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DEVELOPMENT APPLICATION: 201732500 BLOCK: 1560 SECTION: 0 BELCONNEN

Proposal: CONCURRENT DEVELOPMENT APPLICATION - PROPOSAL FOR PUBLIC WORKS - Construction of a new 330/132kV electrical substation, new 330kV electrical transmission lines, fencing, vegetation clearing and associated works as part of the ACT Second Electricity Supply Project

Development Application: 201732485 Address: 135 STOCKDILL DRIVE, HOLT Block: 1582 Section: 0

Proposal: CONCURRENT DEVELOPMENT APPLICATION - PROPOSAL FOR PUBLIC WORKS - Construction of new 132-kilovolt electrical transmission lines and vehicle access tracks, vegetation clearing and associated works as part of the ACT Second Electricity Supply Project.

SYNOPSIS

1. The Ginninderra Falls Association (GFA) has four concerns about this proposed extension to the ACT's electricity supply. GFA considers it highly unfortunate that this proposal has arisen after approval for two separate residential developments in the vicinity has been granted and construction commenced.
2. Firstly, the proposed 330 kV power line will run very close to the eastern edge of the new Ginninderra Estate currently under construction on the golf course, and along the eastern edge of Stages 1 and 1A of the proposed Ginninderry housing development.
3. Secondly, the new 330 kV power line will link up with the existing 330 kV power line to Williamsdale, thus enclosing the land around Strathnairn homestead which is a known area frequented by the Little Eagle. In so doing, it will cut across the open access path to wider foraging areas and potentially discourage future use of the area by Little Eagles.
4. Thirdly, a short section of 132 kV power line will be constructed linking the new substation to the existing line to Woden. This is right in the area where the Ginninderry Conservation Corridor links to the Pine Ridge area, and thence to the Pegasus and Lands End locations south of Drake Brockman Drive, both sites known to be frequented by the Little Eagle. Thus, there will be two power lines adjacent to each other impeding passage from west to east and presenting a potential hazard to airborne creatures.
5. Fourthly, the location of the substation is exposed to catastrophic fire danger associated with dynamic fire propagation associated with the landscape.

Ginninderra Estate

6. The Ginninderra Estate, when first proposed by Woodhaven Investments Pty Ltd in 2010 and approved by ACTPLA in 2011, intended to put the existing overhead 132kV power line underground. When this proved unviable, a 92 m wide overhead power line reservation was

created to separate the power line from residences. It is now intended to put the very high tension 330 kV power line between the lower-powered line and residences. The higher tension line will now be closer to residents than the lower tension line.

7. While current research has not confirmed any link between the magnetic field around power lines and health issues such as cancer, there is no definitive evidence to completely allay concerns that such a link exists. Further, it is not clear whether research has been conducted into the cumulative effects of regular exposure to magnetic fields associated with the large number of very high tension power lines in the broader local area. Research into these matters can take many decades to provide convincing evidence one way or the other. Hence, the precautionary principle should prevail in making decisions about location of housing and power lines.

Little Eagle

8. The Little Eagle and Superb Parrot, both listed as ACT Threatened Species, are regarded as having a high likelihood of occurring in the area of this proposed development. It is stated that no significant impact to either species is expected but as with magnetic field effects, current research is not necessarily comprehensive and might not be adequate to properly predict all impacts thoroughly. The commencement of construction work at Ginninderra Estate could already have discouraged the Little Eagle from using the Strathnairn nesting tree, 600 m away, in the 2017 breeding season.[1] This effect is likely to be exacerbated in the near future by commencement of roadworks only 300 m from the tree under Stage 1 of the Ginninderry project.
9. While the electrical works will not occur within 800m of the nesting tree, there is an admission that:

> Only foraging habitat would be impacted. The likelihood of electrocution on new lines would be minimised with line marking. [2]

Foraging habitat and safe access to it are both essential to the survival of the Little Eagle in this area. While protection of the nests is important, nests will not be used if there is no suitable foraging ground within 2-3 km of the nest when a chick is being raised. Danger from power lines will add to that discouragement. It is likely that the combination of two housing developments and the construction of an additional power line and substation right in the Little Eagles' foraging route will seal the future of this bird in the Strathnairn vicinity. Accordingly, the precautionary principle should be applied.

10. The supporting studies referenced in this development application include one on movements of the Little Eagle commissioned by Riverview Developments Pty Ltd for Ginninderry[3] and another refuting the notion that the number of Little Eagles breeding in the ACT has collapsed[4].

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[1] The nest has been found to be infested with beetle larvae which complicates any analysis of why the nest was not used in 2017, despite a pair of eagles being seen there.

[2] Table 5.2 Potential impacts to threatened species habitat, TransGrid and ActewAGL, ACT SECOND ELECTRICAL SUPPLY PROJECT - BIODIVERSITY IMPACT ASSESSMENT, p.78.

[3] Renee Brawata and Bernd Gruber, *Movements of the Little Eagle (Hieraaetus morphnoides) surrounding the proposed Riverview Development Area*, Institute for Applied Ecology, University of Canberra, 2016.

[4] Penny Olsen and Stuart Rae, "Invalid Evidence for purported 'collapse' in the number of breeding Little Eagles in the Australian Capital Territory", *Canberra Bird Notes*, December 2017.

Recently, bird numbers of nine breeding pairs and four chicks were reported for 2017/18.[5] This latest research was again funded by the Ginninderry Joint Venture via the ACT Government's Little Eagle Research Panel. Given that earlier studies were largely reliant on sightings reported by volunteers, combined with the difficulty involved in sighting all birds and distinguishing individuals, along with their tendency to roam over large areas, it is reasonable to question whether the latest study confirms that Little Eagle numbers in the ACT are healthy OR that they have, in fact, declined over time.

11. While the Little Eagle is found over a wide area of the country, their nesting trees and foraging areas are continuously being removed as human population grows. Two ACT little Eagles have been tracked successfully in recent years, one to Daly Waters in the Northern Territory then back to Strathnairn, the other up to Queensland. They return south to lowland, open woodland and rural areas where they nest and raise their young. That four chicks were produced in the ACT in the 2017/18 season out of nine sighted pairs, does not augur well for the future of the Little Eagle here as foraging areas are continuously being removed along the lower Molonglo valley in favour of residential use. This project could add to the loss of sufficient foraging grounds, thus contributing to the disappearance of the Little Eagle from the south-western part of the ACT altogether.

Bushfire risk

12. GFA is pleased to see the acknowledgment and comprehensive assessment of the catastrophic fire risk in this area. In particular, GFA supports the recommendations made in the last paragraph of the report:

> The existing TransGrid (TransGrid 2017₂) and ActewAGL (ActewAGL 2015) bushfire management plans may require updating to incorporate recommendations of this BRA. Consultation with TCCS and ACT ESA may be required to incorporate recommended APZs into the Regional Bushfire Management Zones and annual Bushfire Operational Plans.

GFA notes that the substation is proposed for an area exposed to the north-westerly prevailing winds and the gorges of the Murrumbidgee River. Slopes of over 20 degrees combined with strong winds result in dynamic fire propagation in certain conditions. Attached for information is a report on the latest science on the fire risk in the Ginninderry area.[6]

Conclusion

13. GFA acknowledges the careful assessment displayed in this development application. The location is, however, considered to be unsuitable given the huge residential development intended for this area. GFA notes that the original Transgrid substation was located in this area when there was no intention for residential use to be permitted. There is now a conflict of

[5] Stuart Rae, *Little Eagles in the ACT and nearby NSW in 2017/18, A brief summary from the Little Eagle Research Group,* http://canberrabirds.org.au/wp-content/uploads/2012/03/GG-2018-April-web.pdf.

[6] Melanie E. Roberts, Jason J. Sharples, Andrew A. Rawlinson, *Incorporating ember attack in bushfire risk assessment: a case study of the Ginninderry region*, Paper presented to the 22nd International Congress on Modelling and Simulation (**MODSIM2017**) held at The Hotel Grand Chancellor Hobart, Tasmania, December 2017.

needs and a suggestion of poor planning by the ACT Government with a lack of foresight. The precautionary principle should be employed in assessing this development application.

26 April 2018