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Dear Francisco,

Re: Western Victoria Transmission Network Project

The Councils represented as signatories here write as a follow up to the letter sent on 20 April, 2020. Collectively, we are concerned about the recent weeks' engagement with local landowners and the resulting social license issues in the community. We encourage AusNet Services to act in an innovative and best-practice manner in order to mitigate this ongoing risk. We have put forward within this letter a range of recommendations and requests that we would like formally answered within a two-week period.

The Councils have found the historical response time and information provision highly insufficient and that in many cases only an acknowledgement of the questions and requests for information has been provided, not responses. Therefore, it is critical that formal written responses be provided to questions and requests, some of which are dating back 18 months and have remained unanswered. It is understood that AusNet Services were only appointed to the project in late 2019. However the onus is not on Councils and impacted parties to continually provide commentary about their requests, expectations and concerns. The responsibility of an adequate project handover which addresses any pre-existing issues lies with AEMO and AusNet Services.

1. Emerging Social Licence Issues

Community feedback and recent media articles¹ have shown the emergent opposition and themes of concern across our communities. The key narratives in the community are:

- Predetermined routes being progressed rather than a holistic survey of full area of interest.
- Inappropriate use of farmland in green wedge areas.
- Detrimental effects on social or economic well-being due to displacement of non-residential land use activities such as farming, particularly through construction and ongoing quality/productivity impact on produce.

¹ <https://www.stockandland.com.au/story/6797289/these-farms-have-been-held-for-generations-opposition-to-massive-new-powerline-project/?cs=4584>

<https://themooraboolnews.com.au/?p=4987>

<https://www.abc.net.au/news/2020-06-22/stephen-curry-the-castle-community-fight-against-mega-powerlines/12378098>

<https://mooraboolonline.com.au/2020/06/20/hepburn-moorabool-melton-ballarat-all-call-for-power-pylon-project-transparency/>



- Lack of transparency around purchase of land and compensation of loss of farming income.
- Cumulative impacts.
- Lack of direct and indirect benefits for immediately impacted communities.
- Health concerns.
- Insufficient setbacks from housing being only 65 metres under legislation.
- Enhanced fire risk.
- Lack of grid benefits to the local distribution network bypassing local supply issues.
- Broad loss of social license for renewables.
- Impact to forested areas that are already experiencing current and emerging threats (i.e. gold mining exploration).

In order to mitigate these social license issues, we ask you to meet the following requests:

Request 1.1: Develop a complaints system for this project

Develop a transparent formal complaints process urgently, that Councils can direct ratepayers to. Lodging a formal complaint should be an option on this page: <https://www.westvictnp.com.au/get-involved> to ensure complaints from the community and external parties are correctly recorded, evaluated, investigated and mitigated as required. We urgently request that you prepare a complaint evaluation and response plan in accordance with the relevant standards and recommendations from the National Wind Farm Commissioner. The National Wind Farm Commissioner has an expanded mandate through to 2021 to also oversee all energy technologies and associated transmission infrastructure² and it is important the public understand there is, in effect, also an ombudsman to independently assess complaints.

Request 1.2: Provide the quantitative and qualitative methods to assess social effects

As the Environmental Effects Statement (EES) needs to assess the social implications and AusNet Services will need to use a combination of recognised quantitative and qualitative methods to meaningfully assess potential social effects, such as:

- Potential changes to local population and demographic profile.
- Social structure and networks.
- Residential amenity and social well-being.
- Social vulnerability and differential effects on parts of the community.
- Housing and social infrastructure needs.
- Perceptions of aesthetic, recreational and other social values of landscape or locality.
- Attitudes to proposed development.

These elements are less clear than heritage and environmental assessments. Please provide visibility to Councils as to how these factors will be assessed. Metrics the group would recommend are included within the analysis as they are emergent themes in the community and include:

- Short and long-term Income loss from farming land.
- Loss of succession planning and retirement funds (that are held in land).
- Increased unemployment.

² <https://www.nwfc.gov.au/about>

- Inability to sell land and/or heavily reduced valuation.
- Increased depression and anxiety in regional Victoria.

Request 1.3: Ensure the interactive map remains open for iterative feedback and community visibility for a minimum period of 12 months

The group of Councils congratulates Mondo and AusNet Services on the interactive map³ and wants to ensure that it is a dynamic and transparent tool on an ongoing basis, for the community and Councils to upload issues of consideration to.

Request 1.4: Add a Pin topic on the interactive map for Social Values

Given the need to provide the social effects impact to the EES process, it is recommended that a new pin that defines Social Values is included in the current selection, in order to stimulate community perspectives around the social effects.

Request 1.5: Ensure as many resources are available to the community via the website

Such as Planting near Electricity Lines⁴ and recommended fact sheets in this letter.

Request 1.6: Develop a fact sheet on how the preferred route will be determined and the associated timeline

Please clarify how you will assess the entire area of interest and address the community concern that a preferred route has already been finalised. There has been information emailed advising that 19 July, 2020 is the deadline for engagement on the area of interest. This short timeline is highly concerning for Councils, particularly given the current COVID-19 restrictions extended until 20 July, 2020. Please confirm the timeline and advise Councils and ensure it is uploaded on the website. We would expect to see more information on the multi-criteria methodology and the opportunities for meaningful community participation in the process.

Request 1.6: Develop a fact sheet on construction and long-term impacts for impacted landowners

Given the community concern around loss of income and biodiversity impacts through the construction period, as well as the long-term impacts to their livelihoods, please provide a fact sheet that outlines the typical impacts on farmers and other possible location based representatives (i.e. if situated on roads or in forest).

2. Council Resourcing

Given the emerging opposition from the community, there will be a significant impact on Council resources and services over the long timeline of this infrastructure development project. There is concern that we currently do not have adequate information available to respond to enquiries or support larger community discussions about the project outcomes.

Request 2.1: Consistency of communications and communications protocol in Terms of Reference

Currently there is inconsistency between on the ground information reaching landowners, what is available on the website and provision of information to Councils. This has resulted in a loss of community trust early in the process, particularly around the perspective that only a preferred route will be pursued.

³ <https://www.westvictnp.com.au/area-of-interest>

⁴ <https://www.ausnetservices.com.au/-/media/Files/AusNet/Residential-Electricity/Safety/Your-guide-to-planting-near-electricity-lines.ashx?la=en>

Further, Councils have not been provided with formal responses to queries, therefore it is recommended that the Terms of Reference for the Project Advisory Group (PAG) include communication protocols such as a two-week response time for AusNet Services to provide responses to Council representatives.

Request 2.2: Provision of Community Engagement Plan, stakeholder lists and schedule for landowners

Given landowners across the LGAs have started being contacted and Councils have no transparency of the approach, it is requested that a summary of the Community Engagement Plan activities (including advertisements and media) and an investigation corridor schedule with associated maps and/or addresses of properties is provided. Given Councils hold the ratepayers database it is not considered this would be a breach of privacy. These details should be provided a minimum of four weeks before the next engagement activity is deployed. The provision of Stakeholder lists is key, so that Councils can ensure key stakeholders are engaged.

3. Fire Risk

In response to the 2009 Black Saturday bushfires, the Victorian Bushfires Royal Commission was established to investigate causes, responses and how such devastating fires could be prevented from happening again⁵. Powerlines were found to be a significant risk, particularly SWER and 22kV lines, which are now undergoing significant upgrades under the REFCL program to mitigate this risk.

All of the signatory Councils have high risk fire danger areas. Moorabool Shire and Hepburn Shire host several extreme fire risk areas that were identified by the State Government after the 2009 bushfires, and there is concern over the risk that 500kV transmission lines may impose on the community if put above ground in the wrong locations. Although this is transmission infrastructure of a significant height, there will still need to be shown that the fire danger is not enhanced by the installation of the new lines. 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.

Request

Provide a Fact Sheet on how fire risk of the new infrastructure will be managed, particularly in forested areas as well as farmland, including impacts to aerial firefighting.

4. Undergrounding and Design Innovations

AusNet Services have a true opportunity to be highly innovative and world leaders with this project. 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.

Undergrounding of transmission infrastructure is occurring internationally due to storm related outages, security of supply issues and community opposition. Given the current community opposition and strong push for undergrounding of the transmission lines, we foresee that, in particular, there will be a focus on the visual intrusion around towns and the need to minimise the visual intrusion.

⁵<https://www.energy.vic.gov.au/electricity/powerline-replacement-fund/powerline-bushfire-safety-program/victorian-bushfires-royal-commission>

At the very minimum, the communities impacted will need to see sophisticated analysis as to why this is not an option, either for the entire project or for portions of it in highly sensitive areas.

There are several precedents, with the already built Southern California Edison's Tehachapi Renewable Transmission Project⁶ which completed a 3.5 mile underground area as part of its 173 mile route, due to community concern over a section of the chosen route's proximity to homes, schools, and parks and what the regulator considered an unfair burden on the local community's values.

In addition, there is the forthcoming Soo Green HVDC Link⁷ which will be the first underground long distance project in the USA, and is scheduled to be built by 2024. The 350-mile 2100 MW, 525KV underground high-voltage direct current (HVDC) transmission line will run from Iowa to Illinois along existing railroad right of way and other transportation corridors such as highways. This innovative project is proof that the undergrounding is an affordable option given the considerations of reduction in landowner payments, reduction in tree clearing and sensitive species, reduction in permitting complexity and reduction in social license risk to timeline and project budget blowouts from legal fights.

In order to develop these projects, there are new design innovations to overcome the open excavation technique previously used to bury underground cables. Directional drilling⁸ minimises such disruption. The directional drilling technique involves sophisticated machines that can drill holes up to 250 metres long. The tunnels or conduits can turn corners and can be sunk to a required depth. It is noted that in areas where there is considerable amount of rock or heavy subsoil it will be necessary to revert to the traditional open excavation method. Further design innovations are deployed in order to mitigate impacts of overhead lines on arable land⁹. Agricultural machines can now run under the towers, since the space under the tower is sufficient, and protective structures surrounding the legs of the new tower prevent potential collisions. In this way, soil can be worked quite close to the tower.

We encourage AusNet Service to investigate these innovations and report back to the stakeholders accordingly.

Request 4.1: Cost-benefit analysis for underground versus overground areas

Provide information as to a cost- benefit comparative analysis with undergrounding entire/portions of the transmission line to compare it with the above ground option.

5. Forest and Biodiversity Impact

Council is concerned the biodiversity, fire and amenity impacts the power lines may have on natural landscapes and the negative impact that will have on the State and Regionally significant landscapes and views. The impacted LGAs host grasslands, state parklands and state forests in the current area of interest. In addition, the 'VEAC Central West Investigations Draft Proposals Paper' identifies the establishment of the Wombat-Lerderderg National Park.

⁶ <https://www.sce.com/about-us/reliability/upgrading-transmission/TRTP-4-11>

⁷ <https://www.soogreenrr.com/>

⁸

https://www.aph.gov.au/sitecore/content/Home/About_Parliament/Parliamentary_Departments/Parliamentary_Library/Publications_Archive/CIB/CI/B9697/97cib11

⁹ <https://www.fingrid.fi/en/grid/maintenance/transmission-lines/field-tower/>

There is a conflict with these recommendations and the current footprint of the area of interest. Highly sensitive natural areas are already experiencing community backlash over extractive industries such as mining¹⁰ and compulsory acquisition of farmland to protect native grasslands¹¹ that would be further exacerbated by any intrusion by the transmission project.

Request 5.1: Provide clear information as to how the transmission line may impact natural areas and how this impact may be mitigated.

Describe how exactly these sensitive local areas may be impacted and if they would be potential locations for transmission infrastructure or if they will be removed from the area of interest early in the process.

Please progress with formal responses to these questions and requests.

We will provide a further document around the benefit sharing opportunities, process and implications of the project in the coming weeks.

Yours sincerely,



Derek Madden

Chief Executive Officer, Moorabool Shire Council



Kelvin Tori

Chief Executive Officer, Melton City Council



Evan King

Chief Executive Officer, Hepburn Shire Council

¹⁰ <https://www.abc.net.au/news/2020-06-17/blackwood-residents-protest-gold-exploration-lerderberg/12363094>

¹¹ <https://bwvp.ecolinc.vic.edu.au/content/proposed-western-grassland-reserves>