

TO THE TASMANIAN PLANNING COMMISSION

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RESPONSE FROM PATRICIA ELLISON TO THE TASMANIAN PLANNING COMMISSION'S INVITATION TO MAKE A REPRESENTATION ON THE DRAFT PLANNING CRITERIA FOR THE NORTH WEST TRANSMISSION UPGRADES PROJECT

Thank you for the invitation to make a representation on the Draft Planning Criteria for the North West Transmission Upgrades Project. After reading through the documents, I would like to make the following comments for your consideration.

1. Ambiguous Use of the Word, 'Should', in 'Schedule 2: Environmental Impact Statement Requirements, General Information for the Proponent'

The use of the word, 'should', throughout the document is ambiguous. It is unclear whether it means the proponent has an **obligation** to carry out an action or is being **advised** to carry out an action. (I have referred to the Macquarie Dictionary for meanings of 'should'.) In my reading of the text, I have assumed that 'should' is being used in its obligatory sense but I have spoken to another reader of the document who considered its use is advisory only and the decision whether or not an action is carried out is at the discretion of the proponent. This lack of clarity needs to be resolved before the document is finalised to ensure the proponent and everyone else with an interest in the document fully understand what is required in the Environmental Impact Statement. In my opinion, most of the nearly 150 occasions in the document when 'should' is used need to be classed as obligatory actions.

2. Reason for the Project

It is disappointing that the Explanatory Document does not include the reason for the project. It states that it will involve the construction and operation of an overhead transmission line and transmission towers to transmit electricity between certain locations, with accompanying electricity substations and ancillary facilities, but fails to inform the reader why they are necessary.

From what I have heard in the media, I assume the reason is to accommodate the extra supply of electricity that will come on line when wind farms, such as those planned for Jim's Plain and Robbins Island, become operational and provide a link between them and the proposed Marinus Link to the mainland. But this needs to be clarified and the true reason for the project detailed in both the Explanatory Document and the Environmental Impact Statement.

Because commercial and overseas-owned enterprises are involved in the development of the wind farms it is critical that the reason for the project is in the best interests of the Tasmanian and Australian public. This needs to be clearly and impartially calculated and open to public comment. From the limited information that I have had access to, I am concerned that commercial interests will dominate.

3. Calculation of the Project's Carbon Footprint

The carbon footprint of the entire project will need to be calculated to determine its impact on earth's climate. This should include but not be limited to: the manufacture of all components, their transportation to the site and their need for maintenance once installed; the amount of vegetation that is planned to be removed along the route (whether it is native forest or part of a plantation) and the accompanying loss of photosynthetic activity during the lifetime of the project; impacts on adjacent forests that could reduce their capacity to absorb carbon from the atmosphere. Calculating the carbon footprint is particularly important if the electricity transmitted by the project is claimed to be renewable.

4. One-off assessment accreditation for the TPC under the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* for the Hampshire to Staverton transmission line, including the Staverton substation

I am concerned whether this will put extra pressure on the TPC to carry out its duties and ask whether the Commonwealth has provided funding to facilitate the delegation of its responsibilities. I am also concerned that this delegation of responsibilities may be a conflict of interest because the TPC is acting as the planning authority for the project and request clarification as to whether my concern is justified.

5. Key Issues to be addressed in the Environmental Impact Statement

Only two key issues are identified for inclusion: potential effects on threatened fauna and potential effects on threatened flora and ecological communities; but impacts on climate change is a very good candidate for a third issue. It is essential that the following paragraph is carried over from the draft to the final version of the EIS Requirements to allow for inclusion of other issues that have not yet been identified:

'It should be noted that other matters deemed to be significant that emerge as significant from environmental studies, public comments or otherwise during the course of the preparation of the EIS, should not be excluded from consideration.'

6. Other factors which must be taken into consideration

Other factors which must be used or considered in assessment of the project include:

- Ecologically Sustainable Development Principles
- Aboriginal Heritage
- Bushfire risk and how this will be managed
- Visual impacts, including heights of the towers

- In-depth socio-economic studies of the genuine impacts of the project on the economy and society (The brief description required in Section 5.2 is not adequate.)
- The risks associated with the project, such as competition from other renewable projects on the mainland
- Transparency and public consultation in the development of all secondary documents associated with the project, such as management plans for easements
- Continuing weed management along the route
- A hazard and management plan for the karst areas of Loongana
- A comprehensive assessment of project alternatives
- Use of the most stringent planning criteria for all aspects of the project
- Stringent and legal enforcement of all mitigation measures, carried out in a transparent manner, with opportunity for public comment

Conclusion

This is a very large project and it is critical that the planning criteria used for its assessment are sufficiently stringent and comprehensive to ensure that it will only be approved if it can demonstrate environmental, social and economic benefits for all members of the Tasmanian and Australian public.

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