

Department of State Growth

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John Ramsay
Executive Commissioner
Tasmanian Planning Commission
GPO Box 1691
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Via email: tpc@planning.tas.gov.au

Dear John

Thank you for your letter dated 13 March 2024 regarding the Whaleback Ridge Renewable Energy 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 I provides State Growth's consolidated comments, including input from Renewables, Climate and Future Industries Tasmania, the Office of the Coordinator General and Mineral Resources Tasmania, as to what should be specified in the assessment criteria as matters to be addressed in the major project impact statement.

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

A handwritten signature in blue ink, appearing to read "Craig Limkin".

Craig Limkin
Secretary

11 April 2024

Attachment I – Department of State Growth comments on the Whaleback Ridge Renewable Energy project assessment criteria

Economic Development

The Department of State Growth (the Department) supports diverse and sustainable economic growth and facilitates the creation of job opportunities for the benefit of the Tasmanian community.

Similar to the North East Wind Major Project (section 2.2), the Whaleback Ridge Renewable Energy project (Whaleback Ridge) should include assessment criteria that consider whether the project facilitates economic development or improves the social, economic and cultural wellbeing of people and communities in the short and longer term, to an acceptable level.

The following considerations are also likely to be relevant to Whaleback Ridge:

- the degree to which labour, material or products required for the project are sourced locally;
- the level of local direct and indirect employment and the skill level of employees over the operational phase of the project;
- the distribution of economic or material benefits resulting from the project across the community; and
- the net effects of the project during the construction phase including any potential adverse outcomes such as ‘crowding out’ existing local industry sectors or reducing the affordability of local housing for residential purposes.

Energy and Renewables

The Department notes that Whaleback Ridge will contribute to Tasmania’s legislated renewable energy target of 200 per cent of Tasmania’s current electricity needs by 2040 and will also contribute to Australia’s national 82 per cent renewable energy by 2030 target.

Mineral Resources

The Department administers the *Mineral Resources Development Act 1995* and the *Mining (Strategic Prospectivity Zones) Act 1993* and is responsible for the effective and efficient regulation and development of Tasmania’s mineral resources, ensuring that the State’s mineral resources are managed in a sustainable way and in accordance with government policy.

In addition to its regulatory functions, the Department is also the key agency responsible for the production and promotion of up-to-date geoscientific information, which aids industry in its efforts to discover new mineral deposits and provides critical information for land use planners to make strategic land use planning decisions.

The Mining (Strategic Prospectivity Zones) Act 1993 (SPZ Act)

The SPZ Act provides for the declaration of areas of the State known to be prospective for mineral resources. The purpose of the Act is to ensure that, for mining purposes, there will be continuing access to certain areas of the State having a very high potential for effective and efficient mining for minerals, without any implication as to the prospectivity of the remaining areas of the State.

Whaleback Ridge is within a defined Strategic Prospectivity Zone (SPZ) under the SPZ Act. It is Mineral Resources Tasmania's (MRT) understanding that the proponent will require a Crown lease where, under the SPZ Act and prior to the issuance of a Crown Lease, areas above 500 hectares require the approval of both Houses of Parliament and under 500 hectares require the approval of the Director of Mines.

Wind Farms and Mineral Exploration and Development

Wind farms and mineral exploration and development are highly incompatible, related most directly to interference with the electromagnetic and electrical geophysical technologies that are the mainstay of modern exploration. These effects arise from associated infrastructure such as power lines and underground connecting cables, in addition to the wind turbines themselves, even if no electricity is being generated. This interference can extend for over half a kilometre from the infrastructure. Additionally, safety considerations associated with wind turbines severely hamper practical use of all airborne geophysical methods, not just electromagnetic, as their effective mineral exploration application relies on systematic closely-spaced coverage.

Required Assessment Criteria

The following assessment criteria are requested for inclusion in the major project impact statement to enable MRT, through the Department of State Growth as a relevant State Service Agency, to assess and provide specialist advice regarding impacts on the State's potential mineral resources affected by Whaleback Ridge:

- I. Justify the placement of proposed footprint as it relates to the prospectivity analysis provided by MRT based on the following background information:
 - The proposed project is coincident with land considered to be highly prospective for economic accumulations of minerals. The locating of the infrastructure associated with the proposal will need to be carefully considered to minimise the potential negative impacts on the minerals industry.
 - In December 2023 (and noting that the major project proposal provided by the proponent for assessment is dated 6 October 2023), MRT reached a written agreement with the proponents on the following areas - see attached map (Appendix A). Specifically, the written agreement identified that there were:
 - a. Significant areas within the eastern boundary of the footprint of moderate prospectivity in which windfarm development could occur;
 - b. Significant areas of moderate prospectivity within the western part of the footprint adjacent to Mt Heemskirk in which windfarm development could occur, subject to detailed analysis of proposed turbine and related infrastructure siting; and

- c. Significant areas through the middle of the footprint - broadly corresponding to an arc between Zeehan and Granville Harbour - and in the north of the proposed area, of high prospectivity in which windfarm development is not supported.
 - This prospectivity analysis approach is in keeping with the Government's multiple land use policy, and has been successfully implemented with other wind farm proponents throughout the State.
2. An assessment of how the proposed infrastructure emplacement has been designed to minimise detrimental impacts on the potential for mineral exploration and discovery based on the mapping provided by MRT. This should include a detailed assessment of proposed impacts on the mineral potential and on exploration licence holders and include measures to avoid or mitigate impacts.
 3. An assessment demonstrating that the proposal will not impact on the undertaking of exploration and mineral development within areas defined as highly prospective.
 4. A detailed assessment demonstrating compatibility with existing SPZs and government's mineral development strategies.
 5. Provide evidence of industry consultation, specifically including with those mineral tenement holders coincident with the proposed project footprint, in accordance with the scale and scope of the project. Clearly demonstrate how concerns identified or raised during consultation will be addressed, and the resulting outcomes and solutions.
 6. A landslide risk assessment. The Landslip Hazard Code has identified a number of areas within the proposed project footprint as posing a landslip hazard.

Office of the Coordinator-General

The Department thought the Office of the Coordinator-General (OCG) has provided significant support to the proponent in preparing their submission for consideration as a Major Project.

The OCG would expect that those agencies with specific expertise and/or responsibilities will provide input on those criteria most relevant to them, but would provide the following recommendations for consideration:

The Assessment Criteria North East Wind (NEW) Major Project (August 2023) provides a useful template for the majority of matters relevant for inclusion as assessment criteria for Whaleback Ridge.

The NEW criteria refer to "impacts", "affected" matters – the guidance information accompanying the criteria might benefit from it being made clear that "impacts" and "affects" may be positive, and that any positive impacts should be included for evaluation/assessment.

Specific matters

Electromagnetic Interference (NEW section 4.1.3)

In the context of potential mining activity (both exploration and extraction – see below regarding Land Use Compatibility), specific consideration needs to be given to the ability of the proposal to co-exist with mineral exploration involving airborne and other geophysical surveying techniques.

Key Species (NEW section 4.2.1)

In addition to those species identified in the NEW criteria, the Key Species should include the Orange-bellied parrot.

Other Avian Fauna (NEW section 4.2.2)

Resident shorebirds and waterbirds are unlikely to be relevant in the context of the project.

Similarly, there is no adjacent or nearby Ramsar wetland requiring consideration (also relevant for other listed flora and fauna (NEW section 4.2.3).

Landscape and Visual (NEW section 4.5.1)

The proposed location of Whaleback Ridge is remote, with limited visibility from settlements and public and private roads, which are themselves very infrequently accessed. It is the OCG's contention that any consideration of visual impact should consider the proportional visual impact of the project.

Land Use Compatibility (NEW section 4.6.1)

The OCG notes the specific complexity associated with the project site and its coincidence with a SPZ as defined by the SPZ Act. The OCG has facilitated discussions between the proponent and MRT to identify potential locations within the SPZ that are less prospective but retain good wind energy generation capacity, such that coexistence between the project and future mining activity (exploration and extraction) could occur. It was anticipated by the proponent and MRT that the Major Project process would allow for further refinement of this work, and it is therefore potentially beneficial to include criteria that demonstrate the land use compatibility of the proposal and mining.

Similarly, the project footprint includes areas of potential significance for both forestry and hydroelectric generation, and as such it is suggested that the assessment criteria include the requirement to provide evidence of land use compatibility where these uses overlap with (or could be impacted by) the project footprint.

The OCG also notes that the project area does not include any land subject to agricultural use or proclaimed under Part 9 of the *Water Management Act 1999*.

Transport and Infrastructure

The Department has reviewed the transport, traffic and access assessment criteria for the North East Wind Major Project (section 4.I.1). For the most part, it covers matters that would be relevant to Whaleback Ridge and should be used as a basis for the assessment criteria, subject to the following comments:

1. Whaleback Ridge will have multiple construction phases, and this should be reflected in the assessment criteria.
2. The maximum extent of the transport task and associated traffic across different stages of the project should include any worker commuting routes.
3. In considering the criteria, the panel should have regard to:
 - a. traffic impact assessment and traffic management during the construction phases; and
 - b. heavy and construction vehicle access over structures, e.g. bridges (noting this may include the need for vehicles to be escorted by Transport Inspectors).
4. The North East Wind Assessment Criteria includes consideration of “the condition of existing transport infrastructure and any asset upgrade, maintenance or rehabilitation works that may be required”. This is also relevant for Whaleback Ridge but should also include consideration of the need for monitoring road condition.
5. The methodology used to undertake the assessment of transport, traffic and access should be informed by relevant sections of:
 - a. Traffic Impact Assessment Guidelines, Department of State Growth, August 2020; and
 - b. Austroads Guide to Traffic Management, Part 12: Integrated Transport Assessments for Developments.

The assessment criteria should not constrain the traffic engineer preparing the Traffic Impact Assessment from considering all matters they believe are relevant to the transport task.

The Heavy Vehicle Access Team notes that the applicant is not clear on the potential needs for Oversize/Overmass (OSOM) transport of project items under Major Projects Proposal dated 6 October 2023. However, in section 5.9 of the Proposal, it is recognised by the proponent that there will be increased traffic on the surrounding road network, the proponent will require transport approvals for the tasks associated with any restricted access heavy vehicle, these will need to be obtained separately.

When OSOM activity is likely to be involved, the Heavy Vehicle Access Team encourages the proponent to make contact at an early stage so that this detail can be assessed. The Commission may wish to consider a requirement for engagement with the Heavy Vehicle Access Team as part of the assessment criteria.

Appendix A – Mineral Prospectivity Analysis map

