



All correspondence to:
PO Box 51, Port Fairy, VIC, 3284
DX 28402 Port Fairy

7 April 2021

Email: REZDevelopment@delwp.vic.gov.au

Dear Sir/Madam

Victorian Renewable Energy Zone Development Plan Directions Paper

Council welcomes the opportunity to make a submission on the Renewable Energy Zone Development Plan (RDP) Directions Paper and consents for this submission to be published on the DELWP website. Council requests a meeting with the Minister for Energy, Environment and Climate Change and representatives from DELWP Energy to discuss in detail, any proposed transmission infrastructure projects that may impact on Moyne Shire.

For background, Council resolved on the 27 November 2018 (attached) to oppose any further wind farm development until recommendations 8.2.1 - 8.2.7 in the National Wind Farm Commissioners 2017 Annual Report were implemented in the Victorian context. This resolution was restated by Council on 25 August 2020. Council does not support any investment in new transmission infrastructure or renewable energy generation in the Moyne section of the South West REZ until these recommendations have been implemented.

At its meeting on 6 April 2021, Council resolved to forward its response to the Directions Paper (attached) and to request an urgent briefing from DELWP on the timeline and details for each project listed in the REZ paper that affects Moyne. Council also resolved to notify all relevant members of parliament of Council's position.

The cumulative impacts of transmission infrastructure and wind farms is a current issue for Council and its community. Noise, visual, traffic, road, housing and environmental impacts are consistently raised by the community as areas of concern. Investment in new transmission infrastructure as signalled in the RDP Directions paper, will result in further clusters of renewable energy generation facilities in the South West REZ and 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.

Within Moyne Shire there are five operational wind farms, one being commissioned, one under construction, three with permits scheduled for construction this year and three 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 two distinct and significant geographical clusters in the north east and west of the Shire, as can be seen by the attached map.



All correspondence to:
PO Box 51, Port Fairy, VIC, 3284
DX 28402 Port Fairy

It should be noted that due to DELWP's limited attempt to engage with rural communities on REZ development, Council has placed an advertisement in Warrnambool Standard and on social media to inform the Moyne community about the Directions Paper and avenues for comment.

It is recommended that in the future, engagement of matters that will impact on rural and regional communities should include a minimum of letters to all Local Councils, advertisements in all regional newspapers and use of the Engage Victoria portal.

Should you have any queries about this submission please contact Michelle Grainger, Manager Energy Projects at mgrainger@moyne.vic.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Brett Davis".

Brett Davis
Acting Chief Executive Officer

Attachments:

- Council resolution advocacy sheet
- Moyne Shire wind farm map



All correspondence to:
PO Box 51, Port Fairy, VIC, 3284
DX 28402 Port Fairy

MOYNE SHIRE COUNCIL SUBMISSION RENEWABLE ENERGY ZONE DEVELOPMENT PLAN DIRECTIONS PAPER

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 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 Directions Paper 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 is required. Issues identified in the Directions Paper 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 Directions paper 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 Directions Paper 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.
- 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 Directions Paper or the possible routes for proposed new transmission infrastructure. 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



All correspondence to:
PO Box 51, Port Fairy, VIC, 3284
DX 28402 Port Fairy

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 will designate the EPA as the responsible authority for wind farm noise. This will take a large enforcement and compliance burden from local government. DELWP and VicGrid 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 with extra cost placed on all consumers, largely city dwellers that do not experience these power line impacts.

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 policy 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 Victoria 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 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.



All correspondence to:
PO Box 51, Port Fairy, VIC, 3284
DX 28402 Port Fairy

Decommissioning and Sustainable Disposal of Components

A REZ development plan needs to cover the entire life cycle of infrastructure constructed and land use change in a REZ. The Directions Paper does not present a plan for the orderly and sustainable decommissioning of facilities, including a commitment to establish a recycling system for components. The Directions Paper does not attempt to reflect the principles and goals of the Victorian Government circular economy policy – *Recycling Victoria – A New Economy*. 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 Directions Paper 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.

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 localised 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 South West REZ 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 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,



All correspondence to:
PO Box 51, Port Fairy, VIC, 3284
DX 28402 Port Fairy

clubs. This would help to balance the inequitable impacts experienced by local communities being forced to host energy generation facilities by State Government VRET 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.

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, taking the responsibility for noise compliance and enforcement away from Local Government.

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 Government should develop mechanisms to lock in developer (transmission and generation) proposed community benefits schemes under the planning permit or other suitable instrument. Government 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.

