



23 June 2021

Email: ISP@aemo.com.au

Dear Sir/Madam

Moyne Submission on the Draft Transmission Cost Report

Council welcomes the opportunity to make a submission on the Draft Transmission Cost Report and consents for this submission to be published on the AEMO website. Council would like to request a meeting with AEMO to discuss, in detail, any proposed transmission infrastructure projects that may impact on Moyne Shire.

Council resolved on the 27 November 2018 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 (Attachment 1). 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.

Moyne Shire Council also put forward a motion to the Municipal Association of Victoria State Conference about a strategic approach for the siting of renewable energy developments and electricity transmission infrastructure, taking into account the cumulative social, economic and environmental impacts these developments have on local communities. Undergrounding of transmission lines must be assessed as a viable alternative, based on the whole of life economics of infrastructure not just construction costs. This motion was supported by a significant majority of Councils in Victoria. The motion is attached (Attachment 2).

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 signaled in the Draft Transmission Cost report, 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 5 operational wind farms, 1 being commissioned, 1 under construction, 3 with permits scheduled for construction this year and 3 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 (Attachment 3).

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 "Michelle Grainger". Below the main signature is a smaller, stylized signature that looks like "pe".

Bill Millard
Chief Executive Officer

Attachments:

1. Wind Farm Advocacy Paper 1
2. MAV Motion
3. Moyne Shire wind farm map



MOYNE SHIRE COUNCIL SUBMISSION DRAFT TRANSMISSION COST REPORT

Council recognises that the Draft Transmission Cost Report is one step in the ISP process and consultation, however would like to make a broad ranging submission that should be considered at all phases of ISP and REZ development.

The Report is part of a process that 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 Report and recommendations to reduce impacts and facilitate integrated planning are outlined in this submission.

Issues

Cumulative Social and Environmental Impacts from Transmission and REZ Development

Investment in new electricity transmission infrastructure proposed in the REZ section of the Transmission Cost Report 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 Report focuses on the cost and location of 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. AEMO 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 farm and powerline development to mitigate the impacts on Brolgas from renewable energy development. These guidelines have not been reflected in the transmission line options presented in the Report. Other cumulative impacts that are already occurring, that need to be understood and mitigated when planning for transmission line and 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.

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. Undergrounding transmission lines resolves many of these issues and should be costed and implemented as a matter of course, where technically feasible. Undergrounding transmission lines should be assessed as a viable alternative based on the whole life economics of the infrastructure not just construction costs.

Disproportionate Impacts on Rural Communities

Transmission line and subsequent REZ development results in a disproportionate impact on the rural communities of Moyne, 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 at least 25 years. Community benefits are not formalised in the planning system 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. This should be signaled in the ISP.

To gain the maximum economic benefits for regional Victoria from the accelerated development of REZ, local content percentages for transmission line development should be mandated. This will need to be taken into account when costing developments, but 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 of transmission infrastructure 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 transmission lines and subsequent wind and solar farms being constructed or operational – enforcement and compliance needs to continue for over 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

Any costing of transmission line infrastructure needs to cover the entire life cycle of infrastructure constructed. The Report does not seem to cost, or present a plan for the orderly and sustainable decommissioning of facilities, including a commitment to establish a recycling system for components.



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 Report and the ISP are signaling an increase in development in local 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 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 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. The ISP should drive a holistic strategic planning approach 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 occur across the entire REZ not just in a piece meal way for individual infrastructure developments. 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 the infrastructure developers and Council. With accelerated development of transmission lines and generation facilities in REZ , 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 decisions and directions. The need for strategic economic and social development in host communities should be signaled in the ISP.

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. Undergrounding of all new transmission lines should be costed as a matter of course, and costs should reflect the long term economic impacts and benefits. Undergrounding transmission lines should be assessed as a viable alternative based on the whole life economics of the



infrastructure not just construction costs. Increased costs resulting from undergrounding should be passed onto all consumers so that the burden of reducing the localised impact is equally shared. A long term economic assessment of the costs and benefits of the underground Mortlake South Wind Farm transmission line should be conducted and data added to the transmission line costing database.

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 transmission line and 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

Transmission line and 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. Decommissioning costs and bonds should be reflected in the cost estimates for transmission lines.

Lock in Community Benefits and Engagement Standards

To ensure maximum community confidence in REZ planning and development, including transmission line 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. The cost of best practice developer community engagement and benefit sharing for the life of the infrastructure, should be included in the cost estimates of any new transmission line infrastructure.

Lock in Local Content Requirements

To ensure maximum benefit to regional communities from transmission line and 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. The impact of local content requirements should be included in the cost estimates for new infrastructure