked Creek approximately 1 Km west of the GWMC and it is approximately another 3km where crooked creek feeds Lake Albert (the primary water park of Wagga Wagga, skiing, fishing, sailing, dragon boats and boat and ski racing are all clubs and users of the Lake)

GWMC has an Environmental Protection Licence, monitoring bores and Council has good and reliable data on the underground aquifers and geological data.

Council considers although not a recognised classification under state planning the GWMC is a critical infrastrcuture for the city of Wagga Wagga and the Riverina.

The facility regularly sees 500 movements over the weighbridge on a weekend and during the working week a steady stream of commercial and domestic users.

Humelink EIS Comments relating to Gregadoo Waste Management Facility

Section 3.3

TABLE 3.1 WORKING OUTSIDE EASEMENT

Transmission line sections	The project includes the construction of new 500 kV transmission lines between: • Wagga 330 kV substation and proposed Gugaa 500 kV substation (approximately 11 km) • proposed Gugaa 500 kV substation and Wondalga (approximately 65 km) • Wondalga and future Maragle 500 kV substation (approximately 46 km) • Wondalga and Bannaby 500 kV substation (approximately 234 km). Note that the transmission line section between Wagga 330 kV substation and the proposed Gugaa 500 kV substation would operate at 330 kV under HumeLink. The project also includes the rebuild of approximately 2 km of Line 51 as a new double circuit 330 kV transmission line between the Wagga 330 kV substation and near Ivydale Road, Gregadoo. This would be adjacent to the new transmission line between the existing Wagga 330 kV and proposed Gugaa 500 kV substations.	Figure 3-1 Section 3.3

Rebuilding of the 2km of line between the Gregadoo substation and Ivy Road will block entrances to the Gregadoo Waste Management Centre. On an average year the GWMC will close for 2 days only (Christmas and Easter Friday). There are no alternate entries to GWMC and rebuilding, stringing will block access to the facility. Transgrid have not approached Council on how these proposed works will be undertaken and sequenced with Council operations. Council has not been approached by Transgrid for the proposed works at the GWMC.

Later is Section 3.3 (below) the following seems to contradict the rebuilding commentary from Section 3.3, albeit "generally" is used in the description.

Comment 3.3

The EIS needs to address how rebuilding works will not interfere with Council operations at GWMC.

Section 3.6

Operational maintenance and resource use	Regular maintenance activities would be required for the transmission lines and substations during operation. Likely maintenance activities would include: • regular inspection and maintenance of transmission lines and structures • ad hoc fault and emergency fly over(s) to assess infrastructure condition should an unplanned outage occur • vegetation management within the transmission line easement to maintain appropriate clearances between ground vegetation and transmission lines and management of trees outside of the easement which could pose a bushfire risk and/or risk to the transmission lines WORKING OUTSIDE EASEMENT?? • ad hoc attendance (typically one to two times per month) at substations of one or two switching operators to undertake planned and unplanned switching of equipment • routine inspection and maintenance of substation infrastructure, property and switchyard areas. The operational water requirement for the project is anticipated to be approximately 116 kL/year.	Section 3.6

Comment 3.6

Strong objection to the EIS authorising access to land outside the easement corridor. Reads like authorised trespass, bushfire risk needs to be quantified and elaborated upon.

Section 3.7.2

Why weren't access easements included in the compulsory or negotiated acquisition process. Does this subject landholders to another round of legal costs that they have to prefund before compensation determinations?

3.7.2. Access easements

As discussed in Section 3.3.4, access to the transmission line easement would be required for operational purposes. Access easements may be required to provide Transgrid operational staff with access from the nearest public road to the transmission line easement. These access easements would be negotiated with landowners as necessary. Transgrid may install locked and signed access gates to enable access to the access easement should a landowner not have a suitable gate nearby. Access for landowners would be maintained and landowner access requirements would be complied with (such as biosecurity protocols).

Comment 3.7.2

An indication that project planning is not mature and rigorous given that access requirements have not been determined at this late stage of the project.

Section 4

PAGE 106 PROJECT OVERVIEW SECTION 4

Some activities would be defined as pre-construction work as their purpose is to make the key construction sites ready and to manage specific features or issues of the project. Pre-construction work is typically low impact work and proposed to take place prior to the approval of the Construction Environmental Management Plan (CEMP) by the Department of Planning and Environment (DPE). Pre-construction work would be managed in accordance with an Enabling Works Management Plan or Environmental Work Method Statements or similar environmental management documents. Chapter 26 (Environmental management) provides further information on the approach to environmental management during construction including details of activities considered as pre-construction work. VAGUE??

A summary of the key construction features of the project is provided in Table 4-1 and shown on Figure 4-1.

PAGE 107 TABLE 4.1

element		
Project footprint	The project footprint extends from the existing Wagga 330 kV substation in the west to the existing Bannaby 500 kV substation in the east and the future Maragle 500 kV substation in the south. The project footprint includes the indicative location of project infrastructure, the area that would be directly disturbed during construction and any easement and permanent access tracks required during operation. As such, the project footprint includes the area of temporary construction disturbance, such as construction compounds, laydown areas, the worker accommodation facility, construction benches for transmission line structures, brake and winch sites, a concrete batching plant, temporary access tracks and waterway crossings. The final locations for these project elements would be confirmed by the construction contractors during detailed design.	Figure 4-1 Figure 4-7

Works authorised without a CEMP is vague and broad ranging. Waterway Crossing and establishment of camps with sewer and stormwater management requirements appear to be pre-construction work under the definitions of the EIS.

Comment 4.0

The EIS should clearly articulate what activities are pre-construction and covered under other instruments other than the project CEMP. There is a mix of terminology of *pre-construction* and *project footprint* with *defined activities.*

Clarity is required for authorities to assess the impact on key waterways and the environment.

Table 4-5

PAGE 131=132 WAGGA COMPOUND

Table 4-5 Key features of Wagga 330 kV substation compound (C01)

Key feature	Summary
Site area	Approximately 1.92 ha
Ownership	Transgrid
Land zoning	RU1 Primary Production
Site description	Located in the Wagga Wagga City LGA at the site of the existing Wagga 330 kV substation on the corner of Ashfords Road and Boiling Down Road, Gregadoo. The construction compound would be surrounded by residential and farm infrastructure land uses and is located on level ground. Ground conditions are a mix of hardstand associated with the existing Wagga 330 kV substation and vegetation consisting mainly of pasture grasses. Isolated trees surround the construction compound along Ashfords Road and Boiling Down Road. The closest sensitive receiver is a residential dwelling located about 270 m south-east of the construction compound. The closest waterbody to the construction compound is a farm dam about 170 m to the south-west. Boiling Down Creek is located about 270 m further west from the construction compound. NO MENTION OF GWMC
Access arrangements	Access to the construction compound would be via a temporary connection with Ashfords Road. Road improvement work would be required to facilitate access (refer to Section 4.2.1.6).

Comment table 4-5

No mention of the GWMC which is on the eastern side of the Gregadoo 330KV substation.

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The method for discharging treated wastewater would be confirmed during detailed design but could involve discharge via sprinklers over a grassed area. A large system may require an area of grass, about 50 by 50 metres. Treated wastewater would not be discharged to waterways and it is not expected the treated wastewater would be used for construction activities. EPA?

Comment Page 145

Needs clarity and oversight. Workers camps and compounds are pre-construction works not covered by any specific project plan (CEMP).

Section 16 Soils geology and contamination

Site and location	Distance to project footprint	Scheduled activities
Gregadoo Waste Management Centre 132 Ashford Road, Wagga Wagga, NSW, 2650	The project footprint passes through this site but waste activities are undertaken about 700 m to the west.	Waste storage –waste tyres Waste disposal by application to land

Comment 16.0

Council operates Tip Shop which is less than 50m from the work zone. Council under the EPL maintains groundwater bores, groundwater monitoring points and dust monitoring that are in project footprint. Council operations are not 700m to the west as per statements in the EIS, this is incorrect

Page 706 Pre-construction Minor Impact Works

Overpage is a new definition of pre-construction works. Multiple and ambiguous references of works and work types that may occur outside a considered and formal environmental impact assessment specific to the site and circumstance.

Comment Page 706

Tighten up on definitions of works and when they can occur.

If you have any questions, please do not hesitate to contact Darryl Woods, Executive Manager Major Projects on 1300 292 442.

Yours Sincerely,

Darryl Woods
Executive Manager Major Projects