

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:**

We ask that the planning criteria break new ground and have the most rigorous planning criteria possible.

The Project covers a large geographical area, with several different components. Some components are upgrades with taller towers replacing old within an existing easement, however the component proposed between Hampshire and Staverton is entirely new infrastructure and needs to be given separate treatment through the planning criteria.

60km of new overhead line, 50-60m high towers and 60m wide easements (with provision to increase to 90m), these new easements will cover 380 hectares, use 160km of access tracks and require 25km of new tracks to be built.

Introducing new infrastructure into a landscape is not an upgrade. This new route will have long lasting social, economic and environmental impacts. Loongana in particular, an area of high biodiversity and with many threatened and endangered species, will be impacted disproportionately from anywhere else in this project and must be assessed exclusively through a strict planning criteria.

Not only does this section need to be assessed exclusively, but the Tasmanian Planning Commission must also ask the proponent to take a step back in their process and re-assess this route based on the Planning Criteria. It is absolutely crucial that route selections have fire risk, environment and climate change as top priorities, and be assessed against alternatives for better long-term outcomes. Alternatives must include 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 environments. Doing this would properly meet all the objectives of the planning criteria, create better outcomes long-term, and better reflect our present moment in time of the climate and extinction crises.

COMMENTS:**1. Using Ecological Sustainable Principles (ESD) has merit but only if applied fairly.**

The project covers a large geographical area. ESD principles, used broadly, should not be a way of allowing the proponent to ignore true costs and then apply benefits away from where impacts occur. This would risk enabling the proponent to ignore their obligations.

- Using ESD principles broadly implies that the project as a whole has a fair distribution of impacts and benefits, whereas there are clearly areas with very little impacts and areas which carry an unreasonable amount.

- The geographical area of The Project needs to be broken up and exclusive attention be 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.

Loongana is a biodiversity hotspot, heavily forested with large areas of native vegetation providing habitat for a long list of threatened and endangered species, formal and informal public reserves, private reserves, conservation covenants and tourist businesses that rely on high wilderness values. It is unreasonable for one community to take on so many impacts without ESD principles of social, economic and environmental being applied and analysed exclusively.

- An example of using the ESD principles broadly: This project is electricity infrastructure, with the Hampshire to Staverton Line being part of Project Marinus, and given that 90% of the power will go direct to the mainland (*House of Assembly Estimates Committee A, Thursday 26 November 2020 – Barnett pg 131*) there is an argument that ESD principles could be applied even more broadly. If that were the case, the social and economic benefits enjoyed further away will be at the cost to Tasmanians.
- The Hampshire to Staverton transmission line is being built for UPC Renewables to connect Jims Plains and Robbins Island wind farms to the Marinus Link so power can go into the National Energy Market. It could be argued that there is negligible benefit from the transmission line itself when a private company is the sole user of this section of the line for the foreseeable future and the energy and profits go out of Tasmania. It is also noted that the rush to finish this project for a private company may not be in the best interests of our regions natural values, local communities and taxpayers when there are better alternatives that may take longer but be a better outcome long-term.

The Staverton and Hampshire line is being constructed to connect into the UPC's, I am trying to think of the name, the north-west development.....We will build that line in time to connect into the UPC Jim's Plain development, which they are targeting for around 2024 commissioning. We will recover the costs of that line from UPC until such time as there are other users of that line, other generators connecting into that line, and it will then become a regulated asset. Balcombe GBE 9 December 2020

- It is in the public interest for Tasmania, Australia and globally that the ESD principles include climate change as a sub-principle so it is applied to all aspects of the project.

2. **Aboriginal Heritage should be included: It is in the public interest that the detail any assessments and management plans be included for comment.**

The proponents' EPBC referral (1.12) states that Indigenous heritage matters for the Hampshire to Staverton transmission line will be assessed under the Aboriginal Heritage Act 1975. Aboriginal Heritage matters need to be included in the Planning Criteria and details of the Assessments made public.

'A large number of registered Aboriginal heritage sites are mapped within 3.5km of the SV-HH route.'... 'there are known values in the region which could indicate a higher potential for stone artefacts within or adjacent to the SV-HH route' from EPBC referral.

3. **All Separate and Secondary Assessments and management plans should be included: Any decision, assessment, certificate of exemption or approval made prior to, or completed separately, and to be incorporated into the TPC assessment, needs to be listed, detailed and available for public comment.**

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.

Doing this will bring these assessments in line with the rest of the planning criteria.

It should be noted that other matters deemed to be significant or matters that emerge as significant from environmental studies, public comments or otherwise during the course of the preparation of the EIS, should not be excluded from consideration. (Schedule 2 environmental impact statement requirements: 3)

It is important that separate and secondary assessments be available for public comment as it would go some way to address the public concern that some key departments are becoming increasingly politically compromised.

A recent CPSU survey of DPIPWE staff found that 46 per cent of staff have said that they've felt morally compromised in what they have been asked to do or stopped from doing, and that fact that frank and fearless advice is a career-limiting move with only 17.5 per cent felt that their advice was actually acted upon.

The proponent should be required to:

- List all separate and secondary approvals completed or that may be required. (eg. permits under the Threatened Species Protection Act 1995).
- List details of all separate and secondary approvals including:
 - When approvals be secured.
 - Assessment details, permit conditions, mitigations and monitoring recommended by the issuing body.
- Outline in detail all mitigation and management plans in separate and secondary approvals. These plans will directly and indirectly affect the environment of local communities and require absolute rigour to meet ESD principles and planning objectives. The public requires evidence that the proponent approach these matters with absolute commitment to long-term benefits.
 - That they be open to public comment.
 - That they will incorporate new information gathered

- All mitigation and management plans need to involve local landholders, whether directly indirectly or potentially impacted.
- All mitigation and management plans need to incorporate ESD principle (b)

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

A hazard report and management plan for Karst is a crucial addition. 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.

The Loongana Karst (2587) is a Category A Karst System that extends 1,300 hectares throughout the valley.

Category A: Intensely karstified or probably intensively karstified: Carbonate rock formations known to be highly susceptible to karstification; on the basis of existing knowledge well developed karst is to be anticipated. (Kiernan 1995)

DPIPWE in their guidelines for managing Karst systems state that:

‘Effective planning for karst regions demands a full appreciation of all their economic, scientific and human values, within the local cultural and political context’ and that ‘More than in any other landscape, a total catchment management regime must be adopted in karst areas. Activities undertaken at specific sites may have wider ramifications in the catchment due to the ease of transfer of materials in karst.’

Management prescriptions for Tasmania’s cave fauna were formed for the RFA in 1997, recommendations include:

‘In land areas adjoining karst where there is no accurately mapped boundary to define the karst hydrological limits, a buffer zone extending 1,000m beyond the known extent of Category A karsts should be established on the downslope side of a known karst area and similarly for a distance of 2,000m on the upslope side of the known karst area’. (Clarke 1997)

The proposed route will have vegetation clearance, earthworks and construction for two 60m towers directly above the karst system, this affects public land and two private reserves, one is an internationally renowned wilderness tourist destination where visitors come to visit the Mostyn Hardy Cave which has cave fauna only found at that site.

Habitat protection of the surface environments adjacent to Category A karsts or known karstified carbonate outcrops is vital to the maintenance of neighbouring karst processes and their cave fauna, because unless the adjoining carbonate rock boundary and its karst hydrology have been accurately defined, the same risk factors apply to ground disturbance directly above the karst. (Clarke 1997)

It is in the public interest that assessing, managing and monitoring is done specifically for this karst system, the impacts may have many social, economic and environmental consequences. Of particular concern are the detrimental effects on fauna and geomorphology within the karst, tourism, personal water supplies and health of the River Leven Catchment with serious consequences downstream to agricultural areas.

5. **Width of transmission line easement:**

Any plans for easement expansion should be considered as part of this assessment.

The new Hampshire to Staverton transmission line easements are 60m initially but allow for 90m to accommodate a second line of towers during the project lifecycle. The extra 30m presents additional impacts to natural values and extra long-term social and economic consequences.

This future component of this project needs to be part of this assessment if ESD (c) of inter-generational equity are to be applied. The full 90m must be assessed for comparison to alternatives to ensure ESD (d) that the conservation of biological diversity and ecological integrity be a fundamental consideration in decision making.

SCHEDULE 2: ENVIRONMENTAL IMPACT STATEMENT REQUIREMENTS:

Using Desktop data for the route selection through Loongana was insufficient to make an informed decision on natural values present. This area has large sections of high conservation forest and non-forest communities which will be impacted by this project. An exclusive EIS is required for the Loongana area, using the planning criteria and ESD principles, include an independent social-economic analysis, and a cost benefit analysis using true costs.

Species in the Loongana area:

<p><u>EPBC Critical:</u> Swift Parrot (suitable habitat) Lowland native grasslands (not yet surveyed)</p> <p><u>EPBC endangered:</u> Wedge-tailed eagle Tasmanian Devil Eastern Quoll Swift Parrot Ptunarra brown butterfly Native wintercress (suitable habitat) Alpine sphagnum bogs (suitable habitat)</p> <p><u>EPBC vulnerable:</u> Masked Owl Spotted-tail quoll Giant freshwater crayfish Australian grayling (recorded in Leven system) Eastern barred bandicoot (potential suitable habitat) Maidenhair spleenwort (suitable habitat)</p> <p><u>EPBC threatened:</u> E.viminalis (nominated)</p> <p><u>EPBC migratory:</u> Satin flycatcher</p>	<p><u>TSP endangered:</u> Grey Goshawk Wedge-tailed eagle Masked Owl Tasmanian Devil Native wintercress (suitable habitat)</p> <p><u>TSP threatened:</u> E. viminalis wet forest community</p> <p><u>TSP rare:</u> Spotted-tail quoll Showy willowherb Forth River Peppermint (suitable habitat, unconfirmed observations)</p> <p><u>TSP vulnerable:</u> White-bellied sea eagle Giant freshwater crayfish</p> <p><u>Category A Karst</u> covering over 1,300 hectares.</p>
--	---

6. Climate Change:

Climate impacts for each aspect of the project need to be properly assessed.

“Human interference with the climate system is occurring, and climate change poses risks for human and natural systems.” IPCC Summary for policymakers 2014.

This is ostensibly a renewable energy project so it is disappointing to see little emphasis in the criteria regarding climate change. The current wording in the ESD, using the term “precautionary principle” is outdated, considering that the science clearly supports the fact climate change is real, and urgent action is required. Including this scientific reality avoids inappropriate development from the start, and may avoid unnecessary, lengthy and costly appeals. 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. It cannot be left up to proponents, whose imperatives are commercial and come well before the environments they exploit or even the wider public interest.

The proponents’ EPBC referral has just one single reference to climate change, that is disappointing in itself but when it in reference to the use of agricultural land in response to climate change, this is alarming.

The Hampshire to Staverton route selection is a climate destroyer. Permanently removing trees from forests and plantation land removes long-term carbon dioxide storage and sequestration above and below ground, with a further 30m of forests removed over time for a second set of towers, this is a huge carbon footprint. The use of fossil fuels in vegetation management and herbicides in weed management is a negative climate action. The clear easement, will over time of changing climate conditions, dry out and degrade surrounding soils and forests and increase risk of bushfires.

If climate change was the highest priority, the proponent would properly consider taking transmission lines through agricultural land, whether overhead or underground, as a route having lesser climate impact, as well as lesser economic impacts. Soils, under or above farm land, can still be used for economic purposes as well as carbon storage. The current route is an example of destroying environment to prioritise cheapest and least contentious pathways. Most importantly the choice of route through Loongana raises moral questions about the Tasmanian State government’s renewable energy action ‘plan’, and whether renewable energy that is transported in this way can be called green.

The lack of emphasis on climate change is unacceptable, and must be addressed through planning criteria:

- Climate modelling needs to be included for all assessments, mitigation and management plans.

- Climate change must be analysed in every part of the criteria, having it as a separate question to be addressed briefly is unacceptable. It is not what a proponent says but what they do that is important here.
- All projects, including renewable energy projects, need to be scrutinised through the lens of climate change. The most stringent attention to this is required for social, environment and economic long-term futures for the region but most importantly to protect Tasmania's threatened and endangered wildlife and biodiversity.
- A CSIRO study (Quantifying Extinction Risk) suggests that climate change is a 'threat multiplier' and that species loss will increase fivefold "without purposeful intervention". Rigorous assessment and managing any existing, potential and perceived conflicts of interest in development planning and approvals are also crucial interventions.
- One of the biggest metrics of assessing environmental impact is greenhouse gas emissions. A quantitative analysis should be required of all stages of the project throughout its entire life-cycle.

Climate change and Extinction Crisis.

It is well known fact that Australia has the highest rate of mammal extinctions in the world. Climate change will amplify the negative impacts already caused to threatened species by this project; land clearing, habitat degradation, habitat loss, and introduced species. Tasmania threatened species are found no-where else in the world, their loss is therefore a loss to the world. The planning criteria must show global citizenship in this regard.

6. **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.

Examples of TRUE COSTS include: reduced land values proximal or adjacent to lines, added burdens and stress costs to residents who are already working to preserve their local wilderness and threatened species habitats, increased expense on weed control and feral cats and dogs, increased fire risk leading to additional insurance costs, or even availability of getting insurance, Tourist business loss. Etc. Community benefits need to be real and obtained at the source of the impact.

Employment opportunities details need clarity and conditions:

It is noted that the proponent is not a signatory of 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 best practice employment standards that benefit the region affected.

- The proponent must commit to an ethical supply chain that provides adequate wages and conditions for employees, now and into the future.
- The proponent's responsibilities to extend to contractors and labour hire companies engaged for the entire operation of the project.

- The proponent must ensure that contractors and labour hire companies make every effort to hire locals and that this information is transparent and publically available.
- The main area of long-term employment for this project will be weed and vegetation management. It is absolutely crucial for environmental outcomes that this is done to best practice. Standards on employment, training and oversight are central to this but unfortunately recent answers to questions in Government Business are not encouraging in this regard.

At the moment we pay our contractors by the hour, and that is inefficient....We are going to a new regime which will basically have three regions in the state, the north, the north-west and the south. Essentially, we hand over control of those zones to those contractors. They have prescribed requirements. The vegetation has to be cut to a certain standard and they then charge us by the span.....Then we reassign the team that is currently dealing out all this work to do the quality controls in behind the contractors. If we find a span is not cut properly they recut it and don't charge us for that time. It drives efficiency. We think it will contribute close to a 20 percent saving once we get this new system up and running. (Lance Balcombe Government Business Wednesday 9 December 2020)

There are many risks presented here. Contractors can be registered in Tasmania but employ workers from afar, and that contract arrangements like this may drive down workers pay and entitlements, and put these jobs on a pathway similar to seasonal workers, where exploitation is a pressing issue. A situation similar to seasonal workers during covid restrictions is a perfect example of how this would negatively impact the environment, and cause long-term consequences to landholders and public reserves. Planning criteria is a way to ensure mistakes that have a potential impact on a vast scale cannot happen.

The proponent currently spends \$22million on vegetation clearing. One could argue that building a new transmission line through forested areas is not only environmentally and socially destructive it is not even the most economical route in the long-term.

Socio-economic criteria are too vague, and leave the level of response up to the proponent.

'The extent to which socio-economic considerations need to be described depends on the nature and extent of any negative impacts or risks to the environment from the proposal'. (Draft Planning Criteria 6.11)

Words like 'a brief description', 'discuss', 'details may include' are not encouraging.

Socio-economic issues are an important aspect of the project and many claims have been presented by the proponent to date, all of which have had no analysis beyond a simple modelling of the business case for private companies operating in the context of a commercial energy market. The Planning Criteria must ensure there is utmost clarity to who benefits and who pays for a given project proposal. An independent detailed cost-benefit analysis should be required, including for local communities like Loongana, whose residents will be disproportionately impacted by new infrastructure.

The criteria allows the proponent to decide where and if detailed analysis is required. Loongana will have a higher level of, and broader scale environmental impacts from, the new Hampshire to Staverton line, and needs an exclusive and comprehensive analysis.

Proposals with higher level or broader scale environmental impacts will need a more comprehensive analysis of economic and social benefits. This may include an explanation of the methods used to model impacts and describe the manner and results of engagement with the local community to determine their needs and aspirations in relation to the proposal.

Analysis of economic and social benefits: comprehensive exclusive analysis for Loongana is needed.

Residents and landholders in Loongana are being burdened with the most impacts from this Project, including degradation of their private forests, nature reserves and covenants, decreased land values, increased risk of bushfires, added expense for weed control. There are three tourist accommodation properties whose businesses rely on the wilderness, and all new tourism business enterprises are on hold.

- Any socio-economic analysis should be independent, best practice and evidence-based analysis. The Criteria needs to outline this standard to ensure the process is genuine, thorough and transparent. Eg: Who will do the analysis, what methodology will be used, how will this information be gathered and analysed, how will economic and social issues be monitored, how will negative and un-intended consequences be addressed?
- Any benefits must be compared against true costs. No-one benefits from direct or indirect impacts from infrastructure that is sited in inappropriate locations, and it should also be noted that these impacts have inter-generational consequences. It is in the public interest to see a detailed analysis of claims of economic benefits, numbers of jobs, occupations, duration, where workers will be sourced and how this compares with true costs.

A specific Tourism impact analysis should be included:

- The consequences of building infrastructure through wilderness areas have economic impacts of local and regional tourism in the short and long-term, this must be analysed and use in true costs. Loongana currently enjoys an international reputation as a destination to see threatened species in the wild.

Research undertaken at one Loongana business showed that '***nature-based tourists tend to avoid destinations which have transmission lines running through or past***' (River Consulting 2020). This means this project will damage the region's image, tourist demand and consequently tourist businesses and jobs.

Analysis needs to be quantified to understand the level of impact, including:

- ***Disturbance to wildlife during construction: (eg. Devils being scared off).***

- *Visual impacts from local trails: Leven Canyon, Brookes Track, Winterbrook Falls and Rainforest Walk, Taylors Flat, Penguin to Cradle Trail, Black Bluff Recreational Area*
- *Penguin to Cradle Trail: This has seen a steadily growing market with numbers up this year despite closed borders.*
- *Downturn in guided walks affecting local tour operators.*
- *Downturn in unguided independent hikers: these visitors say in the region longer and spend money in a wide range of local businesses.*
- *Downturn on day visitors and an avoidance of the local area.*
- *Reputation of all North West experiences.*
- *Reputation the Tasmanian Brand.*

7. **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.

All measures must be implemented in a 'problem solved' basis to get the most effective outcomes, and be assessed for effectiveness and changed if required.

Proponents must commit that all mitigations, monitoring and offsets have input from adjacent landholders and local communities. Acknowledging the direct and indirect impacts to biological biodiversity, ecological integrity and EPBC and TSP listed species at a local level and working together with residents and community groups will create better outcomes environmentally, socially and economically now and for generations.

8. **A Bushfire Risk Assessment and Management Plan be included and available for comment:**

The new transmission line Hampshire to Staverton goes through Loongana, a bush-fire prone area close to residents and through and adjacent to areas of high biodiversity with threatened and endangered species. Unmanaged vegetation and timber plantations already pose high fire-risk to this area. Loongana residents have tried to create a community fire plan but the TFS are unable to identify and place of last resort. A bushfire here has the potential to affect a large area region, risks personal safety of residents, and destruction of assets, native forests and three regional reserves. It is in the public interest that Fire Assessments and Management Plan details need complete transparency and are available to all stakeholders for public comment.

There is a public perception that transmission lines increase fire risk. Concerns surround safety and fire management during a bushfire; the ability to evacuate safely, especially if passing under a transmission line is the only option, the safety of fire fighters and emergency personnel working around transmission lines, and the ability of water bombers working to protect property around transmission lines. There are also known incidences of forest fires being caused by transmission lines, incidences of flashovers being caused by smoke, dust, mist and fog, low maintenance standards leading to bushfire, pylons falling over in high winds, and commercial imperatives causing slow responses to local fire risks – cutting power early is safer for communities but costs the proponents, who have the say. Some of the devastating fires in California are an example of this conflict.

The proponent and Planning Commission must accept that this public perception exists and therefore it is in the best interest for all concerned that the assessment and management plan be transparent.

- Phrases such as ‘negligible impacts’ and ‘tolerable risk’ to summarise assessment, without providing details, are not enough to assure the public that infrastructure put in bushfire prone areas will not cause increased risk.
- At a local level this transparency of management plans is critical information for forming community and personal bushfire safety plans, and when deciding when or whether to leave or stay and defend.
- All fire assessment and management plans need to use climate modelling.

BOM recently told the Bushfire Royal Commission that global warming was the cause of a long-term warming trend, drier forests, drier fuel loads create better burning conditions and overall increased fire risks. This development will introduce cleared easements, introduction of weeds and wind tunnels, all contributing to higher fire dangers with additional unnecessary increased fire risk.

It is essential that climate modelling be used for Fire Risk Assessments. This new infrastructure has a long operating lifespan and the risks increased during that time with a larger easement and second row of towers, it will be tested by known and unknown impacts of climate change. Any development in bushfire prone areas should not give rise to unreasonable increased risks.

- Although The Land Use Planning and Approvals Act 1993 51 (2) state that a planning authority be asked to accept any bushfire hazard management plan or certificates issued or certified by an accredited person or a State Service Agency; they must also balance the desires of the proponent with the needs of the public.

Accepting and incorporating bushfire assessments without public involvement is not in line with the objectives of Schedule 1 of the Land Use Planning and Approvals Act 1993, particularly:

Part 1: Objectives of the Resource Management & Planning System of Tasmania
1 (c) to encourage public involvement in resource management and planning; and
1 (e) to promote the sharing of responsibility for resource management and planning between the different spheres of Government, the community and industry in the State.

Part 2: Objectives of the Planning Process
(f) to promote the health and wellbeing of all Tasmanians and visitors to Tasmania by ensuring a pleasant, efficient and safe environment for working, living and recreation;

- In the broader context, public, communities and businesses, regionally and state-wide, need to be sure that the infrastructure assets placed in high risk areas are not presenting them with unnecessary increased risk.

Part 2: (h) to protect public infrastructure and other assets and enable the orderly provision and co-ordination of public utilities and other facilities for the benefit of the community.

9. **Project Alternatives:**

Site selection and assessment of alternatives need to be re-analysed by the proponent comparing all alternatives of technology, 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.

- The criteria used by the proponent to date may be distinctly different to the final TPC criteria which will have gone through a public submission process. All stakeholders need to be assured that site selection, route selection, alternative routes, preferred technology and justifications for each meet the objectives of the TPC Planning Criteria and withstand long-term objectives for ESD principles.
- If micro-siting within an inappropriate route is used as a mitigation option, but still presents social, economic and environmental long-term consequences, this is simply not acceptable.
- developers usually plan knowing exactly what planning criteria will apply. In this instance having the planning criteria generated through the MIDA Act, after the planning is complete, must not close any opportunity for better planning, no matter how inconvenient it is to timelines.

10. **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.

Australia has the highest rate of mammal extinction in the world, and [Recent research](#) highlights that invasive species are their number one threat. The consequences of this from over a century of land-clearing is not slowing down, it seems to be accelerating.

- The new transmission line from Hampshire to Staverton will have the largest impact on threatened species in this project, particularly in Loongana. Open cleared easements through high biodiversity areas and timber plantations will not only degrade habitats through edge affect, allowing weeds to spread, it will provides ideal conditions to introduce new invasive species.
- Easements favour predator behaviour, and feral animals (such as cats and dogs) will benefit significantly from clear wide easements. A management plan for this is essential.
- Effective prevention and management is not only a high priority for landholders with easements on their land but will likely have direct and indirect impacts to adjoining landholders, forests and potentially affect the whole catchment of the River Leven and public reserves. Infestation through forests and waterways is of great concern to Loongana. The management of weeds on a broad scale using herbicides is also a major concern in respect to the Karst System and private drinking water sources.

- First and foremost careful analysis of alternatives that don't have increased risks of this scale should be explored and justification of preferred routes made taking into account costs of management and economic and environmental consequences of worst case scenarios.
- A broadly-worded weed management plan is not enough in this instance. The Planning Criteria is a chance to address serious risks to the environment by ensuring there are detailed management plans created specifically to sensitive areas like Loongana and that these plans have community input. Like the promises made by the proponent in their factsheet:

We are committed to working with you and recognise that effective prevention and management of identified weeds, pathogens and pests is a high priority for landholders. We will work with you to identify potential biosecurity risks and develop effective and appropriate management methods throughout the project lifecycle. Local knowledge is essential for effective weed management and we encourage you to provide input wherever possible. We also work cooperatively with government agencies in our shared responsibility to establish management requirements appropriate to the level of risk.
TasNetworks Environmental Management Fact Sheet : Nov 2020

- All obligations need to be outlined, use weed-mapping and be tailored for local conditions.
- Management plans require strict enforcement of mitigation and management measures, and some new thinking around solutions.
- There needs to be clarification over what timber plantations will be obliged to do from increased weeds caused by transmission lines. If not addressed, these weeds can spread rapidly. Whose responsibility will this be?
- The question of costs is an important one in this instance as the Hampshire to Staverton Transmission Line will be managed by Tasnetworks on behalf of UPC Renewables with costs being covered by UPC by an annuity. The annuity amount must reflect detailed costed best practice management plans for the entire operation life of the line to avoid cost-cutting with negative impacts with costs being burdened on the environment, local landholders, councils, ratepayers and Tasmanian public.
- The control of invasive species has an economic cost. Not having detailed management plans and enforcement outlined at the start could be very costly to local council, land holders and degrade regional reserves. The economic costs of invasive weeds is another example of how the project be evaluated using true costs.

A recent UN report from the Intergovernmental Science-Policy Platform for Biodiversity and Ecosystem Services (IPBES) found that the effect on biodiversity from invasive species is at least as much as the economic costs of control and probably more.

Invasive species management is critical to preserve our local environment at Loongana. It is a sensitive environment with threatened forest communities, threatened species, karst and caves and is the catchment of the River Leven. It is also close to sensitive sub-alpine and alpine areas. Weeds in our windy climate have potential to spread to these environments and the consequences are very serious. Currently Loongana already has a few weed species, mostly foxglove and blackberry, however there are more serious weeds on our doorstep. An

Ox-eye daisy infestation at South Nietta is slowly making its way into Loongana unchecked. It is described as of 'minimal economic impact in Tasmania', but this merely reflects a weighting of concern directed to threats to agriculture rather than the environment. NSW are living with the expensive consequences of this mistake; like the area adjacent to Loongana, it is also sub-alpine area, which is sensitive to herbicide use. It is one example of what could happen with this project and the economic cost that new weeds being introduced into a wilderness area can cause.

Ox-eye daisy went from garden escapee to the most pernicious invasive plant, and threatens an area of 3,000h of subalpine community in Kosciuszko National park. It is a resilient species with a large seedbank of long-lived seed. Helicopters are required for monitoring. The economic cost is huge.

SUMMARY

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 worlds 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 closing, all assurances and promises the proponent is allowed to make in this planning process will be met with public distrust. This is entirely the fault of the Proponent who have repeatedly shown they do not care about genuine community engagement and have failed to hear, acknowledge or discuss the environmental damage this project will cause, or the impacts this will have on communities.

We ask that the planning criteria break new ground and have the most rigorous planning criteria possible.

SOLVE – Supporting Our Loongana Valley Environment
 solvetasmania@gmail.com

www.solvetasmania.org <https://www.facebook.com/solvetasmania>

