Australian Capital Territory

Planning and Development (Jerrabomberra 132kV Transmission Line - Numerous Blocks, Jerrabomberra and Symonston) Scoping Document 2019

Notifiable instrument NI2019–632

made under the

Planning and Development Act 2007, section 212 (Scoping of EIS)

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1 Name of instrument

This instrument is the *Planning and Development (Jerrabomberra 132kV Transmission Line - Numerous Blocks, Jerrabomberra and Symonston) Scoping Document 2019.*

2 Commencement

This instrument commences on the day after its notification day.

3 Scoping of EIS

Under section 212 of the *Planning and Development Act 2007* (the Act), the planning and land authority has prepared the scoping document in the schedule.

George Cilliers
Delegate of planning and land authority
25 September 2019

ACT Government
Environment, Planning and Sustainable Development

Scoping Document

Under Division 8.2.2 of the *Planning and Development Act 2007*

APPLICATION NUMBER: EIS201900038	**DATE OF THIS NOTICE:** 25 September 2019
DATE LODGED: 14 August 2019	

PROJECT: Installation of a new 3.6 km 132kV transmission line from the existing East Lake-Gilmore 132kV line connecting into a new substation at HMAS Harman at Jerrabomberra

IMPACT TRACK TRIGGER: Planning and Development Act, Schedule 4; Part 4.2 Item 2(a).

BLOCK:	SECTION:	DISTRICT/DIVISION:	LESSEE/LAND CUSTODIAN:
10	107	Symonston	TCCS-City Presentation
13	4	Symonston	TCCS-City Presentation
11	4	Symonston	Private lease
12	4	Symonston	EPSDD-Parks and Conservation
9	4	Symonston	Private lease
6	4	Symonston	EPSDD-Parks and Conservation
14	4	Symonston	TCCS-City Presentation
8	4	Symonston	Private lease
12	111	Symonston	Private lease
2233	0	Jerrabomberra	Bonshaw ACT Ltd
10	4	Symonston	EPSDD-Parks and Conservation
6	111	Symonston	Private Lease

ADDRESS: Monaro Highway, Hindmarsh Drive, Canberra Avenue, Narrabundah Lane and Road Reserve

PROPONENT: WSP Pty Ltd

APPLICANT: Evo Energy Ltd

ACT Government
Environment, Planning and Sustainable Development

Scoping Document

Under Division 8.2.2 of the *Planning and Development Act 2007*

SCOPING DOCUMENT

The planning and land authority (the Authority) within the Environment, Planning and Sustainable Development Directorate received your application under section 212(1) of the *Planning and Development Act 2007* (the PD Act) for Scoping of an Environmental Impact Statement (EIS) for the above proposed development. Pursuant to section 212(2) of the PD Act, the Authority has:

a) Identified the matters that are to be addressed by an EIS in the relation to the development proposal; and

b) Prepared a written notice (the ***scoping document***) of the matters.

NB: The EIS must conform to the requirements of this scoping document. This document does not indicate approval or support in any way, nor does it indicate approval in principle.

TERM OF SCOPING DOCUMENT

Pursuant to section 213(2) of the PD Act, the proponent must give the draft EIS to the Authority by the end of the period of 18 months starting on the day the Authority gives the scoping document for the development proposal to the applicant.

FORM AND FORMAT OF EIS

The Authority requires that the proponent engage a suitably qualified independent consultant to prepare an EIS, OR the proponent submits, with the draft EIS, an independent review of the draft EIS undertaken by a suitably qualified consultant. The EIS must be in the following form and format:

- The EIS must be prepared in accordance with section 50 of the *Planning and Development Regulation 2008.*
- The EIS must be written in plain English and avoid the use of jargon as much as possible.
- The EIS is required to be provided in the same structure as described in this Scoping Document as closely as possible (e.g. executive summary, introduction, proposal details, legislative context, risk assessment, assessment of impacts, consultation, recommendations/mitigation, conclusion).
- A table that cross-references the EIS to the scoping document must be included in the EIS submission.
- The report must reference any figures or supporting information used to the supporting appendix and page number, table or figure.
- Additional technical detail, including relevant data, technical reports and other sources of the EIS analysis must be provided in appendices.
- A redacted version (in addition to the full version) of any reports containing restricted or sensitive information must be provided for public notification, such as a Cultural Heritage Assessment report.
- Maps, diagrams and other illustrative material should be included in the EIS to assist readers to interpret information.
- The EIS document sized A4 with maps and drawings in A4 or A3 format.
- The proponent must supply a copy of all draft EIS and revised EIS documents in electronic formats for circulation and web posting. These are to be supplied by email, USB, or another agreed method.
- Digital files must not exceed 20 MB each.

- The proponent must supply three hard copies of the draft EIS and two copies on individual USB's once it has been accepted for lodgement and three hard copies and three copies on individual USB's of the revised EIS once it had been accepted for lodgement.

COST OF PREPARATION OF EIS

The proponent is responsible for the preparation of the draft and revised EIS and any related applications and associated costs. This includes additional copies of the draft and revised EIS and other associated documents as required by the Authority from time to time.

NEXT STEPS

The proponent is now required to prepare a document (a ***draft EIS***) that addresses each matter raised in the scoping document for the proposal within the timeframe provided in this scoping document. Once the draft EIS has been accepted for lodgement, a public notification fee is payable in order for notification, referrals and assessment to commence. After the notification period has closed, the Authority will provide comments and any public representations received for the proponent to address in preparing a ***revised EIS***, and any further instructions on the application.

If you have any queries about the requirements outlined in this scoping document, please contact Kristy Moyle to arrange a suitable time to discuss.

Delegate of the planning and land authority
George Cilliers
A/g Executive Group Manager
Planning Delivery Division
Environment, Planning and
Sustainable Development Directorate

Contact
Kristy Moyle
Development Assessment Officer
Impact Assessment and Business Improvement
Environment, Planning and
Sustainable Development Directorate
Email: EPDImpact@act.gov.au

GENERAL REQUIREMENTS FOR THE EIS

1. Cover Page

The cover page must clearly display the following:

- The name of the proposal (project title)
- The block identifier(s) and street address for the proposal
- The date of the preparation of the document
- Full name and postal address of the designated proponent
- Full name and postal address of the designated applicant
- Name and contact details of the person/organisation who prepared the documents (if different to the above)

2. Glossary

Provide a glossary of technical terms, acronyms and abbreviations used in the EIS.

3. Executive Summary

Provide a non-technical summary of the EIS including a description of the proposal, key findings and recommendations.

4. Introduction

Summarise the proposal background and justification for the proposal.

5. Proposal Details

5.1. Project Description

Provide a description of the proposal, including:

a) The objectives and justification for the proposal;

b) The location of the land to which the proposal relates, including detailed maps;

c) The division and/or district names and block and/or section numbers of the land under the *Districts Act 2002;*

d) If the land is leased – the lessee's name;

e) If the land is unleased or public land – the custodian of the land;

f) The purposes for which the land may be used;

g) A clear identification of all lands subject to direct disturbance from the proposal and associated infrastructure and geomorphic features such as waterways and wetlands. This is to be supported by a map showing all affected lands;

h) An outline of any developments that have been, or are being, undertaken by the proponent, or other person(s) or entities, within the proposal area and broadly in the region. Describe how the proposal relates to these developments;

i) A description of all the components of the proposal, including the proposal specifications, the predicted timescale for implementation (design, approvals, construction and operation) and project life;

j) A plan/description of the precise location of any works to be undertaken, structures to be built, dimensions of machinery to be used for installation and all other elements of the proposal that may have relevant impacts; and

k) A description of the construction methodologies for the proposal.

5.2. Alternatives to the proposal

Provide details of any alternatives to the proposal considered in developing the proposal including a description of:

a) Any design and location alternatives to the proposal and provide reasons for selecting the preferred option with an analysis of site selection;

b) The criteria used for assessing the performance of any alternative to the proposal considered;

c) Any matters considered to avoid or reduce potential impacts prior to the selection of the preferred option; and

d) Details of the consequences of not proceeding with the proposal.

6. Legislative and Strategic Context

A description of the EIS process including any statutory approvals obtained or required for the proposal, and how the proposal is aligned with strategic priorities for the ACT.

6.1. Statutory requirements

The EIS must include information on the following statutory requirements:

- *Planning and Development Act 2007*
- *Planning and Development Regulation 2008*
- *Environment Protection Act 1997*
- *Environment Protection Regulation 2005*
- *Nature Conservation Act 2014*
- *Tree Protection Act 2005*
- Other related statutory approvals

6.2. Climate change

The EIS must include information on how the proposal will reduce emissions and increase our resilience to unavoidable climate change impacts including increases in the duration and intensity of heatwaves, droughts, storms with flash flooding and bushfires. The information must address impacts on the local microclimate and how it will contribute to the reduction of urban heat and positively contribute to urban cooling measures.

Additionally, the EIS must address the greenhouse gas emissions associated with the proposal and how legislated target emissions reductions will be met.

Preparation of the EIS must consider the ACT Government's policies:

- ACT Climate Change Strategy, 2019-25 (2019), and
- Canberra's Living Infrastructure Plan: Cooling the City (2019)

6.3. Other requirements

The description must also include information on how each of the following has been considered in the preparation of the EIS and the development of the proposal:

- Territory Plan 2008
- ACT Planning Strategy
- National Capital Plan
- Relevant Environment Protection Policies and Separation Distance Guidelines for Air Emissions (https://www.environment.act.gov.au/environment/legislation_and_policies)
- Eastern Broadacre Strategic Assessment (https://www.planning.act.gov.au/topics/current_projects/studies/eastern_broadacre_planning_project)
- Plans of Management for any public land
- Any relevant Master Plan
- Other relevant planning and environmental guidelines, action plans and management plans.

6.3.1. Ecologically sustainable development (ESD)

Provide a description of the proposed action in relation to the long-term and short-term considerations of economic development, social development and environmental protection. The proponent should ensure that the EIS adequately addresses the principles of sustainable development as defined by s 9 of the P&D Act, especially the economic consequences of the environmental impacts from the proposed development.

6.3.2. Territory Plan strategic directions

A statement must be provided regarding the proposal's consistency with the principles in the Statement of Strategic Directions in the Territory Plan 2008 (Section 2.1 - Strategic Direction).

7. Risk Assessment

7.1. Risk Assessment Methodology

Provide a risk assessment in accordance with the Australian and New Zealand Standard for risk management AS/NZS ISO 31000:2009 *Risk Management – Principles and guidelines.* The proposed criteria for determining which risks are potentially significant impacts must be described.

The Preliminary Risk Assessment (PRA) submitted as part of the request for a scoping document must be revised to include, but not be limited to, the risks identified by the Authority in Table 1.

-Assessment guide-			
Provide a table with the headings below to describe the risks identified and the original risk rating without any mitigation strategies in place. This table format is one option, however alternative formats can be used provided the methodology is clearly described and in accordance with AS/NZS ISO 31000:2009 *Risk Management – Principles and guidelines*			
Risk	Likelihood	Consequence	Risk rating

The risks identified in Table 1 are based on the scoping document application and comments received from entities on the application. All of these risks are considered potentially significant (i.e. a medium risk level or above), and must be addressed in the EIS. Should any risk levels change during the preparation of the EIS or any new risks become apparent, these must be assessed and included

with a justification in the EIS, and where relevant, the residual risk assessment.

Table 1 – Identified impacts and requirements to be addressed in the EIS

Environmental Theme	Risk identified	See section/s below for further detail
Planning and Land Status	• Impact of powerlines upon adjacent land uses identified as 'approach routes' within NCA Designated Areas	8.2.1
Traffic and Transport	• Increased traffic congestion and reduced road safety during construction	8.2.2
Utilities	• Impacts to existing infrastructure during construction	8.2.3
Materials and Waste	• Increased waste to landfill during construction and demolition	8.2.4
	• Hazards created by stockpiling of materials within the construction site	
Soils and Geology	• Impact on adjoining land as a result of sediment and erosion	8.2.5
Landscape and Visual	• Visual impacts on approach routes and iconic visual features in the ACT	8.2.6
	• Visual disturbance caused by the temporary storage of machinery and materials along approach routes	
Water Quality and Hydrology	• Impact on water quality due to potential erosion and sedimentation during and post-construction	8.2.7
Socio-economic and Health	• Impacts upon critical services and electricity-dependent entities as a result of temporary losses in electricity supply	8.2.8
	• Impacts upon human health and safety as a result of exposure to electro-magnetic fields (ELF) and frequencies associated with high-voltage power lines	
Hazard and Risk	• Impacts upon construction workers and service personnel as a result of exposure to high-voltage power lines	8.2.9
	• Risks associated with electromagnetic induction and Earth potential rise (EPR) upon human health and safety	
	• Risks associated with powerline failures and bushfire during extreme conditions for heat and wind velocity	
Ecology and Natural Environment	• Direct impacts on ecological species or communities as a result of construction activities	8.2.10

Environmental Theme	Risk identified	See section/s below for further detail
	• Indirect impacts on ecological species or communities as a result of changes in physical characteristics of the area	
Heritage	• Impacts on identified objects with Aboriginal Cultural Heritage value	8.2.11

8. Assessment of Impacts

Sufficient information is required to provide the Authority with an adequate understanding of the environmental impacts associated with the proposal.

Each potentially significant risk identified in Table 1 and in the proponent's PRA must be addressed, and structured, as set out in sections 8.1-8.2 below.

8.1. Standard requirements

8.1.1. Environmental conditions and values

Describe the environmental conditions and values for the environmental themes identified in Table 1. This section should discuss the baseline conditions for the area.

8.1.2. Investigations

Identify the findings and results of any environmental investigation in relation to the land to which the proposal relates.

8.1.3. Impacts

Describe the environmental impacts associated with the construction and operation for the environmental themes identified in Table 1 and in the proponent's risk assessment (including cumulative, consequential and indirect effects) on physical and ecological systems and human communities. Particular emphasis should be placed on the potentially significant impacts identified in the risk assessment. Include a discussion of the timeframes of impacts i.e. short or long term, their nature and extent and whether they are reversible or irreversible, unknown or unpredictable. Include an analysis of the significance of the relevant impacts. Information must include any technical data and other information used or needed to make a detailed assessment of the impacts.

8.1.4. Mitigation

Discuss the proposed safeguards and mitigation measures that will be implemented to reduce the potentially significant impacts identified in Table 1 and the proponent's risk assessment. This is to include:

a) A description and an assessment of the proposed impact avoidance, mitigation or offsetting measures to deal with the environmental impact of the proposal, along with which stage the mitigation measures will be adopted

b) Any statutory or policy basis for the mitigation measures

c) An outline of an environmental management plan (EMP) that sets out the framework for continuing management, mitigation and monitoring programs for the relevant impacts of the action, including any provisions for independent environmental auditing

d) The frequency, duration and objectives of monitoring proposed

e) The name of the agency responsible for endorsing or approving each mitigation measure or

monitoring program

f) Any corrective actions should the mitigation measures fail

g) A description of the cost effectiveness of environmental mitigation or rehabilitation measures proposed and the expected or predicted effectiveness of those measures.

8.1.5. Residual risk

Provide a table that details the residual risk for potentially significant impacts identified in Table 1 and the proponent's risk assessment. A residual risk assessment is only required where the significance of impact is determined as medium or above. The calculation of the residual risk should take into account the implementation of mitigation or offsetting measures. A discussion of how the calculations were determined should also be included, including the expected or predicted effectiveness of the mitigation measures.

-Assessment Guide-				
Provide the residual risk assessment as set out in the table below.				
Risk identified in Section 7	**Original risk rating from items identified in 7**	**Residual likelihood**	**Residual consequence**	**Residual risk rating**

8.2. Detailed requirements

The following matters relate to Table 1 and must be addressed in detail in the EIS. Please note this is not an exhaustive list of matters that may be required to accurately detail the assessment scenarios.

8.2.1. Planning and Land Status

- Include a description of planning context of the area where the project will be located.
- Describe planning and development status of any land or project relevant to the proposal.
- Describe land use of the proposed land and any land to be affected (including, but not limited to, zoning, lessee(s) or custodian of the land, the permissibility of the proposed use defined in the Territory Plan).
- Include reference to the pending *Eastern Broadacre Strategic Assessment* being prepared under the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999*.

8.2.2. Traffic and Transport

- Provide a Traffic Management and Control Plan detailing all safety measures to be implemented during construction.
- Describe arrangements for the transport of construction materials, equipment, products, and personnel during the construction phase of the development proposal.
- Include a description of the volume of traffic generated during construction.
- Investigate the impacts the proposal will have on traffic congestion and road safety and describe mitigation measures to reduce the impacts.
- Investigate the impacts on the vehicular route chosen to transport oversized equipment and accessories by heavy vehicles and describe mitigation measures to reduce the impacts.
- Identify and investigate each of the entrance/exit points to be utilised during

construction to ensure the minimum stopping sight distances are achieved in accordance with any applicable standards.

8.2.3. Utilities

- Describe the existing utilities located on the land subject to this proposal.
- Describe any new utilities, removal or realignments required as a result of this development.
- Investigate potential impacts to existing infrastructure and provide mitigation measures to reduce the impacts.

8.2.4. Materials and Waste

- Describe all materials to be stockpiled on site.
- Provide details on the quantity, storage and disposal of any waste products (including any waste soil) generated during installation and commissioning works.
- Investigate potential impacts of stockpiling materials (including any hazard to persons who may use the area) and provide mitigation measures to reduce any impacts.

8.2.5. Soils and Geology

- Describe the soil and geology features of the area.
- A contaminated land search for the site needs to be performed and reflected in the EIS. Discuss any contamination impacts that are present at the site, and how the site will be remediated, if required.
- Provide a Sediment and Erosion Control Plan and describe erosion impacts from construction and operation activities, especially during extreme weather.
- Detail measures to reduce the impacts of sediment and erosion in the Plan, including dust suppression.
- An unexpected finds protocol that is prepared by a suitably qualified environmental consultant should be included in the EIS.

8.2.6. Landscape and Visual

- Undertake a visual assessment and impact analysis of the site and surrounds to describe the current landscape character of the area.
- Visual assessment and impact analysis must address impacts from the subject sites on approach routes as identified in the National Capital Plan.
- Visual assessment and impact analysis must provide perspectives of the site from both carriageways and present a comparative assessment of existing and proposed views upon immediate surrounds, views along approach routes and any significant views/vistas.
- Identify impacts on important view sheds and significant views and vistas to and from the site.
- Describe measures to be adopted to reduce the visual impact from the infrastructure bulk and scale, any stockpiling that may be required and lighting of the facility.

8.2.7. Water Quality and Hydrology

- Include consideration of water quality as a result of sediment and erosion entering drainage lines, waterways and road drainage infrastructure.
- Describe any mitigation measures required to prevent sediment and erosion from impacting on water quality.

8.2.8. *Socio-economic and Health*

- Consider the impact of temporary electrical outages upon critical services in proximity to the installation site. Services should include but are not limited to the following:
    - Medical services
    - Emergency services
    - Security services
    - Critical care services, including services for vulnerable people
- Consider any impact (either perceived or actual) upon human health and safety as a result of exposure to electro-magnetic fields (ELF) and frequencies associated with high-voltage power lines. Refer to studies that examine the impact of high voltage power lines and human health.

8.2.9. *Hazard and Risk*

- Provide an analysis of the potential causes and impacts of infrastructure failure and how the associated risks will be managed. Consider any potential risks to construction and service workers as a result of exposure to, and working in proximity to high voltage power lines both during installation and during operation.
- Consider the risk of electromagnetic induction hazards and any potential impact upon materials and persons in proximity to any infrastructure.
- Consider the risk of Earth potential rise (EPR) and associated Step, Touch and Transfer potential hazards, both from power lines and the proposed Harman zone substation:
    - Consider any factors that may cause these hazards
    - Consider the potential severity of these hazards, with consideration given to current magnitude, time duration of current flow, soil electrical resistivity, earthing systems installed on both the impacted assets and the transmission line/substation infrastructure, proximity of metallic conductors (pipelines, unearthed fences, telecommunications lines as examples).Consider any impact upon materials and persons in proximity to any infrastructure.
- Provide details of mitigation and safety measures and evidence of compliance with Australian Standards AS 7000 and AS/NZS 4853, and Other Standards as follows:
    - HB 101 – 1997 (CJC5) Coordination of Power and Telecommunications – Low Frequency Induction (LFI): Code of Practice for the Mitigation of Hazardous Voltages Induced into Telecommunication Lines
    - HB 102 – 1997 (CJC6) Coordination of Power and Telecommunications - Low Frequency Induction.
    - ENA Doc 025 – 2010 Power System Earthing Guide – Part 1: Management Principles.
    - ENA EG1 – 2006 Substation Earthing Guide.
- Consider the risk of fires starting in the grasslands.
- Provide detailed bushfire protection measures to be implemented in proximity to infrastructure, including asset protection zones and vegetation management/fuel load reduction strategies.

8.2.10. Ecology and Natural Environment

- Provide a description of the ecological values (including native vegetation, endangered ecological communities) and potential threatened species and their habitat on and adjacent to the site.
- Undertake ecological surveys by a qualified ecologist for the following species and their habitats:
    - Grassland Earless Dragon,
    - Golden Sun Moth,
    - Pink-tailed Worm-lizard,
    - Striped Legless Lizard,
    - Perunga Grasshopper,
    - Canberra Raspy Cricket.
- Provide maps showing the location of all habitat in relation to the proposal.
- Consider the direct impacts of the development on the ecological values of the area, with particular consideration to pole placement, laydown and access arrangements upon any Natural Temperate Grassland, or potential Golden Sun Moth and Striped Legless Lizard Habitat.
- Consider the impacts of the development on the Grassland Earless Dragon, particularly in consideration of the significance of any remaining habitat as detailed in the National Recovery Plan.
- Consider the indirect impacts of the development on fauna species listed above with particular consideration of the following:
    - Increased predation efficiency and predator abundance due to the erection of poles and lines adjacent to grasslands which are by nature almost treeless
    - Increased mortality of birds due to collisions with power lines, with particular consideration for Little Eagle and other avian species known to occur in the area.
- Consider the potential for weed species to be introduced to the site and describe weed hygiene and control measures to be undertaken.
- Provide details of mitigation measures to reduce the impacts identified on flora and fauna species in accordance with additional detailed assessment of both direct and indirect impacts.

8.2.11. Heritage

- A revised Cultural Heritage Assessment (CHA) must be prepared by a suitably qualified and experienced archaeologist in accordance with ACT Heritage Council (Council) 'Cultural Heritage Reporting Policy', and in consultation with Representative Aboriginal Organisations (RAOs).

8.3 Entity requirements

The EIS must address the entities comments provide in Attachment A. If the issues raised by entities have been addressed in other sections of the EIS, this must be cross referenced.

9. Community and stakeholder consultation

9.1. Consultation must be undertaken with:

- Lease holders and land managers of land potentially impacted by the proposal ;
- Any recreational groups which may be affected by the proposal;
- Any volunteer conservation, landscape management or land care groups active in the area

who may be affected by the proposal; and
- Any local community and community groups.

9.2. Consultation methods

- Describe the community consultation undertaken (methodology and criteria for identifying stakeholders and the communication methods used).
- Provide details on the information provided during the community consultation process. A plain English statement explaining the proposal and conceptual drawings must be made available to the community and stakeholders.
- Consultation should occur as early as possible and avoid, or make allowances for public holidays, school holidays and the summer holiday (Christmas) shutdown period.

9.3. Consideration of community feedback

- Provide a summary of how the community and stakeholders responded to the proposal and the main comments raised.
- Describe how any concerns have been considered and identify any changes that have been made to the proposal.

9.4. Consideration of public representations from Draft EIS notification

- The revised EIS must include the representations received, issues raised in the representations and a response to the issues and values identified. The summary response must clearly identify the representation(s) to which the responses relate.

10. Recommendations

Provide a summary of commitments to avoid, mitigate and offset the potential significant impacts associated with the proposal.

Describe the monitoring parameters, monitoring points, frequency, data interpretation and reporting proposals.

11. Other relevant information

The proponent may wish to include issues outside the scope of the EIS as a separate section of the EIS. This allows the proponent to identify matters not required to be addressed in the EIS, but that would be subject to development assessment consideration and notification. This can provide additional context for members of the public regarding management of environmental issues, by ensuring that the public is aware that these issues will be addressed in the detailed design of the proposal.

12. References

A reference list using standard referencing systems must be included.

13. Required Appendices

13.1. Scoping document for the EIS

A copy of the final scoping document should be included in the EIS. Where it is intended to bind appendices in a separate volume from the main body of the EIS, the final scoping document should be bound with the main body of the EIS for ease of cross-referencing.

13.2. Scoping Document Reference

Include a table that cross-references the EIS to the scoping document. If the EIS addresses the scoping document in multiple places then this must be also referenced.

13.3. Proponent's Environmental History

Provide details of any proceedings under a Commonwealth or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against:

- The person proposing to take the action
- For an action for which a person has applied for a permit, the person making the application.

If the person proposing to take the action is a corporation, then provide details of the corporation's environmental policy and planning framework.

13.4. Information Sources

For information given the following must be stated:

- The author or any reports or studies
- The publication date
- The source of the information
- How recent the information is (i.e. when a study was conducted or when primary sources were produced)
- How the reliability of the information was tested
- What uncertainties (if any) are in the information

13.5. Study team

The qualifications and experience of the study team and specialist sub-consultants and expert reviewers must be provided.

13.6. Specialist studies

All reports generated based on specialist studies undertaken as part of the EIS are to be included as appendices.

13.7. Research

Any proposals for researching alternative environmental management strategies or for obtaining any further necessary information should be outlined in an appendix.

GLOSSARY

Controlled Action (EPBC): An action defined under the EPBC Act, s 67.

Development application (DA): Application for development as defined under the PD Act.

Environment: As defined under the *Planning and Development Act 2007* (the PD Act), each of the following is part of the environment:

(a) the soil, atmosphere, water and other parts of the earth;

(b) organic and inorganic matter;

(c) living organisms;

(d) structures, and areas, that are manufactured or modified;

(e) ecosystems and parts of ecosystems, including people and communities;

(f) qualities and characteristics of areas that contribute to their biological diversity, ecological integrity, scientific value, heritage value and amenity;

(g) interactions and interdependencies within and between the things mentioned in paragraphs (a) to (f);

(h) social, aesthetic, cultural and economic characteristics that affect, or are affected by, the things mentioned in paragraphs (a) to (f).

Environmental Impact Statement (EIS): As defined under the PD Act.

EPBC Act: *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth)

Impact Track: An assessment track that applies to a development proposal defined under the PD Act, s 123.

Long term: Greater than 15 years duration.

Medium term: Greater than three (3) years to 15 years duration.

PD Act: *Planning and Development Act 2007* (ACT)

Regulated waste: waste defined under the *Environment Protection Act 1997*

Scoping: The process of identifying the matters that are to be addressed by an EIS in relation to the development proposal - see the PD Act, s 212 (2).

Short term: Zero to three (3) years duration.

Socio-economic: Involving both social and economic factors.

ATTACHMENT A -- ENTITY COMMENTS

ACT Health

Given the historic use of the land for the proposed development. The Health Protection Service Supports comments discussed in the Contamination Preliminary Site investigation conducted by WSP as follows:

- Contamination risks must be managed by an Unexpected Finds Protocol during the installation of the transmission lines.

- During development all reasonable and practicable measures are taken to suppress dust.

There are no further public health concerns in relation to the proposed EIS scoping document.

ACT Heritage Council

A revised and finalised Cultural Heritage Assessment, prepared in accordance with Council policy, is required as part of the project's Environmental Impact Statement. The following revisions to the CHA are required:

- Consideration of potential impacts to Aboriginal places JA1, JA7 and Hume PAD 1; and a list of any necessary mitigation measures to avoid damage to these Aboriginal places. Where these places fall within proposed project impact areas, additional archaeological survey will also be required.

- A description of further consultation with RAOs regarding JA1, JA7 and Hume PAD 1, and description of RAO views about appropriate management of these heritage sites.

- Both options involve damage to Aboriginal places, and the preliminary CHA recommends salvage of JA5 should Option 1 proceed and salvage of Hindmarsh 1 should Option 2 proceed.

As both options will require Heritage Act 2004 approvals prior to the commencement of works, a Statement of Heritage Effect (SHE) application should be submitted to the Council for approval following selection of an option for the project. Any SHE approval for the project will require that a Return to Country (RTC) protocol be developed in consultation with the RAOs and other relevant stakeholders (lessees and land managers), and approved by the Council prior to delivery of this outcome.

Conservator of Flora and Fauna

While the Preliminary Environmental Assessment has identified most of the direct impacts associated with erecting poles and lines for both options presented, it has not considered indirect impacts which are likely to be significant. The following items should be included in the Scoping Document and addressed in the EIS process:

1. Increased predation efficiency & predator abundance

Grasslands, including Jerrabomberra Valley East are by their nature almost treeless. Erecting poles and lines across or adjacent to grasslands introduces an unnatural vertical structure that can be used as perching and nesting points by birds. This enables predators of threatened lizards and invertebrates a wide field of view and enhances predation efficiency. Known predators of the threatened species present at East Jerrabomberra which will utilise perches to hunt from include the Magpie, Australian Raven, Black Shouldered Kite, Nankeen Kestrel, Indian Myna, European Starling, and probably includes many other species such as the Black-faced Cuckoo-shrike, Kingfishers and Butcherbirds.

Research elsewhere has found the abundance of such predators in an area can be increased by the presence of new vertical infrastructure, while species such as magpies may nest on the structures creating a more permanent presence within a core grassland area. The potential impact of powerlines increasing both predation efficiency and predator abundance needs to be thoroughly canvassed during the EIS process, in addition to possible mitigation measures.

Within Option 2 (the preferred option) there is some existing vertical infrastructure associated with the road reserves and past plantings, but this proposal will result in a substantial increase. The proposed route also passes by the rocky hill on the Cookanalla property which is a hotspot for threatened fauna.

2. Increased avian mortality

Powerlines can cause mortality of birds through collisions. Currently a research project has satellite trackers on two male Little Eagles that are part of pairs that nest nearby. Both males have been recorded foraging over the proposal area, hunting rabbit kittens, middle sized birds (e.g. magpies, rosellas etc.) and large lizards (blue tongues and bearded dragons). Females have also been seen flying over the area and are likely to hunt there. The Little Eagle is listed as a vulnerable species in the ACT, where there are estimated to be about a dozen breeding pairs. The Scoping Document must consider the potential impact of bird strike on this and other species. This is likely to be a greater issue for Option 1 rather than (preferred) Option 2.

3. Increased risk of fire

Powerlines may increase the risk of wildfire starting within the grassland. This risk and any associated mitigation measures (e.g. reduced fuel loads under powerlines etc.) need to be addressed within the EIS process.

4. Introduction and spread of weeds

The disturbance caused by pole erection and maintenance will create conditions favourable for weed introduction and flourishing of those weed species already present in the area. Weed hygiene and control will need to be thoroughly addressed.

5. Direct impacts to native vegetation

Pole placement, laydown and access arrangements for Option 2 should seek to avoid any Natural Temperate Grassland, recorded Golden Sun Moth Habitat (note there are additional areas to those identified in the proposal documents, please see Attachment A) and minimise placement within habitat of the Striped Legless Lizard and native grassland. The assessment claims no loss of native vegetation, but this does not seem credible given the proposed mapped locations of the new poles.

Additional notes

The National Recovery Plan for the Grassland Earless Dragon found that "Because the Grassland Earless Dragon is now known from so few sites, and its former distribution has been so reduced and fragmented, all remaining known occurrences are considered critical to the survival of the species, and should not be compromised." Option 1 passes through known Grassland Earless Dragon habitat and given the direct construction impact and probable significant indirect impacts it appears impossible for this option not to compromise the East Jerrabomberra occurrence of the species.

Similarly, the likely impacts from Option 2 are of such significance that the EIS needs to include a more comprehensive and thorough investigation of possible alternatives, that do not cross or circumnavigate the native grassland areas. The project's needs require greater clarification so that the veracity of possible alternatives can be assessed.

Option 2 is likely to require referral to the Commonwealth for consideration under the EPBC Act as it is likely to result in a significant impact.

ACT Emergency Services Agency

Fire & Rescue has reviewed the Request for EIS Scoping Document (EIS201900038) – Harman 132 kV transmission line. B.10 S.107 SYMONSTON and have no comments at this time regarding the scope of the document.

Environment Protection Authority (EPA)

The scoping document adequately addresses Environment Protection Authority (EPA) concerns within the proposed works area and the EPA supports the proposed works subject to the following conditions:

- *A site specific unexpected finds protocol (UFP) must be prepared by a suitably qualified environmental consultant and implemented during site development works. The UFP must include, amongst other things, appropriate procedures for the identification, assessment, management, validation and disposal of potential contamination at the site and contractor induction procedures into the use of the UFP.*
- *All soil subject to disposal from site must be assessed in accordance with EPA Information Sheet 4: Requirements for reuse and disposal of contaminated soil in ACT.*
- *No soil is to be disposed from the site without EPA approval.*

Further advice will be provided in relation to the proposed development following review of the Development Application.

EPD – Strategic Planning Division

Chapter 2.4 (page 19) would benefit, for completeness, with reference to the pending Eastern Broadacre Strategic Assessment being prepared under the Commonwealth's Environment Protection and Biodiversity Conservation Act 1999. The strategic assessment includes the area under consideration for the EIS.

Further information on the strategic assessment is available from:
https://www.planning.act.gov.au/topics/current_projects/studies/eastern_broadacre_planning_project

National Capital Authority

Part of the proposed transmission lines are located in the road reserves of Monaro Highway, Canberra Avenue and Harman Estate. Both roads are identified as approach routes in the National Capital Plan (the Plan) and are within the NCA's Designated Area. The NCA's interest in approach routes are identified in Section 4.15 of the Plan. A key interest for the NCA along approach routes are to enhance views to recognisable and popular images of Canberra.

The proponent has identified a medium level for risks of the NCA's interest such as visual impact, construction and traffic impact. The NCA supports the proponent providing assessments for visual and traffic impact in their EIS. The NCA requests that part of the visual analysis provides a comparative assessment of existing and proposed views of both the immediate surrounds and views along the approach routes, as well as more distant views (for example, towards sites such as Black Mountain and Mount Ainslie).

Works for the transmission line along the road reserve of Monaro Highway and Canberra Avenue will require a Works Approval from the NCA. The installations at Harman are on National Land outside of a Designated Area and will require a Letter of Consistency to be obtained from the NCA. This process is not dissimilar from the Works Approval process, and works are required that is consistent with Development Control Plan 11/04. Section 2.3.1.4 of the scoping document refers to 'draft' Development Control Plan 19/01, however this is now an approved DCP and should be referred to as such in future documentation. It should be noted that Block 12 Section 111 Symonston and Block 2233 Jerrabomberra is under EPSDD planning jurisdiction and any works on these sites are not required to be submitted for NCA Works Approval.

Utilities Technical Regulation

Risks identified by Utilities Technical Regulation that have not been included in the EIS scoping request for this project is that due to:

Electromagnetic induction (as distinct from EMF covered in clause 6.7)
Electromagnetic induction hazards can arise from normal load currents and especially when fault currents flows. The hazard can create dangerous high voltages and these can be impressed on: metallic pipelines, telecommunications cables, and unearthed wire fences (eg. fence wire on wooden posts), which can be hazardous to the impacted asset, workers and the public.
The level of severity is dependent on: the current magnitude, time duration of current flow, separation distance from the transmission line, length that the transmission line runs roughly parallel to the pipe, fence, etc., earthing systems installed on the impacted assets.
Guidance to hazard assessment and mitigation measures can be found in AS/NZS 4853, HB 101 and HB 102.

Earth potential rise (EPR) and associated Step, Touch and Transfer potential hazards. These hazards would also apply to the proposed Harman zone substation.
These hazards can arise from faults at the zone substation or on the transmission line, and the severity is dependent on the current magnitude, time duration of current flow, soil electrical resistivity, earthing systems installed on both the impacted assets and the transmission line/substation infrastructure, proximity of metallic conductors eg. pipelines, unearthed fences, telecommunications lines. The arising voltages can be hazardous to the impacted asset, workers and the public.

Guidance to hazard assessment and mitigation measures can be found in AS 7000, AS EG0, AS EG1, AS/NZS 4853, HB 101 and HB 102.

Canberra Airport

Based on the data provided the sub-station and the adjacent lightning pole will not penetrate Canberra Airport's OLS, therefore no further assessment is required by Airservices Australia (ASA) or CASA.

However, this does not take account of the construction methods to install this infrastructure, including crane operating heights which will require an independent assessment once this is known. The previous information provided in 2018 was that a crane would need to operate up to a height of 35m.

It would be useful for a condition on your approval to state that the contractor must consult with Canberra Airport for approval of any crane/s to operate on the site.