

correspondence to: daheim@bigpond.com

Director – Energy Assessments,  
Development Assessment,  
Department of Planning and Environment,  
4 Parramatta Square,  
12 Darcy Street,  
Parramatta NSW 2150

Dear Sir/Madam,

**SUBMISSION IN RESPONSE TO THE ENVIRONMENTAL IMPACT STATEMENT OF  
HUMELINK APPLICATION NO. SSI-36656827**

We hereby submit this response to the HumeLink Environmental Impact Statement report.

Our objection to the proposed Humelink project and EIS is significant as our home is within direct sight of the proposed 22Ha Gugaa substation near Wagga Wagga. Our 500 acre farm directly adjoins the boundary of our neighbour where the substation is to be located.

A recent neighbourhood meeting with our local MP raised major concerns by the community about the substation and its negative impacts to our area. None of these concerns have been addressed by TransGrid (TG) when given the opportunity and we have been consistently dismissed and ignored by Transgrid representatives.

We also feel that the recent inquiry to investigate undergrounding of the transmission lines was predetermined by government and didn't address the long-term benefits of undergrounding for the environment, community, and safety.

We operate a 120hd grass-fed beef cattle enterprise on our 500 acre farm here at Gregadoo. Since purchasing in 2021, we have invested significant resources to restore native vegetation and over 500 new tree plantings to improve biodiversity. We were drawn to the area's high rainfall, abundant water sources and old stands of yellow box and red gums full of native bird species. We rely on the health of our on-farm water sources for our stock and domestic drinking water.

We strongly object to the HumeLink proposal and the Gugaa Substation to be built near our farm boundary due to the following reasons;

1. There is uncertainty and unease from our community why TransGrid are proposing to construct the **biggest substation in the southern hemisphere** next to our farms? TG will not disclose nor deny any future solar farming operations or battery farm projects. DPE should carefully consider these risks before approving the substation be built near a zoned bushfire area and the potential impacts to human life, flora and fauna.
2. TransGrid has **failed to genuinely communicate and engage with impacted landholders and the wider community re: Gugaa substation** and the Gregadoo Road Compound (C06). Refer to EIS Vol.3, pp.24-9 and pp.27-3. Our community have had NO information or consultation about Gugaa prior to the release of the EIS. There have been no mailouts given in the area or

news of any kind regarding the substation. Swans is in the direct project footprint for Gugaa substation and yet we were only advised the day before release of the EIS. This has created a level of distrust and poor reputation amongst the community towards TransGrid.

3. We have unaddressed concerns surrounding the **Biosecurity risks** during construction of Humelink. Refer to EIS Vol.2, pp.11-35. The potential introduction of foot and mouth disease would devastate our ability to sell and trade cattle. Furthermore, TG have advised they will not be fencing off their construction zones from our cattle nor provide agistment/relocation of our stock during the construction phase. This presents hazards to their workstaff as well as our livestock impacting sensitive worksite areas with metalwork, concrete and other hazardous materials. TG would be directly impacting the human food-supply and contravening our on-farm biosecurity plan.
4. Negative Impacts of new 500kV Transmission lines to **Agricultural production** re: no aerial applications of sprays and fertilizers and impacts to electric fencing. Vol.2, pp.11-44. TG state that the impacts of this are *“minimal due to the small area affected relative to the total size of enterprises within the LGA”*, this direct TG statement shows the arrogance and contempt which they have shown to landholders during the entire “consultation” process.

Refer to the attached photos of existing towers showing blocked laneway access and placement of towers near existing gates and fences. Transgrid have shown little regard for placement of their towers nor working with us on the placement of the new 500kV Humelink towers. Humelink will restrict our right to farm by prohibiting the use of machinery over 4.3m, spray irrigation, aerial operation (spraying/fertilising), the use of drones and precision agriculture, thus limiting the use of our farmland for future agricultural production. TG have completely ignored our suggestions for Humelink to be placed underground.

5. **Reduced farmland values** within Gugaa substation area (industrialisation of farmland, refer EIS Vol.2, pp.11-42). Also refer to Vol.2, pp.13.21 table TG states ***“operational impacts on livelihoods within the social locality could arise in land use, loss of agricultural land and impacts on property values for land within the project footprint”*** but should state the wider community area not just the project footprint. In addition, a neighbouring farm has been unable to sell due to the impact of Humelink and this will have a direct effect on all landholders by placing downward pressure on local farm values and equity levels.
6. **TG intends NOT to rehabilitate** the areas they will clear of old remnant yellow box sp. (EIS Vol.2, pp.11-47) – We’ve been advised by our TG Land Access Officer that TG will NOT be replacing the trees they clear on our farm which is clear contradiction of their statements on pp.11-47. HumeLink will significantly impact matters of national environmental significance by taking critically endangered habitat from critically endangered species. We have observed and identified small groups of the threatened Yellow-Tailed Black Cockatoo’s on our property at various times of the year. Clearing their habitat is NOT an option.
7. **Visual impact & amenity of farmland** – (EIS Vol.2, pp.13-21) 90 dwellings will have high visual impact from views of Gugaa and TG has not consulted with landholders re: screening that is promised in the EIS. The EIS declaration states that the EIS “does not contain information that is false or misleading” however the photomontage Figure 3-6 on page 3-18 of the EIS is taken from an angle where the substation is barely visible and grainy, which is false. The substation will be up to 30m high in parts and will be clearly visible to us as neighbours and motorists on Livingstone Gully Road. Our requests to TG for clearer photomontages of the proposed Gugaa substation have not been provided.
8. **Increased Bushfire Risk** – Gugaa is being placed less than 2km from WWCC zoned Bushfire Prone Land, Mt Flakney. Vol.3, pp.19-5 to 19-6. TG states *“There are a range of ignition*

*sources within the project footprint that are a potential risk to starting fires....this may subsequently increase bushfire events that have the potential to negatively impact the community". We are extremely concerned about the danger this project places us in by increasing the risk of bushfires and undermining ground/aerial firefighting options and potentially starting fires. Undergrounding of Humelink is still an option!*

9. **Long term exposure to Electric and Magnetic Fields** not disclosed or studied in the area – Vol.3, pp.19-19 (Table 19-4).
10. **Moderate Rural valleys landscape character zone changes & tourism impact** with the introduction of a large-scale construction activity at Gugaa & Mt Flakney – EIS Vol.2, pp.14-35. Humelink will undermine regional development by taking the liveability, workability and beauty from impacted regions. Tourists travelling to nearby attractions such as the picturesque Big Springs Homestead will be impacted by the industrialised substation and additional 500 kV towers en-route.
11. **Visual Impact Assessment** re: private dwellings in relation to Gugaa substation – EIS Vol.2, pp.14-49. TG does not state how they could have mitigated this high-moderate impact by moving site further south. TG have not offered us any workable solutions to the visual impacts on our boundary facing the substation.
12. **Visual Clutter** – EIS Vol.2, pp.14-53 to pp.14-59 (Grainy and unclear photomontage of proposed Gugaa substation view from Livingstone Gully Rd). We will be impacted by two sets of high rise towers (330kV and the Humelink 500kV and a substation). No photomontage images have been provided to us in proximity to Gugaa.
13. **Noise Pollution Levels** - EIS Vol.2, pp.15-19 to 15-22 and in particular pp.15-28 re: substation operational noise levels at night. In addition, the noise from HumeLink, in certain weather conditions, will exceed NSW Noise Guidelines night time criteria at 65 dwellings. TG have not offered us any information or workable solutions to this issue.
14. **Water Quality & Erosion** – EIS Vol.3 pp.17-17. We are concerned about the EIS identified "moderate erosion risks and high risk to water quality" following construction of Gugaa substation. No mitigation measures have been given by TG.
15. **Gugaa Substation FLOODING** - No TG environmental surveys/investigations have been conducted on the impact to Big Springs creek (runs adjacent to the Gugaa substation) in consultation with the impacted landholders. TG study by Lyall & Associates indicates Gugaa substation site will "obstruct the existing overland flow from the south...increasing flood levels to the South-West boundary of the site", EIS Vol.3, pp.18-12.
16. **False information re: alteration of waterflow at Gugaa** Vol.3, pp.17-23, 5<sup>th</sup> paragraph. This states that "A moderate impact (magnitude) is expected for the construction of the proposed Gugaa 500 kV substation given the significant volumes of earthworks. However, it is considered to have a low sensitivity as it is not close to a waterway"...this is false as Gugaa substation will be close to the Big Springs Creek which eventually feeds into the Murrumbidgee River. Independent Hydrology reports should be conducted by TG on this issue.
17. **Impacted Groundwater Levels & Contamination of aquifers at Gugaa substation site.** Vol.3, pp.17-24 to 25 (2<sup>nd</sup> paragraph). We are deeply concerned about the impact of TG extracting groundwater and drilling aquifers near our farm without adequate hydrology reports being completed and its impact on our future water availability.
18. **Construction Road Traffic** – Gugaa specifically pp.Vol.3, pp.20-8 to 20-12 (up to 102 Heavy Vehicles DAILY and 190 Light Vehicles). Furthermore, the EIS fails to mention that

Livingstone Gully Road is an unsealed road and that increased machinery and road traffic mean that sealing the road should be a priority, given that dust pollution will impact local residents and the frequently used Gregadoo East Road. TG have not stated mitigation measures.

19. **Air Quality** impacts from above – Vol.3, pp.21-5. Both during construction and the long-term increased road traffic.
20. **False information re: Biodiversity offsets** - These offsets should be located ON the properties where clearing is going to occur so that TG is ACCOUNTABLE for the destruction of biodiversity at a local level, not by purchasing carbon credits elsewhere. Vol.3, pp.27-10, (27.7.4).
21. There have been **no current environmental surveys undertaken** on our property and these should have been undertaken by an independent and qualified environmental surveyor before release of the EIS (not TG field staff). Our farm is located in the EIS Gugaa Substation project footprint (see attached) as per map shown Vol.1, pp.3-17. EIS is false on Vol.4, pp.B-9, *section Biodiversity Conservation Act 2016 and Biosecurity Act 2015*.
22. **TG failure to meet their own EIS Community Engagement Objectives Report** – Vol.4, pp.6. Again, NO information has been given to the Gregadoo/Big Springs wider community about the Gugaa substation proposal before release of the EIS. This goes against everything they claim to be doing on paper.
23. **Social Licence to construct Gugaa Substation** – for us, Transgrid would need to offer fair and reasonable compensation to all impacted landholders for the disruption and reduced land value that Gugaa substation will cause. Transgrid would need to plant mature screening trees along our boundary to compensate for the unnecessary clearing of our valuable remnant yellow box woodland trees as well as offer meaningful engineering solutions (such as land bank forming) to reduce the visual amenity impact to our area.
24. **Taxation of Compensation** – Compensation to impacted landholders should be set by government as tax-free payments to ensure that payment is not taxed in the year it is received at the full rate of 45%.

We believe Transgrid has no social licence nor the environmental track record to complete this proposed Humelink project safely and in line with community expectations unless they address and mitigate the numerous issues their EIS has raised.

We simply request that Transgrid be held accountable for their actions and that the DPE considers and investigates ALL of the concerns raised in the EIS before granting approval to such a divisive project. We are not opposed to undergrounding Humelink.

Yours Sincerely,

The image shows two handwritten signatures in black ink. The first signature is a cursive 'LH' followed by a flourish. The second signature is a stylized 'A' followed by a long horizontal line.

Louise & Andrew Sinca