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**Nature Reserves Preservation Group,
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TO: Mr Adrian Stubbings
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12 June 2008

CC: WA Minister for Energy, Fran Logan
WA Minister for Planning and Infrastructure, Allannah MacTiernan

**SUBJECT: Submission on Western Power Site Selection Process for
Eastern Terminal**

Dear Mr. Stubbings,

The Nature Reserves Preservation group of Kalamunda (NRPNG) wishes to comment on Western Power's proposed Eastern Terminal Switchyard, and related consultation process.

The NRPNG was formed in 1989 to preserve the DOLA reserves in Kalamunda from being sold by the Shire for development. Since then, the NRPNG's role has been to continue to protect the Kalamunda bushland and other natural areas. Our group attended the community consultation meetings relating to the Eastern Terminal late last year, having first heard about the project "through the grapevine".

We have a number of concerns about the proposed project, the first being the rapidly changing "scope" of the proposed terminal, and whether this latest reduced scope is truly representative of Western Power (WP) and the State government's long-term intent. In 2002, the residents near Hackett's Gully were informed by WP that WP had no intentions of pursuing the Eastern Terminal project in the Hacketts Gully area. Last year's community consultation proposed a substation as well as switchyard, and the potential for 27 transmission circuits. We are concerned by the fact that WP's selection of a 20 Ha site for the switchyard is the same size as what was proposed for the switchyard and substation, and that the selected site will be the "thin end of the wedge" for further development.

If the potential full scope of switchyard and substation development were to proceed in the future, it appears there would be a need to clear, in some form or another, up to 400 Ha of land, including transmission line clearance. We would then realize the worst concerns about:

- Destruction of significant environmental values
- Impact on the visual and recreational amenity of the area
- Construction of 14 to 27 power transmission lines
- Spread of Dieback
- Location of a substation in a high-priority water catchment area

We are also concerned about the site selection process because:

- The site selection process paper contains very little information on the project or alternative options that would enable informed comments.
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- The deadline for submissions of June 16 is too short to allow many people and organizations to research and submit comments.
- We are not aware of the sustainability criteria used in the decision to site the terminal in the hills area. The true application of sustainability principles have in past examples, revealed much better solutions on technical, economic, social and environmental terms, than the original solutions proposed. (Case in point from a talk by Dr. Peter Newman: BHP's Pyrenees development proposal to place a processing plant on Thevenard Island (Class A reserve). The original proposal was considered the best technical and economic solution. A re-evaluation from a "clean slate" using their own sustainability criteria resulted in the selection of a site on the mainland which was already degraded, was welcomed by the community for its employment and economic benefits, and which delivered a better technical and economic outcome for BHP).
- There is no mechanism to provide feedback to the community on submissions made to Western Power

We urge Western Power to consider alternative sites outside the study area and to improve the proposed site selection process by:

- holding open meetings as soon as possible to enable the community to be properly informed before submitting comments
- extending the comment period to at least 2 months after community meetings
- applying sustainability principles to the question of whether an Eastern Terminal should be located in this study area reviewing the criteria listed in Table 3.1 using community workshops to enable open discussion of the criteria
- presenting "external" costs, such as the loss of visual amenity by transmission towers and lines scarring the landscape; the loss of state forest due to clearing and spread of Dieback, and the increased exposure of water catchment area to risk.

Furthermore, in the interests of climate change mitigation, it is important that our electrical energy and metro development strategy be re-evaluated with the following in mind:

- Demand from fossil-fired generators must be reduced dramatically, particularly as carbon capture and sequestration is yet to be fully proven, ie. the recent irreparable failure of the BP/Rio Tinto CCS project off Rockingham.
- It is generally accepted that we can cut energy use by 20-30%, by efficiency improvements and waste reduction. Furthermore the use of "demand management", as Western Power has tested in Perth, will delay further transmission infrastructure, and facilitate the incorporation of more renewable energy into the grid. To facilitate the savings requires education and feedback to the customers on their use of energy, for example, such as the Water Corporation's very successful water use graph published frequently in the West Australian newspaper.
- As Perth is to be a Solar City and solar PV costs are declining rapidly, a portion of our electricity can be supplied within the distributed metro area
- Perth is a sprawling city, and as the outcome of the Dialogue with the City workshop showed, the overwhelming majority supported an "urban growth boundary". Presently, there is a proposal by Bouvard to develop 480 Ha of land NE of Parkerville. If this project is approved, it will further drive the need for electricity and add pressure for a substation, not to mention all other infrastructure aspects for a community so far out of the metro area. The DPI must take the environmental and amenity consequences of this seriously and not approve this development. It should be contained within the existing metro boundary, for the benefit of all.

In summary, if demand can be reduced long enough for distributed generation to be installed, it will reduce or negate the need for further transmission infrastructure. It is furthermore disappointing that the upgrade of the transmission line is to provide a conduit for energy from a new coal-fired power plant, exacerbating WA's position as the biggest greenhouse gas polluter, per capita, on the planet.

I look forward to your response to this letter.

Yours sincerely,

Steve Gates
President/Chair, NRPB Inc.