

The Hon Robert Stokes MP

Minister for Planning and Open Spaces

By email: [https://www.nsw.gov.au/nsw government/ministers/minister-for-planning-and-public-spaces](https://www.nsw.gov.au/nsw-government/ministers/minister-for-planning-and-public-spaces)

2 April 2021

Dear Minister,

Snowy 2.0 Transmission Connection Project Environmental Impact Statement

It is half a century since the last major high voltage overhead transmission line was constructed in a NSW National Park. Those years have seen a dismaying deterioration in the state of our environment: a huge increase in loss of native vegetation cover across NSW; increasing numbers of native species and ecological communities sliding towards extinction; and the undeniable signs of climate change in the form of global heating, drought, fire and extreme weather events.

As our State's environment deteriorates the role of National Parks has become increasingly important. National Parks, along with the other reserves that form our Protected Area Network (PAN), are the cornerstone of biodiversity conservation and the delivery of ecosystem services such as clean air and water. National Parks help protect threatened species and rare cultural sites, however they play just as important a role in ensuring 'common' fauna and flora species remain secure and natural ecosystem processes are maintained. The PAN has never been more important for the environmental sustainability of our State, and National Parks are our most precious legacy to the future.

NSW has a special place in the history of National Parks, creating the second and third National Parks in the world. From the very first legislation establishing The National Park (now Royal) in 1879, a central tenant has been that extractive industries and industrial infrastructure have no place in a National Park. In NSW as across the world, any works within a National Park must fully account for the special statutory, environmental and ecological status of these lands.

The deterioration of our environment and the increased importance of the PAN have profound implications for the EIS currently before you, which proposes the construction of overhead transmission lines through Kosciuszko National Park (KNP). As we will demonstrate in this submission, this EIS categorically fails to consider the purposes for which KNP was gazetted under the *National Parks and Wildlife Act*.

The last half century has also seen a major shift in international 'best practice' for the construction of transmission connections through areas of environmental sensitivity. While overhead towers and cleared easements may have been tolerable in National Parks fifty years ago, this is no longer the case. This submission demonstrates that best practice has shifted to the use of underground cables whenever traversing significant agricultural, community or conservation lands. Indeed, many nations are actively decommissioning overhead lines and replacing them with underground cables.

The shift towards underground cables informed the statutory Plan of Management (POM) for KNP. The POM, as approved 2006, expressly prohibits the construction of any additional overhead transmission lines in KNP and requires that existing lines be rationalised or placed underground wherever possible. The POM was not intended to prohibit the construction of future transmission connections in KNP. Instead, it simply put Snowy Hydro Corporation and TransGrid on notice that they would need to adopt best practice and place any future connections through KNP underground.

NPA is appalled that, in 2021, any proponent would submit an EIS for the construction of overhead transmission lines through a National Park. It is particularly shocking that TransGrid, acting on behalf of Snowy Hydro Corporation, would do so in the full knowledge that the statutory POM requires that any new connections be constructed underground.

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Snowy Hydro Corporation is responsible for funding TransGrid's assessment and construction costs. TransGrid has acknowledged to NPA that they were instructed to propose an overhead option by their client, presumably on the grounds of expected cost. Your colleague Minister Kean confirmed in recent budget estimates hearings that the differences in cost between overhead and underground options are the dominant issue.

Notwithstanding this clear motivation, the EIS makes no argument about the potential financial benefits of overhead transmission. The apparent reluctance to acknowledge cost as the primary driver has resulted in an EIS that attempts to make a paradoxical argument that underground cables have a greater environmental impact than would overhead towers in a permanently cleared easement. The proposition is simply absurd, the lower environmental impacts of undergrounding are precisely why overhead transmission is no longer regarded as acceptable practice on the international stage.

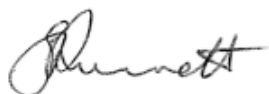
NPA understands that the NSW Government is obliged to facilitate the issue of environmental approvals for the Snowy 2.0 project under the Snowy Hydro Corporation sale agreement with the Commonwealth. However, the facilitation of approvals does not mean that the least expensive option for any particular component of Snowy 2.0 is necessarily the most appropriate for assessment under the *Environmental Planning and Assessment Act*. An underground connection in no way compromises the delivery of a transmission connection for Snowy 2.0, and as a tiny portion of the overall cost of Snowy 2.0, has very limited implications for the overall viability of the Snowy 2.0 project. The inappropriate weighting of financial considerations has distorted the EIS process to the extent that the validity of any approval would be legally questionable.

A detailed report to accompany this submission will be forwarded to your Department by no later than 8 April 2021. That detailed report demonstrates that the EIS has comprehensively failed to adequately assess the environmental impacts of the proposed overhead transmission lines. In common with the preceding Snowy 2.0 Main Works EIS, the assessment of environmental impacts is almost exclusively focused on the construction footprint. This ignores the profound impacts associated with the fragmentation of habitat, loss of connectivity, disruption of ecosystem processes and introduction of weeds and feral species into a largely undisturbed portion of KNP.

Most importantly, once again the Snowy 2.0 project has generated an EIS that totally ignores the purpose and values of lands gazetted under the *National Parks and Wildlife Act* and treats KNP as though it has no legal protections or status beyond any other category of Crown Estate or private land. The proponent was obliged to propose a transmission connection that resulted in the lowest possible impact on a landscape of outstanding significance and importance for future generations. This EIS utterly fails to meet that objective. It is now your responsibility to **refuse the Snowy 2.0 Transmission Connection EIS** and require that a new EIS be prepared based upon an underground transmission connection.

I can be contacted at garyd@npansw.org.au or on 0432 757 059.

Yours sincerely,



Gary Dunnett
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National Parks Association of NSW
protecting nature through community action