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File: 13/03/010

Dear Francisco,

Re: Western Victoria Transmission Network Project

The signatories to this letter, as a collective, write to you in relation to matters regarding the Western Victoria Transmission Network Project (WVTNP). You have held initial meetings with the Local Government Authorities (LGAs) that will be impacted by this project, and therefore will likely understand that some concerns exist about its implementation.

It is acknowledged that the transmission lines are critical infrastructure for the future expansion of Victoria's renewable energy generation capacity, however the project has the potential to negatively impact on our communities. The delay in the project launch provides an opportunity to consider these potential impacts in more detail and implement effective mitigation strategies.

We note the following statement from the materials provided to us by Mondo at the initial meetings earlier in the year:

"We are committed to engaging openly and respectfully. We will work closely with local communities, as well as industry and government, to understand what's important to ensure we appropriately identify and manage cultural heritage, environmental, and community matters."

In that spirit, we respectfully make the following suggestions.

Project Reference Group

To provide transparency and a common understanding of the project, it is requested that Mondo set up a Project Reference Group with at least one representative from each council. The purpose of this group will evolve over time and will require regular review. The reference group may provide the platform for a broader stakeholder reference group as the project advances. This group will require a Terms of Reference to be drafted and reviewed by the relevant Councils.

Investigation of "Undergrounding" Option

It was the understanding of the signatory Councils that there was going to be investigation of and discussion about the option of the transmission lines going underground.



For example, Moorabool Shire Council's submission to the PADR process dated 26 June, 2019 makes reference to that option as follows:

“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. If the financial implications are too high to underground the transmission lines in their entirety, then at a minimum the transmission lines should be underground around the towns to minimise the visual intrusion in highly populated areas.”

It was only at the project briefings with the Mondo project team earlier in the year that it was made clear for the first time that the 180-kilometre electricity transmission line was to be above ground. It was indicated that this is the only option on the table for discussion.

Signatory Councils and their communities have not been privy to the process of examining the undergrounding option. We have little insight into the specifics of what has been considered or how it has been considered, as there is little transparency as to how the process worked or how the conclusions were arrived at.

It is the collective view of the signatory Councils that the undergrounding option ought to remain on the table for consideration, at least in certain sensitive areas. These areas can only be identified once a refined investigation corridor has been provided to Councils, which is requested as a matter of urgency.

Before any decision to reject consideration of whether or not to put all or part of the transmission lines underground, there ought to be a detailed investigation, which utilises multi-criteria decision methodology to assess this approach more holistically.

The WestVicRiT-T process focussed primarily on technical and economic factors. While it is understood that Mondo have only come into the project at the completion of the RiT-T process, it should be noted that concerns have been raised continually, and largely dismissed with a promise of review at later project stages. It is now unclear at which project stages these concerns will be addressed, if at all, as the project appears to be progressing past a point at which such fundamental aspects could be changed. Further, it should be highlighted that the RiT-T process focusses heavily on the economic viability of potential options, but when a more holistic assessment is used and concessions are suggested (i.e. modification to the project to achieve improved social acceptance and other non-economic outcomes), the suggested changes are deemed cost prohibitive.

It is imperative that there be an investigation into the underground option, including a cost-benefit comparative analysis to compare it with the above ground option.

Community Consultation and Benefits

Detailed and extensive community consultation is a priority expectation of the signatory Councils. It is acknowledged that Mondo is now prepared to engage with Councils to best understand the unique communities in the project area and how to best engage with them. It should be noted however that, based on the information received at the meetings in February-March 2020, a rapid public consultation plan was initially proposed. This approach was not fitting with the sentiments of community engagement previously claimed, and we respectfully encourage Mondo to strive for best practice community engagement.

The speed and nature of the community consultation would not have provided for the best outcomes, nor a proper consideration of community benefits from the project.

Now that there is a forced slowdown of the project, it is important that this time is used to develop an engagement plan that clearly identifies the relevant communities and stakeholders to truly understand community concerns and requirements.

Once the current pandemic restrictions are lifted, it is assumed that the project will be subject to even more intense pressure and an aggressive timeline for completion. This has the real potential to result in even greater negative impacts on the surrounding communities. We appreciate the tight timelines expected of this project, however this unique situation needs to be given the consideration and respect it deserves. Measures need to be put in place to ensure that genuine and collaborative community consultation occurs, and that the recommendations resulting from this consultation are reviewed with the same degree of transparency, openness and willingness to grant concessions as Mondo have indicated in discussions and documents to date.

In conclusion, we recognise the importance of this project and the benefits, including potential employment opportunities. However, the project needs to be conducted in a manner that has the least impact on our residents, existing landscapes, the natural environment, farming activities and our towns, including a consideration of growth projections. This approach needs to be further balanced through tangible and ongoing community benefits, as it will be these communities that are left with the legacy of this project for decades to come.

To ensure this, we strongly advocate for a proper consideration of innovative and flexible approaches to addressing community concerns. These concerns will become apparent as the project progresses, and will likely require bespoke solutions along the length of the new transmission line. This may include a consideration of the undergrounding of the powerlines in key locations, community benefit sharing, guarantees of (genuine) local employment, and assessment of the project through community consultation.

Thank you for your time and we look forward to working closely with you and your team.

Yours sincerely,



Derek Madden
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Kelvin Tori
Chief Executive Officer, Melton City Council



Evan King
Chief Executive Officer, Hepburn Shire Council