Australian Energy Regulator Transgrid The NSW Minister for planning

GPO Box 3131 PO Box A1000 NSW Government – EP& A Act 1979

CANBERRA. ACT.2601; Date: 19th March 2024 Sydney South NSW 1235 SYDNEY NSW 2000

aerinquiry@aer.gov.au vniw@transgrid.com.au

Re: Victoria to NSW Interconnector West: VNI West) (NSW) Draft Route report - NSW- Route 'C'& C1; C2; C3 & C4

ISSUE: The Directors of Windouran Pastoral Company Pty. Ltd.; The Peoples of NSW and in particular, Moulamein, Mellool, Mallan and District claim that Transgrid; Lacks a Social Justice Licence and a professional Business licence for declaring a preferred route without exhaustively testing all options and testing each option for its present value of net economic benefit but relies on MCA as the primary tool for route identification; not involving the entire community and listening to its conversation, and causing mental stress and health problems and consequently endangering the social, economic, and environmental fabric/assets of the district - And therefore, Warrants an investigation by AER that would direct-

- Transgrid to investigate route options in a new and expanded corridor close to Energy Connects approved 330Kv line and that maximises the present value of net economic benefit from the construction of the line and facilitates and expedites delivery of the VNI West (NSW) project.
- Transgrid to robustly review, thoroughly and openly, all other options available that
 intersect at or near the 330KV Energy connect line and compare favourably with the
 length of transmission line of other options, thereby reducing the risk to issues
 exposed in APPENDIX A and which satisfies the draft 2024 ISP and reduces the
 negative legacy of the project; improves the broader social licence; reduces risk of
 transgressing on endangered species habitat; and harnesses more renewable energy.
- Transgrid to show due diligence and a duty of care in any proceedings they undertake.

It is recommended that We; The Directors of Windouran Pastoral coy. Pty.Ltd; the people who are consumers and legitimate users of electric energy request AER; grant us an expeditious audience to present in person our briefing note and proposed alternative preferred route; intercede and direct Transgrid to investigate all possibilities under dot point 2 within the parameters of the other two dot points.

R B Crawford J A Crawford

References:

- (1) VNI West Project Update Brochure Jan 2024. Themes: Technical- To find a reasonably direct route and avoid challenging technical conditions so we don't end up building unnecessarily long infrastructure, or using complex engineering solutions which energy consumers will pay for;

 Environment: To protect important areas of biodiversity, like protected habitats national parks and state forests. Community: To minimise potential impacts to the community and landholders. Aboriginal heritage: To protect and preserve know and potential aboriginal cultural heritage sites and areas of indigenous importance.
 - **Minimising loss of agricultural production:** To protect important areas of agricultural operations with a focus on irrigated agriculture.
- 1.1 Transgrid's- Reasons for selecting route: (1) Be in **proximately** to the least number of dwellings, provide the greatest opportunity to **minimise visual disturbance**.(2) Have **the lowest impact** on irrigated agriculture lands, by following existing assets like railway corridors, roads, travelling stock routes and existing property fence lines: (3) Have the **least impact** on previously identified aboriginal sites: (4) Have **fewer** impacts on existing waterways (5) Be **further away** from sensitive ecological environments such as wetlands associated with the aboriginal werai forest and other areas in the Edward -Wakool and Billabong catchments: (6) Have **the least potential impact** on the protected habitats of the endangered **Plains Wanderer**.
- (2) Victoria to New South Wales Interconnector West (VNI West) (NSW)January 2024.
- (3) **The reports:** 2019 PSCR: 2022 PA draft report: 2023a VNI West Consultation report; PACR 2023b; Draft corridor 2023; Preferred Corridor Report (NSW section) January 2024.**AEMO** -Update to the 2022 Integrated System Plan -December 2023; **AER**. Victoria New South Wales Interconnector West (VNI West) Determination of dispute application of the regulatory Investment test for transmission. October 2023.
- (4) Project Energy Connect Implementation Final Report. February 2024

APPENDIX A

The preferred route bisects property in the Mellool, Mallen region (a region that is a flood prone area with soft soils and challenging geological conditions with alluvial channel deposits and sinkholes.

and transits perilously close to houses and infrastructure on the Ettershanks, Mc Donalds, Spences, Glenn, Halls, Burger, Nalder, Pearce's, Char Sing properties et all, South of the Edward River; The preferred route transits perilously close to the Historic Mooloomoon Homestead precinct and at least 7 dwellings in the peri Urban area of Moulamein and the township of Moulamein;

Relies on desk top studies that have missed delicate, subtle Environmental areas and infrastructure, important to the peoples of the district. -

Transits perilously close to the Moulamein Grain shed; Moulamein Sewerage works: The nearby registered Billamein wetlands: Moulamein recreation Lake; The Moulamein rubbish tip; The rice sheds and ancillary works; Access roads to same and resultant high traffic movements in high-risk times; Interferes with Broadband and mobile phone reception; The emergency (dry weather only) airstrip – China's strip! & the all-weather (except in flood) non registered airstrip north of the township;

The extensive Lignum and Indigo bush, lowlands at or about the 5 mile reserve on South side of the Billabong Creek; (At or about the 5 mile reserve -The Murray Darling Basin Commission logged the depth of the various strata /alluvium occurring in this area at or about the 8Km zone on MR 319 and again next to the Moulamein -Wanganella road at or about 3081Wanganella/Moulamein road; The timelines according to the strata indicate that enormous time periods are very close to the surface) The significant Red gum, Kooba and black box eucalyptus trees at the proposed Re crossing (Northwards) of the line over the Billabong Creek at or about the boundary of Woorooma and another Landholder(Crossley?) (Two river crossings within 1500meters! the turning structure as it is portrayed on the South side of MR319 and north of the Billabong creek- (directly over a fenced area of rare Fuscias, endangered orchids, fobs and seasonal bulb plants and eucalypt

<u>trees</u>) – Part of Windouran environmental protection works; Bisects well <u>established box trees alongside MR319;</u>

- Significant visual negative legacy alongside MR319 Easterly before intersection with Moulamein/ Wanganella road and Easterly along Moulamein Wanganella Road and from the Windouran homestead precinct; The visual pollution in this area will be extreme and, increased daily transits will exacerbate and spread this negative legacy of wilful planning and misallocation of consumers funds; Increases the Bush fire hazard by running through trees and the plains;
- Transects alongside the Rangeland Assessment Program site in the paddock called Reids adjoining MR319. This RAP has been ongoing for the past 35Years:

 Bisects Windouran Airstrip (heading 18) on the old section of MR319; transects through known and suspected Plains Wanderer land noted on the Windouran environment plan (anywhere near clay pans associated with prior streams and at large like the most recent (12 March 2024) sighting of a clutch of chicks and adult carer); transects through moving sandhills, gil gai country abutting these sandhills; transects an approx. 141Ha special area of alluvium loam& sand containing old Knotted Box trees, Myall, Casuarina & Murray pine and a rare and unique stand of remanent Tea trees- Myrtle family Melaleuca, sympathetic of the Palaeocene environment of 12 to 13000 years ago.
- Bisects the alluvial pop up sandhills (These sandhills are a probable, yet unmapped Aboriginal resource) and extensive Atriplex Nummularia, Atriplex Vesicaria, Maireana aphyalla, Rhagodia; Family Zygophyllaceous, Danthonia& Stippa swards et al; stands on Windouran; Bundyulumblah Caroonboon; Zara; Spring Plains; Warwillah, Bullawah, Boonoko; Bisects the extensive woodlands at the old confluence of the Eurolie Creek and Billabong creek on Caroonboon; and transits within the circuit area of local Agriculture airstrips on Windouran, Mooroolbark, Bundyulumblah, Caroonboon Warwillah et all.

ABBREVIATIONS

PACR- Project Assessment Conclusions report

MDBC- Murray Darling Basin Commission

RAP – Rangeland Assessment Program

WSP-

