

**Submission on Community Infrastructure Designation (CID)**

Stuart Topp — Project Manager  
Woolooga to Eerwah Vale Project  
Powerlink Queensland  
PO Box 1193  
VIRGINIA QLD 4014

Delivered via Email: [stopp@powerlink.com.au](mailto:stopp@powerlink.com.au)

09 June 2010

**CID - Woolooga to Cooroy Transmission Line and Eerwah Vale Substation Project**

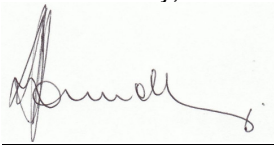
Powerlines Action Group Eumundi (PAGE) is a community group formed to ensure that the wider community interests are served when considering how to provide energy for sustainable development on the Sunshine Coast.

With this in mind, PAGE wish to work constructively with the Queensland Government and its agencies to deal with the issues facing the Sunshine Coast with respect to provision of energy. With this mind PAGE have commissioned an independent electrical engineering consultant to review the proposal and make an assessment of the Powerlink proposal and any feasible alternatives that meet the network requirements – the full report is attached with this submission.

This submission comprises documents (noted in the list of attachments below) which we have produced in response to your letter of 7 May 2010. In this covering letter we raise our general concerns with the proposed Powerlink project. These general concerns are drawn from our list of specific issues raised with the project to date and the supporting attachments. We expect you to respond to the matters raised in this covering letter and the specific issues in the attachments.

This document also addresses fundamental deficiencies in the Environmental Impact Statement (EIS) process and the substandard final EIS produced. Core issues are addressed in an executive summary, with more detail and comments provided in the ensuing table, referenced for ease of use. We trust you will act on our comments and demonstrate that genuine community input into this proposal is possible at this late stage. We look forward to receiving the response to the CID submission in due course.

Yours faithfully,



Jack Connolly,  
President,  
Powerlines Action Group Eumundi Inc.

**List and explanation of attachments:**

The PAGE submission to the Community Infrastructure Designation comprises several documents which are listed in the table below. The following points describe how the key documents are related to one another:-

Attachment 3:- "PAGE Original Submission Response Summary". This document contains PAGE's original responses to the draft EIS. The numbers in the left most column of this document have been added for the purpose of the CID submission. Please use the numbers in the left most column to cross reference to

Attachment 4 – “PAGE CID Submission Matrix 1” and  
Attachment 5 “PAGE CID Submission Matrix 2” which contain PAGE’s detailed issues in relation to questions previously raised with Powerlink/Parsons Brinckerhoff and new issues raised. Attachment 4 and attachment 5 both refer to

Attachment 1 – “PAGE Alternative Proposal Final” which contains details of alternatives proposed by PAGE.  
Attachment 1 contains an appendix which is

Attachment 2 – “Performance Electrics Study Report (Appendix A to Attachment 1)”

<b>Attachment</b>	<b>Content</b>
1.	PAGE Alternative Proposal Final
2.	Performance Electrics Study Report (Appendix A to Attachment 1)
3.	PAGE Original Submission Response Summary
4.	PAGE CID Submission Matrix 1
5.	PAGE CID Submission Matrix 2

**Cc: Australian Energy Regulator  
Queensland Treasury  
Minister for Natural Resources, Mines and Energy and the Minister for Trade  
Queensland Coordinator General, Department of Infrastructure and Planning**

## **Executive summary**

The Environmental Impact Statement (EIS) is a complex and lengthy document. In order to deliver a meaningful, community-centred reflection of impacted residents' concerns, a substantial amount of time and effort was required, but not provided.

The main requirement of the EIS was to provide an assessment of the environmental (economic, social, cultural and physical) impacts from the construction, operation, maintenance and decommissioning of the proposed transmission line (TL) and substation, and to duly consider alternatives to the proposal carried forward. Ultimately this document is to be used to form the basis of a Ministerial designation of land for community infrastructure.

PAGE concludes that the proposal:

- Fails to assess the lowest cost and lowest impact solution
- Fails the Australian Energy Regulators (AER) lowest cost solution requirement
- Fails in its requirement to have adequately consulted with the community
- Fails to comprehensively address the issues raised by the community
- Fails the threatened iconic Koala
- Is not required in light of the alternatives proposed

The EIS cannot therefore form the basis of a credible assessment of the environmental impact of the proposal, which is intended to responsibly meet the future energy requirements of the northern Sunshine Coast and Gympie regions. The Woolooga - Eerwah Vale project is not required. It is incomprehensible from a system strategic assessment as to why the proposed 275kV injection with 800MW capacity would be fed into a 132kV bottle neck which is the 132kV system between Woolooga to Palmwoods given that the 132kV system limits the flows out of the 132kV system to the wider Sunshine Coast area to 200MW in its present and proposed configuration, while the wider Sunshine Coast area is seen to be the area which requires the new additional supply capacity.

There are several key issues that PAGE has identified within the EIS and project assessment process that lead us to this conclusion. These issues are outlined below and explored in greater detail in the attachments to this submission.

### **Fails to assess all viable options**

Three alternatives have not been adequately considered by Powerlink and are documented in more detail in attachment A of this submission. The proposals have not previously been adequately assessed by PL or Parsons Brinckerhoff. PAGE puts forward three cheaper and significantly lower impact solutions:

1. A single Bus Section Circuit breaker at Gympie (Cost estimated at \$1.5M) deferring any augmentation requirement until at least 2027.
2. A Staged augmentation north of Cooroy (NPV estimated at \$96.2m – savings of \$14.4m<sup>1</sup>)
3. Network augmentation Woolooga to Palmwoods at 275kV using the existing PL easement (NPV estimated at less than \$60.5m – a saving of over \$50m)

Options 2 and 3 were put forward in submissions to the draft EIS in May 2009. The solutions developed by PL from this information were incorrect and bore no relation to the actual solution being proposed. PL did not attempt to clarify or validate their understanding of the alternative solutions that they assessed and dismissed in the EIS. Options 1 and 3 have been put forward by an independent electrical engineering consultant, who has reviewed option 2 and concluded that this is also a feasible alternative to the Powerlink proposal.

The Eerwah Vale 275kV tee off line and substation is not required for the Energex 132kV Woolooga to Palmwoods system and the PL preferred solution is not the cheapest or lowest impact solution.

---

<sup>1</sup> Base Powerlink NPV of \$110.6m, Final EIS Appendix G p26 consistent with the figures used throughout the EIS

## Consultation

PAGE considers the consultation process to be flawed and have consistently pointed this out to both Powerlink (PL) and Parsons Brinckerhoff (PB) Australia during the past 18 months. The EIS displays lots of statistics about the volume of consultation, but no information regarding the quality or timeliness of the consultation. From a community perspective, the quality of consultation has been completely inadequate on a number of levels. They include:

- Refusal to provide relevant and timely information when requested
- Refusal to attend community organised public meetings
- Issuing misleading information and attempting to portray PAGE as deceitful and dishonest
- Treating this community with contempt, with no willingness to conduct an open and transparent consultation process
- Inadequate time provided to formulate a comprehensive response to a 1900-page document that it has taken PL/PB 19 months to compile
- The EIS either does not address satisfactorily or ignores the majority of issues raised in the PAGE submission on the draft terms of reference

The combination of these factors leads PAGE and its members to have little or no faith in consultation process undertaken to inform the EIS process or as a basis for the Minister to make an assessment regarding community infrastructure designation.

## Financial assessment

The proposal is not the lowest cost alternative and the augmentation is not required urgently as stated by Powerlink. The table below highlights the alternatives, their cost and the timing:

Alternatives	NPV	Timing
Powerlink Woolooga – Eerwah Vale Project	\$110.6m	2014 / 22
PAGE – Option 1 – Bus Switch (Gympie)	\$1.5m	2014
PAGE – Option 2 - A Staged augmentation north of Cooroy	\$96.2m	2014 / 27
PAGE – Option 3 - Woolooga to Palmwoods	\$60.5m	2027
PAGE Preferred Option – Combine Option 1 and 3	\$62.0m	2014 / 27

The PAGE preferred option is not only the cheapest, but provides a staged solution, requires investment when it is demonstrated that demand requires it and provides the best long term security of supply for the whole of the Sunshine Coast Region.

## Impact on Koala and other species

Powerlink's proposed route is planned to go through pristine koala habitat, which is home to a healthy population of Koalas. The koala habitat mapping commissioned in 2009 by the Queensland Government, the very mapping relied upon by Parsons Brinckerhoff, as the basis for their assessment of the Woolooga to Eerwah Vale area, has been found to be flawed and has drawn scathing criticism from a wide circle of stakeholders – including conservation groups, local government authorities and landowners throughout South East Queensland. Chief among their criticisms has been the methodology employed in this mapping project - which relied on the remote digital analysis of aerial image pixels (pertaining to tree colour). The consultants responsible for the delivery of the mapping to DERM (GHD), recommended comprehensive ground truthing (field verification of koala habitation), and that this was not conducted to the extent required.

Other key species including the northern most colony of the Richmond Birdwing Butterfly will be adversely impacted by Powerlink's proposal with the easement planned to go directly through the habitat of the butterfly. Generally survey methods undertaken were not considered adequate, despite the community putting forward detailed proposals at the ToR stage of the project that would have ensured that detailed and best practice flora and fauna surveys were conducted. These proposals were ignored through the EIS process. Consequently the community has little faith in the veracity or accuracy of the conclusions relating to environmental impacts based upon the actual studies undertaken.

## **Conclusion**

The dismissive approach taken to the alternative technologies and sustainable strategies aimed at meeting the energy needs of the region is extremely disappointing, particularly as it counters major policy reforms of the Bligh Government, namely *Towards Q2*.

Not only does it counter the *Towards Q2* target of protecting more land for conservation as it rips through hectares dedicated as Land for Wildlife, it also highlights that Powerlink, a Queensland Government agency, is not serious about introducing its own policies and measures to cut carbon omissions. The government's *Towards Q2 – Tomorrow's Queensland* green vision is made to appear as nothing more than that; a vision.

Therefore, based on the innumerable flaws in the EIS, many highlighted in this document, this Project and the proposed alignment cannot be recommended to the Minister for designation and should be stopped now. This EIS fails to fulfil the ToR and lacks critical detail, providing the Minister with inferior and insufficient information on which to base a decision regarding the designation of land for community purposes.

This Project also cannot be recommended with integrity, based on the inappropriate EIS process deployed, including poor community consultation and engagement practices. The process for Ministerial designation regarding this Project is therefore flawed to a potentially devastating extent, based upon the current analysis completed.

## **Recommendation**

Based on the above considerations, the PL preferred option cannot be endorsed and Community Infrastructure Designation (CID) should not be granted. The EIS has failed to address all of the relevant and cheaper options. The PL preferred option is clearly not the cheapest option and will not pass the regulatory test as required by the Australian Energy Regulator. The CID should be refused and PAGE asks that an independent and transparent assessment be made of the options proposed in this document and that the lowest impact and cheapest option be selected that meets the network requirements.

PAGE further recommends that should an alternative option be considered a more appropriate alternative that the Community Infrastructure Designation process be abandoned for the Powerlink proposal and the cheaper options outlined in this submission be assessed with a view to eventual designation when actually required in 2027 at the earliest.