

Our Ref: A24/404394

11 November 2024

Pam Allen
Chairperson – Development Assessment Panel
Bell Bay Wind Farm - Major Project
Tasmanian Planning Commission
tpc@planning.tas.gov.au

Dear Ms Allen,

BELL BAY WIND FARM MAJOR PROJECT – DRAFT ASSESSMENT CRITERIA

Please find the following information in response to your letter of the 14 October 2024 regarding the exhibition of *Draft Assessment Criteria for the Bell Bay Wind Farm Major Project*.

On 16 August 2024 the Tasmanian Planning Commission wrote to the SES inviting comments on assessment criteria for the Bell Bay Wind Farm Major Project. The SES responded to the request and recommended development of assessment criteria related to:

- Flood risks; and
- Emergency management.

SES note that the currently exhibited *Draft Assessment Criteria – Bell Bay Wind Farm Major Project* contains provisions that responded to the SES recommendations as described in Attachment 1 of this letter.

The SES support the draft assessment criteria for the Bell Bay Wind Farm Major Project as summarised in Attachment 1 from the perspective of enabling the consideration of flood risks and emergency management considerations during the assessment process.

Please contact the Manager Flood Policy Unit – Chris Irvine, on 6173 2700, or by email chris.irvine@ses.tas.gov.au , if you wish to discuss any of the matters raised in this submission.

Yours sincerely



Mick Lowe
Executive Director SES and Volunteers

Attachment 1: Draft assessment criteria relating to previous SES representation to Tasmanian Planning Commission on flood risks and emergency management

Section and subsection	Detail of text within section
2.0 Design and management 2.2 Management Practices	Management actions applied during construction, operation and decommissioning of the use and development, eliminate, minimise, mitigate or offset adverse social, cultural, economic and environmental effects, in relation to: ... (f) accident and emergency response
3.0 Planning assessment 3.3 Transport, traffic and access	3.3 Transport, traffic and access (a) The design and condition of 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: • natural values; • the safety of other road users; and • the amenity of local communities to an acceptable level; In considering the criterion, the Panel may have regard to: • the degree to which access points and supporting infrastructure meet security, resilience and emergency management needs
3.0 Planning assessment 3.13 Amenity and interference	The proposed use and development maintains communication service quality and the amenity of the project site and vicinity by: a) protecting pre-existing radio communication services from interference due to physical structures or electric and magnetic fields to an acceptable level The term 'radio communication services' is defined in the draft assessment criteria as meaning: <i>"radio communication assets used by emergency services, broadcast radio and television, satellite television and internet, including fixed and other licence types."</i>

3.0 Planning assessment 3.14 Natural Hazards	The proposed use and development, including temporary development: a) maintains an acceptable level of risk of causing, or contributing to landslip, flooding and coastal hazards of the project site and nearby land; b) maintains an acceptable level of risk of causing, or contributing to the spread and intensification of, bushfire; and c) minimises potential adverse effects from landslip, flooding, bushfire and coastal hazards, including on other values and human health, to an acceptable level. In considering the criterion, the Panel may have regard to: • advice from the Tasmania Fire Service, an accredited bushfire practitioner, Tasmania State Emergency Service, other state authority or a council; • the significance and extent to which the use and development has the potential to cause adverse effects; • the degree and certainty of effects; • whether hazardous chemicals of manifest quantity are stored on site. • the extent to which design and siting of buildings and works and fire protection measures can: ○ manage the risk of and effects from landslip, flooding, coastal hazards, and bushfire; ○ limit the potential for bushfire to ignite on the project site; ○ minimise the exposure of people and the environment to hazardous chemicals or emissions as a consequence of bushfire; and ○ reduce risk to emergency service personnel; • measures to monitor risks and effects; and • measures to avoid, remedy or mitigate potential adverse effects and the degree to which alternatives exist.
3.0 Planning assessment 3.15 Design, siting, subdivision and signs	The design and siting of buildings and works (including for temporary development), subdivision, proposed lease and licence arrangements, and signs: (a) provide for the safe and effective operation of the project. In considering the criterion, the Panel may have regard to: ... • the extent to which the design and siting of buildings, works, subdivision, and proposed lease and licence arrangements: • provide for the ability to manoeuvre vehicles on the project site, the ability of emergency services to access the project site and the safety of vehicle crossings and the road network.