



11 February 2022

Email: ISP@aemo.com.au

Dear Sir/Madam

Draft 2022 Integrated System Plan

Council welcomes the opportunity to make a submission on the Draft 2022 ISP and consents for this submission to be published on the AEMO website. Our detailed submission is attached.

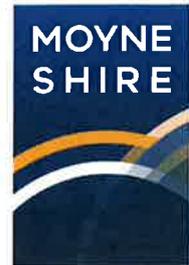
Moyne Shire forms a large proportion of the SWREZ. In Moyne there are already 6 operational wind farms, 1 under construction, 3 with permits scheduled for construction this year and 4 seeking permits or in the feasibility stage. If all these wind farms are constructed the Shire will host approximately 800 turbines, generating about 3 GW of electricity and covering over 12 % of Moyne Shire's rural land area. These wind farms are creating 2 distinct geographical clusters in the north east and west of the Shire as can be seen by the attached map.

Council would like to request a meeting with AEMO representatives to discuss the development plans for South Western Victoria Renewable Energy Zone (SWREZ) and the proposed transmission infrastructure projects that may impact on Moyne Shire.

Council understands that the ISP predicts that up to 3450 MW of wind energy will be built by 2040 in the SWREZ and a new transmission line will need to be built to the Mortlake substation to transport this electricity.

The cumulative impacts of transmission infrastructure and wind farms, is already an issue for Council and its community. Noise, visual, traffic, road, housing and environmental impacts are consistently raised by the community as areas of concern.

Greater development of the SWREZ and investment in new transmission infrastructure as signalled in the ISP, could result in further clusters of renewable energy generation facilities in the Moyne Shire. This will exacerbate cumulative social and environmental impacts. A strategic land use planning approach which manages cumulative impacts is needed to stop further clusters and mitigate future impacts. For developments already planned, long term economic and social benefit for host communities are required.



The greater focus outlined in the plan on gaining social licence for REZ development, through integrated planning and community consultation, using a REZ Design Report process, is noted. Council is keen to see how this will translate to planning for the SWREZ which is earmarked for early development and would like to participate fully in the REZ design process as soon as possible.

Should you have any queries about this submission please don't hesitate to contact Michelle Grainger, Manager Energy Projects at mgrainger@moyne.vic.gov.au

Yours sincerely

A handwritten signature in blue ink, appearing to read "Bill Millard".

Bill Millard
Chief Executive Officer

Attachments:

- Council Submission
- Moyne Shire wind farm map

MOYNE SHIRE COUNCIL SUBMISSION DRAFT 2022 INTERGRATED SYSTEMS PLAN

Council recognises that AEMO's modelling predicts the need for a doubling of electricity generation by 2050 and a nine-fold increase in generation from wind and solar farms to meet this electricity demand as coal fired power stations retire. Most of these new generation resources will be built in Renewable Energy Zones and will require approximately 10,000 km of transmission infrastructure.

Council also recognises that the Victorian Government has legislated a renewable energy target (VRET) to achieve 40% of electricity generated from renewable sources by 2025 and 50% by 2030. The Victoria Government has also committed to net zero greenhouse gas emissions by 2050. It is understood that both policies will require the construction of more wind and solar farms in rural areas for the targets to be met.

The ISP's plans for investment in new transmission infrastructure, however does not present a plan for the orderly development of generations facilities that will use the infrastructure in each REZ. A holistic approach to REZ development needs to be activated for the South Western Victoria REZ (SWREZ) as soon as possible. Issues identified in the ISP and recommendations to reduce impacts and facilitate integrated planning are outlined in this submission.

Issues

Cumulative Social and Environmental Impacts from REZ Development

Investment in new electricity transmission infrastructure proposed in the ISP will drive further investment in wind farms (and possibly solar farms) in Moyne Shire resulting in:

- Greater cumulative social impacts. The communities in the north east and western parts of the Moyne Shire are already experiencing cumulative social impacts from ongoing development and operation of "clusters" of wind farms. The ISP focuses on the network infrastructure required to facilitate further development but not the potential cumulative impacts from this increased development.

Examples of social impacts being experienced in Moyne include rental housing shortages and price rises that impact on housing options for the most vulnerable people in our community; community stress and anxiety about changes to the rural landscape and their quality of life.

The Victorian Government has a duty of care towards the rural communities that will be hosting large scale renewable energy facilities, not to create more disadvantage (compared to their city counterparts) by allowing further development clusters that impinge on the quality of life of rural residents.

The ISP needs to actively address how it will strategically plan and consider new infrastructure having regard to cumulative impacts and options that reduce impacts on local communities and landowners.

- Greater cumulative environmental impacts. In recognition of the potential for cumulative impacts of wind farms on Victoria's threatened Brolga population DELWP recently released draft Brolga Standards for public comment. These standards recommended no go zones for wind farms and powerlines development to mitigate the impacts on Brolgas from renewable energy development.

These guidelines have not been reflected in the ISP or the possible routes for proposed new transmission infrastructure. It would be prudent for the ISP and resultant projects to consider the guidelines as part of any infrastructure planning.

Other cumulative impacts that are already occurring, that need to be understood and mitigated when planning REZ development include removal of native vegetation and threatened flora; impacts on other threatened fauna e.g. the Southern Bent-Winged Bat and Stripped Legless Lizard; and impacts on iconic species such as Wedge Tailed Eagles.

Noise impacts

High voltage power lines, large battery storage systems, terminal stations and synchronised condensers can all impact on local amenity from the noise they produce. Strict standards need to be in place to reduce the impact of noise on residents from new transmission infrastructure, as well as the noise from any new wind or solar generation facilities.

The cumulative impacts of noise from clusters of infrastructure should also be predicted and mitigated, with ongoing monitoring to ensure compliance with noise standards.

Moyne Shire Council welcomes the regulatory changes that have designated the EPA as the responsible authority for wind farm noise in Victoria. This will take a large enforcement and compliance burden from local government.

Jurisdictional planning bodies need to consider who will have regulatory responsibility for noise impacts from new transmission infrastructure, as local government do not have the resources or expertise to manage these issues.

Visual and Rural Land Use Impacts from High Voltage Powerlines

Greater visual and land use impacts from high voltage powerlines will be experienced by REZ communities as a result of accelerated REZ development. This includes further easements on private and public land; difficulties in managing fuel loads for bushfire prevention; concerns about aerial firefighting near powerlines and turbines; possible traffic hazards; more powerlines interrupting landscape views from people's residences and tourist roads.

Under-grounding transmission lines resolves many of these issues and should be implemented where technically feasible. The costing argument needs to have regard to the full lifecycle costs of the infrastructure, not solely consider the construction only costs, when considering options.

Council strongly advocates for a rule change that broadens AEMO considerations beyond economics and balances social and environmental impacts in making decisions on infrastructure design.

Any extra cost for under-grounding infrastructure should be shared by all consumers, or weighted so that the recipients of the power, rather than the communities that have the burden of the infrastructure, pay for or share the increased costs.

Disproportionate Impacts on Rural Communities

REZ development results in a disproportionate impact on the rural communities of Moyne so to produce clean energy for mainly city based residential, business and industry consumers.

Development of this type results in a boom bust economy for local areas with little ongoing benefit to host communities compared to the magnitude of impacts which are ongoing for 25 years.

Community benefits are not formalised via the planning permit and do not provide for strategic and long term economic development. In developing a plan that results in more impost on rural communities to generate electricity for use in largely urban areas, there should be some strategic government led social and economic development package for host communities to balance out the inequities.

To gain the maximum economic benefits for regional Australia from the accelerated development of REZ, local content percentages should be mandated. This will go some way to countering the negative impacts experienced by host communities.

Permit Compliance and Enforcement

Enforcement and compliance of the conditions of a planning permit for transmission lines and renewable energy facility falls to local government. Local government resourcing is already stretched to the limit, carrying out this role.

Further development in REZ resulting in more transmission lines and bigger clusters of wind and solar farms, will exacerbate this problem in two ways. The compliance and enforcement load will increase due to the numbers of wind and solar farms being constructed or operational – enforcement and compliance needs to continue for up to 25 years. With the increase in developments near towns and residences Council will also receive more complaints and concerns that need to be responded to in a timely manner.

Decommissioning and Sustainable Disposal of Components

REZ design reports and development plans need to cover the entire life cycle of infrastructure constructed and land use change in a REZ.

The ISP does not present a plan for the orderly and sustainable decommissioning of facilities, including a commitment to establish a recycling system for components.

As some wind farms in Moyne Shire are approaching the decommissioning stage, this is a matter that immediately needs to be addressed with systems put in place for long term REZ development.

Community Engagement

There is a great variation in the quality of developer engagement with local communities about high voltage powerlines and renewable energy generation facilities.

As the ISP is signalling an increase in development in localised areas it should recognise this issue and propose solutions to ensure engagement during all phases of development (feasibility through to decommissioning) reaches a minimum best practice standard.

Council welcome the ISP's greater focus on gaining social licence and community consultation for REZ development, however greater emphasis supported by best practice guidelines are needed to ensure genuine, fit for purpose and comprehensive engagement is mandated.

Additionally, local government needs to be recognised as a major stakeholder for engagement in infrastructure planning. Moyne welcomes the opportunity to provide you with its lived experience and offer advice as to how planning, thresholds and compliance could be improved.

Recommendations

Strategic Land Use Planning for REZ

REZ planning should include strategic land use planning, constraints mapping and cumulative impact assessment leading to upper thresholds for development in sensitive areas.

Planning for an orderly development of network infrastructure that will accelerate the development of renewable energy generators, will not result in coordinated planning of the resulting pipeline of wind and solar farms.

New transmission infrastructure without strategic land use planning will have the opposite effect by causing more clustering of development and greater impacts on local communities, environments and vulnerable species. A strategic planning approach that covers all types of energy related developments that may occur in the REZ is required.

For the SWREZ this also includes gas extraction, transmission and generation and the emerging hydrogen industry. All these developments will have impacts on rural land uses, roads, visual amenity and the environment.

A holistic strategic planning approach should be implemented that assesses and maps constraints to development (e.g. housing, town boundaries, Brolga no go zones; bat roosting and breeding caves; threatened flora and native vegetation types) and uses criteria to map suitable areas for development. This should be coupled with robust processes for cumulative impact assessment that guide upper thresholds for future development in a Shire/locality.

Government Funded Strategic Economic and Social Development in Host Communities

Strategic economic and social development in host communities /Shires should be led by State and Federal Government in partnership with Council and supported by industry.

With accelerated REZ development should come a package of strategic long term community and regional development projects e.g. upgrade of SWER lines; upgrades to telecommunication systems that benefit rural communities; cheaper power for local industry/business (leading to a competitive advantage); cheaper power to residents; energy efficiency/roof top solar for local public and community facilities; e.g. hospitals, childcare, halls, clubs. This would help to balance the inequitable impacts experienced by local communities being forced to host energy generation facilities by State and Federal Government policy and planning decisions.

High Voltage Powerlines

High voltage powerlines should be placed underground as was done by Acciona for the Mortlake South Wind Farm. Star of the South has also proposed underground land based transmission lines to reduce community and environmental impacts. Increased costs resulting from undergrounding should be passed onto all consumers so that the burden of reducing the localised impact is equally shared. ISP cost benefit analyses should factor in undergrounding cost.

Where undergrounding is not feasible, technically or due to environmental impacts, Council recommends that a system of powerline sharing should be instituted. This should form a part of a REZ development plan.

Resourcing Compliance and Enforcement

A review of the compliance and enforcement role carried out by local government should be conducted to assess the increased burden on local government from accelerated REZ development. This review would ensure appropriate expertise and resources are available to the regulator coupled with clear and reliable systems that provide community confidence.

Regulation related to noise produced by transmission infrastructure should form part of this review, assigning the responsibility for noise compliance and enforcement to the EPA who usually have this jurisdiction.

Decommissioning Strategy

REZ planning should include a strategy and accompanying systems for orderly and sustainable decommissioning of renewable energy facilities and transmission infrastructure. This would include clear understanding of roles and expectations in the decommissioning process, decommissioning bonds and facilities for recycling all components from transmission and generation infrastructure.

Lock in Community Benefits and Engagement Standards

To ensure maximum community confidence in REZ planning and development State and Federal Government should develop mechanisms to lock in developer (transmission and generation) proposed community benefits schemes under the planning permit or other suitable instrument. Jurisdictional bodies should also develop mechanisms to ensure a minimum standards of engagement occur before a permit is lodged (e.g. assess it as a part of the permit application process) and during construction, operation and decommissioning.

Lock in Local Content Requirements

To ensure maximum benefit to regional communities from REZ development the Government should develop mechanisms to lock in local content percentages for network infrastructure investments and the resulting pipeline of new renewable energy generation facilities.