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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 THE  
HUMELINK PROJECT - SSI-36656827**

I hereby submit this response to the HumeLink Environmental Impact Statement.

I object to the HumeLink proposal.

I am a fourth-generation farmer who will be directly impacted by the proposed transmission line (over 3.1km and 70m wide across my property) and associated EIGHT TOWERS and construction and maintenance access roads.

My objections to the Humelink project relate to the following:

- **Lack of Consultation and Inadequate assessment (Ecology and Environment, Cultural and European Heritage)**
- **Assessment in the EIS of the wrong route alignment**
- **Significant adverse visual, environmental, economic, and family succession planning impact**
- **Substantial environmental harm**
- **Failure to consider alternatives with lesser adverse impacts.**

I have with Stephen Noon (who has extensive expertise in High Voltage design and construction, and environmental approvals of substations, transmission lines, power station switchyards and telecommunication facilities) identified an alternative route through my property with lesser adverse environmental and economic impacts. Mr Noon's report is attached (**Attachment 1**).

Also attached (**Attachment 2**) are photos I have prepared to demonstrate the improved visual and environmental impact of the alternative route.

## 1. Introduction

Cowridge (our property) was a portion of the larger original property holding, 'Bellevale,' Black Range Road, Yass, settled in the 1850's from (Hamilton)Hume/Barbour family. Cowridge has been farmed by our family for 90 years.

Cowridge is a fine merino wool and meat agricultural business. We take pride in our environmental management and sustainable rotational grazing practices to maximise the best health and productivity for livestock, soil, native and improved pastures.

My children are the 5<sup>th</sup> generation, our family succession plan offers the best enterprise opportunities to diversify with an eco-tourism business, whilst maintaining a viable and sustainable agricultural business. We have four small concessional blocks of land for development.

Cowridge has a fenced off area of **175ha of private conservation land including planted tree line connectivity corridors to waterways. This equates to nearly 30% of landholding protect biodiversity and conservation.** Our family has spent decades restoring and improving habitat for native species (plants and animals). The original land holding fenced off 45ha, five kilometres of the 'serpentine aerial view' Yass River protecting the waterway and enhancing a wildlife corridor which is not grazed by livestock. A further 110ha, private conservation block of land on either side of Derringullen Creek, is not grazed by livestock with a small portion, 40ha, is managed under restricted and controlled reserve grazing to benefit the native grasses, depending on the seasonal conditions.

The centre point of this conservation land is Derringullen Falls, not described in the EIS, within the transmission line easement (photo below).



*Above - Wedge-tailed Eagles nest.*

*Mid-point viewing stop.*

*HIGH VISUAL IMPACT*

*Standing under Overhead 500kv lines through to horizon, (Centre right tree lines)*

The transmission line (and associated access roads and towers) will slice this conservation area in two and is proposed to directly impact the waterfall. The proposed 70m wide clearing zones

will remove all significant vegetation, impacting habitat connectivity, and creating numerous erosion and invasive weed issues. The EIS ecology survey is NOT comprehensive, it does not 'paint' a clear picture of the flora and wildlife corridor connectivity to the waterways, Derringgullen and Bowning Creeks and the Yass River. This unique hidden landmark has been under conservation for 40 years. I have received funded monies for environmental projects over many years to secure a viable future for our waterways and wildlife corridors ***A more environmentally and visually destructive location for the powerlines could not be imagined.***

## **2. Lack of Consultation and Inadequate assessment (Ecology and Environment, Cultural and European Heritage)**

My experience with Transgrid since we were first informed of the proposed line through our property has been distressing. Communications have been dreadful, at no point have any communications answered our questions truthfully. The first letter in April 2019, listed one small north-east corner of the property, the second letter 2020 the line was through the entire property. It was apparent that the route selected was based on aerial maps and no ground truthing.

I have over the last two/three years unsuccessfully:

- *Requested Transgrid to bring a qualified engineer, mapping team, or surveyor on site to consider the significant practical impediments to constructing a powerline in the location proposed.*
- *Requested Transgrid to consider an alternative adjusted alignment, within the original corridor, which would minimise adverse impacts to Agriculture primary production, Ecology and Environment, Cultural and European Heritage; and*
- *Sought from Transgrid critical construction information, tower sites and additional property access roads to each tower site. Information on the results of the ecological /heritage survey undertaken by them.*

I was shocked, extremely upset, and disappointed when I reviewed the EIS.

Despite two years of "consultation" I was unaware of the nature and extent of proposed impacts, including the proposed access tracks, total clearing zones and hazard clearing zones.

*I still do not understand, nor been advised of the location of the 8 proposed towers on my land and how heavy vehicle construction access to those sites is proposed.*

Until I saw the EIS and worked through the extremely large document (in a limited timeframe) to identify any information specific to my property. I have had to engage the expertise of many people in various fields to help me understand the impacts of what is proposed and to break down the misinformation in the EIS.

My property is *identified in the Ecology Assessment in the EIS in (EIS REF: DBAR Part 2 Figures 1 of 3 Figure 7-2 Map ref 68,69,70 –pages 564-566 of 599)*

Based on my experience of the land, I have significant concerns as to the feasibility of what is proposed on my property.

In relation to the EIS, I note that:

- **The EIS ecology surveys undertaken by Transgrid are NOT comprehensive.** Relevant biodiversity assessment has been omitted.
- **The Derringullen falls is not mentioned,** the waterfall is central in the surveyed corridor. Reading the EIS surveyed documents you would not know this landmark feature exists.
- No identification of the rock escarpments and cliffs or surrounding the falls landscape.
- Wrong description, the water as turbid. Clearly a notation would have been appropriate, only after heavy rain would this occur.
- The vulnerable Little Eagle has been recorded in the ecology survey but the protected Wedge-Tailed Eagle pair and nesting tree within the 70m easement were not marked on survey maps. It is a certainty, death by electrocution, and will never return to this habitat and hunting grounds. All raptor birdlife connectivity to waterways and landscape are now threatened survival.
- The ancient *Callitris glaucophylla*, unique as it is the only tree of this size, and species on Derringullen Creek, not listed. Estimated over one hundred years of age, a girth of 3.4m.
- The neglect of omitting the true value of the biodiverse environment as low to moderate impact is shameful.
- Clearing multiple 100 -200-year ancient woodland trees -, *Euc melliodora*, *Euc blakelyi* and multi-hollow *Euc. bridgesiana* trees.
- Transmission line potentially over the top of the largest tree on property, *Eucalyptus camaldulensis*- River red gum, estimated 200 years, 8.5m girth
- Clearing multiple young to mature paddock trees, plus over 300 planted tree lines and understorey corridors, connectivity to waterways.
- Damage to vulnerable stability of Rocky cliffs and rocky outcrops and habitat for legless lizards.
- **The EIS Fails to honour of the true values of the Aboriginal women's site.** The visual impact and dominance of towers and lines, and ambience on sensitive waterway location and social impact on protecting, educating, and celebrating this special area.
- Dismisses European History sites as 'insignificant'. The report contains wrong information. The reported date of the property ownership is incorrect. The well and sheep dip are disappointing survey result. Another small quince tree orchard and rubble house site directly under the transmission line has not been assessed.
- The route has a heavy impact on the neighbours' hollow tree woodland, 40 - 50 trees, on the Bowning Creek. This is where the vulnerable little eagle is marked on EIS survey
- **Transgrid could not have chosen a worst-case scenario for many of the assumed tower sites on our property.**
- **All maps drawn on satellite cannot be presented to us without the practical on ground landscape assessments. Before the EIS not after. The EIS document contains many inaccuracies, it appears this information has been withheld from landholders. After our years of requests.**

- **Impracticalities of crossing the 132kv 99M line could not be in a worse location.**
  - The safety issues on the line crossing over on an escarpment and slope without on ground site analysis.
  - The tower location crossing the 99M line seriously impacts our livestock yards, high volume of livestock movements and animal husbandry practices, and
  - surrounding paddocks lambing paddocks and sheep camps. The paddocks are tree lined for seasonal protection and lambing survival.
  - Transgrid did not advise me, and I have only identified in my review of the EIS and discussions with Stephen Noon that a large portion of tree lines outside the 70 m easement will be totally removed outside of the 70m easement zone for the extra construction constraints due to the larger span across the Black Range Road, deeper footings, and pulley/tensioning on a bend. [Reference map EIS: TR1 Part 2 of 3 Figure 13-1 map reference 69,70 \(pages 195,196 of 905\)](#)
- **Another disastrous tower site next to our central water distribution water tank, pipelines, and Helicopter pad.** My farm and livestock are irrigated by a gravity fed system of dams, troughs, and pipelines. The key to this system is a 120kL above ground water tank near the proposed easement. The helicopter pad is located next to the tank (highest point and best location for mixing of weed spray with water for aerial weed control). My sheep yard, lambing paddock and sheep camps are also nearby (under the proposed tension tower and HumeLink/ 99m (132kv line intersection). At the highest point on property now deemed too dangerous. Impacting land weed management practices impossible to access by land vehicles. -Comments from Transgrid regarding the Livestock yards and water tank were, "we'll just move it".  
However, it appears that our critical agricultural infrastructures are now is just on the edge of the easement, so it is 'OUR PROBLEM AND JUST BAD LUCK'.
- **Transgrid have contradicted themselves in the EIS; stating Transgrid will choose the narrowest waterway crossing point. With the lowest impact.** This is definitely the opposite case in point. Transgrid have decided to cross the Derringullen Creek, over the widest point a very large span, over a landmark Derringullen Falls, (although, incredibly, this is not mentioned in the EIS), cutting through conservation land that has had funded project money to fence off the waterway and re-vegetate over a long-term projected time. **The total clearing zone indicated in map 69 (reference above) and the span over the waterway is ridiculous and simply does not make sense.**
- Again, I refer to our preferred re-alignment line where all these issues can be annulled (see attached report of Mr Stephen Noon).

**Before any further assessment is undertaken, I request that our alternative line is re-assessed for practical, construction, maintenance and safety issues crossing the following critical points:**

- **The Black Range Road at the narrowest point.**
- **Crossing the 132kv, 99M Line - open (clear of vegetation) level ground either side of 99M line.**
- **Crossing the Derringullen Creek at the narrowest point, low ecological impact.**
- **Crossing the Bowning Creek (neighbours' property) at a lower impacted area.**

### 3. Assessment in the EIS of the wrong route alignment.

The EIS has considered a different transmission line alignment than the one I am now informed is proposed.

I have been provided by Transgrid with a number of maps, dated June 2022, 14 November 2022 and 17 April 2023.

***The route apparently assessed in the EIS is the November 2022 route. I understand that the 17 April 2023 route is the route currently proposed by Transgrid.***

The November 2022 is to the north of the April 2023 route. The April 2023 route requires the removal of very substantial (ancient trees), crosses Derringullen Falls at the base of the falls (at its widest extent), is closer to my main water tank and the helipad, will require the removal of more mature habitat trees on my and my neighbour's property.

The 17 April 2022 map was provided to me with a letter stating: "We have, however, been able to adjust the alignment to adequately consider the areas you have previously raised in relation to the conservation of cultural heritage, the biodiversity conservation area you are developing and the waterfall on Derringullen Creek". I completely disagree that the route (as depicted in the April 2023 map) has been adjusted to adequately address cultural heritage impacts and impacts on conservation areas and Derringullen Falls.

**The route in the EIS is not the route that is apparently proposed.**

The adverse environmental and economic impacts of route that is now apparently proposed has not been assessed.

I do not know where the eight towers will be.

I do not know how Transgrid proposes to access the towers for construction and maintenance (as the terrain is difficult for heavy vehicles).

I do not understand why some small portions of land on my property is marked "no land access" as I distinctly recall Transgrid walking over this land (which is the site of my water tank and helipad).

My experience with Transgrid and Humelink project has included: stone walling lack of information, false information, generic statements and have not delivered responsibilities of expert consultation, good design, surveyor/engineering and proper on ground land assessment, before the reduced 70m easement map was issued to us, as landholders, November 2022. And I may add, the Compensation agreement document issued July 2022, deadline December 2022, was also BEFORE notice of the reduced corridor delivered, still without any critical information of towers site locations and construction access.

**This is completely unacceptable.**



New surveys are required. The 'new' route a little further to the south which has EQUALLY HIGH IMPACT. [Refer EIS map reference](#)

To note, the new transmission line is environmental damaging destroying biodiversity connectivity between closely associated waterways, the Derringullen, Bowning and Washpen Creeks, are 500 -600m from the Yass River.

The neighbouring properties to the west, (as above; *figure 7-2 Map ref 68 & 69*) suffer HIGH IMPACT environmental losses, significant loss of habitat. The advantages of our re-alignment must be considered for reducing overall biodiversity impact and irreversible damages over 3 properties.

#### 4. [Significant adverse impact - visual, economic, and family succession planning](#)

The proposed transmission line will have a significant adverse visual impact on the conservation land and our agricultural business generally.

- **Environmental conservation land and protection:** *Our family has long been involved in funded Rivers of Carbon (ARRC) Australian river Restoration Centre, Bowning, Bookham and Yass area Network Land Care, projects to protect the waterways and connectivity, planted tree lines. Accomplished and achievable long-term projects are adversely impacted.*
- **Eco-tourism opportunities:** *Our family purchased adjoining land (2018) to allow us to diversify with potential Derringullen Walking Tracks and Eco-lodge, to share the beautiful short walks and scenic environment. We commenced works and plans with helicopter application weed control and track development and presented a preliminary DA application to the Yass Valley Council for a small Eco-Lodge with views across Derringullen Creek. (On hold pending Humelink project line, will null and void Eco-tourism potential, re-alignment)*
- **Visual impact, the 500kv transmission line will be a dominant visual structure in the landscape scenery and vistas adverse impact on the eco-tourism enterprise.** *The sections of the walking tracks will be under the wide span transmission line and two towers crossing the Derringullen Creek. HIGH visual impact of seven of the eight towers in the walking track landscape. (Our preferred re-alignment reduces the visual impact. Underground is a clear advantage for long term benefits.)*
- **Subdivision blocks and Land devaluing.** *Entitlements of four subdivision blocks Yass Valley Council, 2007, have been impacted on social, visual impact and devaluing. Impacts children's future inheritance. The subdivision blocks will all have a visual impact. The span over Black Range Road is very high both sides. (to the escarpment /sheep yards plateau). Block No. 1. 10ha lines up on the edge of the easement. This means noise impact become an immediate issue that cannot be overcome. HIGH IMPACT and financial loss.*
- *Property devaluing is heavily impacted with the 500kv transmission line 'green fields' 75m height, 70 m easement, 3.1km.*
- **Succession family planning,** *over generations we have had strategy plans to retain a viable property and look to the future in diversified business opportunities. These include the above mentioned, Eco-tourism walking tracks and Eco-lodge farm stays. Also in place are Entitlements of subdivision small blocks. The visual and social impacts of the proposed line decimate all of these opportunities.*
- **High lightning strike and Bushfire impact:** *Unaffordable insurance with a high impact infrastructure crossing our property puts us in a financial hardship and disadvantage. A large portion of my property relies heavily on aerial water bombing in inaccessible terrain unsafe*

for RFS ground crews. Both land and air offer NILL protection of conservation land and property.

- **AGRICULTURAL IMPACT -LAND, AERIAL WEED SPRAYING, ECONOMIC, ANIMAL HUSBANDRY IMPACTS, Paddock TREES AND TREE LINES, CONSTRUCTION DAMAGES.**
- *Anticipate the losses and impact from the above mentioned will have long term recovery, some rock levelled towers sites will not recover, we expect years of weeds in construction zones. High Erosion in the vulnerable steep country.*
- *I understand that high voltage transmissions lines produce noise. The impact of noise created by the lines has not been assessed in the EIS. Transmission line noise will disturb livestock (note a tension tower and the crossing of the Humelink and the 99m (132kV) line is proposed directly over my sheep yards and sheep camps).*

## **5. Substantial environmental harm**

Our family has devoted decades and significant resources to understanding and improving the ecological values of Cowridge. We have benefited from a number of funded projects: -Australian River Restoration Centre (ARRC), Rivers of Carbon Project, Bowning Bookham Landcare, Yass Area Network Landcare- Greening Australia, Birdlife Australia, Birds on Farms project. We have created a 175ha Cowridge conservation area and Wildlife corridor. The Cowridge conservation area: NB. Not a comprehensive list.

- *Derringullen Creek habitat; (HIGH Connectivity to Bowning Creek and the Yass River)*  
*Numerous raptor bird population, in threat of electrocution and will never return to this ideal habitat. **Little eagle-Vulnerable. Wedge-tailed Eagle nest pair- protected.***  
**Vulnerable birdlife, Superb Parrot, Scarlet Robin, Occasionally Gang-Gang Cockatoos**
  - *Birdlife Australia - Birds on Farms Project, Survey 4 areas within the property. The birdlife list is extensive, we hope to see numbers improve as revegetation projects establish on the conservation land and green corridors connectivity with waterways.*
  - *Woodland and native grasses birdlife.*
  - *Rocky escarpments, rocky outcrops in native grass provides ideal habitat for legless lizards.*
  - *Rakali, Echidnas, Wallabies, Wallaroo, Kangaroo, Wombats, owls and bats.*
  - *Variety of skinks and lizards, Red-bellied black and Eastern Brown Snakes.*
- *Contains a high density of native flora, providing unique ecosystem.*
- *Encompasses a culturally significant Aboriginal women's site*
- *Contains (areas of Cowridge) fossil deposits limestone coral, shells, trilobites.*
- *Includes and protects Remnant grassy box woodland – Yellow box, Blakelyi Red gum*
- *Includes one of the many large habitat trees, a Wedge-tailed Eagles nest tree*
- *hidden spring water sink hole, 2 large Springs feeds Derringullen waterway and is part of the wildlife biodiversity.*





Derringullen Falls



-Edge of (but NOT in picture) Ngunnawal Women's Area. Multi-hollowed ancient *Euc bridgesiana*, top of waterfall. Grassy box woodland (top right) Rocky escarpments and habitat for flora and fauna.





*High viewpoint, Badgerys walking track. Left, Edge of Grassy Box Woodland. Right, hidden waterfall, deep at base of steep terrain. Potentially standing under 500kv Humelink, HIGH VISUAL IMPACT line through to 'Bald Hill' centre horizon.*

## **6. Failure to consider alternatives with lesser adverse impacts**

The substantial adverse environmental, heritage, economic and social impacts of the Humelink transmission on Cowridge are significant, unique, **and largely avoidable**.

The environmental and economic harm of the Humelink would be largely mitigated if the line were underground.

Transgrid have in my view undertaken no meaningful steps to identify the specific impacts of the line on the Cowridge Conservation land or to consider a relatively minor route re-alignment which would shift the crossing of Derringullen Creek upstream to the narrowest part of the waterway (also on our property). This slight adjustment of the route would be less visually intrusive, easier (level/ stable ground), cause less ecological harm and allow our ecotourism project to proceed.

## **Conclusion:**

From my review of the EIS and the plans provided to me by Transgrid, I have identified that the project (as proposed) will require attention to address and justify the following actions:

**We have consistently put forward, a practical and less damaging line on the northernmost side of the original wider corridor line, partly through two neighbouring properties.**

***Before any further progress can be made, I request that the alternative line is re-assessed.***

***My objections as listed, are extensive and have a greater adverse impact over multiple components of our agricultural business, developing Eco- tourism business, succession plan and a high impact on the long-term regeneration and survival of the biodiversity on conservation land.***

**Transgrid re-alignment expenses are a one-off cost and re-alignment offers more a feasible outcome.**

***The advantages – practical easement access, construction, maintenance, and safety issues crossing the following critical points:***

- The Black Range Road at the narrowest point.***
- Crossing the 132kv, 99M Line - open (clear of vegetation) level ground either side of 99M line.***
- Crossing the Derringullen Creek at the narrowest point, low ecological impact.***
- Crossing the Bowning Creek (neighbours' property) at a lower impacted area.***

Yours sincerely

