



Nature Conservation Council

The voice for nature in NSW

5 April 2021

The Snowy 2.0 Transmission Connection Project – Nature Conservation Council Submission

Meeting our energy needs does not need to come at the expense of our precious natural heritage. Kosciuszko National Park (KNP) is a national treasure – an iconic remote alpine landscape with immense biodiversity value. Major infrastructure development in KNP should meet the strictest requirements for minimising environmental impact.

We are concerned that the EIS on exhibition for the Snowy 2.0 Transmission Connection Project does not sufficiently investigate options to put transmission lines underground, which would significantly reduce the environmental impacts of the project.

The current proposal for overhead transmission lines will involve two sets of 75-metre-high towers traversing eight kilometres of KNP, clearing an easement up to 200 metres wide. This major disturbance will destroy vegetation, fragment habitat for threatened species, reduce visual amenity and create sources of erosion and weed invasion. Easements will enable movement of feral pests, such as foxes and pigs.

There are feasible alternatives to overhead transmission lines which would have much less permanent environmental impacts. Research presented by the National Parks Association puts forward a compelling case for thorough investigation of undergrounding options.¹ The NPA's open letter of 18 January 2021, signed by two dozen environmental organisations and 50 expert engineers, scientists, environmentalists, academics and economists, calls for a comprehensive analysis of transmission alternatives and the adoption of an underground solution.

There are many environmental and reliability benefits to putting transmission lines underground. Underground lines are less vulnerable to damage from extreme weather events, such as lightning, bushfires, storms and extreme winds. These events will only become more severe in the future. Underground transmission lines have lower operating costs, lower electrical losses and no potential to start bushfires, compared with overhead lines. Importantly, they have minimal long term surface vegetation disturbance and minimal visual impact.

¹ National Parks Association (18 January 2021). *Snowy 2.0-Transmission project Open Letter to Ministers Stokes and Kean with Background Paper and Addendum*. Available at: <https://npansw.org.au/wp-content/uploads/2021/02/Snowy-2.0-Transmission-Connection-Project-Open-Letter-to-Ministers-Stokes-and-Kean-with-Background-Paper-1.pdf>



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Transmission lines are often put underground in cities or environmentally sensitive areas. For example, the 'Directlink Interconnector' between Mullumbimby and Terranora in northern NSW and 'Murraylink', between Red Cliffs in Victoria and Berri in South Australia. The Snowy 2.0 Transmission Connection Project in KNP is a clear case where underground transmission lines should be fully investigated and adopted.

There is a clear statutory obligation, outlined in the Environmental Planning and Assessment Regulation 2000, to include 'analysis of any feasible alternatives' in the project EIS. This was reinforced in the Secretary's Environmental Assessment Requirements for the Transmission Connection Project, which state "In particular, the EIS must include a summary of the background to the project, including alternatives that were considered to the project".

In the current EIS TransGrid has failed to fully analyse viable and lower impact undergrounding alternatives. This is inconsistent with TransGrid's statutory obligations and is out of step with community expectations that all reasonable actions will be taken to minimise impacts on KNP.

Snowy Hydro's latest projection is that the Snowy 2.0 project will cost around \$5 billion. Much of the infrastructure is being built underground, at great expense, to minimise environmental impacts. In this context, the relatively small cost of undergrounding transmission lines is justified.

The fragile ecosystems in KNP are already facing many threats, including feral horses, fire damage, climate change impacts and long-horned beetles devastating snow gum stands. Overhead transmission lines will cause further, entirely avoidable, ecological disturbance in KNP. Every effort should be made to prevent this destruction.

Your sincerely,

Chris Gambian
Chief Executive
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