Department of State Growth

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Tasmanian Government

Ms Pam Allen
Chairperson
Development Assessment Panel
Tasmanian Planning Commission
Email: tpc@planning.tas.gov.au

Dear Ms Allen

Thank you for your letter of 14 October 2024 regarding the preparation and exhibition of the draft assessment criteria for the Bell Bay Wind Farm Major Project.

I note my previous letter to the Tasmanian Planning Commission dated 18 September 2024 provided input into the preparation of the draft assessment criteria. The Department of State Growth considers most matters raised have been incorporated into the draft assessment criteria. However, some matters require further consideration as detailed in Attachment 1.

Please contact Claire Armstrong, Senior Strategic Planner, by email at claire.armstrong@stategrowth.tas.gov.au or telephone on (03) 6166 3397 for more information.

Yours sincerely

Craig Limkin
Secretary

29 October 2024

Attachment 1: Department of State Growth input to the draft assessment criteria, Bell Bay Wind Farm

Assessment criterion	**Comment**
1.2 Infrastructure coordination	Infrastructure Coordination is one of four core pillars identified under the Government's Renewable Energy Coordination Framework which identifies actions to plan and coordinate the renewable energy expansion and load growth required to achieve the Tasmanian Renewable Energy Target (TRET). The Framework identifies scenario planning and Renewable Energy Zones (REZs) as key initiatives to deliver infrastructure coordination. It is recommended that these be referenced in the assessment criteria. The assessment criteria as drafted do not reference REZ or existing transmission plans such as the Australian Energy Market Operators (AEMO) Integrated System Plan (ISP) which are also highlighted by the Framework. In the future, relevant considerations may also include any REZ declared under the Tasmanian draft REZ Bill that has recently undergone public consultation. Accordingly, the assessment criteria should be updated to better align with these policy aims. The criteria as drafted include consideration of 'least cost'; 'congestion'; and 'potential requirements for public or electricity consumer-funded transmission infrastructure to the level of benefit those parties receive.' These criteria potentially duplicate or separately assess matters more appropriately assessed by the AER and the Australian Energy Market Operator. For example, under National Electricity Rules, the AER oversees economic regulation of the electricity transmission networks, and also reviews and approves the investment plans and expenditures proposed by transmission network system planners (TNSPs), such as TasNetworks, to ensure these are efficient and in the best interest of consumers. With respect to issues of congestion, the current National Electricity Market is 'open access.' New generators are able to request connection anywhere in the network and indeed a more efficient new generator may lead to an incumbent generator being constrained as the network in that area cannot dispatch generation from both. The market rules would see this as a preferable outcome for consumers. For these reasons we do not see this is an issue that the Panel should consider. Accordingly, it is recommended that this be deleted to limit the assessment to land use matters.
1.3 Low-cost renewable energy	This criterion is similar to Criteria 1.2. It is noted that 'Low Delivered Cost' is not a defined term, nor is it a term commonly used in the TRET, the Renewable Energy Action Plan, or the AEMO's ISP. Accordingly, this may introduce some interpretation issues both in terms of what is being measured, and how it will be assessed by the Panel to be 'acceptable'. Electricity generation operates in a market (the National Electricity Market) where dispatch by AEMO is scheduled to meet demand by only the lowest cost mix of generators. Proponents well understand

	the requirement to be cost competitive and will likely need their own offtake arrangements with retailers or corporate partners at the time of taking a final investment decision on their project. Again, this is outside the remit of land use matters and not a matter for the Panel to consider. It is recommended that this criterion be deleted.
1.4 Community wellbeing and economic development	Criteria 1.4 does not refer to the Government's Community Engagement, Benefit Sharing and Local Procurement Guidelines which sets out the Government's expectations for developers. This sets out the guiding principles and outcomes sought by Government from renewables developers in Tasmania. While this criterion broadly aligns with the intent of the Guidelines it is recommended that this policy be referenced as a relevant consideration by the Panel when determining what is an 'acceptable level'.
3.1 Land use compatibility	This criterion allows the Panel to have consideration to the effects of wind turbines, overhead power lines and underground cables on mineral exploration and extraction methods as it relates to both existing and future mining use of the land. This requirement is not derived from the current planning scheme, under which the site is zoned Rural, which focuses on the agricultural use and development of the land. The criterion also appears to extend beyond existing mining regulatory requirements. While the site is in a strategic prospectivity zone, this only applies to Crown land. The wind farm site is located on private land. It is recommended that the criterion be revised so as not to unintentionally require assessment which would not otherwise be required under existing regulatory requirements. Criterion (a) refers to the proposed use and development: 'ha[ving] an acceptable level of compatibility with land management activities and operations associated with land used, reserved or available for timber harvesting and mining including: • managing the risk of weeds, diseases and pests being introduced and spread • implementing fuel-reduction, ecological or cultural burning.' It is unclear how the matters in the two dot points are relevant to timber harvesting and mining, and how the proponent could address the criterion.
3.3 Transport, traffic and access	A comprehensive Traffic Impact Assessment (TIA) will be required to satisfactorily address this assessment criterion. It is recommended that the criterion directly reference the requirement to prepare a TIA. Private road infrastructure will likely be required to support the project (as well as public road infrastructure), and this should also be reflected in the assessment criterion. Assessment criterion 3.3(c) should be revised to clarify additional costs to public road owners and managers.

	Please see below for specific revisions addressing these matters: **3.3 Transport, traffic and access** <u>Assessment criterion</u> (a) The design and condition of existing, new or upgraded ~~**public**~~ **road** infrastructure, both within and outside of the **project site**, is at an acceptable level to cater for the transport task of the project while maintaining road user safety, infrastructure condition and the efficiency of the **public road** network. (b) The selection of transport routes, traffic management arrangements and **development** of new or upgraded ~~**public**~~ **road** infrastructure required to accommodate the transport task of the project, both within and outside of the **project site**, avoid, minimise or mitigate adverse effects on: (i) natural values (ii) the safety of other road users (iii) the amenity of local communities to an acceptable level. (c) The **development** of new or upgraded ~~**public**~~ **road** transport infrastructure and short- and long-term road maintenance intervention required to accommodate the transport task of the project, both within and outside of the **project site**, avoids additional costs to **public road** owners and managers, ~~to an acceptable level~~<u>, noting that the developer will be responsible for the construction and maintenance of any new road infrastructure that has no clear public benefit. The developer is required to have an agreement in place with impacted public road owners and managers for any additional capital or maintenance costs to be incurred by the public road owners and managers.</u> (d) <u>A comprehensive Traffic Impact Assessment must be prepared, and this should be supported by the Department of State Growth. The methodology used to undertake the TIA should be informed by relevant sections of</u> • <u>Traffic Impact Assessment Guidelines, Department of State Growth, August 2020</u> • <u>Austroads Guide to Traffic Management, Part 12: Integrated Transport Assessments for Developments.</u>
3.13 Amenity and interference	State Growth previously requested that the assessment criteria have regard to how adequate fixed and mobile telecommunications coverage will be maintained. While this assessment criterion references ‘radio communication services’ broadly, it does not identify digital connectivity as a key issue in ensuring how the proposed development can be delivered and how it will ensure the development does not negatively impact the communities that currently use existing digital communications services. At present, the proposal site is predominantly serviced by NBN satellite and some fixed wireless. While Telstra appears to have good coverage of the 4G network in the vicinity, this requires on-site verification.

	It is expected that the Bell Bay Wind Farm will require adequate digital connectivity coverage and backhaul for operational requirements, safety systems and workforce usage. It is important to ensure the new usage: • can be adequately accommodated by the network • will not cause interference and congestion, thereby compromising the reliability of the telecommunications services for local communities and any other users.