

Submission on Humelink EIS

David Falepau
112 Ivydale Road
Gregadoo, NSW 2650

We strongly object to the proposed Humelink 500kV overhead transmission line. It should be built underground or located to bypass Wagga Wagga and other townships and areas of **high rural visual amenity**. The impact on Wagga Wagga and all the rural towns, residences and businesses along the proposed route is immeasurable. The cost of overhead is only cheaper than underground because the regulations that protect the profits of the foreign owned Transgrid **do not require anyone other than landholders from whom Transgrid needs to acquire an easement from to be compensated**.

Our main contention against this EIS is that the proponent has not adequately advised, consulted, considered or accounted for the impact of their proposed project on all landholders **affected** by their project – particularly those from whom the proponent **does not** require to acquire an easement from.

The SEARs required the proponent to:

“Engagement During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups, **affected landowners, Native Title holders, exploration licence holders, quarry operators and mineral title holders.**

In their EIS the proponents accounting for their community consultation and their subsequent assessment of the impact of their project is ambiguous between the requirement to consult all **affected landholders** and the classification of affected landholders being alternately referred to as: those “directly affected” and/or those “within the foot print” of their project and/or those from whom they require to acquire an easement (referred to as “easement affected” landholders).

The proponents summary of their level of consultation is stated as thus:

“6.4.3. Impacted landowners

Transgrid has implemented a targeted approach for landowner engagement, including the deployment of dedicated Place Managers and Land Access Officers local to the area. A key focus for Transgrid has been to meet with easement-impacted landowners prior to and during the preparation of the EIS. There have been over 1,100 on-property meetings and over 13,000 interactions (including emails, phone calls and text messages) with the impacted landowners across the project footprint to June 2023. The initial purpose of these meetings was to understand landowner sentiment and any concerns or opportunities, seek input and receive local information on such matters as local farming operations, logistics, land use and environmental and cultural considerations.”

Any other **affected landholders** the proponent has referred to as:

“6.4.4. General community feedback

“Feedback from a range of stakeholders has been captured and responded to prior to and during the preparation of the EIS. The feedback has been received through HumeLink’s communication channels (identified in Table 6-4) and direct consultation activities (Table 6-5) including the project hotline, email address, webpage form, and in-person and online events.”

No evidence is provided by the proponent as to the nature of the information provided about the project to these landholders/community members not classified as ‘**Impacted landowners**’. Nor the number of them with whom communication was established. Nor the feedback received from those landholder/community members.

Considering Figure 6 page 16. Aside from the “1100 one on one meetings with easement affected landholders” and the more than “10,000 ‘interactions’ with easement affected landholders”, the extent of the proponents communications with non-easement affected landholders is “44 community events with more than 200 attendees”. “9 webinar’s with 76 attendees”. This is the extent of their non-easement affected landholder consultation along a 360 km transmission line passing through numerous rural townships 276 attendees!!!! Over two years!!! And nothing to verify that these weren’t just easement affected landholders anyway. Or they weren’t the same people attending multiple events.

Similarly: “77,780 Newsletters letterbox dropped”. The proponents produced “11 Newsletters” over the two year period. So is that 11 newsletters to each of 7070 landholders along the entire 360 km line? Was it the less important newsletters to 30,000 landholders and the important newsletters to a few hundred?

Specific objections to the impact assessment:

The ‘below’ excerpts from the EIS mentioning upgrading (to double circuit) and relocation of 2 kms of Line 51 (existing 330kV line) was not included in the proponents application to the Department, which was the basis upon which the Department issued its SEARS. The proponent should be required to undertake an assessment of the impact of this *additional* project in order for the planning authority to consider appropriate consent conditions including; what the proponent will do to with the old 330kV line and redundant easement to minimise the cumulative impact on landholders and any measures required to mitigate or offset the environmental impact of the footprint of the new 330kV line.

Excerpts:

“The project also includes the rebuild of approximately 2 km of Line 51 as a new 330 kV transmission line between the Wagga 330 kV substation and around Ivydale Road, Gregadoo. This would be adjacent to the new transmission line between the existing Wagga 330 kV and proposed Gugaa 500 kV substations.”

“The 330 kV structures for the rebuild of Line 51 would range between 24 m and 50 m in height and have a typical height of 40 m”

“The easements for the 500 kV transmission lines are typically 70 m wide. However, a number of locations may require wider easements of up to 110 m wide at transposition locations and up to 130 m wide where the new transmission line would parallel the relocated section of Line 51.”

It should also be considered that the proponents upgrading of 2 km's of "Line 51" (330kV) closest to the Gregadoo substation signals their intent to upgrade the remainder of that line at some point in the future. Why isn't the impact of the entire 330kV line's upgrade being required to be assessed by the proponent now?

The double circuit towers and lines are higher and larger than the existing single circuit lines and will cause a greater single and cumulative impact on the environment as a result of the proposed project.

Visual Impact assessment methodology has not been validated:

1) Methodology not validated.

"4.4 Assessment of visual impact – private dwellings

4.4.1 Approach

There is no guidance for the assessment of visual impact on views for private property that applies to energy transmission projects in NSW. However, the assessment of visual impact on views from private residential properties is generally guided by the planning principles for 'view sharing' provided in the judgment of the NSW Planning Environment court in the Tenacity Consulting V Warringah Council [2004], NSWLEC 140 ('Tenacity'). View sharing is when a property ... 'enjoys existing views and a proposed development would share that view by taking some of it away.' (NSWLEC 140, 2004).

While the approach set out in this judgment is more suitable for urban settings, **the principles can be applied to regional landscape settings** in a more general way and with considerations of scenic preference appropriate for the range of landscapes available within the setting of the project."

How can the proponent claim that the principles can be applied to rural settings and transmission lines? View sharing is where some of a [favourable] view is blocked by a proposed development. [i.e. the pleasing view is shared by taking some of it away]. A transmission tower does not share 'share' a view. It doesn't block a view. It materially changes the view.

The proponents have not provided any basis to support that the "principles can be applied to regional landscape settings". But their subsequent assessment is based on this assumption and is therefore not valid.

2) Validity of the assessment was contingent on unqualified and unverified 'expertise'

Quote: "This assessment relies on **expert opinion** to assign impact based on a combination of factors, and the extent of design information currently available."

The proponent provides:

- no qualification of what constitutes the 'expertise' their assessment relies on,**
- no reference to the 'experts' whose opinion formed the basis of their assessments,**

- no qualification or verification that the 'experts' whose opinions they relied on had the 'expertise' their assessment relied on.

Their assessment is not valid.

3) Page 17 Section 3.

The proponent presents regional and local planning instruments (e.g. LEPs) to qualify landscape character. E.g. "This region is described as being renowned for its ... 'distinct scenic landscapes', including 'green hinterlands, the spectacular high country of the Australian Alps', 'heritage towns and glorious countryside', which underpin region's tourism industry (p.8). A priority for the region is developing the Snowy Mountains into ... 'Australia's premier year round alpine destination' (NSW Department of Planning, Industry and Environment, 2017, Goal 1, Direction 3)."

Logically these characterisations should be the basis upon which the visual impact is 'scored'. i.e. the degree to which the proposed infrastructure impacts on these descriptors.

EIS Technical report 8. Table 6.1 pp65

- **Wagga Wagga rural fringe landscape character area** impact on landscape.
 - *Note : "Gregadoo landscape character area, which is located to the south of Wagga Wagga. Southern parts of this area (outside of the project footprint) include 'visually prominent ridges and higher ground' extending between Kapooka, Gregadoo and Gelston Park, providing 'the visual setting of the city' and includes 'important visual reference points' for the city of Wagga Wagga (City of Wagga Wagga Council, 2010a, s.5.1). The Wagga Wagga DCP also identifies the intention of 'keeping development below these points ... to protect the natural skyline' of Wagga Wagga (s.5.1).*
 - the proponents have deemed in their assessment the impact on the Wagga Wagga rural fringe landscape character **neighbourhood and low**. With no evidence provided to validate this assessment.
 - Very little to none of the existing (330kV – 35m high) transmission infrastructure is visible from the low lying suburban residential areas (e.g. Lake Albert foreshores). The only infrastructure visible from these residential areas currently is the **top half** of an 80m telecommunications tower located adjacent to the Gregadoo substation. Had the proponent created photomontages from these visually sensitive residential area viewpoints (as requested by impacted residents during community 'consultation', they would have shown the **top 35m** of each of the proposed 500kV towers to be visually prominent from these residences and public viewpoints. Note: the top 35m of the proposed towers comprises the visually prominent **cross arms and cables**.
 - 500kV towers (EnergyConnect) have already been approved across the same landscape visible from the residential areas across Wagga Wagga township. Thereby adding significantly to the cumulative impact of the proposed project/s.
 - No assessment of the (cumulative) impact on landscape character has been made for any other residential areas surrounding the proposed project/s (Humelink and EnergyConnect). The proposed project/s infrastructure will be visually prominent

from all residences and public viewpoints south and west of the Willans Hill range including Koorinal, Lake Albert, Tatton and Springvale. Had the proponent created photomontages from any of these viewpoints it would have shown very clearly that the proposed 500kV infrastructure will not be 'visually absorbed' by the existing infrastructure across this rural fringe landscape character zone. The cumulative impact of EnergyConnect and Humelink will be **regional** and **high to moderate**.

- Should the proponent have assessed the visual impact on the rural urban fringe landscape character from any of these viewpoints the magnitude and scale of the impact would be able to be objectively assessed. Without any of these viewpoints being objectively assessed the proponents assessment is at best subjective.
- Every one of these residential properties will be devalued. The proponent should be required to assess the impact of their project on these people and account for this cost before dismissing alternatives such as undergrounding.
- Cumulatively and including affected public viewpoints, the attraction of Wagga Wagga as a place to live and work will be diminished in favour of other regional towns. The proponent should be required to assess and value the impact on the greater Wagga Wagga township including residences and businesses and account for this cost before dismissing alternatives.

Page 46

"Landscape sensitivity: This landscape consists of a semi-rural landscape on the land fringing the urban area of Wagga Wagga. This landscape would be appreciated by **local residents and workers from the scattered farms**, people travelling along the **Hume Highway, as well as local roads such as Gregadoo East Road and Elizabeth Avenue**. Overall, the Wagga Wagga rural fringe landscape character zone is of neighbourhood landscape sensitivity."

- The Hume Highway is **45 kms** from the land fringing the urban area of Wagga Wagga?? Why on earth is the proponent referring to people travelling "along the Hume Highway"? Did they even visit the "land fringing the urban area of Wagga Wagga."?
- This 'semi-rural landscape' 'fringing Wagga Wagga' is visible to and appreciated by at least 30,000 residents of Wagga Wagga on a daily basis – *not* just **local residents and workers from the scattered farms**. It is a *major* tourist route from the Snowy Mountains and from the south via the Hume Highway through to Wagga Wagga.
- It is used frequently and preferentially by recreational cyclists from Wagga Wagga. They ride out Gregadoo East Road and back around via Elizabeth Avenue.

EIS Technical report 8. P67

The proponents choice of private dwelling and public viewpoints for visual impact assessments cannot be determined or verified. The proponent quotes:

"The photomontage locations were also chosen to illustrate views from areas with the greatest visual sensitivity and where the greatest number of viewers would be located."

The proponent provides no evidence to support their selection of viewpoints for visual impact assessment on the basis of either "greatest number of viewers" or "greatest visual sensitivity".

The proponent needs to provide a statistically valid number of alternative viewpoints and data on potential viewers, in order to verify that those chosen are “greatest”.

Viewpoint 1 - Gregadoo East Road appears to have been chosen by the proponent to assess the visual impact on landscape character against advice provided during local consultations. VP1 is not at all representative of the visual impact on the Gregadoo Great Dividing Range foothills landscape. The location suggested by locals was a viewpoint anywhere up to a kilometre south of the Gregadoo East Road/Ashford Road intersection. From this viewpoint looking **south west** (as opposed to the proponents east west from VP1), the cumulative visual impact of the 500kV line next to the 330kV line, including the significant easement area denude of any vegetation as the lines cross over the Gregadoo Hills, would have been clearly evident and enabled a more accurate assessment.

The corner of Gregadoo East Road and Ashford Road is on a bend, whereby south bound traffic looks **straight ahead** directly across the Gregadoo Hills foothills. This view cannot be avoided, as can the view east west from VP1 that the proponent chose.

Had the proponent provided photomontages viewing south west from anywhere up to a kilometre south of the Gregadoo East Road/Ashford Road intersection, the images would have shown clearly that the tops of the existing 330kV (35m) towers across the *Gregadoo foothills* are all **just below the Gregadoo Range skyline** and relatively less visible against the background hills and vegetation. What this public viewpoint would also have shown is that from this viewpoint and **any other public viewpoint across Wagga**, the 500kV towers proposed for both Humelink and Energy Connect will **all extend above the Gregadoo Range skyline** and contrast directly against the sky. **And the portion of the 500kV towers visible above the skyline will be the cross arms and cables.** Very similar to Viewpoint 5.

This visual impact is in complete conflict with the Wagga Wagga City council LEP. *“Gregadoo landscape character area, which is located to the south of Wagga Wagga. Southern parts of this area (outside of the project footprint) include ‘visually prominent ridges and higher ground’ extending between Kapooka, Gregadoo and Gelston Park, providing ‘the visual setting of the city’ and includes ‘important visual reference points’ for the city of Wagga Wagga (City of Wagga Wagga Council, 2010a, s.5.1). The Wagga Wagga DCP also identifies the intention of ‘keeping development below these points ... to protect the natural skyline’ of Wagga Wagga (s.5.1).”* which is the instrument by which landholders in the Wagga Wagga shires property values are protected.

Viewpoint 5. – just absolutely incredulous that the proponent can rate this visual impact as **low visual impact**. Even if it is deemed ‘neighbourhood’. The magnitude of change can’t be any less than ‘very high’. The proponent concedes that they had to make up this methodology. Refer 4.4.

Similarly Figure 11 - Photomontage showing a **moderate visual impact** expected at a view south from Snowy Mountains Highway. How can this not be **regional** and **very high**? Its visual impact should be assessed against the relevant planning regional and local planning instruments (e.g. LEPs).

It is also absolutely clear that the proponent has selected **not to** create photomontages for viewpoints which would either show high visual impact and/or demonstrate cumulatively the mass destruction of the rural amenity when the entirety of the line is considered.

112 Ivydale Road – contrary to the proponents indicating in this table that they did not visit 112 Ivydale Road – they visited numerous times. They were even allowed a visit specifically to take photographs from our residence with which they said they would create photomontages of the proposed towers so we and our valuers could make a more informed assessment of the visual impact of both the 500kV line and the proposed 330kV relocation on our residence. They took their photos but subsequently declined to provide us any images and they haven't provided any images or photomontages in this EIS to substantiate their assessment of the visual impact on our property. These photomontages would have been representative of the impact on properties through the rural residential areas along the entire alignment, many of which are within 500m to 1km of their proposed line's but do not receive any compensation.

The proponent never advised us that their proposed relocation of the 330kV line included an upgrade from a single to a double circuit. We found out from a neighbour. As referred earlier, the impact of this realignment and upgrade has not been assessed and was not part of the proponents application to the Department upon which their SEARs were issued.

They have simply included this statement (almost randomly) against some properties in table 7-3. "Existing 2 km section of Line 51 may be demolished and rebuilt".

Assessment of landscape impact around Gregadoo:

Proponent states: "Landscape impact during operation: This project would increase the presence of electricity infrastructure in this landscape and further detract from the semi-rural landscape character. The transmission line structures would be of a similar character to others within this landscape. They would be located near an existing substation and in the vicinity of other light industrial uses such as a major waste disposal facility. **Although the transmission line structures would be higher, they would not substantially change the character of this part of the landscape character area.**"

"Although the transmission line route would follow the alignment of an existing easement, the transmission line structures would be a **slightly different design and range between about double to triple the height of the existing structures.** There would be little opportunity for additional planting, however, due to the relatively flat topography, there would be minimal changes to the terrain. Overall, due to the intensification of the electricity infrastructure, reducing the extent of rural landscape and vegetation within the area, there would be a **moderate magnitude of change and a low landscape impact** during operation."

The proponents has provided no evidence to validate their assessment that the new transmission infrastructure "double to triple the height of the existing structures" would "not substantially change the character of this part of the landscape character area".

Nor have they provided any evidence as to support their assessment as "moderate magnitude of change and a low landscape impact during operation."

Their assessment is subjective and contradictory.

The proponent could have provided photomontages for the viewpoints they have discussed above to verify their assessment *but have chosen not to*.

They also have unrestricted access to more sensitive public view points (e.g. Lake Albert foreshore, Main Street/Gregadoo Road intersection....), from which they could have created photomontages to validate their assessments.

Contradictory assessment:

The proponents state: "Impacts to the visual landscape and scenic quality, where construction activities would temporarily disrupt the views and amenity for dwellings near the project footprint and affect peoples enjoyment of their local areas and sense of pride".

Construction activities that would most disrupt the views and amenity for dwellings would be the erection of the towers. That disruption is clearly not temporary. The towers will not be removed. The disruption has to be deemed permanent.

Land access for operational management is not being acquired by the operator

The proponent has included this Tech report 16 page 7.

"Transmission line easements: The easements for the 500 kV transmission lines are typically 70 m wide. However, a number of locations may require wider easements of up to 110 m wide at transposition locations and up to 130 m wide where the new transmission line would parallel the relocated section of Line 51. The easement provides a right of access to construct, maintain and operate the transmission line and other operational assets. The easement also generally identifies the zone of initial vegetation clearance and ongoing vegetation management to ensure safe electrical clearances during the operation of the lines. **Vegetation management beyond the easement may also occur where nearby trees have the potential to fall and breach safety clearances.**"

The easement does not "also generally identify the zone of initial vegetation clearance and ongoing vegetation management to ensure safe electrical clearances during the operation of the lines." **The easement limits the operator's capacity to manage vegetation to within that [70 metre wide] easement.**

If the management of vegetation "beyond the [70 metre] easement" is required by the operator in order to "maintain safety clearances", the operator will need to acquire a wider easement and should be required to re-assess the subsequent impact.

Consent condition to mitigate catastrophic bushfire risk:

Abundant evidence exists that the proposed overhead transmission line/s significantly limit the measures available for local (predominantly voluntary) fire authorities to fight bush fires, ***whether the fires are caused by HV overhead transmission lines or not.***

The proponents absolve themselves of any responsibility for fighting bush fires. They say that it is the responsibility of the RFS and they will just co-operate with them. If the current project is approved, **a consent condition (operational phase) should be that the transmission line operator is required to extinguish any fire occurring within a certain distance* either side of their overhead**

transmission line/s (* to be determined in consultation with the RFS to be sufficient distance to prevent fire jumping from one side of the line to the other). The operator should be required to:

- staff and equip their own bush firefighting service, and/or
- sufficiently fund and equip (i.e. contract) the RFS to do so, and/or
- install an automatic bush fire fighting/retardant system along their lines.

The proponent could apply any or all of the above measures. But whatever they choose to do, **they should be made legally accountable for extinguishing any bush fires adjacent to their transmission lines.**

Consent condition regarding screening to mitigate visual impact:

Meaningful efforts to provide screening - The proponents propose (verbally) that wherever possible they will provide screening (e.g. tree plantings) to mitigate visual impact on residences and public, whether those affected are compensated landholders or not. In locations where the most effective screening of a transmission line from a residence or public viewpoint would be required to be located on a non-compensated or compensated property (to the affected residence or public viewpoint) – the proponent should be required to negotiate with the associated landholder/s to establish and maintain screenings, including the proponent paying fair compensation to those landholders. These screenings could easily be established under a ‘Property Vegetation Management Plan’ or similar such instrument as previously implemented by Land Catchment Authorities to improve catchment landscapes. Or with local authorities where screenings are situated on public land.

The proponents should be required to consult meaningfully with communities and landholders (not just those they need an easement from), even if just to consider alternative tower structures or line locations that might reduce visual impact and negative affect on communities.

For example; maybe the community would prefer two 300kV lines instead of one 500kV line? Or maybe they’d prefer the lines to be spaced apart, not running right next to each other? Or perhaps monopole towers would be less visibly intrusive than lattice towers?



“As the roughly 90-ft-tall [33m] lattice structures are taken down, they are replaced with monopole structures that will carry the new 345-kV lines. PSE&G is using monopoles because they are quick to install, have a small footprint and are less expensive, Tkachuk says.

The project calls for erection of 92 monopoles, averaging 165 ft [50m] in height, with the tallest, 245 ft [75m], installed where the corridor crosses the New Jersey Turnpike.”

Alternative locations for new interstate HV transmission lines should be considered *in consultation* with the affected communities:

One wonders why the new 500kV lines that are to transfer electricity **between states** and cities **on the eastern and southern seaboard** even needs to pass directly through Wagga Wagga and/or other rural townships. E.g. why does the Humelink 500kV line have to connect to the EnergyConnect 500kV line at Gregadoo? It would surely be cheaper (shorter) and less damaging to connect Humelink and EnergyConnect well south of Wagga Wagga. There could still be a Gugaa 500kV substation to branch off the existing 330kV line, but much further south of the Wagga Wagga township, perhaps next to the Hume highway. And then the 500kV Humelink line could go from there across to the EnergyConnect at Lockhart, well south of the Wagga Wagga rural residential fringe?

And Gregadoo Solar farm aside (note: not yet started construction), wouldn't it be more sensible to put the 500kV Humelink and EnergyConnect lines through land well away from rural townships more amenable to hosting solar farms or wind turbines? Landholders in those areas might even welcome the 500kV line through their properties so they can participate in renewable energy generation.

The proponent should be required to justify why the 500kV **inter-state** lines need to be located adjacent to existing **intra-state** 330kV lines. **i.e. the approval process requires them to consider alternatives.** Which they clearly have not done.

At the least, the proponent should be required to present all the alternative's they have considered along the entire route, to verify that they have reasonably considered all alternatives, including divulging the alternatives proposed by others through their 'consultation' process. With evidence of that consultation.

And for each of those alternatives, undertake a comparative Environmental Impact Assessment in order for the Department to determine **what the least impact route** is for subsequent approval.

NB: The proponents have recently chosen an entirely different (substantially longer and assumed more costly) route through the Green Hills State Forrest around Batlow, to that originally proposed and assessed in their EIS. In doing so the proponent has of their own accord and without disclosure determined that the extra cost of the alternative route is justified to mitigate against the impact of their original route on surrounding landholders and community.

The proponent should be required to divulge the basis of their determination to choose this **more costly** alternative route through a **National Park** and be required to apply that basis of determination to the multitude of other sections along the proposed 360km route where they have to date chosen not to consider and assess any [more costly] alternatives.

Compensate all affected landholders and community members:

On the basis of the impact assessment – the proponents should be required to fairly and directly compensate every landholder and business along the entire route, however small. Not just those who are forced to concede an easement.

In the least, electricity prices should be regulated to be discounted substantially to retail consumers along the entire route for the duration of the operation of the project. It would be easy to do. e.g. within 500m an 80% discount, then sliding scale by distance from transmission line for all properties with line of sight.