

**Submission  
No 1**

**INQUIRY INTO FEASIBILITY OF UNDERGROUNDING  
THE TRANSMISSION INFRASTRUCTURE FOR  
RENEWABLE ENERGY PROJECTS**

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I make this submission based on my many years of experience in undertaking site inspections and documentation audits to monitor the environmental performance and environmental compliance of the installation of underground transmission lines for renewable energy projects.

I ask that the Standing Committee on State Development take note that the undergrounding of transmission infrastructure for renewable energy projects has been occurring for many years and that the potential environmental impacts of such works are supposed to be fully documented in reports associated with the environmental assessment of such projects.

I also ask that the Standing Committee on State Development note that when a Project Approval is issued by the Minister for Planning and Infrastructure or delegate, conditions are set in which the renewable energy project is required to: (1) prevent, minimise, and/or offset adverse environmental impacts; and (2) set standards and performance measures for acceptable environmental performance. What is interesting however is that most Project Approvals for renewable energy projects involving the undergrounding of transmission infrastructure never include specific construction environmental management conditions for such infrastructure and yet such works can result in unacceptable environmental impacts if not undertaken carefully and correctly.

Some of the obvious environment problems associated with the undergrounding of transmission infrastructure include: (1) entrapment of vertebrate and invertebrate native fauna in cable trenches and joint pits, especially those left open overnight (2) land and water pollution from sediment and sediment-laden water escaping from open cable trenches and joint pits during a rainfall event (3) soil erosion from inadequately back-filled or poorly compacted cable trenches (3) improper management of spoil from cable trenches and joint pits which results in a pollution incident (4) improper management of topsoil along cable trenches and joint pits which results in a biosecurity incident associated with an invasive plant species.

In addition to the above, I consider that it is important that the Standing Committee on State Development also recognise that Environment Protection Licences issued by the EPA to renewable energy projects such as wind farms place an obligation on the licence holder to control the pollution of waters and to report incidents causing or threatening material environmental harm to the environment and that this applies to the undergrounding of transmission infrastructure.

Perhaps such licences, in future, could include specific operating conditions to ensure that all feasible and reasonable land and water (including groundwater) mitigation and management measures are implemented during the undergrounding of transmission infrastructure work authorised by the licence.

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