



The Hon Richard Wynne
Minister for Planning
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Email: Richard.Wynne@parliament.vic.gov.au

27 July, 2020

File: 13/03/010

Dear Minister,

Re: Western Victoria Transmission Network Project Environmental Effects Statement

The Councils represented as signatories write to you collectively as we are concerned about the undetermined Environmental Effects Statement (EES) referral outcome for the Western Victoria Transmission Network Project (WVTNP). This letter puts forward a number of recommendations that will assist with determining sufficient criteria is included in the EES to respond to the needs of our local communities.

We encourage the State Government of Victoria, as the referral authority under *Environmental Effects Act 1978*, to consider the long-term impacts of the multiple transmission upgrades that are forecast across the state 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. The construction of this infrastructure directly impacts the social license of renewables more broadly and our ability to deliver to the state based Victorian Renewable Energy Target (VRET) of 50% renewable by 2030.

1. Confirming the EES

Whilst we understand the pressures on the State Government during COVID-19, it is vital that the requirement for a full and detailed EES is confirmed as soon as possible in order to mitigate the increasing social license issues across our communities around a fair and transparent process.

The current key narratives in the community are:

- Concerns over fast tracking of the EES process as part of COVID stimulus actions.
- Broad loss of social license for renewables in areas with historically high social license.
- Predetermined routes being progressed rather than a holistic survey of full area of interest.
- Inappropriate use of prime agricultural land 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.



- 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.
- Emotional and physical health concerns.
- Insufficient setbacks from housing being only 65 metres under legislation.
- Enhanced fire risk and hindered firefighting options.
- Lack of grid benefits to the local distribution network bypassing local supply issues.
- Impact to forested areas that are already experiencing current and emerging threats (i.e. gold mining exploration).

Request 1.1 - That the requirement for a full and detailed EES is confirmed soon in order to mitigate local community distress around a fair and transparent process.

2. Undergrounding and Design Innovations

The Victorian Government and AusNet Services/Mondo (AusNet) have an opportunity to be highly innovative world leaders with establishing best practice design for this project and setting the bar for future transmission infrastructure. As there have been additional options put forward through the AEMO Project Assessment Draft Report (PADR) and Project Assessment Conclusion Report (PACR) processes that were not considered nor documented as to why not, the EES is the only pathway for these to be resolved.

Request 2.1 - That the EES requires AusNet to investigate alternative designs

We request an explicit directive for AusNet to investigate alternative design innovations and report back to stakeholders accordingly. This would include providing a cost-benefit comparative analysis with undergrounding entire or portions of the transmission line to compare it with the above ground option. There may also be complimentary easements becoming available through the Western Outer Ring Main Project for a new gas pipeline that should be considered in the undergrounding scenario¹. In addition we recommend that further analysis is undertaken in regards to AusNet's preferred alternative route as identified in their submission to AEMO². AusNet put forward what they considered to be an enhanced and more optimal route that was a new third option to the two routes identified by AEMO.

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 increased fire risk. 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.

¹ https://www.apa.com.au/globalassets/documents/our-current-projects/worm/worm_factsheet_023.pdf

² https://www.aemo.com.au/-/media/files/stakeholder_consultation/consultations/nem-consultations/2020/draft-2020-isp/submissions/ausnet-services-submission-draft-2020-isp.pdf?la=en

There are several precedents, with the already built Southern California Edison's Tehachapi Renewable Transmission Project³ 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. There is also the 150kV Murraylink project built in 2002 with two 180-kilometre long bipolar HVDC cables, which put Australia on the map as the first and longest HVDC underground project.⁴

In addition, there is the forthcoming Soo Green HVDC Link⁵ 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 drilling minimises such disruption⁶. 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 land⁷. 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.

3. Social Effects

As the EES needs to assess the social implications and AusNet 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 clearly defined than heritage and environmental assessments.

³ <https://www.sce.com/about-us-reliability/upgrading-transmission/TRTP-4-11>

⁴ <https://new.abb.com/se/temasidor/hvdc-60-ar/murraylink>

⁵ soogreenrr.com

⁶ https://www.aph.gov.au/sitecore/content/Home/About_Parliament/Parliamentary_Departments/Parliamentary_Library/Publications_Archive/CIB/CIB9697/97cib1

⁷ <https://www.fingrid.fi/en/grid/maintenance/transmission-lines/field-tower/>

Request 3.1 - Provide directive to AusNet to make visible the quantitative and qualitative methods to assess social effects under the EES

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 include:

- Short and long-term Income loss from farming land.
- Loss of succession planning and retirement funds (that are held in land).
- Increased unemployment.
- Inability to sell land and/or heavily reduced valuation.
- Increased depression and anxiety in regional Victoria.

Request 3.2 - Provide directive to AusNet to transparently provide Community Engagement Plan, stakeholder lists and schedule for landowners under the EES

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.

4. Competing Policy and Future Aspirations of the Region

Many long-term plans, studies and forthcoming legislation across the area of interest creates particular complexity and conflict with the development of the WVTNP. Many of these projects are sponsored by different departments across the State Government, however a lack of integration of these competing activities is brought into the spotlight in regards to the transmission project. Council is concerned the biodiversity, cultural heritage, farmland, 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.

Request 4.1 - Provide directive to AusNet to respond to VEAC recommendations early under the EES

There is a conflict with the VEAC recommendations and the current footprint of the area of interest. These highly sensitive natural areas are already experiencing community backlash over extractive industries such as mining. The community needs to be informed if the areas identified in the 'VEAC Central West Investigations Draft Proposals Paper' for establishment of the Wombat-Lerderderg National Park will be removed from the area of interest early in the process

Request 4.2 - Provide directive to AusNet to respond to fire risk early under the EES

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 extreme and high-risk fire danger areas. These fire risk areas 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 4.3 - Provide directive to AusNet to respond to the cultural heritage sites part of the regional UNESCO world heritage bid early under the EES

Work is finally underway on a regional tourism, community development and cultural heritage concept that has been floated since 1986 to apply for UNESCO world heritage protection for the sites of importance to the global gold rushes across our region. This year 12 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.

Request 4.4 - Provide directive to AusNet to work closely with the regional Registered Aboriginal Parties early under the EES

Given the large footprint of the area of interest it is vital a place-based approach to engagement with these significant stakeholders is delivered to understand the level of engagement, partnership and co-design that is possible, desired and appropriate throughout the project stages. Registered Aboriginal Parties (RAPs) are responsible for the protection of Aboriginal cultural heritage in a specified area. Engaging with RAPs, is key to understanding local priorities and sensitive areas that cannot be discovered through desktop analysis.

Request 4.5 - Provide directive to AusNet to review future plans around land use, farming and water early under the EES

Competing investigations such as the initial outcomes of the Protecting and Supporting Melbourne's Strategic Agricultural Land which will be starting stage two of consultation in August are of high relevance to the area of interest⁸. The Victorian Government is committed to protecting the long-term future of agricultural land in Melbourne's green wedge and peri-urban areas and to develop robust planning controls with local Councils to ensure a cohesive approach to land-use planning.

⁸ <https://engage.vic.gov.au/gwal>

A further high priority development is the Western Irrigation Network (WIN) which is co-funded by the State Government, Federal Government, Western Water and private agribusinesses to the value of over \$100m⁹. Farmers across our region are working on detailed farm plans as to how they will use the increased water supply once WIN is delivered in 2022.

It is vital that these important farms to Melbourne's food supply are not detrimentally impacted by the transmission project.

We thank you for taking the time to consider the issues raised in this letter, but again we strongly urge the Victorian 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 they can be proud.

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.

Yours sincerely,



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