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Federal Minister for the Environment
Via electronic lodgement
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2020/8741 WESTERN VICTORIA TRANSMISSION NETWORK PROJECT MOORABOOL SHIRE COUNCIL SUBMISSION

Introduction

Moorabool Shire Council (Council) appreciates the opportunity to provide a submission in response to the Western Victoria Transmission Network Project (WVTNP) EPBC referral (2020/8741).

Council does not dispute the importance of this significant renewable energy infrastructure project and we are supportive of the transition to renewable energy. However, Council is mindful of achieving long-term sustainable outcomes where the impact to our community and the natural environment is not unreasonably compromised by the project.

This project will have a significant impact with over 70km of new 500kV transmission lines proposed to run through the length of the Shire. As there has been no decision on the alignment corridor, and no detailed assessment of the Area of Interest (AOI), the impact to Matters of National Environmental Significance (MNES) are unknown.

While it is acknowledged that AusNet Services (AusNet) are assuming the project will have a significant impact on MNES, it is important to understand the proposed location of the project and the potential impact it may have, not only to MNES but also the community which will house this project indefinitely. We are calling on the Federal Government to request the project not only review alternative alignments, but most importantly alternative technologies and construction techniques that would allow these lines to go underground.

Therefore, this submission will focus on providing the Federal Government an understanding of the context of the Moorabool Shire and the concerns the Shire has with the current proposal for this large infrastructure project.

Moorabool Strategic Context

Moorabool Shire is a fast-growing semi-rural municipality nestled between Melbourne, Geelong and Ballarat. The Shire spans more than 2,110 square kilometres, and is made up of 64 localities, hamlets and towns, the bigger towns being Bacchus Marsh and Ballan. These towns will continue to be under increasing pressure to accommodate a share of the projected population growth across the State.



Bacchus Marsh has specifically been identified in *Plan Melbourne* and the *Central Highlands Regional Growth Plan* as a suitable location to accommodate growth. Bacchus Marsh is expected to reach a population of approximately 31,000 residents by 2041.

Ballan also has an important role in forming part of Moorabool's growth areas and is identified as a peri urban town in *Plan Melbourne* and the *Central Highlands Regional Growth Plan*. Ballan is projected to double in size by the year 2041 with a population of approximately 6000 residents.

Gordon is a small town to the west of Ballan that is projected to continue with demand for steady growth. With the recent sewerage of the town, this has increased the capacity for residential growth up to a maximum of 800 residents. While the remainder of small towns and settlements are anticipated to accommodate minimal growth in the foreseeable future, it is noted that if sewer becomes available both Bungaree and Wallace could experience growth, with each town having the potential to grow to approximately 2000 residents.

In addition to the existing towns, the Bacchus Marsh Urban Growth Framework identifies four strategic growth areas being Merrimu, Parwan Station, Parwan Employment and Hopetoun Park North. The Victorian Planning Authority (VPA) is the planning authority for the Merrimu, Parwan Station and Parwan Employment Precincts. Hopetoun Park North will be a developer led amendment and will not be subject to a structure plan.

Merrimu is a proposed residential precinct covering a land area of 957ha which will cater for an ultimate population of up to 20,000 people. Parwan Station is a proposed future mixed-use precinct, including residential land providing for an ultimate future population of up to 13,000 people around a future Parwan train station and commercial land uses in buffer areas. Parwan Employment is a future agribusiness precinct covering a land area of 2,880ha.

While the project has committed to avoiding the centre of the main towns, the addition of high voltage transmission lines in this location has the potential to significantly impact and restrict the ability of the Shire to grow, particularly in the strategic growth areas. This is due to the intrusion the powerlines would have on this growth corridor, and the potential for the transmission lines to dissect the municipality further which is already constrained by a number of other local and State assets, both of an infrastructure and environmental nature (for example the Western Freeway which dissects Bacchus Marsh).

Moorabool Shire Fire Risk Areas

A major concern for Council and for the community with this project is fire safety. Moorabool Shire has three extreme fire risk areas that were identified by the State Government after the 2009 bushfires:

1. Blackwood,
2. Dales Creek, and
3. Greendale.

These three towns are situated in the forest that borders the current preferred alignment. There is a risk, albeit smaller than other types of transmission lines, that these lines could cause a fire in the right conditions. If there is a fire in this patch of forest, the transmission lines have the potential to hinder aerial fire fighting efforts (if in smoky conditions). If these towers come down, as we saw last summer in Portland (Victoria), these lines will close off the evacuation routes for these towns.

Further areas that are identified in the high to very high-risk area for fire danger included in the Victorian Fire Risk Register include:

- Darley
- Korweinguboorra/Spargo Creek/Blakeville
- Coimadai
- Long Forest
- Mount Wallace and Beremboke
- Gordon
- Mount Egerton
- Myrning
- Lal Lal

All of these towns are within or close to the AOI.

The climate in the Moorabool area is dominated by warm dry summers and cool wet winters. In recent years there has been a significant decrease in average spring and autumn rainfalls. The bushfire season generally runs from December to April.

Under the State Government climate change projections, Moorabool Shire can expect:

- To be hotter with the greatest increases in temperature expected in summer;
- To be drier with greatest decreases in rainfall expected in spring; and
- To have fewer rainy days but increasing rainfall intensity.

It is understood that these predicted changes in climate have the potential to increase the fire risk across Moorabool Shire.

Not only do transmission lines have the potential to cause fires and impact high risk human settlement areas, but fires near transmission lines are dangerous, aerial firefighting is limited and it can cause damage to the infrastructure and interrupt electricity supply. Poor alignment decisions will not only put the community at greater risk, but also the transmission infrastructure.

Farming Implications

The Shire contains a substantial amount of prime agricultural land. As part of a current State Government project 'Protecting Melbourne's Strategic Agricultural Land', the Government have stated a commitment to protect the long-term future strategic agricultural land in Melbourne's green wedge and peri-urban areas, recognising that some of Victoria's most productive agricultural land is within 100km of Melbourne. The intent of the project is that in the future, strategic agricultural land will be recognised and protected in the planning system. This work is about more than protecting strategic agricultural land, it is also about providing greater certainty for agricultural businesses in key areas to support long term investment. Expansive areas of the municipality have been identified as Strategic Agricultural Land.

It is critical that the approvals for the transmission project has due consideration to the implication the project will have on farming activities within the Shire. AusNet is yet to provide an understanding of the implications that high voltage transmission lines could have on the farming community, including the impacts on where dwellings are located, buffer requirements and the limitation on any farming activities the project could entail.

Community and Social Implications

The Moorabool Shire community prides itself on being a place that residents can live in close proximity to Melbourne without being surrounded by significant infrastructure and being able to enjoy the natural landscape and rural environment. The community wants the small towns and country charm to be retained in the long term, which is already a key challenge for the Shire in accommodating some of Melbourne's population growth, while recognising the importance of retaining the intrinsic country characteristics that makes the Shire the attractive and liveable place it is today.

While we understand that undergrounding high voltage transmission lines comes at an increased expense, we are of the view that undergrounding the transmission lines would be a solution to many of the concerns the Shire has with the project.

Environmental and Natural Assets

More than 74% of the Shire comprises of water catchments, state forests and national parks with a number of environmental and natural assets both of National, State and local significance. This includes the Long Forest Nature Conservation Reserve, Brisbane Ranges National Park, Lerderderg State Park, Werribee Gorge State Park and the Wombat State Forest, all of which are key assets within the Shire and attract an estimated visitation of approximately 550,000 people per year across all sites. There is currently a draft proposed 'VEAC Central West Investigations Draft Proposals paper' which identifies the establishment of the Wombat-Lerderderg National Park.

Council is also concerned of the amenity impacts the powerlines may have on these natural landscapes and the negative impact that will have on the State and Regionally significant landscapes and views that were identified in the South West Landscape Assessment Study (Planisphere, 2012). Sites identified in the study included:

- Lerderderg State Park (State significant landscape)
- Werribee Gorge State Park (State significant landscape)
- Wombat State Forest (regionally significant landscape)
- Mt Blackwood (State significant view)
- Lal Lal Falls (State significant view)
- Mt Buninyong / Mt Warrenheip (regionally significant view)

The remainder of the Shire is largely rural land, towns and settlements that also contain a number of environmental and natural assets including rivers, cultural heritage, flora and fauna. When considering the location of these natural assets, which are generally located to the north of the Western Freeway from Bacchus Marsh through to Gordon, these parks provide a significant constraint for the transmission project due to the fire risk, fault lines, natural assets and flora and fauna that require protection.

UNESCO World Heritage Bid

Work is finally underway on a regional tourism, community development and cultural heritage concept that has been floated since 1986 to apply for United Nations Educational, Scientific and Cultural Organisation (UNESCO) world heritage protection for the sites of importance to the global gold rushes across our region. This year 13 local governments have begun progressing it, and combined funding from Regional Development Victoria and Regional Development Australia is supporting a two-year project to build the case for the UNESCO

application. The specialness of this landscape and the future aspirations of the community must be accounted for early in the process. Most of the sites that are now being assessed under this program are emergent and not listed in the State Heritage Register, therefore special consideration must be given to this.

The sites of significance currently being investigated for the UNESCO bid are directly interspersed across the area of interest for the transmission line and the proposed new terminal station area of interest. In assessing the bid, UNESCO will use two measurement pillars of Authenticity and Intactness of the sites. This creates the need to avoid certain highly valuable landscapes and cultural sites as well as the view shed impact, in order not to disrupt those areas and impact the bid process.

Renewable Energy Production

Moorabool Shire Council has three wind farms approved by the State Government:

- Yaloak South Wind Farm is owned and operated by Pacific Hydro. It comprises of 14 turbines that are 126m in height; construction is complete, and turbines are operational.
- Moorabool Wind Farm is owned by Goldwind Australia and will comprise of 105 turbines over two (2) locations (Moorabool North and Moorabool South). The turbines are 171m high and currently under construction. The proposed completion period is late 2020.
- Lal Lal Wind Farm is owned by Lal Lal Wind Farms (a partnership between InfraRed Capital Partners, Macquarie Capital and Northleaf Capital). It has 60 turbines of 161m height which are split between Elaine and Yendon.

The three wind farms produce 568MW of power. This is the equivalent of approximately 343,000 homes per year, or 15% of Victorian homes. Yet the residents of Moorabool Shire are still to experience access to renewable energy or any true benefits.

Large Infrastructure Projects and Cumulative Impacts

Due to the Shire being located on the periphery of the metropolitan growth area, we have become a pseudo 'service centre' for Melbourne as the host of multiple extractive industries, mines, and a waste hub - all being located on the critical entry points of Bacchus Marsh. In addition to this, the encroachment of industrial and residential development on our agricultural land has resulted in a very real challenge for Council to ensure that it is no longer impacted or inhibited by uses that pose further impost on land owners and loss of local identity.

Bacchus Marsh contains Maddingley Brown Coal to its south, which contains a substantial land fill operation and results in a significant constraint for growth to the south of Bacchus Marsh. Further, to the north of Bacchus Marsh are sand and gravel quarries which again provide a considerable resource for the region and creates a significant constraint for further growth to the north of Bacchus Marsh.

From the Shire's experience with the wind farms, there have been several lessons learnt about the impact the construction phase of large infrastructure projects can have on the community. This has included the length of the construction phase and the negative impact on the road and intersection network, with a significant number of truck movements on a daily basis. This has resulted in constant damage to the local rural roads which have not been designed to accommodate the volume of trucks that the roads have had to accommodate during the construction of these projects.

While these large-scale infrastructure projects do provide local, regional and State benefits they also have a number of negative implications for the community. There is currently much angst in the Bacchus Marsh community in regard to the potential expansion of the waste facility and quarries, and there is still angst in the community in the west of the Shire in regard to the installation and cumulative effect of the number of wind farms that have been constructed.

While the Shire understands the importance of projects with State benefits, it is important that consideration is also given to the local community and the potential impacts the project may have on that community, including the cumulative impacts of many projects in the same community.

Community Consultation and Benefit Sharing

It is critical in undertaking the transmission project that the community is provided the opportunity to be engaged throughout the process, and there is a clear understanding of the local benefits and needs. Given the requirement for the upgrade of the transmission network stems from the significant increase of renewable energy being produced in Western Victoria, the Shire would like to strongly encourage the adoption of the *Community Engagement and Benefit Sharing in Renewable Energy Development – A Guide for Renewable Energy Developers* produced by the Department of Environment, Land, Water and Planning in 2017. In addition to implementing best practice in community engagement, the Shire is compelled to discuss benefit sharing. If this project is to go ahead, Moorabool Shire will be home to three wind farms, neighbour to many more and the conduit for transmission to Melbourne. Yet the residents of Moorabool Shire are still to experience true community benefits.

Moorabool Shire residents deserve cheaper, greener electricity. Legacy benefits such as micro grids for smaller towns and large energy users. Larger community infrastructure such as pedestrian and bike links, public art work strategies, improved public spaces. Scholarships and traineeships for the younger community to enter the renewable energy sector. These are just some examples of the possible community benefits the Shire would like to see for the community. With the right level and consistency of consultation, the community could start to see true benefits from these State significant projects in the Shire.

Conclusion

In conclusion, the Shire recognises the importance of this project and benefits including potential employment opportunities. However, Council demands that the project is conducted in a manner that has the least impact on our residents, our existing landscape, the natural environment, farming activities, our towns and the growth projected for the Shire. It is Council's view that the most appropriate way to address our concerns would be through the undergrounding of the powerlines, ideally for the extent of the project.

We encourage the Federal Government, as the referral authority under *Environment Protection and Biodiversity Conservation Act 1999*, to consider the long-term impacts of the multiple transmission upgrades that are forecast across the country and how to ensure a best practice approach is deployed in all cases. It is vital to minimise and plan for common issues that may delay, and in some cases prevent, the much-needed transmission infrastructure.

We thank you for taking the time to consider the issues raised in this letter and strongly urge the Federal Government to be world leaders in the transmission sector, set the path for future projects, and make the Western Victoria Transmission Network Project a legacy of which we can all be proud.

Considering the significance of this project at a Federal, State and local level, we would like to request a meeting to discuss our submission in more detail.

If you have any queries please do not hesitate to contact Vanessa Osborn, Major Developments Co-ordinator, Moorabool Shire Council on 5366 7100 or vosborn@moorabool.vic.gov.au.

We welcome further discussion in regard to our submission.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Derek Madden', written in a cursive style.

Derek Madden
Chief Executive Officer