

Mr Arek Gulbenkoglu
General Manager
Australian Energy Regulator
GPO Box 3131
CANBERRA ACT 2601

30/5/22

Dear Mr Gulbenkoglu,

RE: TransGrid Humelink Contingent Project Submission

We would like to lodge a formal submission in regards to the HUMELINK 500KV transmission project.

NAME: John and Sarah Roche Pondera Pastoral Company
ADDRESS: 351 West Gilmore Road, Gilmore, 2720

IMPACT TO OUR PROPERTY: We have 1800 acres of prime productive agriculture land, where we produce beef and lamb for human consumption, as well as 90% of our land is native pastures with important native flora and fauna and potential for 50 000 Carbon Tonnes. The proposed corridor is set to go straight through the middle of our property end to end for 4km. Our country is steep terrain and we are very concerned about our ability to effectively run our core business during the operations of construction and the impact the easement and the 500kv lines and 80metre towers will have on valuation of our land.

COMPLAINT ABOUT THE PROJECT:

We write to you and request Government and AER intervention urgently on HumeLink proposed 500Kv corridors. As we are now in year three of this ongoing negotiation, it is clear to us as farm landowners that unless there is a Government directive to Transgrid that public land and existing route easements are the preferred routes for HUMELINK, communities and productive farming land will be destroyed and many people displaced from their multi-generational homes forever.

Transgrid have slightly improved their engagement with landowners however this community consultation and feedback is not being taken seriously enough and is certainly not being reflected in the analysis and the proposed corridors currently on public display. There has not been enough ground truthing of the public or private land options, nor has there been enough expertise and due diligence applied to the significant impact to community, farming land, landowners and then human livelihoods.

We understand the critical importance of the renewables strategy and support it however it can't be at the cost of community, livelihoods and productive farms. HUMELINK is a \$3.317 billion project, 360km long, 550kv, with hundreds of 80m towers. This is largely unprecedented in Australia. The existing RIT-T framework and legislation Transgrid is working to is simply not acceptable where the cost / benefit analysis prioritises private land, people's homes, productive farming country producing food and carbon, rural and regional communities as the preferred routes over public land where there are existing easements away from community.

It has been stated right from the outset, where there is a public land option, then given this is a government owned asset this must be the priority route. It is so clear that the cost of this will be greater as our farming land has been so well looked after for generations for food production. It is ripe for picking by Transgrid and presents the easiest, cheapest route. This point was also confidently supported by Minister Kean at a visit to the Tumut area in 2021 and we also were communicated this directly by previous Transgrid executive team who are no longer there.

Transgrid are preparing with pace and purpose to go public with their 200m and 70m corridor end of May/June and we concerned it is going to be no different to the one they released March 2020, the cheapest easiest with no social licence. It is clear that all their community engagement and feedback with us as landowners over the last 2.5 years has been largely disregarded. Transgrid have used data, biodiversity modelling programs to map their preferred routes however in no report have they applied the same modelling to our farming country which also has biodiversity impact, land disturbance, set to destroy our carbon soil and tree potential banks, nor listed out how many acres of productive farming land is being destroyed, how many communities of people will be negatively impacted, how many people will have their homes destroyed, will have to rebuild, move, how many people will be displaced, nowhere does it mention the safety risk the lines will pose, particularly the increased fire threat on our properties and no one will want to work in and around them. The Transgrid Land Managers are good people talking to us however this information we are providing as impacted landholders and leaders in our community is not being reflected in the preferred routes at all by the engineering team.

Below are the 20 questions we have recently submitted to Transgrid and a series of photos to help you understand this significant issue facing our farming community unless AER and government intervene. We have spent over 45 days of our time on this project, taking us away from our core business. We have had over 30 meetings with multiple stakeholders in regards to it Snowy Valleys Council members, Minister Dr Joe McGirr, Federal Minister Kristy McBain, Transgrid Project Team, we recently met with Transgrid CEO Brett Redman in Tumut. In addition, we have spent a day with the Humelink Project Director, they have seen first hand our productive 1800 acre farm which the preferred route is set to cut right through the middle of for 4km end to end. We also took them up to Long Plain to show them their own Transgrid existing 330kv transmission lines infrastructure. They were surprised particularly by the 01 330kv (Upper Tumut to Canberra) line and how infrastructure of this scale can co-exist in the National Park away from community. They were also surprised at the development Snowy Hydro are undertaking in the park, why are Transgrid and Snowy Hydro not working together planning access roads, containments depots and using this land for the transmission lines as well? It lacks logic, strategic thinking, common sense and leadership. See attached photos.

IN TERMS OF RESOLUTION WE ARE SEEKING;

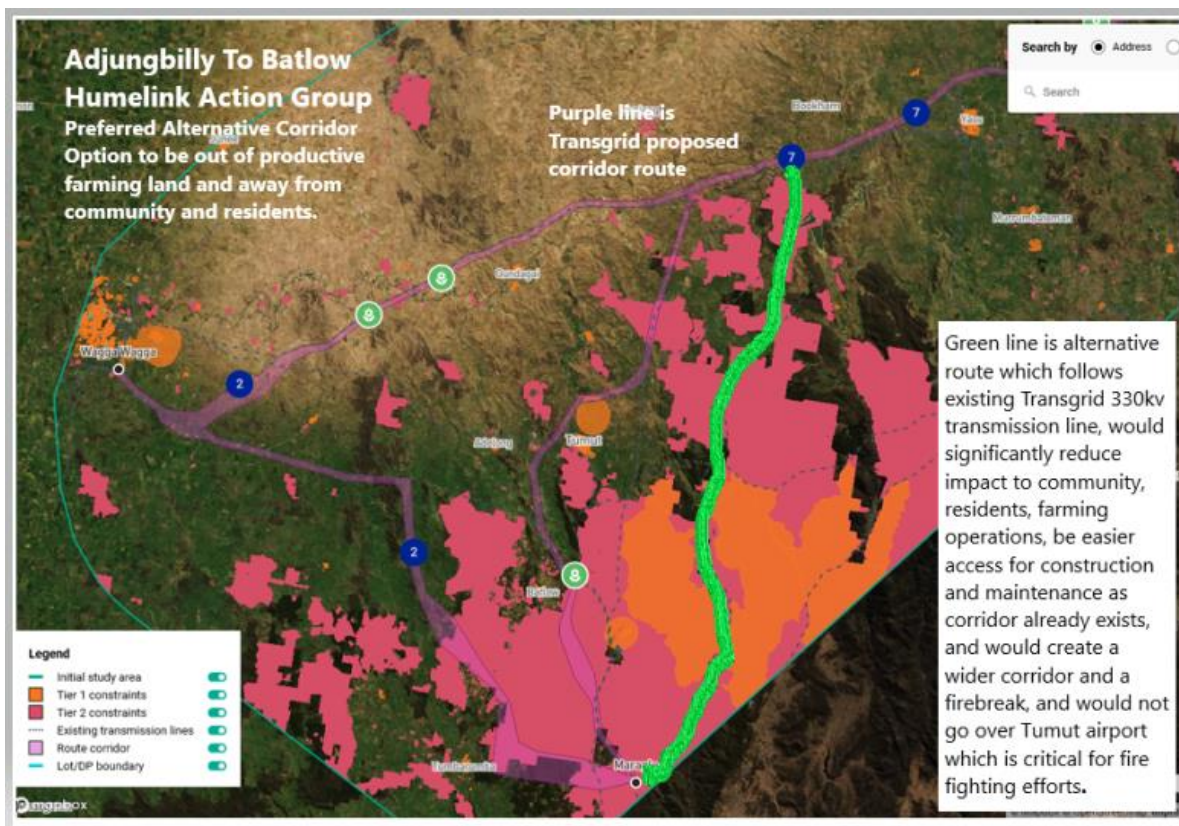
- We ask for your urgent intervention as the AER and support to Minister Kean for direction to Transgrid to ensure that public land is a priority for a public asset.
- We are concerned that the NSW government / NSW State Forestry is undertaking an investigation with CUBICO for a private investment Wind Farm in the Green Hills State Forest, yet HUMELINK can't go in there, this doesn't make sense to us as landowners, when Hume link is a State Significant Asset and Green Hills Forest is State owned land????
- That there is review and amendment to the RIT-T so as social impact and licence is applied and all costs are fully transparent and more accurately accounted for. Currently they are largely CAPEX estimates
- We make you aware that NSW Parliament passed amendments to the Forestry Act 2012 as part of the Energy Legislation Amendment Bill to facilitate the opportunity to establish renewable energy infrastructure in State forest pine plantations and request that where there is state forest this is used as a priority over productive farming land
- We believe the GHD data used to ascertain preferred corridor is flawed and costs presented to us as landowners are flawed and are requesting another independent review, all the data GHD used was provided by Transgrid???
- We are seeking productive farming and carbon producing land to be aligned with a Tier 1 impact land area

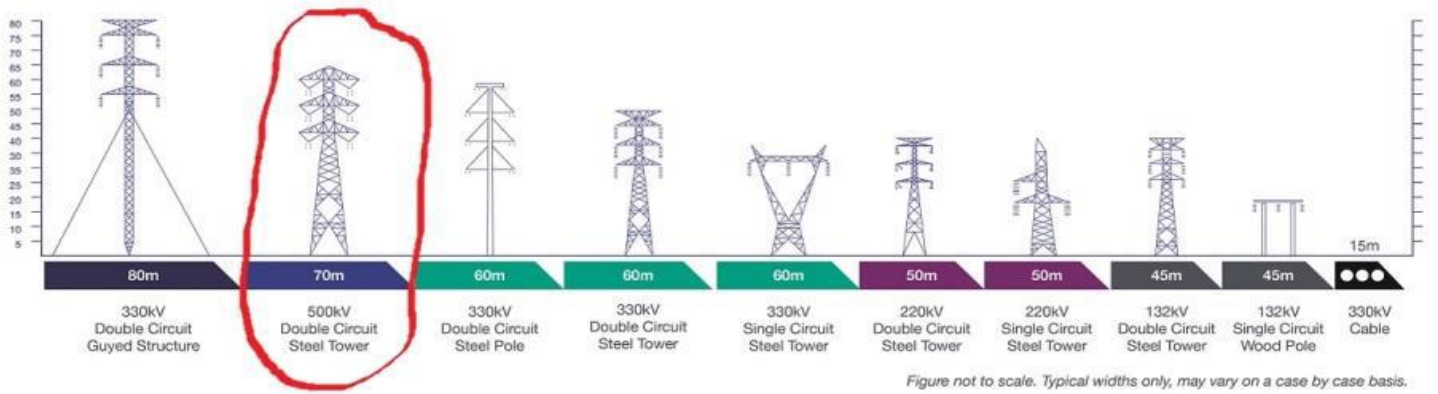
SUPPORT MATERIAL : TRANSGRID QUESTIONS– Brett Redman, Eli Baker, Craig Stallan

1. We were informed by previous Transgrid Executive and the Minister for Energy that **public land would be the priority** given existing infrastructure is already on it and easement agreement is with government and (line is 360km long, only 10km currently planned through govt land) with next priority on public land.
2. When this is a Government Asset and there are clear **public land options to take the route East** - why is it being proposed on productive, private farming land, near the community of Tumut which is built on agribusiness and tourism?
3. How is it fair or reasonable that we as primary producers need to give up our land, and carry the financial and aesthetic burden for a government asset that is providing for all Australians?
4. The 80m towers, 550kv transmission lines are unprecedented in Australia. We need Transgrid CEO Brett Redman, Hume link Project Director Eli Baker working the AER, other members of parliament to ensure the legislation, **frameworks are aligned to ensure that for CSSI as public assets are on public land** and the framework, economic modelling and budget is aligned to the needs of the community and impacted landowners, not just the quickest, easiest route.
5. There is no respect for **the devaluation of agricultural or food producing land** which is our core business. A lot of farms have significant mortgages over them, for example a 10million property, anticipating a 20-30% value deduction, suddenly 10million now 8 million, reduces expansion and bank position needs to be greater than 60% in a grazing operation.
6. Our **farms are also carbon banks** now eg the 30ha Transgrid need for an easement on our farming land equates to 35 000 tonnes carbon just from trees alone, current carbon price is \$50 / tonne and rapidly increasing, how is this going to be handled? All the public land is ineligible for carbon sequestration?
7. We can plant 400 trees per HA on our property, how is this **biodiversity offset going to be managed for our farms** as the easements negates this opportunity for the Australian Farm National Farm Stewardship Scheme?
8. We currently earn **\$1500 / Ha beef production on our farm per year**, anticipate production reduction by 100% on the easement area and surrounding when being built and significant impact to the operations overall. Corridor proposed 4km end to end of our property.
9. **Aerial spraying (plane and helicopter) is our only form of weed control and spreading of fertiliser for pasture optimisation** due to the steep terrain. We are in a high rainfall area 40inch, the 80m towers will impact this and ability for aerial fire fighting. We need to spray to maintain our pastures to optimise our grass for our livestock. This will impact our production and income.
10. In the scoping report , there is a comprehensive list of equipment, excavators, drill rigs, cranes, explosive equipment - **how are we to operate in and around this and on our steep terrain country** how is it proposed to get into our country when in winter we can't even get on our country on a side by side buggy? Huge safety risk, as opposed to existing infrastructure easements already have access roads

11. **Insurance on farms** with powerlines infrastructure given increased risk and threat of fire , how are we to manage this increased risk and ongoing insurance costs?
12. What negotiations are happening with Government, Transgrid, Snowy Hydro, National Parks, State Forest to get to a **triple bottom line outcome** away from community of Tumut and productive farming land?
13. This won't be first transmission line for Transgrid, is Transgrid together with Government committed to get the framework right for 2022 and beyond given it's been 50/60yrs since infrastructure of this nature built?
14. The 450 page scoping report is comprehensive, covers all aspects (environment, soil, flora, fauna) other than the **agricultural and people impact? When is this coming out?**
15. **The initial proposed corridors were done off google earth** no people/ community consideration, why is the National Park a priority over people, livelihoods, houses, communities and farms?
16. If Aboriginal land of significance can be detoured (dog leg on Tumut North proposed corridor, why is multi generational farming land , homes, people, community not ?
17. Transgrid have **not undertaken enough ground truthing of the routes**, its all been off government modelling and data sources. For example if they were to travel up to Long Plain they'd clearly see the existing transmission infrastructure (01 330kv line) in the area, it has a minimal footprint impact on the park and clearly the biodiversity of the park and the transmission line can easily co-exist.
18. Huge amount of development is being done **by Snowy Hydro in the National Park on public land**, development can be done sensitively in public land , why are Transgrid and Snowy Hydro not working together on access roads and containment depots given it is CSSI but needs leadership at CEO and government level to influence this proposed route to be on public land.
19. For any landowner impacted, **compensation needs seriously addressing staged payments** for (prep payment, development, construction, ongoing maintenance, annual payment, agreement/admin negotiation payment and land degradation) it can't be a one off fee for only the easement and especially when we have real evidence maintenance in and around existing infrastructure has been almost non existent by Transgrid. What is a real life scenario so landowners understand financially the value?
20. **We are in third year of this fight , landowners aren't being paid to fight it or advocate for alternative routes, placing huge stress on families and taking us away from core business producing food beef / sheep. Landowners are giving consistent and regular feedback on public land as preferred option followed by existing infrastructure easements, this was also the commitment made to us as community, none of this is being considered in the proposed routes. Please explain to us why?**

IMAGES TO SUPPORT OUR POSITION PUBLIC LAND FOR HUMELINK





Erosion of private paddock with existing TransGrid transmission tower and access tracks, no maintenance compared to how Transgrid public land easements are maintained and so well looked after. We cant have these on our farming land.



01 and snowy
hydro
development

This is the 330kv 01 Upper Tumut to Canberra Line, clearly can see the development underway by Snowy Hydro and the below images with existing opportunity for HUMELINK to parallel the 01, on public land away from community.





View from our farm property the proposed HUMELINK corridor set to go straight through the middle of it and into the community 1.5km from Tumut



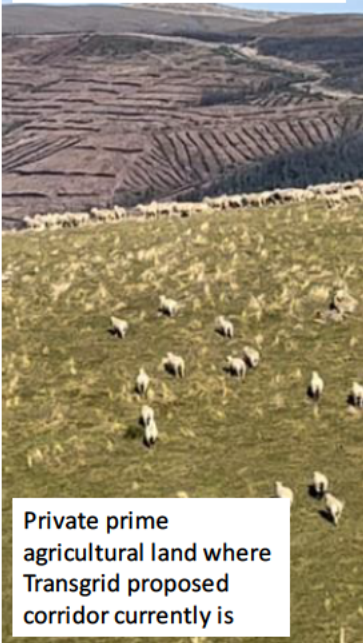
Top half of image is Green Hills State Forest PUBLIC LAND proposed alternative Maragle to Wondalga eliminating all private landowners of HUMELINK

- Minister Kean outlined where there was a credible State/ Public Owned Option this would be utilised for HUMELINK – Bago and Green Hills Forest Fits this criteria
- 100% Bago and Green Hills State Forest was burnt out in Dunns road fire and now being fully cleared – see image
- Excellent access roads exist through state forest as well as large main roads for easy access and development
- NSW State Forest Legislation recently changed to allow dual purpose for renewables including transmission lines and towers



Bottom half of image is Pondera Pastoral 2000 acres prime agricultural land, TransGrid HUMELINK corridor set to go through end to end for 4kms, we have several biodiversity areas, and 100 year old Elms as can see where our sheep cattle yards located, where there is a state forest option so close, which would eliminate all private landowners. Our land needs protecting, state owned asset should go on state owned land.

Green Hills State Forest PUBLIC LAND Landowner proposed corridor



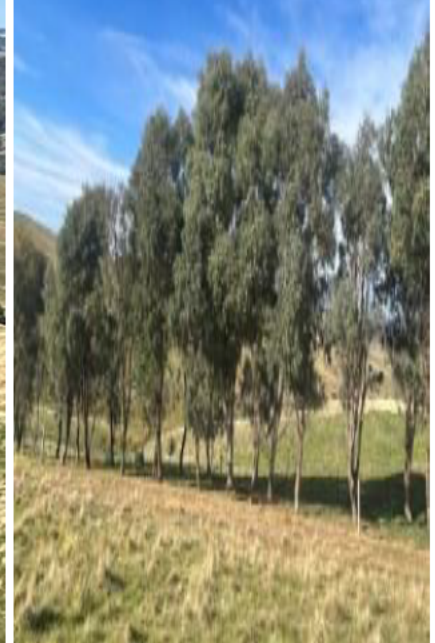
Private prime agricultural land where Transgrid proposed corridor currently is

Pondera Pastoral private prime agricultural land where Transgrid proposed corridor currently is



This land needs protecting when there is State forest so close

One of our many native tree areas on our property



Green Hills State Forest proposed landowner alternative for HUMELINK Maragleto Wondalga

