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31 December 2020

Ms Sandra Hogue
Acting Executive Commissioner
Tasmanian Planning Commission
GPO Box 1691
Hobart TAS 7001

By email: tpc@planning.tas.gov.au

Representation on 'Draft planning criteria for the North West Transmission Upgrades Project' – recommendation to include site selection criteria weightings in the interests of transparency

Dear Commissioner Hogue

In Section 3 Project Alternatives (p 6 of Schedule 2 Environmental Impact Statement requirements) the Draft states

Transparency around alternatives and the criteria on which decisions have been based is encouraged as it can lead to better outcomes.

The process by which TasNetworks arrived at its preferred route for the Hampshire Hills to Staverton 220 kV transmission line through Loongana was not transparent. While TasNetworks undertook extensive community consultation and published a lengthy Route Options Report document on 18 August 2020, the justification for selecting their preferred route through Loongana was deliberately vague and at best qualitative.

The qualitative nature of TasNetworks analysis is evident in Section 8 of their Route Options Report which uses a 'traffic light' graphic to justify its preferred Central Corridor route (Table 8-1, pp 37-38). The 'traffic light' analysis also failed to include two of the criteria that it earlier claimed were a priority, namely overall route length and use of existing transmission corridors. It also selectively disaggregated criteria for visual effect.

As the preferred route is selected on a mix of financial, technical, social and environmental criteria it is essential that their relative weighting is known. It is possible that the potential effects on threatened fauna, flora and ecological communities may not be minimised by the preferred route but this needs to be understood in the broader context.

Only through a quantitative comparative analysis of all route options can the public and the Commission as planning authority understand TasNetworks decision making process and be satisfied that the proposed development will deliver the best overall outcome.

To achieve this it is recommended that the requirements associated with describing the site selection process in paragraph 2 of Section 3 Project Alternatives be amended as follows:

*Describe the site selection process, including site selection criteria, **criteria weightings**, alternative sites considered and ~~a~~ **quantitative comparative** assessment of those alternatives.*

These additions to Schedule 2 of the Draft Planning Criteria will improve the transparency around site selection for all stages of the North West Transmission Upgrades Project.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'John Thompson', with a stylized, flowing script.

John Thompson

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