



15 August 2022

Hon Lily D'Ambrosio
Minister for Energy Environment & Climate Action
PO Box 500
Melbourne VIC 3002

Via email – engage Victoria website

Dear Minister

Victorian Transmission Investment Framework – Preliminary Design (VTIF)

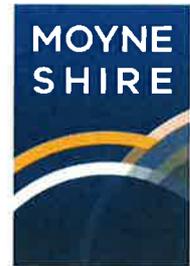
Council welcomes the opportunity to make a submission regarding the Framework on exhibition. Council expects that this submission will be considered having regard to the issues it has previously raised with the government in respect to the Directions Paper for Renewable Energy Zones made in 2021.

It was pleasing, with the release of the VTIF, for Council to be invited to a range of consultation sessions, which provided us with opportunities to discuss the framework and the lived experience Moyne has with renewable energy development.

Council appreciates the legislative obligations to reduce carbon emissions and meet set targets and the approach to creating zones.

Council has an existing resolution that advocates for all new transmission infrastructure in Moyne to be located underground. This is a key advocacy objective, and one that is achievable having regard to balancing economic, environmental and social outcomes. It is an achievable outcome as Acciona has demonstrated with the Mortlake South Wind Farm installing a 15km long, 220 Kv underground line from the wind farm to the Terang Terminal Station.

The Framework as presented provides candidate pathways for transmission infrastructure to meet investment needs for the next 25 years. The approach has a number of steps and importantly discusses a strategic land use approach. This land use planning would benefit from incorporating both a regional and local perspective. The importance of strategic land use planning should recognise the importance of agricultural production, remnant vegetation, aboriginal heritage and environmental significance to inform suitable sites for renewable energy generation and transmission corridors.



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Council seeks that prior to finalising the preliminary design process due regard be given to incorporating the following additional measures:

- Incorporating strategic land use planning for generation facilities in addition to transmission so that there is a wider strategic approach.
- Looking at transmission only will fail to recognise the overall impact of renewable energy zones that is significantly broader. The cumulative impacts of both generation and transmission infrastructure has the potential to impact on the primary use of the land for significant food and fibre production.
- Council recommends thresholds or development limits incorporated to limit cumulative impacts on landholders, the hosting communities and environmental assets..
- Moyne has raised in submissions to the state government and AEMO the need to assess cumulative impacts. Increased generation and transmission has so far been optimised having regard to access to the grid with an overwhelming focus on only economic impacts. The impacts of decision making without due regard to cumulative impact is resulting in clustering of projects leading to a concentration of development.
- Data has been collected for wind farm projects required by permit conditions (for example bird and bats monitoring, noise monitoring, complaints) but there is a need to collate and review what has been provided across projects and this should be a key element or input to the outlined strategic land use assessment.
- Transmission infrastructure and indeed renewable energy developments are occurring on farming land where the primary use is agriculture and the energy generation is ancillary. The economic importance of agriculture to the Moyne and wider economy, and the dominance of the continued food and fibre production must be recognised.
- Transmission infrastructure must be designed to facilitate co-location of wires to ensure best design and use and limit the need for separate poles per line or project. It is Council's experience that each project aims to construct its own transmission infrastructure and this does not provide optimal economic, landscape, environmental or community benefits. For example in Moyne we have 2 transmission lines crossing each other, Dundonnell heading west to the Mortlake substation, which intersects with the Salt Creek transmission line



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heading east to Terang. Both of these lines have been developed to host wind farms developed by the same company.

- Community consultation early in the process for corridor and transmission development is vital. Generational change is being experienced with renewable energy development. Having clear, open and transparent conversations with all stakeholders is vital. It is noted that local government needs to be more strongly incorporated as a stakeholder for engagement purposes, and with its role as both the planning and responsible authority for land use planning it should have a significant role in the strategic land use assessment.

Guidelines already exist in the form of *Community Engagement and Benefit Sharing in Renewable Energy* without having to write a specific guide for transmission.

- The VTIF should be revised to ensure that community engagement and community benefit sharing are well understood as separate components of the framework and that providing a community benefit plan is an outcome and not an engagement tool.
- Community benefit sharing is currently provided as an element of renewable energy generation projects. Whilst there are guides produced by the state government, the Clean Energy Council and a range of advocacy groups, it is Moyne's experience that there is no one successful model. As the industry develops and cumulative impacts increase, there should be an ability to review existing programs or a mechanism to apply an index so that there is some parity between new and old infrastructure.
- Different to generation projects, transmission is more likely to have greater regional rather than local impacts and there is an opportunity to develop a community benefits sharing program that is tailored and aimed at regional outcomes. Again to provide context from a Moyne perspective, there are a range of community benefit sharing programs that assist the communities who host renewable energy development such as community grants, education scholarships and event sponsorship. Council is advocating for implementation of the Terang-Mortlake Health Services or the Port Fairy Smart Energy Precinct which would provide regional outcomes that could benefit from transmission community benefit programs.



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- Community benefit sharing for wind farms involves payment to host land holders for the life of the project and in some cases for a significant period in project planning. For parity, such a system should be considered for host land owners of generation projects.
- Council is revising its current advocacy position in relation to wind farm development in the Shire. When this position is resolved, Council would be happy to discuss this with VicGrid.

In conclusion, Council is pleased to see the release of the VTIF but is keen to continue to be engaged as the framework is developed and to provide you with the benefit of our lived experience.

Council has previously provided you with Shire maps outlining the development across the Shire and its advocacy documents. These can be provided again, if it is of benefit.

Should you wish to discuss this submission further, please contact Michelle Grainger, Manager Energy Projects, mgrainger@moyne.vic.gov.au.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Darby Lee".

Darby Lee
Acting Director
Planning & Economic Development.