

30 June 2022

The Hon. Minister D'Ambrosio
Minister for Energy, Environment &
Climate Change
Level 16
8 Nicholson Street
East Melbourne VIC 3002

Dear Minister

Victoria's Offshore Wind Policy Directions Paper

Council welcomes the opportunity to make a submission on the Offshore Wind Policy Directions Paper and consents for this submission to be published on the Engage Victoria and DELWP websites. Our detailed submission is attached.

Moyne Shire forms a large proportion of the South West Renewable Energy Zone (SWREZ). In Moyne there are already six operational wind farms, two under construction, and two with permits scheduled for construction this year and four 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 understands that to achieve net zero emissions by 2050 about 15 times today's renewable energy capacity will be required and that it is not feasible to build all of this capacity on land. Therefore we recognise the potential for offshore wind to reduce the need for more wind farm construction in Moyne Shire.

As you have been informed, Council is currently consulting with its community on a new draft position for wind farms that seeks a pause on the issue of any more planning permits for wind farms until the government provides a strategic land use plan. I have attached our draft position to this submission. Please note our community consultation period concludes on the 30 June, 2022.

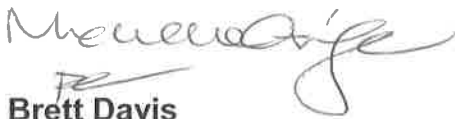
Council's submission outlines the possible benefits and impacts of offshore wind development for Moyne Shire residents, visitors and environments. As guiding principles, any future policy should ensure that local (at a Shire level) communities benefit in the long term from development and that social and environmental impacts are minimised and mitigated.

Underpinning the Offshore Wind Policy Directions Paper, Council strongly recommends that strategic land use planning in SWREZ occur as soon as possible, incorporating offshore wind and the transmission infrastructure it will require. This needs to be reflected in planning schemes. This planning should be carried out in collaboration with Moyne Shire (and neighbouring Councils) and the affected communities.

Council would like to request a meeting with DELWP representatives to discuss the Offshore Wind Policy Directions paper and explore how this affects plans for the SWREZ and any proposed transmission infrastructure projects that may impact on Moyne Shire.

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 faithfully



Brett Davis

CEO

Submission

Issues identified in the Offshore Wind Policy Directions Paper and recommendations to maximise benefits, reduce impacts and facilitate integrated planning are outlined in this submission.

Council 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 Victorian Government has also committed to net zero greenhouse gas emissions by 2050, which will require a 15 fold increase of today's renewable energy capacity from 4 GW in 2020 to 60 GW by 2050. Both policies will require the construction of more wind and solar farms in rural areas for the targets to be met.

Council also recognises that AEMO's ISP 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 on rural lands in Renewable Energy Zones and will require approximately 10,000 km of new transmission infrastructure.

The Offshore Wind Policy Directions paper predicts that 20% of Victoria's energy capacity could come from 13 GW of offshore wind generation. This may reduce some of the pressure from development of renewables on rural lands, however 80% of development will still be required on available and suitable rural land. Therefore, a holistic approach to REZ development needs to be activated for the South Western Victoria Renewable Energy Zone (SWREZ) as soon as possible, which incorporates the potential for offshore wind and associated land based infrastructure.

The Directions Report should be strengthened to include commitments to land use planning thresholds and mechanisms that consider:

- The need to have a strategic plan, incorporating thresholds and setbacks for the nominated renewable energy zones. The REZ planning should include constraints mapping and cumulative impact assessment guidelines.
- Aligning the onshore needs for renewable energy as the report highlights that 70% of the renewable energy infrastructure will still be required
- Consider how cumulative impacts of the entire renewable energy network are considered
- The need to consider the onshore impacts associated with offshore wind farms including undergrounding of transmission lines and the need to co-locate transmission infrastructure.
- Facilitating community engagement to secure social licence and benefits to the host communities.
- Aligning the existing strategic direction for tourism along the Great Ocean Road and south-west coast.

The Directions Paper focusses on two off shore renewable energy zones. The whole of the Victorian Coastline must be considered, not just limited to the development of proposals that are already on the table. As we have seen over the last decade, the innovation in technology and construction has seen larger turbines installed in areas not necessarily reflected initially in previous strategic reports.

The Policy Direction paper does not recognise the important role of Local Government in the development process. Any future policy or implementation statement should explicitly recognise Local Government and the collaborative approach that will be required for effective planning, regulation, development, compliance and community engagement.

Possible Benefits

The shift from onshore wind farm development to offshore development could result in some positive outcomes for Moyne Shire and Victoria more generally:

- 20 % of renewable energy being generated offshore may reduce the need for further development of onshore wind farms in Moyne Shire. This would result in less amenity impacts on residents from construction and operation, e.g. local traffic impacts, wind farm noise, visual impacts. It could also result in reduced land based environmental impacts (e.g. native vegetation removal; impacts on significant fauna such as Brolgas or the Southern Bent Winged Bat).
- Offshore wind farm development will create new jobs during the planning, construction and operational phases of the wind farm. The policy needs mechanisms to ensure maximum benefit from employment of people in the Shires that border and are nearby to development areas (i.e. our definition of local). The Directions paper predicts that offshore wind developments will create 3000 ongoing operational jobs. From Moyne's experience with wind farm development this seems to be a major over estimate of direct jobs required post construction. More details about how this number was derived is required.
- The map on page 15 depicting potential localised employment opportunities does not reflect the experience of construction in Moyne Shire. Wind farm developers tend to employ large construction firms that bring in people from all over Australia and overseas. These people tend to live in major centres and drive to the construction site to complete their shifts.
- Development of offshore wind presents opportunities for local businesses and trades and mechanisms need to be included to enhance these opportunities.
- It is expected that development companies provide for community benefit funds and projects that result in long term social and economic benefits to local communities. The policy should include mechanisms to ensure this.
- The Directions Paper should incorporate local economic and employment targets similar to the VRET Auction Scheme.

Possible Impacts

The development of offshore wind farms has the potential to result in negative impacts on the community and the environment. The Policy should set principles and mechanisms to minimise and mitigate any negative impacts.

- It is assumed that new transmission lines and other infrastructure (e.g. substations), will be needed to service the Portland West Offshore Wind Zone. Moyne Shire contains a proliferation of above ground transmission lines due to the extensive development of wind farms in the Shire. Moyne Shire Council's position is that all transmission lines should be placed underground where technically feasible. This has occurred for Mortlake South Wind Farm and is proposed for Star of the South offshore wind farm in Gippsland.
- Visibility of offshore wind farm turbines from the coastline of Moyne Shire could result in negative amenity impacts for residents and visitors. Moyne Shire is a major coastal tourism destination and development locations should ensure minimal impact on residents and tourists.
- There are potential impacts of offshore wind turbines on marine and migratory fauna that frequent the marine waters and coastline of Moyne. For example shore birds like the Short Tailed Shearwater, Australasian Gannet and Wandering Albatross are important avifauna. Impacts on Southern Right and Humpback whales should also be studied and minimised. The Policy could direct funds for comprehensive and independent scientific research to determine the possible impacts on significant species and how those impacts can be minimised and mitigated.
- Although the offshore wind farm development zone proposed in the Direction Paper is west of Portland, Council is aware of an early stage proposal for offshore wind in Henty Bay, east of Portland. This could impact on waters adjacent to Moyne Shire. It is recommended that the offshore wind zone proposed in the paper reflect this development proposal.
- It is expected that offshore wind farm development will result in increased construction traffic in adjacent and surrounding Shires, as components are transported. Coordinated traffic management across all transport routes is needed.
- The waters off Moyne Shire and the Portland West Offshore Wind Zone are popular areas for recreational and commercial fishing. The impacts of construction and operation of offshore developments on fishing, need to be understood and minimised.
- Cumulative social and environmental impacts are already occurring in Moyne with two clusters of wind farms and a range of transmission lines and projects. Examples of social impacts being experienced include rental housing shortages and price rises that impact on the housing options for our most vulnerable people in our community; community stress and anxiety about the changes to the landscape and their quality of life. There is a strong need for inclusive, balanced policy, thresholds and community benefit programs.
- The wind industry is no longer new to Victoria and this Directions Paper could benefit from the learnings of the industry, state and local government.
- During wind farm construction, Moyne Shire has experienced a boom/bust economic cycle that has not left substantial ongoing economic and social benefit to the nearby communities. The Policy should provide mechanisms for

smoothing out these impacts (especially on housing availability and affordability) and providing for strategic long term benefits to communities impacted.

Council is willing to attend any forum to discuss or elaborate on this submission further.

Home (<https://www.moyne.vic.gov.au/Home>) / Feedback sought on Council's windfarm position



Feedback sought on Council's windfarm position

Published on 01 June 2022

Moyne Shire Council is asking for feedback from the community as it looks to revise its position on wind farm developments across the shire.



Council has planned a month long consultation process which includes a telephone survey conducted by National Field Services and JWS Research, written and online submissions from the community and engagement with youth through the Moyne NextGen! Platform.

Mayor, Cr Ian Smith said in 2018, council resolved to oppose all new wind farms unless certain recommendations made by the Australian Energy Infrastructure Commissioner in 2017 were implemented by the State Government.

"The recommendations our position was based on are now out of date and we have to revise our position on wind farm developments across the shire," Cr Smith said.

Cr Smith said Council is now seeking feedback from the community on a draft position which states:

Moyne Shire Council strongly recommends that the State Government pauses the issuing of all wind farm planning permits in the Shire until strategic land use planning in the South West Renewable Energy Zone (REZ) is completed in consultation with Moyne Shire and other affected Councils and communities. REZ planning should include:

- *Wind farm development buffers placed around towns/townships*
- *A methodology developed to assess cumulative impacts, and used to assess all future planning permit applications*
- *An agreed cap on development for Moyne Shire (development threshold of number of turbines or density limits)*
- *Significant strategic long term economic and social benefits for host communities*
- *Undergrounding of high voltage power lines where technically feasible, or otherwise powerline sharing*
- *A decommissioning policy*

“While we recognise the need for renewable energy developments, we want to make sure they are done properly and that the whole community which is hosting the turbines benefits,” he said.

“Wind farm developments are still a key issue for our communities and for Council, unfortunately under current state government rules, Council doesn’t have a seat at the table when new projects are being approved, but we are responsible for enforcing compliance with permit conditions.

“We are continuing to advocate to the State Government on behalf of our communities for changes to the approval process and our draft position reiterates our strong stance that host communities and neighbours must be more carefully considered in the process.”

Written submissions will be received by Council until 5pm, 30 June 2022.

Submissions can be made:

- Online via a questionnaire at <https://www.moyne.vic.gov.au/Your-Say/Draft-Wind-Farm-Position> (<https://www.moyne.vic.gov.au/Your-Say/Draft-Wind-Farm-Position>).
- Mailed to Moyne Shire Council Offices, Princes Street (PO Box 51), Port Fairy 3284;
- Email to moyne@moyne.vic.gov.au Please place “Draft Wind Farm Position” in the title of your email.

A phone survey of 400 Moyne Shire Residents will begin on June 1 and will be conducted by National Field Services and JWS Research.

All comments will be thoroughly considered and Council's revised position will be presented in August.

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