NORTHERN TERRITORY GOVERNMENT

Department of
INFRASTRUCTURE PLANNING AND LOGISTICS

Crown Land Estate
Level 5 Energy House
18-20 Cavenagh Street
DARWIN NT 0801

Postal Address
GPO Box 1680
DARWIN NT 0801

T 08 8924 7201
E kerri.o'brien@nt.gov.au

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Ms Lisa Bradley
Director Environmental Assessment
GPO Box 3675
DARWIN NT 0801

Email: lisa.bradley@nt.gov.au

Dear Ms Bradley

Re: Draft Environmental Impact Statement – Australia-Asia Power Link Project

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

Please find **attached** a submission on the draft EIS. 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 supplementary material related to the draft EIS for the Australia-Asia Power Link Project.

Please don't hesitate to contact Ms Kerri O'Brien, A/ Senior Manager Land Transactions, on telephone 8924 7201 or via email to kerri.o'brien@nt.gov.au should you wish to discuss this matter further.

Yours sincerely

Sharon Jones
Executive Director Crown Land Estate

1 ~~June~~ July 22

Submission on the Draft EIS

Australia Asia Power Link Assets Pty Ltd – Australia Power Link Project (Sun Cable) solar energy infrastructure project

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

Section of Referral	Theme or issue	Comment
General	Statutory Controls	As the proponent is already aware, a number of applications will likely be required in the future under the *Planning Act 1999*. Application requirements under the *Planning Act 1999* are as follows: • Any leasing or subleasing of land in excess of 12 years will require subdivision approval. It is recommended that the proponent contact DIPL for further information. • Any subdivision of land will require planning approval. Please contact Development Assessment Services (**DAS**) of DIPL to discuss development application requirements. • Any coastal reclamation or dredging of Darwin Harbour and surrounding area (including any associated works on land) will be subject to the requirements of the relevant overlay in the NT Planning Scheme 2020. • Any excavation or fill on zoned land will be subject to the requirements of the NT Planning Scheme 2020. • Any clearing of native vegetation in excess of one hectare on unzoned land outside of the railway corridor will be subject to the requirements of the NT Planning Scheme 2020. • Any clearing of native vegetation in land Zoned Conservation or relevant overlay 3.2 (clearing of native vegetation) or 3.3 (restricted clearing of native vegetation) that is outside of the railway corridor will be subject to the requirements of the NT Planning Scheme 2020. • Any development on zoned land may require planning approval (including overhead transmission lines). Please contact DAS to discuss if required. • The Darwin Converter site and associated infrastructure on zoned land may require planning approval. Please contact DAS to discuss if required. • The development of an electrode site may require planning approval. Please contact DAS to discuss development application requirements for any potential conflict in land use with the surrounding area. It is noted the EIS states a future electrode site would form part of a supplementary EIS. • A future recycling industry may require planning approval. Please contact DAS to discuss development application requirements. • It is noted 'mobile accommodation camps' and 'mobile fly camps' have been discussed throughout the EIS. Please note any accommodation on zoned land may also require planning approval.

Main report Part 2.2.4	Sensitive receptors and land use	• It is noted that Figure 2-5: Map of sensitive receptors proximate to the AA PowerLink identifies sensitive receptors proximate to the AAPowerLink at a large scale. Future applications for planning approval where sensitive receptors are within close proximity to the AA PowerLink, should include maps at a zoomed in scale that have been ground truthed to inform assessment.
Main report Section 15.3.3	Human Health	• Section 15.3.3. Darwin Converter Site and Cable Transition Facilities and Table 15-3 Populated Places, Areas of Interest and Public Infrastructure Proximate to Darwin Converter Site and Cable Transition Facilities, considers existing sensitive environments. In addition to existing environments, a new urban area (Murrumujuk Township) will eventually be located to the north of the Converter Site as set out in the land use framework (Litchfield Subregional Land Use Plan 2016) for this area. When a future application for approval under the *Planning Act 1999* is lodged for the Darwin Converter Site and Cable Transition Facilities, the application should address the compatibility of the Facilities with the nearby future urban area.
Chapter 1 Section 1.6.1.2 – Other NT Legislation	Theme: People Factor: Community and Economy Environmental Objective: Enhance communities and the economy for the welfare, amenity and benefit of current and future generations of Territorians	Other NT Legislation and associated approvals to include: • *Port Management Act 2015*, specifically section 53, which requires approval to lay the High Voltage Direct Current (**HVDC**) cable from the Regional Harbour Master for Port of Darwin waters. • *Marine Act 1981*, specifically section 188 requires approval to lay the cable from the Director Marine Safety for Northern Territory waters. Commitments to include: • intersections within the Northern Territory Government controlled road corridor to be built to DIPL standard and proposed borrow pit on Stuart Highway in vicinity of Powell Creek to be discussed with DIPL; • obtaining permits for all overweight or over-mass vehicle movements in accordance with DIPL's Transport and Civil Services Division (**TCSD**) permit process; • provide a transport management plan or traffic management plan outlining the access from the Northern Territory Government controlled roads, routes, duration, types of activities and anticipated impact on the Northern Territory Government controlled road reserves for TCSD review and approval prior to commencement of works. Specific areas, types of work and their impact is required to understand the risks. Transportation of materials is to be included. Depending on TCSD review of the transport and traffic management plan, TCSD may ask the developer to undertake intersection performance analysis or traffic impact assessment to understand impacts on the certain areas of road network; • provide intersection design where the HVDC Over Head Transmission Line crosses the Northern Territory Government controlled road reserve for review and approval; • inform the Harbour Master and Australian Hydrographic Office about the route of the pipeline once project is complete; and • inform the Harbour Master about the work as the work progresses to allow for notification to mariners.
Chapter 2 Section 2.2.3.2 –		DIPL seek an opportunity to review and comment on any deviations through Katherine, Pine Creek and Adelaide River from the existing railway corridor. Any proposal to access or develop Crown land should be discussed with Crown Land Estate of DIPL.

Overhead Transmission Line		The road corridor at Chinball Road / Stuart Highway intersection (approx. KP713.5) has a 265m span. The average pole placement is 300-450m. Provide further information to enable assessment of significance of impact to road users by outlining: • potential conflict for future road upgrades and proximity to HVDC; and • anticipated downtime to road network during stringing of cables and how impacts to traffic will be minimised. Include an outline of the emergency management procedures for cable breaks in the vicinity of roads in high wind areas (i.e. cyclone areas) detailing risk to motorists and resulting delays.
Chapter 2 Section 2.8 – subsea cable system Location and foot print (Page 2-75 to 2-78)		This section outlines two route options (Route A and Route B) under consideration for the subsea cable in the nearshore part of the footprint from the Shore Crossing Site out to a common point of convergence approximately 45 km northwest of Darwin. Both options have been selected to avoid known areas of environmental sensitivity and recreational fishing values such as artificial reefs and wrecks. The current Subsea Cable System route, including two inshore route options, was selected based on review of available geophysical data. DIPL notes that further surveys of the near-shore Route options A and B are planned for early 2022 to confirm this approach. DIPL also notes that the Subsea Cable System will comprise up to six cables, installed individually or in a bundled configuration with spacing between the cables up to 200 m (for each cable), with actual spacing requirements to be determined in detailed design. The cables will either be laid on the seafloor or trenched into the seabed generally to a depth between 0.3 – 1 m (in certain circumstances it may be necessary to bury to 3 m depth), or protected with armouring as required, subject to various hazards and sea floor conditions along the route. DIPL notes that the location of current route Option A coincides with the location of potential, long term, dredged material disposal grounds. DIPL has engaged with the proponent in this regard and understands its preferred route is Option B. However, if Option A is to be considered, the proponent must demonstrate that these sites can still be used in the future, as dredge material disposal sites after the subsea cables have been installed (i.e. that the installation of subsea cables does not preclude the use of these areas for a long term dredged material disposal ground). The developer is encouraged to continue to engage with DIPL if it intends to pursue Option A.
Chapter 2 Section 2.8.3.3 - Protection		The section outlines 'The depth of burial will vary from 0.5 – 3 m and is dependent on the outcome of the Cable Burial Risk Assessment, which considers the sea floor properties and the risk of cable damage from anchoring and fishing gear.' To assess significance of the impact to the community in the marine / terrestrial interface, further information is required to: • inform what the 'depth of burial' will be measured against (i.e. against Lowest Astronomical Tide); and • provide a Cable Burial Risk Assessment, which is important to understand and clarify risks in tidal areas. Include what protection measures will be implemented at the shore crossing to advise recreational users of the existence of subsea cables and mitigation measures to ensure cable protection.

Chapter 2 Section 2.8.4.2 – Installation works, specifically Cable Lay (Page 2-92) Appendix E – risk assessment specifically Subsea Cable System		The section outlines that 'Cable laying can progress at speeds of up to around 500m per hour and will be performed on a 24-hour basis to ensure minimal navigational impact on other users and to maximise efficient use of applicable weather conditions and vessel and equipment time'. Noise impacts to marine users resulting from 24-hour works in the Subsea Cable System relating to marine users has not been assessed in the risk assessment (Appendix E). Provide a summary in the risk assessment to show risks have been adequately considered and mitigated appropriately.
Chapter 13		Discussion on marine transportation is not evident in the Community and Economy Factor.
Chapter 18 Section 18.13 - Cumulative Impacts		DIPL notes that cumulative impacts to marine users from the potential of future port development in the Gunn Point Mapping the Futures project have not been included. DIPL notes the developers' infrastructure may impact the type, and cost, of future utilities appropriate for colocation in the existing utilities corridor (e.g. safe distance requirements between HDVC and other infrastructure such as gas). The proposed routing of the cable in the vicinity of the Cox Peninsula, Stuart Highway, future Strauss Water Treatment Plant and future Weddell Freeway will need careful consideration due to potential conflicts in that area. DIPL encourages the proponent to continue to engage in this regard.