

TASMANIAN PLANNING COMMISSION: PUBLIC COMMENT**Draft Planning Criteria for the Major Infrastructure Development (North West Transmission Upgrades Project) Order 2020**

Submissions to: tpc@planning.tas.gov.au

INTRODUCTION:

The Northwest Transmission Upgrades Project covers a large area, with several different components including relatively simple upgrades with taller towers replacing old towers within an existing easement.

However, the component proposed between Hampshire and Staverton is entirely new infrastructure and needs to be given separate treatment. It is clearly not an upgrade as it includes 60 km of new overhead line, 50-60-metre-high towers and 60-metre-wide easements (with provision to increase to 90 metres). These new easements will cover 380 hectares, use 160 km of access tracks and require 25 km of new tracks to be built.

This new route will have long lasting social, economic and environmental impacts. Loongana in particular will be impacted disproportionately from anywhere else in this project and must be assessed separately using strict planning criteria.

We request that The Tasmanian Planning Commission ask the proponent to re-assess this route based on the Planning Criteria. It is crucial that route selections consider fire risk, environment and climate change, and be assessed against all feasible technical options, in all locations. Simple infrastructure cost must not be a constraint without being compared to the true costs to communities and the environment.

CRITERIA TO BE ASSESSED**1. Use Ecological Sustainable Principles (ESD) across the entire Project**

The geographical area of The Project needs to be broken up and special attention given to areas where the project will carry disproportionate direct and indirect impacts. If an exclusive EIS using ESD principles is not applied to areas such as Loongana then the whole project will fail to meet Planning Criteria objectives. It will also fail to obtain social licence or meet public expectations from a major project which is claimed to benefit all Tasmanians.

2. Aboriginal Heritage must be included

Aboriginal Heritage matters need to be included in the Planning Criteria and details of the Assessments made public.

3. All Separate and Secondary Assessments and management plans must be included

It is in the public interest that these matters are assessed stringently, to know what compliance and mitigation has been agreed and be able to comment. Total transparency is required in-order to

meet Schedule 1 objectives of the Land Use Planning and Approvals Act and ESD principles of the Planning Criteria.

4. Standards for land use around sensitive areas are incomplete: Karst, cave, and springs, including drainage/catchment areas are absent and must be included.

A hazard report and management plan for Karst is crucial. The Hampshire to Staverton route runs adjacent to a protected karst system along the Loongana Valley. The risks to the karst are well known to landholders in Loongana so the omission of an assessment and management plan for this sensitive area with wide-ranging consequences to social, economic and environment cannot be overlooked.

5. Width of transmission line easement: Any plans for easement expansion must be considered as part of this assessment.

The proposed Hampshire to Staverton transmission line easements are 60 m wide initially but allow for 90 m wide easements to accommodate a second line of towers during the project's life. The extra 30 m presents additional impacts to natural values and extra long-term social and economic disruption and needs to be assessed.

6. Climate Change: Climate impacts for EVERY aspect of the project must be properly assessed.

This is ostensibly a renewable energy project but there is very little in the criteria regarding climate change. To avoid unnecessary, lengthy and costly appeals and inappropriate development from the start, this scientific reality cannot be ignored. The most straightforward way to incorporate climate change in a manner fitting for this project would be by making an ESD sub-principle, or ensuring it is in all aspects of planning criteria. It is only through planning criteria that climate change can be addressed.

7. SOCIO-ECONOMIC ISSUES:

Economic and social impacts, both positive and negative, must have quantitative analysis, and cost/benefit analysis must be based on True Costs.

Employment opportunities details need clarity and conditions:

The proponent is not a signatory to the Clean Energy Council's Best Practice Charter for Renewable Energy Developments, which includes a charter for Building Powerlines for Renewable Energy Developments. Therefore, it is in the public interest that the Planning Criteria ensures that local people are employed in all aspects of the project.

8. Mitigation measures and monitoring, offsets: All mitigation measures, offsets and monitoring proposed must be detailed and all assurances and agreements made or proposed be enforced and the details made available for public comment.

9. A Bushfire Risk Assessment and Management Plan must be included and available for comment:

10. Project Alternatives:

Site selection and assessment of alternatives must be re-analysed by the proponent comparing all alternative technologies, TPC Planning Criteria, ESD principles, include Climate Change modelling, have the environment as a key restraint, include life-cycle costs and use true costs. Only by taking such an analysis is it possible to determine whether one option carries lower or higher true costs than another.

11. Weed and Diseases: The Criteria is vague and does not match the vast scale of the proposed project, and its risks, or where responsibilities and obligations of the proponent start and finish. Feral animals must be included in the criteria.

CONCLUSION

Overall, the planning criteria need strengthening to raise biodiversity protection to the highest priority. ESD principles must be applied to small high biodiversity geographical areas and communities, such as Loongana, that will be affected disproportionately. Mitigation and management plans need strict enforcement, be flexible in a problem-solving approach and include new research and genuine community involvement for the entire operation. Conditions need to extend and apply to permits to ensure that the proponent strictly follows all recommended guidelines alongside the most up-to-date research for the entire operation.

Biodiversity is considered to be the foundation for human health. Protecting the world's biodiversity starts by protecting local biodiversity. Over-exploitation of ecosystems is resulting in a global extinction crisis with global species populations reduced by 68% over the last century and accelerating. Transitioning to renewable energy is an important step, and Australia needs to be a world leader in that, but in doing this the proponent must also be a global citizen by ensuring the least negative environmental consequences.

In the interests of the entire community, The Project must have the most rigorous planning criteria possible.

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