

Department of State Growth

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Your Ref: DOC/24/99274 / Our Ref: D24/222492



Mr John Ramsay
Executive Commissioner
Tasmanian Planning Commission
GPO Box 1691
HOBART TAS 7001
Email: tpc@planning.tas.gov.au

Dear Mr Ramsay

Thank you for your letter of 13 August 2024 regarding the Bell Bay Wind Farm project and its declaration to be a Major Project under the *Land Use Planning and Approvals Act 1993* (the Act).

In accordance with section 60ZJ of the Act, the Department of State Growth has considered its interest in the project across several applicable matters relating to economic development, renewable energy targets, transport considerations and land use compatibility.

Attachment 1 provides State Growth's consolidated comments as to what should be specified in the assessment criteria as matters to be addressed in the major project impact statement.

I note the Tasmania Development and Resources (TDR) is supported by State Growth, and I also hold the role of TDR CEO and board member. The experience of TDR in considering project proposals that support economic development has informed the Department's response.

We look forward to continued involvement in the Major Project process.

Please contact Andrew Smythe, General Manager, Strategy, Policy and Coordination, by email at Andrew.Smythe@stategrowth.tas.gov.au or telephone on (03) 6166 4482 for more information.

Yours sincerely

Craig Limkin
Secretary

18 September 2024

Attachment 1: Detailed comments regarding the Bell Bay Wind Farm proposal:

Topic	Comments
Infrastructure and Transport	The draft assessment criteria for the Whaleback Ridge Major Project (particularly section 3.2) cover most matters that would be relevant to the Bell Bay Wind Farm Major Project from the perspective of the Transport and Infrastructure group and can be used as a basis for the assessment criteria, subject to consideration of the following additional matters. <i>Impacts on the State Road network</i> Crown Land managed by the Department of State Growth is proposed to be used for transmission infrastructure with power line crossings of the East Tamar Highway and Bridport Road. Both roads are limited access roads under the <i>Roads and Jetties Act 1935</i>. It is not currently clear whether crossings will be overhead or underground, where potential towers will be located, what clearance heights will be, and whether access will be required during construction to the East Tamar Highway or Bridport Road. It is also not currently clear whether local road widening or vegetation clearance will be required as part of the project works. It appears the proponent is intending to be the owner of the transmission line assets, rather than transferring ownership to TasNetworks. State Growth requests the assessment criteria have regard to: • How safe operation of the East Tamar Highway and Bridport Road will be maintained. • How easements and infrastructure will be rationalised, considering other nearby existing and proposed infrastructure and the cumulative impacts on the road reservation. • Whether easement corridors are required in addition to other nearby wayleave easements and do they provide the minimum required footprint. • What form of tenure is proposed, given the 30-year life expectancy of the infrastructure and multiple interests in the area. • How can underlying landowner/s be assured that maintenance and decommissioning is the responsibility of the asset owner and is undertaken appropriately. <i>Traffic impact assessment</i> The assessment criteria should not constrain the traffic engineer who is preparing the Traffic Impact Assessment from considering all matters they believe are relevant to the transport task. State Growth must be consulted on any potential impacts to the state road network. The Traffic Impact Assessment must consider generic travel arrangements for the project as well as for the oversize and over-mass (OSOM) vehicle movements required during the construction and commissioning phases of the projects and ongoing operational

	maintenance requirements. The traffic assessment will need to determine the most appropriate route for the movement of OSOM vehicles, noting Solider Settlements Road can be accessed via George Town or Beechford. If movements are through George Town, these will likely need to go through residential areas at night, while the Beechford option will not include movements through residential areas. <i>Heavy vehicle movements</i> Point of access (e.g. which port/or facility location) for OSOM components items for the project must be identified. The proponent and transport operator must engage early with Network Access, State Roads and relevant local government road managers on the proposed routes, proposed component size and mass, vehicle configurations, and numbers of trips for each component type. This will be required to enable sufficient time for the proponent to obtain appropriate route assessments and identify and complete any additional works required to safely and efficiently facilitate the OSOM moves.
Telecommunications	State Growth requests the assessment criteria have regard to how adequate fixed and mobile telecommunications coverage will be maintained. This could include the proponent engaging with a network infrastructure provider to ensure future build plans are in place to ensure adequate coverage and backhaul for operational requirements, safety systems and workforce usage.
Energy	It is noted the Bell Bay Wind Farm's strategic importance to the state is reflected in its potential to contribute to the Tasmanian Renewable Energy Targets in the Energy Co-ordination and Planning Act 1995
Mining and resources	The proposal also partially lies within the North-East Strategic Prospectivity Zone (SPZ) declared under the <i>Mining (Strategic Prospectivity Zones) Act 1993</i>. SPZ's are in place to highlight areas of the State that are prospective for mineral resources. Proposed assessment criteria: • Two active mining leases exist within the proposed area. It is a requirement of the Mineral Resources Development Act 1995 that a person must not hinder or obstruct mining operations, therefore no turbines are to be placed within the mining lease boundaries. • The project has demonstrated awareness the geology of the area within the SPZ and put in place measures, such as placement/density of transmission infrastructure or turbines to manage the impact on efficient future mining operations, including sterilisation of minerals exploration and developments of critical and high value minerals. Mineral Resources Tasmania must be consulted on potential mining impacts.