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Tuesday, 15 August 2023

The Planning Secretary  
NSW Department of Planning and Environment  
12 Darcy Street  
Parramatta NSW 2150  
Locked Bag 5022  
Parramatta NSW 2124

Dear Ms Fishburn

**Re: EnergyConnect (NSW – Eastern Section) – Visual Impact Minimisation for Receiver R26749 (condition C37)**

I refer to EnergyConnect (NSW – Eastern Section) (SSI-9172452) (the Project), which the then NSW Minister for Planning and Public Spaces approved on 12 September 2022 under section 5.19 of the NSW *Environmental Planning and Assessment Act 1979* (the EP&A Act).

This letter details the Transgrid's proposal to minimise potential visual impacts at the residence R26749 and seeks the Planning Secretary's approval, as required by condition C37.

**Visual impact mitigation requirement (condition C37)**

Condition C37 requires Transgrid to implement reasonable and feasible measures to minimise the visual impacts of the infrastructure in the vicinity of towers 16 and 17 on residence R26749. The condition requires the Project to develop measures in consultation with the residence owner and to the satisfaction of the Planning Secretary and implement the approved measures.

**Design considerations**

Alignment changes

The proposed design for the Project includes a new transmission line in this locality adjacent and parallel to two existing transmission lines (refer to **Attachment 1**). The EIS considered and assessed the new line along an alignment to the southeast of the two existing lines, as the new line will join the existing lines from the south and must remain on the southern side of those two

lines on approach to the existing Wagga Wagga substation. Transgrid has secured easement rights in the affected property on this basis. The respective easements for the new and existing lines abut to ensure that all lines have appropriate operational clearance buffers to facilitate safe operation and any future maintenance, including during emergencies. As a result, it is not appropriate to realign the new line any closer to the existing lines (i.e. further away from residence R26749).

Construction of the new line on the northwest side of the two existing lines is not reasonable as it would:

- involve two additional crossings of the existing lines;
- require the new line to be built along an alignment for which Transgrid has no agreement with the affected landholders; and
- affect land for which the existing environmental and heritage values are unknown.

There is insufficient information available regarding existing environmental and heritage values along any alternative alignments to the northwest of the existing lines to consider whether construction of the new line in those locations would be consistent with the approved Project or any associated modification requirements. Therefore, Transgrid proposes to construct the new line along the alignment considered and assessed in the EIS and associated environmental assessment documentation.

#### Tower location changes

Transgrid proposes tower location changes (compared to the concept design assessed in the EIS) to minimise potential visual impacts to residence R26749. Tower numbers have changed compared to the EIS concept design, as several towers between the subject location and the Wagga Wagga Substation are no longer required. Under the revised proposal, New Tower 14 will remain in a similar location to Original Tower 16. However, New Tower 15 will be located adjacent to and in line with the two existing towers on the existing lines (refer to **Attachment 1**). In the concept design considered and assessed in the EIS, Original Tower 17 was positioned away from the existing towers in an isolated location.

The most visually obtrusive elements of transmission lines are the towers themselves. When viewed from a distance, the conductors are quite thin and blend into the background better than towers. Towers can remain quite prominent visual features in the landscape.

When multiple towers are present along the same view line from an observer's position, the towers in front obstruct the view of the towers behind them to a degree, minimising overall obtrusiveness. If a new tower is placed in a location that is not along a view line that features existing transmission towers, the obstruction effect is absent: the additional tower will be a more prominent new feature in the observable landscape. Towers placed in such a manner increase visual obtrusiveness compared to towers placed on a view line to an existing tower. The

proposed location of New Tower 15 is along the view line of two existing towers from the residence R26749.

Further, in hilly country such as the alignment adjacent to residence R26749, towers are best placed on higher ground to minimise interaction with the conductors that sag between them and the ground surface and ensure appropriate safety clearance. Towers placed in gullies and depressions must often be taller/larger to maintain necessary ground/safety clearance and can be more visually obtrusive as a result. For this reason, the existing towers shown in **Attachment 1** are located on higher ground.

Original Tower 17 (in the concept design assessed in the EIS) was located on lower ground (compared to adjacent topography), which would have necessitated taller towers for Original Towers 17 and 18 to provide the necessary ground clearance, increasing the visual obtrusiveness of the towers as observed from the residence. Proposed New Tower 15 will be located on the higher ground adjacent to the two existing towers to minimise potential interactions with the ground surface that would necessitate a taller/larger, and more visually obtrusive tower. The proposed location for New Tower 15 is optimal from this perspective.

Therefore, the revised design groups and aligns the new and existing towers, as viewed for the residence R26749, minimising the new infrastructure's overall obtrusiveness and potential visual impact. The proposed location of New Tower 15 addresses the requirement in condition C37 to consider reasonable and feasible measures, including increasing setbacks, in a practicable and appropriate manner.

Transgrid notes that New Tower 15 will be within the approved development layout and generally in accordance with the EIS, as any potential environmental and heritage impacts will be substantially the same as for Original Tower 17.

### **At-property visual impact mitigation plan**

#### Consultation with owner

Consultation with the owner of residence R26749 commenced in June 2022. Consultation has involved phone calls, site meetings, and email and formal correspondence. **Attachment 2** includes correspondence with the owner. Consultation with the owner is ongoing, with the most recent contact to arrange access to the property to commence the visual impact mitigation measures and activities described below.

#### Visual impact mitigation concept

Transgrid has been developed a visual mitigation proposal in consultation with the owner and local horticultural experts/nurseries that involves the following:

- sourcing, ground preparation and planting of appropriate new vegetation (including around 300 trees) in strategic locations around the affected property identified in consultation with the owner.
- a management/maintenance program for the newly planted vegetation. Transgrid would remain responsible for implementing the program, in consultation with the owner, for two years (from planting).
- a review of attrition in the new vegetation 12 months after planting and replacing vegetation that did not survive.

Further details are below.

#### Planting locations

The proposed planting area is sloped ground that declines away from the residence and features granite outcropping and variable soil depths. **Attachment 3** indicates the proposed planting area at the residence R26749.

The personnel from the nursery that will carry out the planting will decide which species to plant where within the proposed planting area based on the ground conditions and soil depths present, which they will confirm during the planting process.

#### Timing

Winter is the optimal time for planting vegetation, as it allows newly planted plants a chance to become settled prior to the spring and summer growth periods. The initial planting is proposed this winter.

The first component of the at-property works is to spray the proposed planting area with suitable pesticide (with no/minimal residual) to kill the grass and existing vegetation so that the new plantings do not have to compete with existing vegetation for available soil moisture and nutrients.

Transgrid has requested access to the property to spray and is awaiting permission from the landholder. Transgrid expects spraying to occur within two weeks of the landholder granting access.

Planting will commence following spraying but after the appropriate/recommended withholding period, as per the pesticide label and product information (typically two to four weeks, depending on the specific pesticide used), again, subject to landholder consent.

### Management and maintenance program

Surveillance and maintenance (as required) will occur at approximately eight-week intervals for two years following the initial planting, as recommended by the nursery. Maintenance will typically consist of re-spraying or physically clearing regrowth vegetation (mostly grass cover) close to the plantings to minimise competition for available moisture and nutrients.

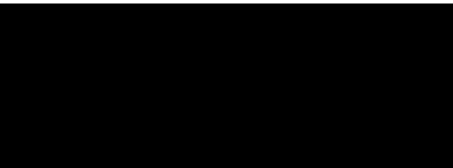
Transgrid has allowed for a 30% attrition rate based on advice from the nursery. Any required replanting will occur in the winter of 2024 (i.e., within one year from initial planting).

### **Planning Secretary satisfaction/approval**

Condition C37 indicates that the Planning Secretary must approve the proposed measures to minimise visual impact on residence R26749. As Transgrid proposes to commence the visual impact mitigation activities described in this letter imminently, it would be greatly appreciated if the Planning Secretary could review and approve the approach described in this letter.

If you wish to discuss this request or matter generally, please do not hesitate to contact the undersigned.

Yours Sincerely



**John Fisher**  
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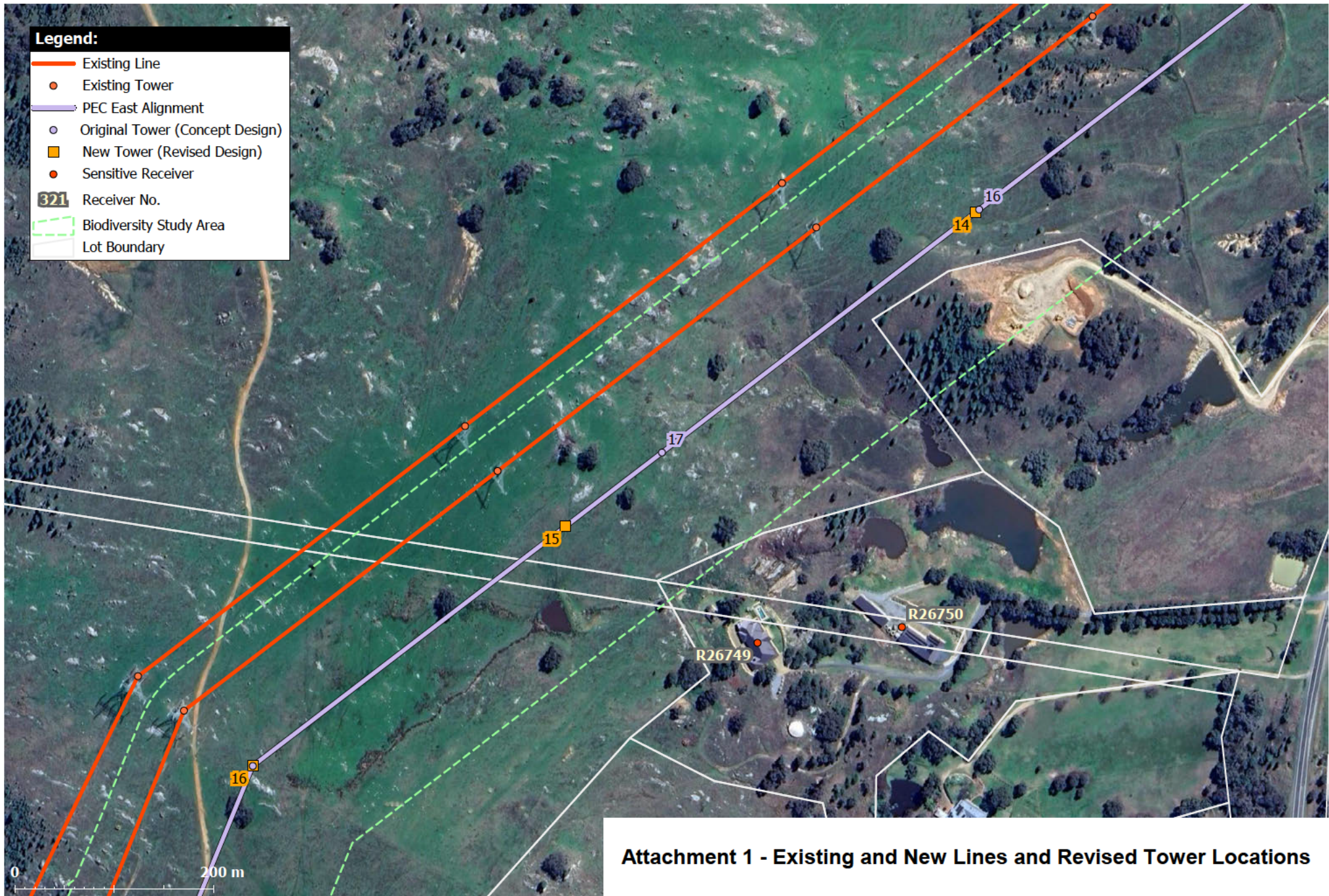


### Attachments:

1. Existing and New Lines and Revised Tower Locations
2. Correspondence with owner
3. Proposed planting location

Attachment 1 Existing and New Lines and Revised Tower Locations

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**Attachment 1 - Existing and New Lines and Revised Tower Locations**

## Attachment 2 Correspondence with owner

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Content removed from this version for privacy reasons

## Attachment 3 Proposed planting location

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- Tower Centres (SE)
- Alignment (SE)
- Sensitive Receivers
- C37
- - - View line
- X X Planting location
- Existing transmission tower
- - - Existing transmission line
- Cadastre
- Lot boundary

