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A/ Director Environmental Assessment  
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Email: [kylie.fitzpatrick@nt.gov.au](mailto:kylie.fitzpatrick@nt.gov.au)

Dear Ms Fitzpatrick

**Re: Supplement to the draft Environmental Impact Statement – Australia-Asia Power Link Project**

Thank you for the opportunity to review the Supplement to the draft Environmental Impact Statement (EIS) for the Australia-Asia Power Link Project proposal.

Please find **attached** a submission on the EIS Supplement. This submission provides a 'whole of Department' response that represents comments from the following Divisions:

- Lands Planning;
- Transport and Civil Services;
- Crown Land Estate; and
- the NT Harbour Master.

The Department welcomes the opportunity to provide comment on any additional material related to the EIS for the Australia-Asia Power Link Project.

Please don't hesitate to contact Ms Kerri O'Brien, Director Strategic Projects, on telephone 8924 7201 or via email to [kerri.o'brien@nt.gov.au](mailto:kerri.o'brien@nt.gov.au) should you wish to discuss this matter further.

Yours sincerely



Sharon Jones  
Executive Director Crown Land Estate

31 January 23

## Submission on the Supplement to the Draft Environmental Impact Statement

### Australia Asia Power Link Assets Pty Ltd – Australia-Asia Powerlink Project (Sun Cable)

Government authority: Department of Infrastructure, Planning and Logistics (DIPL)

Section of Referral	Theme or issue	Comment
General	Statutory controls	<ul style="list-style-type: none"> <li>• In addition to comments provided under statutory controls in DIPL's initial submission on the proponents Environmental Impact Statement (EIS), which remain valid, please see below comment in relation to project amendments. These should be considered in context with the land use comments also provided below:</li> <li>• The Darwin Converter Site (DCS) and associated infrastructure appear to be located in Zone FD (Future Development). Undefined uses are impact assessable and a development permit is required. In addition to other development application requirements, any amenity impact to the site and surrounding area (including land in Zone RL (Rural Living)) will need to be assessed by a suitably qualified consultant. The report/s for the DCS should be provided to Development Assessment Services (DAS) prior to lodgement for discussion.</li> <li>• The Darwin Electrode Site (DES) and associated infrastructure appear to be located in Zones A (Agriculture) and RW (Railway). Undefined uses are impact assessable and a development permit is required. It is noted that the EIS supplement notes a residual impact being created of up to 10km surrounding the site. The potential amenity impact to the existing and future use of land in this radius will need to be assessed by a suitably qualified and experienced consultant as part of a development application, including how mitigation measures will be implemented. The report/s for the DES should be provided to Development Assessment Services (DAS) prior to lodgement for discussion.</li> <li>• The Katherine Overhead Transmission Line (OHTL) deviation appears to be located in Zones RW (Railway), A (Agriculture), C (Conservation), R (Rural) and Zone CP (Community Purpose). Undefined uses in all of these zones are impact assessable and a development permit is required.</li> <li>• Adelaide River and Pine Creek OHTL deviations appear to be located on unzoned land and a development application is only required for the removal of native vegetation (aggregate of 1 hectare) of land.</li> <li>• Any further deviations proposed may require development consent and DAS should be contacted to discuss.</li> <li>• Workers accommodation has been mentioned throughout the application, however the only location identified is at Powell Creek (unzoned land), noting the supplement states "no temporary construction accommodation is proposed along the NTG utilities corridor or at the DCS [Darwin Converter Site]" (p.2-41). If future proposed locations for workers accommodation are being explored (on zoned land), please contact DAS to discuss.</li> <li>• It is recommended any development that has not formed part of the draft EIS and EIS supplement be discussed with DAS to see if a development application is required.</li> </ul>

Section of Referral	Theme or issue	Comment
General	Strategic Land Use Planning	<ul style="list-style-type: none"> <li>The Darwin Regional Land Use Plan 2015 (DRLUP) and Litchfield Subregional Land Use Plan 2016 (LSLUP), contained within the NT Planning Scheme 2020, outline opportunities for future land use adjacent or in proximity to the OHTL, Darwin Converter Site and Electrode Site. These future land uses include:               <ul style="list-style-type: none"> <li>Urban/Peri Urban land uses at Murrumujuk, Noonamah Ridge, Noonamah and South-East Weddell</li> <li>Strategic Industry at Glyde Point</li> <li>Grazing and Agriculture uses.</li> </ul> </li> <li>It is noted that the visual amenity assessment has been prepared on the basis of existing conditions (i.e. land use patterns and zoning). Air quality and noise impacts do not appear to have fully considered future potential land uses.</li> <li>Project impacts should be mitigated as required to ensure that potential future development as identified in strategic land use plans is not compromised.</li> <li>Further consideration needs to be given to how the various elements of the AA Power Link Project will address potential amenity impacts to existing and future land uses, including how mitigation measures will be implemented.</li> <li>The Transport Planning Division will continue to work with the proponent in relation to corridors, temporary construction accommodation sites and vegetation management corridor alignments proposed within Northern Territory road reserves.</li> <li>The Department of Infrastructure, Planning and Logistics will continue to work with the proponent in relation to its required OHTL deviations outside the railway corridor in Pine Creek and Katherine, noting the strategic importance of the planned Katherine Heavy Vehicle Bypass and the future need to duplicate the Stuart Highway to meet capacity needs.</li> </ul>
Chapter 10 - Amenity	Visual amenity	<ul style="list-style-type: none"> <li>The Landscape and Visual Amenity Impact Assessment Report (Appendix 10.1) states that the first 1.5km the infrastructure will appear to dominate the landscape; however, at 3.6 – 7 km the infrastructure will blend into the background due to the visual size in comparison to the surrounding landscape.</li> <li>Given the proximity of the utilities corridor to future planned land uses identified in strategic land use plans, visual amenity needs to consider potential future impact.</li> </ul>
Chapter 10 - Amenity	Noise	<ul style="list-style-type: none"> <li>Table 10-4 noise construction and operational screening distances notes an operational screening distance of 350m from the Darwin Converter Site (DCS) to residential land uses. Given the proximity of the DCS to future residential uses in Murrumujuk operational noise impacts should consider this potential future impact.</li> </ul>
Chapter 12 – Land Use and Transport	Land use	<ul style="list-style-type: none"> <li>Table 12-2 identifies there may be potential impacts within 10km of the electrode site. This includes areas identified in the strategic framework for industry, agriculture and importantly the future port at Glyde Point. Further information is required for what these impacts mean for future land and marine uses. It is recommended that the proponent engage with this Department to mitigate / reduce this buffer to ensure future development as identified in the strategic framework can be achieved / protected.</li> </ul>

Section of Referral	Theme or issue	Comment
Chapter 12 – Land Use and Transport	HVDC Electrode Line Corridor	<ul style="list-style-type: none"> <li>• Figure 2-12 (page 97/2812) and Figure 12-1(page724/2812) identifies the route of the HVDC Electrode Line Corridor to follow the Leaders Creek Road. This route:               <ul style="list-style-type: none"> <li>○ is in proximity to the proposed grade separated crossing of the main road identified to connect to Glyde Point;</li> <li>○ must avoid conflict with the future rail and utilities corridor and main road; and</li> <li>○ bisects the footprint of the future Murrumbujuk Township as identified by the Litchfield Subregional Land Use Plan (2016).</li> </ul> </li> </ul>
Chapter 12 – Land Use and Transport	Future Development Potential Murrumbujuk	<ul style="list-style-type: none"> <li>• The statement ‘The Land Use Plan identifies Murrumbujuk as a potential township development to supply workers to the industrial hub and deep sea port...’ does not recognise the intent of the LSLUP to support a township of approximately 36 000 persons.</li> </ul>
Chapter 12 – Land Use and Transport	Electrode	<ul style="list-style-type: none"> <li>• Potential impact includes disturbance in telecommunication circuits such as railway signalling systems and road intelligent transport infrastructure, and mitigation measures should be applied to avoid malfunctioning of these systems.</li> </ul>
Chapter 12 – Land Use and Transport	Subsea Cable System	<ul style="list-style-type: none"> <li>• 12.4.4.4 - Defence should be consulted in relation to entering the NAXA.</li> <li>• The NT Regional Harbourmaster should be consulted in relation to the following matters:               <ul style="list-style-type: none"> <li>○ As the subsea cable enters area of shipping channels close to port of Darwin, the Proponent should consider the impact of future shipping development and submerge its subsea cable to a depth that considers the mitigation of future impacts.</li> <li>○ A report detailing the impacts on shipping should be provided to the Harbour Master.</li> <li>○ Table 12-3 Summary of EIA results – Land use and Transport – Construction. Consideration should be given to the vertical separation allowed for in the plan at the crossing between the ferry bottom and the subsea cable.</li> </ul> </li> </ul>