Submission on Additional information on the Draft EIS

AA Powerlink Assets Pty Ltd – AA Powerlink Project

This submission is made under regulation 145 of the Environment Protection Regulations 2020

Government authority: Department of Infrastructure Planning and Logistics

Section of Referral	Theme or issue	Comment
	Strategic land use planning	Strategic land use planning context
		• The Darwin Regional Land Use Plan recognises that Litchfield's proximity to established and developing urban infrastructure will inevitably increase demand for urban development in Litchfield. For this reason, the Regional Plan establishes principles that direct subregional growth to previously undeveloped areas to minimise the impacts of growth on established areas.
		• A settlement at Murrumujuk has been a component of regional land use planning since 1984. The original impetus for the development of Murrumujuk was the opportunity for residential development adjacent to a beach without mangroves. Subsequent studies in the 1990's recognised the potential for a more substantial development at nearby Glyde Point, one of the few opportunities in the region for a deep water port.
		• Groundwater availability is limited within the Gunn Point peninsula and the development of the township is contingent upon the provision of reticulated water. A larger township makes the provision of services such as reticulated water, more cost-effective.
		Murrumujuk is approximately 60km from the Darwin city centre and 40km from Palmerston. The distances involved mean that it is a challenge to avoid the creation of a township without high requirements for commuting for employment and services.
		In 2021 following the Mapping the Future work by the then Deptartment of Environment and Natural Resources, and land use investigations by the NT Planning Commission, the Darwin Regional Land Use Plan and Litchfield Subregional Land Use Plan were updated to expand the area identified for Murrumujuk from 1500 hectares to approximately 3000 hectares.
		Full build-out of the enlarged Murrumujuk township may accommodate a population of approximately 36,000 persons. This is anticipated to be equivalent to the size of Palmerston and enable the cost-effective delivery of infrastructure with levels of employment and service self-sufficiency that minimise commuting demands.

	Darwin Converter Site (DCS)
	 It is understood that the location of the DCS and the proposed mitigation measures prevent the ability for noise associated with the proposal to be contained on-site at levels appropriate for noise sensitive land uses identified surrounding the site (in accordance with the NT EPA Northern Territory Noise Management Framework Guideline).
	• Minimising the noise impacts of the DCS when determining its location, with specific attention to the Murrumujuk Township and the land use pattern established in the land use planning framework, does not appear to have been undertaken. Avoiding land use conflict when considering the location of the DCS is a fundamental consideration.
	 Noise mitigation measures to successfully mitigate noise on the site should be further considered for compliance with the land use planning framework, specifically the noise-sensitive residential and rural residential land uses identified for the Murrumujuk Township within the Litchfield Subregional Land Use Plan.
	Overhead Transmission Line
	• The noise modelling uses a point source representing the maximum noise level at the midpoint between towers. During operation corona noise could occur along the full length of the conductor span across the route length. This is a departure from the original AAPL noise technical memo (March 2022) where the approach used a line source in the modelling. It is important to understand the reason for the change and the impact of modelling the noise emission using a line source would have on the results.
	• It is unclear whether noise emission occurring on the non-energised conductors are included or proven not to emit audible noise during the different operating scenarios and how this was assessed.
	• Transmission line sound emission is statistical and dependent on environmental parameters. It is important to understand the range of audible emission expected.
	Any future planning application will need to:
	 Identify and discuss how the proponent will manage future development of land within the OHTL corridor and impacted by noise, as identified in the Community Operational Noise Technical Assessment, such that future development of that land for sensitive land uses, including residential, is not unacceptably restricted.
	 Detail the methodology used to identify all included sensitive receptors.
Statutory controls	• In addition to comments provided under statutory controls in the initial EIS submission (Stage 1 Referral) and significant variation (Stage 2 Assessment), which remain valid, please see below comment to project amendments:
	 While additional information has been provided, it is noted that further information to assess visual amenity impact will be required for any future application lodged under the Planning Act 1999.
	↔ It is noted that the Community Operational Noise Technical Assessment (dated 27 October 2023) maps the cumulative operational noise for existing sensitive receptors along the OHTL Corridor. The potential amenity impact (included but not

Environmental impact assessment under the Environment Protection Act 2019

	limited to the impact of noise and visual) to the existing and future land use of zoned land along the OHTL corridor will need
	to be assessed by a suitably qualified and experienced consultant as part of a development application under the Planning
	Act 1999, including how mitigation measures will be implemented.