

## ISSUE: SOILS

In Appendix O, P 312, of the Soils and Water Assessment, the Table 16-3 Land and Soil Capability (LSC) Scheme Classification (OEH, 2012) shows ratings used to understand the capability of land uses with LSC Class ratings 1-8, with 8 being extremely low capability land.

The EIS catalogues the following:

- north and west facing slopes of the Project ridgeline as the LSC rating of 8 – 8 being **extremely low capability land** with *“limitations so severe that the land is incapable of sustaining any land use apart from nature conservation. There should be no disturbance of native vegetation”*.
- western portion of the Project is a mixture of LSC 8 and 7 – 7 being **very low capability land**, with *“severe limitations that restrict most land uses and generally cannot be overcome. On-site and off-site impacts of land management practices can be extremely severe if limitations are not managed. There should be minimal disturbance of native vegetation”*.
- South eastern corner of Project is predominantly rated at LSC 6 and 7 – 6 being **low capability land** with *“very high limitations for high impact land uses. Land use restricted to low impact land uses such as grazing, forestry and nature conservation. Careful management of limitations is required to prevent severe land and environmental degradation”*.
- eastern ridgeline of the Project has a mixture of LSC ratings of 3,4 & 6- having **moderate to severe** limitations. The Figure of this section is believed to align to the area of Morrisons Gap Rd and Shearers Road. The Figure clearly shows only a LSC 6 rating for that area with no pockets of 3&4 (moderate and high) at all. **This is an inaccurate statement in the EIS according to their own data as seen in Figure 16-2.**

The Figure 16-2 in Appendix O shows the entire classification scheme of LSC capability of land to be developed under this Project. The data in the map shows that the entire Transmission line will be built on land rated at an **LSC 8** - *“limitations so severe that the land is incapable of sustaining any land use apart from nature conservation. There should be no disturbance of native vegetation”*.

**THE DATA WITHIN THE EIS, AS SHOWN IN THE LAND AND SOIL CAPABILITY TABLE CONFIRMS THAT THE ENTIRE PROJECT AREA – DEVELOPMENT FOOTPRINT AND TRANSMISSION ROUTES – CANNOT PROCEED.**

**EVERY CATEGORY OF LSC FOR ALL PARTS OF THE PROJECT CLASSIFIES THE SOIL AND LAND AS HAVING “SEVERE – VERY HIGH LIMITATIONS” TO NATIVE VEGETATION AND SOIL DISTURBANCE.**

**THE LAND USE IS RESTRICTED TO GRAZING AND NATURE CONSERVATION ONLY. THESE CLASSES OF LAND HAVE EXTREME ERODIBILITY AND LAND SUBJECT TO SEVERE WIND EROSION WHEN CULTIVATED OR LEFT EXPOSED.**

If the soil and land as seen in the LSC assessment cannot take cultivation by a plough, it most certainly cannot be subject to major construction, road building, heavy vehicle and machinery impact, deep digging and extraction to name just a few of the impact on the soils and land. Please note that each turbine requires a *“Gravity Foundation in which an area is excavated suitable to support the burying of a “pedestal” design of concrete and reinforced steel....these are typically 3-5 m deep and 25 m in diameter” (EIS P 42).*

The risks of erosion leading to landslides is extremely high and given the topography of the Development Footprint area, with cliff faces and slopes from the ridgeline, the outcomes of any landslide could be catastrophic. **ON THIS BASIS A WIND FARM CANNOT BE CONSTRUCTED AT THIS SITE.**

As I have already pointed out in my Submission 5 on Water, I reiterate that in the EIS P 320 under Mitigation Measures has as its first point, to address potential impacts to soils and water, the following:

*“Preparation of a detailed Soil and Water Management Plan (SWMP) prior to construction commencing. The SWMP should be prepared by a suitably qualified person, such as a soil conservationist.”*

What sort of a Project could be approved when the EIS itself proclaims it has not undertaken any sort of assessment by a suitably qualified expert on the impacts on the soil and water and their management. Given what its desktop data on the Land and Soil Capability alone is telling it, it is an abrogation of responsibility to not have conducted any proper expert assessment.

**I object to this Project on the basis that the land use classification assessed under the Land and Soil Capability (LSC) Scheme Classification (OEH, 2012) shows the site to be totally unsuitable for construction of a wind farm, being suitable for grazing and nature conservation only.**