



**Moorabool**  
Shire Council

# Western Renewables Link Environment Effects Statement and Planning Scheme Amendment GC209

Moorabool Shire Council Submission

**4 September 2025**

## **Acknowledgement of Country**

Council respectfully acknowledges the Traditional Owners of the land which includes the Wurundjeri Woi Wurrung, Wadawurrung and Dja Dja Wurrung people. We pay our respects to the Elders past, present and emerging.

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## Introduction

This submission provides Moorabool Shire Council's (**Council**) response to the Environment Effects Statement (**EES**) and Draft Planning Scheme Amendment GC209 (**PSA**) for the Western Renewables Link Project (**WRL Project**) exhibited on 30 June 2025.

It is noted that, as at 2 September 2025 according to AusNet Transmission Group Pty Ltd (AusNet)'s website, in June 2025 there were changes to the WRL Project program and expert advice was sought in relation to program changes. Separately, on the same webpage, the proponent has disclosed peer reviews relating to the earlier EES materials (prior to the program changes), which pursuant to instructions to peer reviewers may be exhibited with the technical impact assessments. This was not done.<sup>1</sup> The apparently late disclosure of this material on the AusNet website is prejudicial to Council's ability to meaningfully respond to the EES.

These submissions do not substantively respond to either the latest program changes or the peer review material. We note this is consistent with AusNet's website where it is stated on the page that provides such additional information that "submissions should not be based on the information on this webpage".<sup>2</sup>

Council has identified a number of material issues in the EES and PSA. Significant adverse social and environmental effects will occur in Moorabool Shire and these are unacceptable to Council.

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<sup>1</sup> Peer reviews and Program change advice were housed in a separate section of AusNet's WRL Project website: [www.westernrenewableslink.com.au/ees/ees-information-updates/](http://www.westernrenewableslink.com.au/ees/ees-information-updates/)

<sup>2</sup> Clearly the role of the peer reviews and that of the opinions on program changes together with the weight that should be afforded to those documents (if any) needs to be resolved at the directions hearing.

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## Summary

In summary, Council's position is that:

- a. Council is concerned about the environmental impacts of the WRL Project in Moorabool Shire.
- b. The approach to investigation and assessment of environmental impacts and project alternatives, including full and partial undergrounding, in the EES is inadequate.
- c. The environmental impacts of a fully overhead transmission line on Moorabool Shire are not acceptable.
- d. There is a risk that the WRL Project's Proposed Route, and design and siting of infrastructure will change when further assessments are undertaken and/or other approvals or post-approval matters necessitate refinement of the WRL Project. This creates unacceptable levels of uncertainty with respect to environmental effects.
- e. There has been inadequate focus on the impacts on people and communities, including social impacts, bushfire impacts, and impacts on tourism and socio-economic matters.
- f. The proposed implementation arrangements, through the implementation of the PSA and later approvals are not adequate to provide appropriate protection from environmental impacts.
- g. Council does not support the WRL Project in its current form. Major modifications or further investigations are needed to demonstrate that acceptable outcomes can be achieved. The PSA should not proceed in view of the unacceptable level of impact.

The submission identifies the main issues of concern for Council at the date of the submission. Given the volume of the exhibited EES documentation and time limitations on provision of submissions, Council has made limited comments in relation to implementation, including in relation to the PSA, Incorporated Document and Environmental Performance Requirements (**EPR**).

This submission does not represent the complete suite of issues of concern and is not exhaustive. Council reserves the right to expand on these matters and to respond to any other matters raised by the parties at the Inquiry and Advisory Committee hearing.

## About Moorabool Shire

Moorabool Shire is a Peri-Urban Council located 40km west of Melbourne's CBD. The shire straddles Victoria's Western Highway and is situated between the cities of Melbourne, Ballarat and Geelong.

Moorabool's landscape is highly varied, comprising fertile plains, volcanic hills, gorges, bushland and granite ranges. State forests, parks and water catchments make up over 74% of the total local government area.

The municipality contains 64 settlements of varying sizes, ranging from small towns, hamlets and farming settlements to its larger centres of Bacchus Marsh and Ballan. As such, most settlements are small, rural towns that support rural industry, visitors, and provide services for residents.

Moorabool Shire's collection of natural assets and peri-urban environment creates significant lifestyle and economic benefits for residents, businesses and visitors alike.

Moorabool Shire is experiencing rapid urban and population growth, with the current population of 40,339 forecast to double in the next 20 years.

## Council's involvement in WRL consultation

Council has had early and ongoing involvement in the WRL Project.

A formal Technical Reference Group (**TRG**) comprising a number of government agencies was established in late 2020. Council has been a member of the TRG and has provided feedback to the proponent during consultation and WRL Project development.

A Council Advisory Group (**CAG**) was also established in 2020 to provide WRL Project updates and discuss TRG matters of particular relevance to local government representatives, such as communications, fieldwork and community engagement activities. Moorabool Shire attended the CAG along with representatives from each of the five other councils impacted by the Proposed Route, and members of the WRL Project team.

Since 2018, Council has proactively liaised with the Australian Energy Market Operator (**AEMO**) and later the proponent, when the need for the WRL Project was identified.

Between 2018 and 2020, Council made several submissions and held meetings with AEMO and Mondo – AusNet's commercial arm – as part of the RIT-T process and following Mondo's appointment to plan, design, construct, operate and maintain the transmission line.

The focus of Council's initial communication was that the WRL Project's investigation corridor should be identified, to enable Council to provide comprehensive comment to the RIT-T on the proposed alignment and its potential impacts on the community, environment and existing land uses. The area of investigation ultimately was not released until formal EES Referral in June 2020.

Since 2020, Council has communicated concerns with respect to WRL Project.

This has included joint correspondence with other impacted councils, raising shared concerns about several matters relating to the WRL Project. These matters included but were not limited to, emerging social licence issues, underground alternatives for WRL, as well as adequate scoping of social effects to include assessment of community wellbeing and local intangible values relating to place.

Ultimately, notwithstanding the consultation that has occurred, many of Council's concerns with the WRL Project remain.

The exhibited EES materials are the first time that Council has been provided with an understanding of all the projected environmental effects of the wrl Project.

## Overarching Concerns

In addition to particular environmental impacts of concern to Council (outlined at Specific Concerns), Council has overarching concerns with respect to the EES.

### Community and stakeholder engagement

1. WRL is a landscape-scale project with extensive and varied environmental impacts. Community and stakeholder engagement is of fundamental importance to ensuring those impacts are well understood.
2. The only “engagement tool” of 23 listed by the WRL Project, described as being for the purpose of “[obtaining] feedback about what is important to people in their local community” in their own words, was the social pinpoint map from 2021:<sup>3</sup>

A Social Pinpoint data mapping tool was opened from 15 March to 30 April 2021 to inform the project design, specifically asking stakeholders to provide feedback on **what is important to them in their local area** by allowing them to **drop pins to share location specific insights**. The tool was used to **enhance the project team’s understanding of the local area** and was not intended as a full representation of important community information. Examples of insights from the Social Pinpoint mapping tool are shown in Figure 10, with further information provided in Appendix F.<sup>4</sup>

[Emphasis added]

3. Save for select direct quotes in the Social Impact Assessment,<sup>5</sup> the social pinpoint data features in the EES only as a list of geographic locations, with any commentary and values-based information that was originally attached to those pins having been removed.<sup>6</sup>

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<sup>3</sup> See Table 3, pages 18-20 of Attachment IV: Stakeholder and Community Engagement Consultation Report.

<sup>4</sup> Page 22, Attachment IV: Stakeholder and Community Engagement Consultation Report.

<sup>5</sup> See Technical Report F: Social Impact Assessment.

<sup>6</sup> See Appendix F: Feedback from Social Pinpoint in Attachment IV: Stakeholder and Community Engagement Consultation Report.



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4. The EES Consultation Plan (**Consultation Plan**) identifies the purpose of communication and engagement activities undertaken by the WRL Project between 2021 and 2024:<sup>7</sup>

To seek community and stakeholder feedback on EES investigations and project design **for consideration by technical specialists**, to assist in the **identification of values based on local knowledge for consideration in design and assessments**, and to identify opportunities for community benefits.

[Emphasis added]

5. Ultimately, consultation to date has been inadequate and has not delivered on the communications and engagement objectives outlined in the Consultation Plan, which are:<sup>8</sup>

Facilitate genuine stakeholder and community engagement, **seeking input to minimise impacts**, maximise benefits and meet commitments made to the community.

**Strengthen relationships** with the community and stakeholders to **foster trust**, awareness and understanding of the project.

**Establish and maintain social licence** to develop, construct and operate through best practice community and stakeholder engagement.

**Provide timely information** to all stakeholders, including the design, planning and approvals, construction and operations processes.

Minimise impacts to stakeholders by **proactively mitigating potential impacts** and promptly responding to stakeholder inputs.

[Emphasis added]

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<sup>7</sup> Page 11, EES Consultation Plan 2023.

<sup>8</sup> Page 11, EES Consultation Plan 2023.

6. The EES highlights the range of “engagement challenges” faced by the WRL Project, which in turn indicate that the engagement approach falls short of the Consultation Plan objectives. The “engagement challenges” listed include:<sup>9</sup>
- Mental health: uncertainty about the Project delays **impacting mental health and wellbeing in local communities**
  - Community distrust: **Distrust of the Project team** and, as a result, AusNet more broadly
  - Social licence: First major transmission project in decades and varying levels of awareness about the energy transition has added to the **challenge of achieving social licence**
  - Engagement fatigue: [An] **extended Project development stage** and consultation in the region for other infrastructure projects, including Transgrid's Victoria to New South Wales Interconnector West (VNI West) and VicGrid's Victorian Transmission Plan (VTP) have contributed to **engagement fatigue**
  - COVID-19: Community engagement obstacles caused by lockdowns and restrictions enforced during the COVID-19 pandemic.
- [Emphasis added]
7. Proponent-generated reporting of engagement outcomes were provided to the WRL Project’s technical report authors and treated as inputs for “consideration” or “review” as desktop analysis to inform the EES.<sup>10</sup> However, engagement results have not been published in full by the WRL Project, de-identified or otherwise, with transparent documentation of what was heard and how this information was both qualitatively and quantitatively analysed to inform the assessment of environmental effects.
8. In addition to concerns with the adequacy of meaningful consultation with the community, it is noted that up until 2025, Council was being asked to substantively

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<sup>9</sup> Page 10, Chapter 7: Community and Stakeholder Engagement.

<sup>10</sup> Page 12, EES Consultation Plan 2023.

comment on the proponent's Assessment of feasibility for an underground 500kV transmission line for Western Renewables Link.<sup>11</sup>

9. The approach to WRL Project development has left the consideration of people behind, with the substantive evaluation of social and community impacts apparently occurring late in project development, to the detriment of Moorabool Shire.
10. Proposed Environmental Performance Requirements (**EPR**) require amendment to ensure that Council is consulted in the development and approval of any future Communications and Stakeholder Engagement Management Plan and Complaints Management System.

## Difficulties with a “Proposed Route”

11. The EES materials are predicated on delivery of transmission infrastructure located within land identified as a “Proposed Route”. The Proposed Route is located within land that is to be used for either construction or operation (**Project Area**), itself within land identified as covering all the land parcels that could be used for the WRL Project (**Project Land**).
12. The difficulty with this approach is that the “Proposed Route” and siting of towers and other infrastructure will change as a result of “refinement”<sup>12</sup> *after* the EES process including during detailed design. Whether refinement results in a reduction or an increase of impact, it will certainly involve a change in impact.
13. Even if the Proposed Route remains within the Project Area, infrastructure may be located in a different location to that shown in the EES exhibited materials. This presents significant difficulties for community, stakeholders and others to engage with the WRL Project and reasonably understand its potential impacts. Put simply,

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<sup>11</sup> EES Attachment II: Assessment of feasibility for an underground 500kV transmission line for Western Renewables Link.

<sup>12</sup> See, for example: Executive Summary, Page 19, which states “AusNet will continue to consider requests from directly affected landholders and communities in relation to further refinement of the Proposed Route on individual properties.”; Executive Summary, Page 24, “However, surveys will be conducted before construction begins to inform design refinements and reduce the area of impact where practicable.”; Attachment I, Page 1: “It is important to note that the Project may be subject to further refinements throughout the EES process.”

Project impacts could be materially different and, in some cases, much worse than currently identified and purportedly assessed in the EES materials.

## Prematurity

14. The EES is premature. The exhibited EES has been prepared on the basis of incomplete studies. If the studies which underpin the EES are not complete, then the EES process cannot adequately assess the true impacts of the proposal. Similarly, evaluating the effectiveness and acceptability of proposed measures to avoid, minimise, manage and offset environmental effects is more challenging if the impacts are not fully understood.
15. There is extensive reference in the exhibited EES documents to the fact that further studies will need to be undertaken because the studies which underpin the environmental assessment are either desktop only or are incomplete. Further surveys will need to be done with respect to biodiversity,<sup>13</sup> Aboriginal cultural heritage and surface water, by way of example. With respect to biodiversity, a significant limitation is the access restrictions which prevented comprehensive on-ground surveys across approximately 24% of the Project Area<sup>14</sup> and consequently, the impacts are not known.
16. Once further and/or detailed studies are eventually undertaken, they may reveal matters that necessitate changes to the Proposed Route, design or siting of infrastructure that are substantial. An example of this, might occur in the context of surface water impacts, where the proponent has relied exclusively on desktop assessment despite the WRL Project infrastructure crossing a significant number of waterways and water bodies along the Proposed Route and proposing significant infrastructure and construction works. It is foreseeable that Proposed Route, infrastructure design and/or siting may require modification once any field work is undertaken. Similarly, it is foreseeable that in the absence of complete Aboriginal

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<sup>13</sup> See Executive Summary, Page 26: "Surveys will be undertaken to confirm presence of both FFG Act and EPBC Act ecological values in areas previously unsurveyed due to access constraints. These surveys will inform the final design and opportunities to avoid vegetation and species habitat removal through route refinement or the establishment of no-go zones in areas where native vegetation and species habitat will be retained. The approach to these surveys and requirements to avoid and manage impacts will be documented in a Vegetation Management Plan."

<sup>14</sup> Page 37, Technical Report A: Biodiversity Impact Assessment.

cultural heritage studies and approved cultural heritage management plans, matters may be discovered in future studies which necessitate route alterations, potentially resulting in different or additional impacts beyond those anticipated in the EES.

## Inadequate process for development of project and assessment of alternatives

17. Council is concerned about the process for development of the WRL Project and the adequacy of the investigation of alternatives.

18. The decision of the Minister for Planning to require an EES<sup>15</sup> states the requirements for the EES. This includes:

The EES is to document investigations of potential environmental effects of the proposed project, including the feasibility of associated environmental mitigation and management measures, in particular for:

- a. **alternative corridors, alignments, site locations, designs or other options** for the planning, construction or operation of the project;
- b. potential effects on biodiversity, including loss, degradation or fragmentation of habitat;
- c. effects on Aboriginal and historic cultural heritage values;
- d. impacts on visual and landscape values; and
- e. other effects on land uses and the community.

[Emphasis added]

19. The reasons for the decision<sup>16</sup> of the Minister for Planning in relation to the decision to require an environment effects statement include that:

An EES process will provide a robust, transparent and integrated framework through which:

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<sup>15</sup> Decision under the *Environment Effects Act 1978* dated 22 August 2023.

<sup>16</sup> Reasons for decision under *Environment Effects Act 1978* (Referral Number 2023-R04) dated 22 August 2023.

- i. the project's potential environmental effects can be **rigorously assessed**, including in the context of the comparative effects of feasible siting, alignment, design and operational alternatives for key components of the project; and
- ii. the effectiveness and acceptability of proposed measures to avoid, minimise, manage and offset environmental effects and related risks can be evaluated/ examined.

[Emphasis added]

20. In relation to assessment of the alternative of undergrounding at Darley, (with the exception of visual and landscape assessment) no additional field studies were undertaken in relation to the assessment of five alternative corridors. The absence of studies that investigate the environmental effects of alternatives, such as at Darley, does not enable transparent and rigorous scrutiny of alternatives.

21. The Scoping Requirements<sup>17</sup> state that:

The purpose of the EES is to provide a detailed description of the project, assess its potential effects on the environment<sup>1</sup> and investigate feasible alternative project designs, alignments and other aspects to avoid and mitigate effects.

<sup>1</sup> Here, 'environment' encompasses physical, biological, heritage, cultural, social, health, safety and economic aspects.

22. Section 3.4 of the Scoping Requirements provides:<sup>18</sup>

The EES should explain the proponent's criteria for evaluating the feasibility of potential alternatives and explain how specific alternatives were shortlisted or rejected for evaluation within the EES. **The EES should document the likely environmental effects of feasible alternatives, particularly where these offer a potential to avoid or minimise adverse**

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<sup>17</sup> Scoping Requirements Western Renewables Link Environment Effects Statement dated November 2023.

<sup>18</sup> Pages 11 and 12 of Scoping Requirements Western Renewables Link Environment Effects Statement, dated November 2023.

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**environmental effects whilst meeting the objectives of the project.**

[Emphasis added]

23. The assessments and conclusions with respect to feasibility of alternatives is disputed.
24. The proponent's approach to feasibility puts timing, economic and technical feasibility matters ahead of whether or not the proposal is feasible, having regard to environmental impacts and constraints.
25. Furthermore, the exhibited EES materials do not contain any detailed information about the costings for the options to enable evaluation of purported economic estimates that informed feasibility.
26. Council is also concerned about the development of the WRL Project from 2020 to the exhibited Proposed Route. Whilst community engagement is said to have informed the investigation of the WRL Project's Proposed Route since 2020, including through an online virtual interactive mapping tool, social impacts were not a factor in constraints mapping.<sup>19</sup> The comparison of potential corridors and evaluation of shortlisted corridors did not include social impacts, though occupation was considered.<sup>20</sup> Route selection criteria used to guide the design of the Proposed Route did not include social factors,<sup>21</sup> though it did include maximising distance to houses and other sensitive facilities, Aboriginal cultural heritage sites and culturally significant sites and registered heritage sites.
27. Council submits that the EES process has not properly applied the requirements of the *Environmental Effects Act 1978*, the Ministerial Decision and Scoping Requirements.

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<sup>19</sup> Page 29, Attachment I: Project development and assessment of alternatives.

<sup>20</sup> See Attachment I: Section 6 and section 6.3; and pages 53-56.

<sup>21</sup> See Attachment I: Page 66.

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## Reliance on subsequent approval processes to deliver environmental protection

28. The proposed regulatory framework comprises, via the PSA:
- The Incorporated Document;
  - Development Plans and Micro-siting Plans to be approved and endorsed by the Minister for Planning pursuant to the Incorporated Document;
  - An Environmental Management Framework (**EMF**) to be to the satisfaction of the Minister for Planning pursuant to the Incorporated Document;
  - Various plans to be prepared pursuant to the EMF; and
  - Environmental Performance Requirements (**EPRs**) in the EMF.
29. Whilst the Development Plans and Micro-siting Plans and the EMF and constituent EPRs are to be approved by the Minister for Planning, with the exception of plans proposed to be approved by Energy Safe Victoria, all other plans are to be prepared by the principal contractor for the WRL Project (or with AusNet) and approved by AusNet. This leaves much of the substance of environmental effects management to a future and further process, with potential material risks associated with poor plans being developed, without consultation with Council.
30. Many key aspects of avoidance, mitigation and benefit sharing are scattered throughout the paperwork but are unresolved, leaving it to a later consent process to resolve. The proposed framework requires more certainty in relation to outcomes and specific inclusion of consultation requirements with Council and others.
31. There is no clarity that the actual “on the ground” delivery of the WRL Project via various subsequent plans will either deliver appropriate mitigation and benefit or avoid detrimental environmental effect on affected communities.



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## Overview comments in relation to Darley

32. Darley is a picturesque area located north of Bacchus Marsh. It is known for its natural beauty, rolling hills and parks. It has a strong sense of community. A substantial population of 9,190 residents and 3,384 dwellings are located in Darley.<sup>22</sup>
33. Darley is arguably the single most impacted community in the Proposed Route. Social impacts, visual impacts and bushfire impacts are high at this location.
34. The Social Impact Assessment identifies that the residual impact of the operation of the WRL Project for Darley and Surrounds as follows:<sup>23</sup>
- **Major – Moderate Negative impacts** on directly affected landholders
  - **Major Negative impacts** on surrounding landholders
  - **Major – Moderate Negative** impacts on the broader community.
- [Emphasis added]
35. In addition to material negative social impacts and visual impacts, the WRL Project crosses priority bushfire access and egress routes at Darley (discussed further in the Bushfire section below).
36. Given the acknowledged high environmental impacts at Darley, Council is particularly concerned about the approach adopted with regard to the Environmental Impact Assessment<sup>24</sup> of partial undergrounding at Darley, prepared by Jacobs.
37. In the Environmental Impact Assessment and the EES, high impact matters with identified actual risks such as bushfire, biodiversity, landscape and visual are compared against other risks, including risks that are “potential” and in some cases assessed in the assessment as being “negligible.”<sup>25</sup> Furthermore, the bushfire

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<sup>22</sup> As at 2021 Census, Australian Bureau of Statistics.

<sup>23</sup> Page 104, Technical Report F: Social Impact Assessment and pages 19, 22, 23 of Chapter 21: Social.

<sup>24</sup> Appendix B of Attachment I: Darley partial undergrounding environmental impact assessment.

<sup>25</sup> See, for example, the case of surface water, at page 54, Appendix B of Attachment I: Darley partial undergrounding environmental impact assessment.

assessment was not subject to the same tabular assessment and conclusion of impacts, instead the Environmental Impact Assessment states:<sup>26</sup>

There are greater operational bushfire impacts associated with overhead transmission lines, compared to underground transmission lines. These include constraints on bushfire responses in the immediate vicinity of the transmission lines and access and egress issues associated with failure of a tower or fallen conductors during a bushfire event. The latter, particularly, has been raised as a key community concern. While there are effective mitigations for these potential impacts, undergrounding of the transmission line would eliminate most potential operational bushfire impacts.

Undergrounding in the Lerderderg Gorge Rd – Camerons Rd area would address community perceptions of blocked egress following tower or conductor collapse. This area is the only one for which there are no good alternative egress routes. However, if bushfire warnings are timely, accessed by people in these locations and they evacuate quickly in response, there should be time to either receive confirmation that a fallen powerline is safe to cross or safely seek an alternative route.

There is potential for off-site bushfire ignitions to affect operation of an underground transmission network, as there is for an overhead transmission network. However, off-site ignition is less likely to affect underground cables and disrupt electricity supply.

38. Council disagrees with the approach and conclusions with respect to the environmental impact assessment and feasibility of partial undergrounding at Darley. Actual high environmental effects should not be stacked against cost-saving measures or purported timing constraints. With respect to timing, Attachment I states:<sup>27</sup>

Based on supplier information, partial undergrounding could take two to three years to design and install (excluding civil works). Partial undergrounding would also have assessment and approval requirements

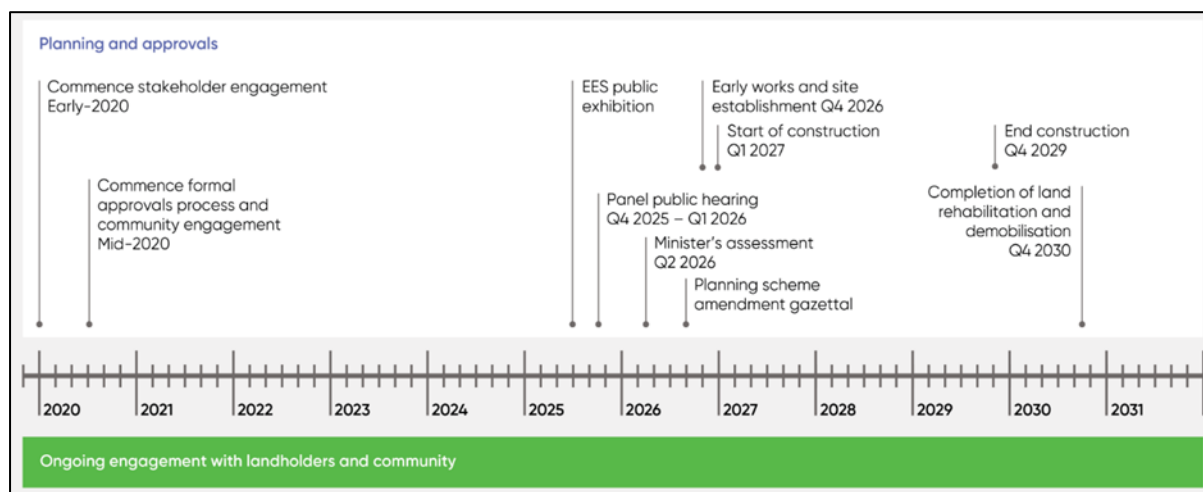
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<sup>26</sup> Page 57, Appendix B of Attachment I: Darley partial undergrounding environmental impact assessment.

<sup>27</sup> Page 146, Attachment I: Project development and assessment of alternatives.

including environmental and heritage surveys further to what has been completed for the Project to date which would extend the timeframe for construction commencement for the Project.

39. Two to three years appears to sit within the recently released updated WRL Project timeline:<sup>28</sup>



40. To the extent that it is argued that the alternative underground option would be subject to environmental and heritage surveys, Council's understanding is the Proposed Route requires these further studies in any event.

## Construction and operational phases

41. Council is concerned with impacts during both the construction phase and operational life of the WRL Project.
42. The nature and extent of construction works for towers in particular has been downplayed in the EES documents.
43. With respect to construction matters, Council is concerned about impacts to amenity associated with noise, dust and vibration.

<sup>28</sup> [www.westernrenewableslink.com.au/about/about-the-project/](http://www.westernrenewableslink.com.au/about/about-the-project/)

## Specific Concerns

### Social and community

44. On the basis of the exhibited EES materials, social impacts have not been adequately assessed or addressed. There is a material risk that social impacts from the WRL Project will result in unacceptable outcomes. The concluding remarks of the Strategic Impact Assessment are in Council's view, a damning indictment of the WRL Project's projected social impact. These include:<sup>29</sup>

Changes to land use and amenity brought about by the Project would be both **unpopular and potentially impactful** for various individuals and social groups who live, work and/or recreate in the study area. While the Project would, in most instances, not prevent existing social and cultural activities (potential limitations on **farming operations being a notable exception**), it does have **substantial potential to undermine the value that people attribute to these activities** and/or **require individuals and groups to actively engage with the Project**, in order to minimise the Project's consequences. In turn, the Project may to varying degrees, **reduce satisfaction obtained from particular land uses**, including residential occupation, recreation, etc. and any associated **sense of connection to the various 'places' and communities which exist** in the study area. In some parts of the study area, impacts would be **sufficiently severe and widespread to precipitate reductions in community capacity and cohesion** in the short to medium term.

[Emphasis added]

45. Council is concerned that:
- a. The community of Darley will be particularly badly impacted by overhead transmission lines at or in the vicinity of the Proposed Route;
  - b. As noted above, the methodology for project development and consideration of project alternatives has been inadequate to understand and avoid adverse social impacts. The social impact of the WRL Project has been underestimated.

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<sup>29</sup> Page 115, Technical Report F: Social Impact Assessment.

In addition to other matters, Council is concerned that according to the Social Impact Assessment, the Social Impact Assessment only occurred after referral and decision of the Minister for Planning on the EES and was:<sup>30</sup>

“based primarily on a desktop review of publicly available data and information generated by AusNet led community engagement activities. Most of this activity occurred prior to the engagement of the author (September 2023)” ...

- c. limited mitigation measures are proposed with respect to social impacts;
  - d. EPRs are extremely limited;
  - e. the project fails to adequately mitigate or offset social impacts; and
  - f. consultation with Council is required before plans are developed.
46. Council is also concerned that the impacts on tourism in Moorabool Shire from the WRL Project have not been adequately assessed in the EES, including in the context of social impact. For example, a summary of residual impacts in the Social Impact Assessment states that impacts from “operation” are “not rated.”<sup>31</sup>

|                         |                               |   |   |   |
|-------------------------|-------------------------------|---|---|---|
| 4- Darley and Surrounds | Directly Affected Landholders | <ul style="list-style-type: none"> <li>Construction activity including noise would affect the amenity of various locations, including nearby dwellings for a relatively short period, and may be a source of minor irritation.</li> <li>Properties to the north of Darley include smaller equine properties and lifestyle properties which offer expansive views (Swans Road) and/or which are set in a picturesque valley. In some instances, the Project's effect on the attractiveness of the properties to the current owners would be substantial. Fears relating to bushfire safety may contribute to landholder concerns in this area.</li> </ul>  | <ul style="list-style-type: none"> <li>Moderate Negative</li> </ul> | <ul style="list-style-type: none"> <li>Major - Moderate Negative</li> </ul> |
|                         | Surrounding Landholders       | <ul style="list-style-type: none"> <li>The undulating topography of Darley and surrounds affords pleasant views of the Lerderberg State Park to the north for suburban residents and contributes to the character and amenity of rural properties. Many homes in the area have been designed to take advantage of the prevailing views. Residents associate the area's scenic qualities with an aspirational lifestyle. The Project would affect the quality of views from many homes, disrupting this lifestyle and the sense of identity that it supports.</li> <li>Increased bushfire risk may affect the attractiveness of some dwellings in Darley and surrounds.</li> <li>Affected residents may harbour ongoing frustration and resentment toward the Project, and in some cases may experience a desire to relocate.</li> </ul> | <ul style="list-style-type: none"> <li>Minor Negative</li> </ul>    | <ul style="list-style-type: none"> <li>Major Negative</li> </ul>            |
|                         | Broader Community             | <ul style="list-style-type: none"> <li>Views of the Project from local roads, and locations such as the Bald Hill Activation Area, the Bacchus Marsh Golf Course and walking trails along the Lerderberg River, may detract from residents' sense of place and enjoyment of a valued lifestyle among members of the broader suburban community of Darley, including Surrounding Landholders.</li> </ul>   | <ul style="list-style-type: none"> <li>Minor Negative</li> </ul>    | <ul style="list-style-type: none"> <li>Major - Moderate Negative</li> </ul> |
|                         | Tourism Businesses            | <ul style="list-style-type: none"> <li>There is some potential for interference with the operation of tourism-based businesses, although the nature and severity of associated social impacts has not been determined. To the extent that there are impacts, these would add to the overall strain the Project would place on the local community.</li> </ul>   | <ul style="list-style-type: none"> <li>Not rated</li> </ul>         | <ul style="list-style-type: none"> <li>Not rated</li> </ul>                 |

47. The EES materials make limited and often conflicting statements about tourism. Notwithstanding this, within the Darley Area and surrounds, the Social Impact Assessment references several important recreational and tourism-related sites that would be impacted.

<sup>30</sup> Page 17, Technical Report F: Social Impact Assessment.

<sup>31</sup> Figure 2, Page 105, Technical Report F: Social Impact Assessment.

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48. The Moorabool Shire Visitor Economy Strategy 2023-2027<sup>32</sup> provides a strategic and unified direction for the development of a strong visitor economy for the shire. This recognises that Moorabool Shire is located as a gateway to western regional Victoria and is perfectly positioned to grow its visitor economy, leveraging an abundance of nature, quality produce, and distinctive towns.
  49. It is estimated that there are significant numbers of visitors to key tourism and recreational sites, including an estimated 238,675 visitors per year to the Lerderderg State Park. The impacts on visitors and tourism from the WRL Project have been poorly addressed in the EES.
  50. Council is particularly concerned about the social and tourism impacts relating to the Bald Hill Activation Area; Lerderderg State Park; Merrimu Reservoir and Pykes Creek Reservoir, among others that would be affected by negative visual impacts.
  51. The WRL Project does very little to ameliorate the social impacts on Moorabool Shire (other than signalling the potential for visual mitigation by way of landscaping with landowners who engage with the WRL Project).
  52. There is scant reference to a Community Benefit Fund, but there are no proposed robust measures to ensure appropriate consultation on the content of same nor its implementation, in order to secure long-term benefits to the impacted community of Moorabool Shire. There are no proposed plans to invest in, or compensate, Moorabool Shire. Similarly, there are no guaranteed economic benefits.
  53. Importantly, as the Social Impact Assessment relies on the estimates of the nature and magnitude of physical changes to the environment that would arise as a consequence of the WRL Project, as outlined in other technical reports,<sup>33</sup> the reliability of the Social Impact Assessment is contingent upon the reliability of those studies. As is set out below, Council has material concerns with respect to Landscape and Visual assessment and Bushfire.

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<sup>32</sup> Moorabool Shire Visitor Economy Strategy 2023-2027, August 2023.

<sup>33</sup> Page 17, Technical Report F: Social Impact Assessment.

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## Bushfire and natural hazards

54. Council has an important role in emergency management, and consequently bushfire management. The *Country Fire Authority Act 1958* and *Fire Rescue Victoria Act 1958* require each Municipal Council to appoint a fire prevention officer and any number of assistant fire prevention officers. The *Emergency Management Act 2013* provides Municipal Emergency Management Planning Committees (**MEMPC**) are established in each municipal district of Victoria. The Moorabool MEMPC is a collaborative, multi-agency group comprising members with organisational, industry and personal expertise relevant to emergency planning for the municipality. Two Council officers are appointed to the MEMPC. The Moorabool MEMPC has prepared Moorabool Municipal Emergency Management Plan 2023-2026 (**MEMP**) which provides for the mitigation of, response to, and relief and recovery from emergencies, and to specify the roles and responsibilities of agencies in relation to emergency management (where not outlined elsewhere). The Municipal Fire Management Sub Plan<sup>34</sup> is a sub plan of the MEMP and is an integrated plan which is risk based, has regard to the social, economic, built and natural environment aspects of fire, and guides participants involved in fire management activities. It is consistent with the MEMP.
55. Bushfire/grassfire is defined as “high” risk in Moorabool Shire.<sup>35</sup> Reflective of this risk, Moorabool Shire has one Community Fire Refuge and three Bushfire Places of Last Resort, being areas that may provide a degree of safety to residents where all other plans have failed.
56. Ultimately, Council is concerned that the risks presented in the Bushfire Impact Assessment are unacceptably high. Options to avoid risks to life and limb were and are available but have not been taken by the proponent.
57. Council is concerned that:
- a. The risk of transmission powerlines collapsing during storm or fire events is foreseeable and has occurred in Victoria on multiple occasions in recent years.

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<sup>34</sup> Municipal Fire Management Sub Plan 2023 – 2027.

<sup>35</sup> Page 15, Moorabool Municipal Emergency Management Plan 2023-2026.

When this occurs, there is a risk that road corridors including significant road access and egress points can become impassable.

- b. The Proposed Route for overhead transmission lines has the potential to impact access and egress in a bushfire event. This impacts both:

- 1. people fleeing bushfires; and

- 58. the ability of fire fighters to respond to fires, including aerial fire fighting.

- c. The EES downplays the risk of operational ignition from transmission infrastructure, focussing instead on construction risk and management arrangements during operation. However, fires caused by electricity transmission infrastructure can occur and whilst less common than fires generated by distribution infrastructure, factors such as the surrounding area (e.g. if the infrastructure is located in a high-risk environment, such as forested areas subject to bushfire risk) and increasing climate change could be relevant to the risk of occurrence. According to the Bushfire Impact Assessment:<sup>36</sup>

**The Proposed Route traverses the two highest risk landscape types** (three and four) at six main locations: near Elmhurst, Lexton, Glendaruel, Lawerence and Bolwarrah and **between North Darley and Long Forest** (Appendix C). Landscape type four, representing **extreme bushfire hazard, is present in** the Lexton, Bolwarrah and **North Darley to Long Forest areas.**

[Emphasis added]

- d. Fighting fires around transmission infrastructure may also be compromised. The EES comments on the lack of willingness of CFA to cross transmission infrastructure. However, Council's understanding is that if bushfires occur near transmission lines, there is an increased risk for fire response teams:<sup>37</sup>

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<sup>36</sup> Page 67, Technical Report K: Bushfire Impact Assessment.

<sup>37</sup> See Transmission and Bushfire Community Factsheet, developed in collaboration with the Australian Government Energy Infrastructure Commissioner.  
(<https://www.theenergycharter.com.au/wp-content/uploads/2024/11/Transmission-and-Bushfire-Community-Factsheet-December2024.pdf>)



1. Electrical arcs: Which occur when electricity ‘jumps’ across air gaps. Fires with lots of smoke and high flames – even if the flames are not directly touching the transmission lines – can create electricity arcs which can cause electrocution and be extremely dangerous for firefighters. This is referred to in the EES Chapter 13: Bushfire as “flashover”.
  2. Step potential: Which occurs when the ground becomes electrically charged during a fire. If the ground becomes electrically charged, firefighters can be at risk of electric shock.
- e. Aerial firefighting may also be compromised. In Moorabool Shire, bushfire suppression activities for air fire suppression are significant as first attack is imperative in these areas to prevent large scale forest fires.
- f. The WRL Project crosses priority bushfire access and egress routes in the Wombat Forest, Lerderderg/Darley/Coimadai and Long Forest areas. In these areas, emergency access and egress routes could be impeded if a structural failure of infrastructure were to occur (due to wind, sabotage or contact with a vehicle or farm machinery). According to the Bushfire Impact Assessment, “this would impede or prevent egress ahead of an approaching fire and / or access to fire grounds by emergency services.”<sup>38</sup> This is one of the most significant impacts at Darley, where the Bushfire Impact Assessment states:<sup>39</sup>
- Relatively safe alternative egress routes towards low bushfire risk areas are available at all key locations **apart from** along Lerderderg Gorge Road, North Darley.
- g. The infrastructure could affect fire suppression efforts and / or landscape fire management in ways that result in a fire spreading to a greater extent than may otherwise have been the case, with larger and / or more severe impacts on people, property, the environment and / or heritage features.<sup>40</sup>
- h. The potential residual impacts of the WRL Project being:<sup>41</sup>

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<sup>38</sup> Page 97, Technical Report K: Bushfire Impact Assessment.

<sup>39</sup> Pages 18 and 114, Technical Report K: Bushfire Impact Assessment.

<sup>40</sup> Page 89, Technical Report K: Bushfire Impact Assessment.

<sup>41</sup> Page 138, Technical Report K: Bushfire Impact Assessment.

Areas in proximity to transmission lines where there are potentially localised disruptions to aerial and ground-based fire responses, including those associated with the use of municipal fire control lines or similar.

The lack of practicable alternative emergency egress towards low bushfire risk areas, apart from across the Project Land for residents along Lerderderg Road, North Darley. **There is a very low, but non-zero chance that their only practicable egress route will be blocked if there is a local failure of transmission towers and powerlines.**

[Emphasis added]

- i. Evacuees' escape ahead of an approaching fire could be delayed if they awaited confirmation that the infrastructure was safe to cross, or they sought alternative escape routes."<sup>42</sup> Evacuees trying to escape from fire grounds could be delayed as they await confirmation that the infrastructure is safe to cross or seek alternative escape routes (where they exist). This could expose them to harm from the approaching fire."<sup>43</sup>
  - j. In view of the recognised risk of climate change on the WRL Project and the surrounding environment, and given the projected operating lifespan of the infrastructure (80 years) placing this type of infrastructure in the environment presents unacceptably high risks in 2025. Extreme weather events are likely to become more frequent and intense. These have the potential to worsen fire and related risks (e.g. tower collapse) arising from transmission infrastructure.
  - k. EPRs do not adequately address bushfire risks.
  - l. Risk to life and limb should be prioritised in the assessment of feasible undergrounding options.
59. It is noted that the CFA submission is focussed on fire risk at specific sites (e.g. proposed laydown and accommodation facilities). It does not address other bushfire risks.
60. It is further noted that as it relates to specific sites, the proposed workforce accommodation at Ballan is immediately adjacent to a CFA firefighting training

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<sup>42</sup> Page 15, Chapter 13: Bushfire.

<sup>43</sup> Page 21, Chapter 13: Bushfire.

facility. As discussed below, Council has concerns about the site selection for the workforce accommodation at Ballan.

## Undergrounding

61. The assessment and conclusions with respect to feasibility of route alternatives for partial undergrounding at Darley are disputed.
62. Council considers that the Proposed Route should be modified to include undergrounding at Darley. Social impacts at Darley are unacceptable and could only be made acceptable with undergrounding.
63. Overhead powerlines in the Proposed Route at Darley have undisputed significant negative visual impact, major social impact, a biodiversity impact, a heritage impact and present bushfire risk. Undergrounding options either eliminate (in the case of visual, social and bushfire impacts) or substantially reduce these impacts.
64. However, these impacts have, without any apparent significant or risk-based analysis been placed on the opposite side of the ledger to other environmental aspects that were reported as having higher “potential” impacts (when compared to overhead transmission cables).
65. Council considers the conclusions of the environmental impact assessment to be flawed, as:
  - a. actual known impacts have been “weighed up” against potential (yet unassessed hypothetical impacts); and
  - b. whereas the undergrounding options may eliminate or substantially avoid some of the most severe impacts of the Proposed Route, by comparison, both the overhead and the undergrounding options have “potential” to impact those aspects identified as of concern which relate to ground disturbance. There will be ground disturbance in relation to overhead infrastructure, most particularly from the construction of towers and access infrastructure; and
  - c. short-term construction impacts have been identified and “weighed up” against long term (80 years) operational impacts.
  - d. Matters concerning contaminated land risk can be adequately addressed through the regulatory framework of the *Environment Protection Act 2021* in the same manner that other pollution and waste matters would be handled in the WRL Project.

66. Ultimately undergrounding is safer, better for the community and for biodiversity.
67. In view of Council's position on the approach to project alternatives, Council also considers that the WRL Project ought to be undergrounded in its entirety.

## Visual and landscape

68. Moorabool Shire residents have expressed significant concerns about lifestyle disruption and landscape degradation.
69. There will be unavoidable and acknowledged visual intrusion into sensitive areas in Moorabool Shire.
70. It is stated that "the residual impact to amenity from the WRL Project's infrastructure is considered to be negligible given that alterations to the visual amenity would not change the underlying use of the land."
71. The proposal covers land in Darley affected by the Significant Landscape Overlay, Schedule 1 (Scenic Hilltops and Ridgeline Areas) (SLO1). Whilst the underlying use of the land may not change, the SLO1 covers land visually prominent from areas of Darley and the SLO1 has been applied to recognise the valued landscape character of areas of the town hinterland. The proposal's visual disruption to these areas of landscape prominence will negatively affect visual amenity.
72. The EES states that "Residual impacts from the permanent changes to the visual amenity will be minor."
73. This downplays the visual impact of the proposal on the wider visual amenity of mostly expansive rural landscapes particularly in areas visible some distance away. Stating there would be no change to the underlying use of land seems largely irrelevant to visual impact and perceptions of visual amenity.
74. Some aspects of methodology for the assessment of impact are flawed and Council does not agree with all the outcomes of the application of the methodology.
75. In relation to section 4.6.2 Viewpoint selection of the Technical Report D: Landscape and Visual Impact Assessment, many high visual impact locations have not been adequately assessed.

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76. In relation to Figure 5-2 Zones of influence,<sup>44</sup> Council does not agree with the zone of influence described.
  77. The mitigation strategies are limited to landscaping and landscaping itself has limitations, particularly in bushfire prone landscapes and from an economic perspective.
  78. The strategies are not robust and require transparent governance and funding allocation, effective mitigation of visual and amenity impacts and genuine collaboration with Council.
  79. There is reference to potential Bald Hill investment and increasing visitation, however, the transmission infrastructure will visually impact this and other recreational and tourism sites, potentially undermining their appeal unless mitigated. Mitigation in respect of certain sites is simply not possible due to elevation and topography. The WRL Project will therefore remain visible.
  80. Council has invested significantly in the construction of the 1000+ steps to the summit of Bald Hill in Darley, and the activation of the Bald Hill summit, to make it a regional tourist attraction. The activation includes the construction of a sculpture trail around the summit with six sculpture locations.
  81. The trail head car park and associated sculpture viewing platform, the Lerderderg sculpture viewing platform and the viewing platform at the top of the 1000+ steps trail – all of which capitalise on views to the north towards the Proposed Route – will be highly impacted by the WRL Project.
  82. Landscape screening is proposed by the WRL Project at the car park and affected viewing platforms to partially screen individual towers, however, Council does not consider that this adequately ameliorates visual impacts to the sculpture trail, nor impacts to the Bald Hill activation area more broadly.

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<sup>44</sup> Technical Report D: Landscape and Visual Impact Assessment.

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## Workforce accommodation at Ballan

83. Council is concerned about the proposed workforce accommodation in Ballan.
84. Specifically, Council is concerned about:
- a. The lack of meaningful consultation with Council that has resulted in an apparent leap from the previous proposal presented to the TRG (namely that a workforce management strategy be prepared and implemented in consultation with local councils) to a specific proposal of a workforce accommodation at a specific site to house 350 workers.
  - b. The process for selection of the site lacked transparency:
    1. The WRL Project's need for construction laydown areas was first communicated to the TRG in late-2021.
    2. The TRG were advised in 2023 that a site in Ballan was the preferred location for one of several construction laydown areas for the WRL Project.
    3. Council requested information on any alternative sites that had been investigated and the selection criteria applied by the WRL Project. The TRG was not provided site selection criteria for the construction laydown areas for comment until 13 March 2024, several months after preferred sites had already been identified.
    4. Council's feedback through the TRG was that the selection criteria lacked specificity and did not provide adequate parameters to guide site selection.
    5. The TRG was informed on 6 June 2024 of the WRL Project's proposal to co-locate "mine style" temporary workforce accommodation facilities at the preferred sites already identified as construction laydown areas. This included the accommodation of up to 350 workers at the Ballan site.
    6. Council requested information on what alternative sites and accommodation models had been investigated by the WRL Project, so that it may form a view on the suitability of the preferred site and any potential alternatives, as well as the rationale for co-locating the facilities more broadly.

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7. Additional information was provided to the TRG in December 2024 on the approach taken to determining the WRL Project's workforce accommodation strategy and the criteria applied to identify potential sites.
  8. Council's feedback through the TRG raised numerous concerns with the co-location proposal, including that:
    - i. the same set of selection criteria had been applied to determine the preferred workforce accommodation sites as for the construction laydown sites, despite having significantly different land uses and potential impacts.
    - ii. information on the WRL Project's investigations into worker accommodation options and site selection did not adequately demonstrate the rationale for co-location, nor the process for identifying and ruling out alternative sites.
    - iii. the primary objective for co-locating the workforce accommodation and construction laydown facilities appears to be maximising efficiencies for the WRL Project, rather than seeking to identify and avoid or minimise adverse environmental effects.
  9. Despite Council's repeated requests between June 2024 and March 2025 for information on alternative sites that were investigated by the WRL Project within Moorabool Shire, this information was not disclosed until their inclusion in the exhibited EES Attachment I: Project development and assessment of alternatives.
- c. The proposed site is potentially unsuitable:
10. the site is located immediately adjacent to a CFA Training Facility;
  11. Traffic impacts arising from the location of such numbers of workers at this location may result in potential for increased traffic congestion through the town centre. A Traffic Management Plan is missing for the workforce accommodation facility. This is a significant oversight given the traffic generation associated with the construction of this site and its potential impact on the existing road surface.
  12. The proponent has not undertaken detailed design of the proposed facility. The proposed construction of accommodation and site

configuration are not known. Flood risk has not been resolved. The ability of the site to respond to setbacks and other building requirements is not known.

13. The emphasis on measures for avoidance of social impact on the community without consideration of potential benefits to the community. This has led to a “mine style” accommodation proposal, which includes more than merely accommodation but amenities for cooking and leisure. This approach, without consultation, significantly diminishes any potential local economic benefit during construction.
- d. The absence of building permits being identified as a secondary consent required under the *Building Act* 1993 and relevant matters such as bushfire protection for accommodation not receiving attention in the EES. There is a lack of clarity over how the matters usually regulated through the building permit system will be applied at the proposed accommodation facility. To the extent that there is any proposal to rely on an exemption from building permit requirements this is not express. If that is the case, the suitability of the site, its environmental impacts and matters concerning building standards, bushfire protection, flood risk, design and compliance standards that should apply and other matters should be evaluated as part of the PSA.
- e. Lack of clarity over decommissioning of workforce accommodation, including decommissioning or remediation of wastewater infrastructure to ensure no long-term environmental or public health risks arise.
- f. Environmental impacts associated with water waste and sewerage connections. The PSA makes no reference to wastewater or sanitation management for the temporary workforce accommodation facilities. Given the location is unsewered, this is a significant gap. Council requires clear commitments to:
1. Installation and management of EPA-compliant on-site wastewater treatment systems.
  2. Appropriate storage, removal, and disposal of wastewater and sewage.
  3. Ongoing maintenance schedules and contingency planning for system failure.
- g. Council considers that it is necessary to understand and assess impacts relating to wastewater and require:
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1. A description and design specifications for onsite wastewater treatment and disposal systems (e.g., tanks, dispersal fields, pump-out procedures)
  2. Location mapping relative to groundwater, surface water, and nearby community areas
  3. Operational management plans, including routine monitoring, maintenance scheduling, and contingency measures.
  4. Evidence that systems comply with EPA's Onsite Wastewater Code of Practice, relevant Council permit requirements, and consider public and environmental health safeguards.
  5. Integration of wastewater risk into the EMF, with assigned accountabilities, monitoring metrics, and community reporting / complaints pathways.
- h. It is noted that there is an existing sewer connection located approximately 100 meters from the boundary of the workforce accommodation site. The proponent should clarify whether connection to this sewer infrastructure is being considered as part of the wastewater management strategy.
85. In the proposed Incorporated Document, there are requirements for plans to be prepared for the temporary workforce accommodation facilities for approval and endorsement by the Minister for Planning, however there is no guidance on how Council should be involved in the preparation of most of the plans (excluding the Operation Management Plan at clause 4.13.6). It is noted that the amendment of plans in clause 4.13.7 requires consultation with Council.
- a. Given the impact of this facility on Ballan Township it is reasonable to expect that Council should have the opportunity to provide advice on the plans for the workforce accommodation to ensure that it is a good neighbour and limits impact to the township.
  - b. As Council has preparedness, response and recovery roles in emergencies such as bushfire, it is important for Council to understand how prepared the workforce accommodation is for bushfire, and how the site is being configured and operated. Being excluded from the temporary workforce accommodation plan / construction bushfire management plan / emergency management plan processes is concerning as it can interfere with our role in the event of a bushfire emergency.

## Aboriginal cultural heritage

86. The EES categorises impacts to Aboriginal cultural heritage as “moderate,” although none of the nine Cultural Heritage Management Plans (**CHMPs**) nor the Cultural Values Assessments (**CVAs**) required for the WRL Project have been completed, which is the only mechanism through which the WRL Project could adequately understand and assess actual impacts.
87. Impact assessment findings only include fieldwork results completed up to 24 June 2024 and any subsequent fieldwork may materially change the impacts described in the EES.
88. The EES argues that the WRL Project is “contributing to the state of knowledge on Aboriginal cultural heritage values within the Project Land and the broader region.” Such an argument disregards the inherent harm of development activities and undermines the legislative imperative of avoiding harm to Aboriginal cultural heritage in accordance with the *Aboriginal Heritage Act 2006*.
89. It is unclear why the proponent has sought to identify and register tangible sites, but not intangible Aboriginal cultural heritage values that are discovered throughout the course of the WRL Project, this being explicit within the WRL Project’s EES scoping requirements:
- Identify any known or previously unidentified intangible Aboriginal cultural heritage values associated with the project area, including values associated with biodiversity, landscape or other elements.<sup>45</sup>
90. Council is concerned that Aboriginal cultural heritage values relating to landscape have been entirely missed and where Aboriginal cultural heritage values have been identified by the WRL Project, this has only been considered in terms of the WRL Project’s potential to physically impact such values on a site-specific scale, rather than considering intangible impacts at a landscape scale across Country.
91. Mitigation measures contain sufficient flexibility to allow for the proponent to selectively adopt recommendations to avoid or minimise impacts to Aboriginal cultural heritage as stipulated in the CHMPs and CVAs still in preparation.

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<sup>45</sup> Scoping Requirements Western Renewables Link Environment Effects Statement dated November 2023.

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## Historical heritage

92. Council is concerned that the WRL Project will have actual or potential physical impacts to at least seven historical heritage places in Moorabool Shire, identified in the Historical Heritage Impact Assessment.
93. The methodology did not include full assessments of the 38 heritage places identified in Moorabool Shire that may be impacted and do not have existing heritage protections or statements of significance. Determining the WRL Project's physical and visual impacts on these sites cannot be adequately determined without first understanding their significance, in accordance with industry best practice in Article 6 of the Burra Charter.<sup>46</sup>
94. Council requires that full heritage assessments be completed for all 38 potentially significant historical heritage places identified in Moorabool Shire prior to construction commencing, and that Council be consulted in the preparation of same.
95. Assessments of potential physical and visual impacts have not been adequately validated through on-ground analysis to determine which tangible and intangible attributes of a place, including its setting, contribute to its heritage significance and could be detrimentally impacted by the WRL Project. The report acknowledges that numerous sites were unable to be visited due to "land access constraints," instead:<sup>47</sup>
- Where applicable, understanding and the appreciation of the context and condition of places has been undertaken using aerial photography, Google Street view, current and historical photographs.
96. It is unclear why the approach to assessing historical heritage significance was limited to only identifying places that may meet the threshold for inclusion on the Victorian Heritage Inventory (VHI) or Victorian Heritage Register (VHR), but not the local heritage overlay.
97. Council is concerned that the WRL Project is a significant visual intrusion carrying potential adverse effects for the future tourism brand and selection of

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<sup>46</sup> See the Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance 2013.

<sup>47</sup> Page 28, Technical Report C: Historical Heritage Impact Assessment.

representative sites currently being developed for the Victorian Goldfields World Heritage Bid. Moorabool Shire is one of 15 local government areas that form part of the bid.

98. The report refers to planting and landscape elements as a mitigation measure to reduce impacts to historical heritage places throughout, but these do not feature explicitly in EPRs. Such amelioration could cause residual visual obstruction that detrimentally impacts on the understanding of the heritage significance of a place in its setting.
99. Given Council's role in the conservation of places of local heritage significance, it is reasonable that Council be included in the preparation of plans to mitigate impacts to historical heritage sites. Council should also be provided copies of any relevant materials relating to local historical heritage matters produced by the WRL Project.

## Biodiversity

100. Council is concerned about biodiversity impacts in Moorabool Shire as a result of the WRL Project and Proposed Route.
101. As noted above, field studies are incomplete and this has led to heavy reliance on desktop modelling, which introduces uncertainty into the findings. This limitation undermines the reliability of the habitat quality assessments and risks underestimating the residual impacts to threatened species and Threatened Ecological Communities (**TECs**). Consequently, the actual extent and severity of ecological impacts remain unclear and are overly reliant on assumptions and previous studies rather than robust, site-specific data.
102. Although the WRL Project claims to prioritise the avoidance of native vegetation and sensitive ecological communities, the proposed alignment indicates impacts to critically endangered ecosystems such as the Natural Temperate Grassland of the Victorian Volcanic Plain and Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands, along with key flora and fauna habitats. This raises concerns about the adequacy of route optimisation. The emphasis on mitigation and biodiversity offsets - rather than proactive avoidance - suggests a reactive approach to environmental protection. This approach appears driven by a predetermined outcome: the installation of overhead powerlines, with span limitations and tower placements effectively fixed. As a result, the report fails to genuinely apply the hierarchy of avoid, minimise, and offset, as required under best-practice

environmental planning. While the report demonstrates some effort to minimise impacts within these constraints, it fundamentally lacks a rigorous assessment of alternative alignments that may have offered superior avoidance outcomes.

103. Despite formal compliance with legislative requirements for biodiversity impact minimisation, the report is shaped by a fixed infrastructure solution rather than an open and transparent exploration of viable alternatives. As such, the loss of significant vegetation and high conservation value assets appears to be downplayed in favour of justifying infrastructure already deemed necessary. The result is an assessment that rationalises the impacts based on a predetermined alignment rather than objectively informing the alignment based on environmental constraints and opportunities.

## Traffic and roads

104. The WRL Project underestimates traffic volumes and risks and impacts to infrastructure.
105. The WRL Project fails to detail the standard of upgrade.
106. It is unclear whether the WRL Project has considered the impact of the project on the construction or use of the proposed Bacchus Marsh Eastern Link Road (BMELR). Figure 12.13 does not include the location of BMELR.
107. The transmission wires will be located over the proposed intersection of four key roads – Diggers Rest – Coimadai Road, the Bacchus Marsh – Gisborne Road, Bences Road and the proposed BMELR.
108. Council is concerned that the impacts of the WRL Project cannot be assessed given the paucity of information in the EES and given the amount of planning that will occur post approval, where planning will occur without proper input by Council. For example, the Traffic Management Plans will not be prepared until after EES.
109. The EPRs put forward in the Traffic Impact Assessment and related matters in the PSA lack specificity.
110. The EMF and EPRs are to be prepared, reviewed and approved without Council's involvement.
111. The information that is available being the Traffic Impact Assessment, significantly underestimates traffic volumes and risks and impacts arising from the WRL Project, including to Council owned infrastructure.

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112. The transmission wires will be located over key intersections.
  113. It is not clear what the impact of the WRL Project is as it traverses these intersections.
  114. Conflict points and the potential for increased construction traffic through Ballan town centre are not addressed.
  115. The EES does not assess the potential congestion and cumulative stress from worker commutes, school traffic, and potential overlap with grain season movements.
  116. Requirements for road dilapidation surveys, road condition monitoring and rectification/restoration are included but lack specificity. The route identifies more than 15 unsealed Council-managed roads, but the standard of upgrade required for the WRL Project use is not stated.
  117. The requirement to “share road condition monitoring and outcomes during project construction with local Council and relevant transportation authorities” is vague, particularly regarding what “shared” entails. Given the increased volume and type of traffic, especially on unsealed roads, damage is likely to occur more rapidly than under standard monitoring schedules, such as Council’s typical six-monthly inspections. It would be more appropriate to require the principal contractor to develop a road monitoring and repair procedure to the satisfaction of the relevant road authority.
  118. Upgrade commitments are vague and not tied to Council’s Road hierarchy classifications (i.e. access vs collector vs distributor roads). There is no mention of existing road hierarchy or asset class ratings for identified roads.
  119. There is no data on projected axle loads and trip frequency per local road segment. Without this, deterioration modelling or lifecycle cost impacts cannot be established. The absence of this data limits the ability to forecast condition decline.
  120. The EES requires the principal contractor to undertake a dilapidation survey and road condition monitoring but there is no mention of Council approving the methodology and monitoring regime.
  121. “Pre-condition” must include the remaining asset life and that the restoration replaces the “consumed life,” due to the additional WRL Project traffic and

accelerated depreciation of the asset. There ought to be provision for compensation for accelerated depreciation.

122. In relation to the proposed temporary workforce accommodation facilities, there does not appear to be any reference to the Temporary Workforce Accommodation Plan having any input from Council before it is approved and endorsed by the Minister for Planning. This is particularly important given that the Environmental Management Framework and associated EPRs do not apply to the construction of temporary workforce accommodation facilities and Preparatory Buildings and Works as defined in Chapter 6: Project description.
123. The draft plan has included a section of Ingliston Road within the Project Area. It is not appropriate that the WRL Project do anything on that section of its road without Council's consent.
124. Council must be assured that the development will not adversely impact Council assets off site.

## Economic

125. Council disagrees with the categorisation of impacts in the Economic Impact Assessment (**EIA**). It is incomplete and reliant upon the successful mitigation of economic impacts through interrelated technical reports in the EES.
126. The EIA's business impact analysis approach was limited to identifying those within a geographic radius of 2km from the Project Route. This approach has excluded businesses in Ballan township and surrounds, these being in proximity to the proposed temporary workforce accommodation and construction laydown facility in Ingliston Road, Ballan.
127. Council is concerned that potential "positive impacts" to the economy described in the report are not guaranteed and are acknowledged as being dependent upon the procurement strategy adopted by the WRL Project.
128. The "mine camp" style temporary workforce accommodation proposal reduces potential economic opportunities for local businesses during construction.
129. EPRs recommend the WRL Project "develop and implement initiatives for procurement of goods and services from local communities and social enterprises," but provide no quantifiable targets to clarify the objectives and make measurable the relative success of such a strategy.

130. The report is not an adequate investigation or representation of the WRL Project's local economic impacts:

- a. No direct consultation with landholders, neighbouring landholders, or businesses has been undertaken to quantify and assess local impacts to agricultural or commercial land, or individual business operations and services generated by the construction, operation or decommissioning of the WRL Project.
- b. The assessment relies upon summaries of stakeholder consultation undertaken by the proponent and other technical specialists that were not expressly sought for the preparation of the EIA.

Regarding the engagement approach, the EIA states:<sup>48</sup>

Identifying potential economic impacts of the Project was informed by **feedback received from a range of stakeholders representing regional communities, industry, government and other interested parties**. While the Economic Impact Assessment does not seek to verify and address every specific concern raised, the **key issues that were identified during stakeholder consultation have been considered** when assessing the potential effects of the Project.

Various stakeholder engagement activities were undertaken, including in-person meetings, online webinars, pop-up sessions and field days. PwC did not conduct this engagement and has **relied on summaries prepared by both AusNet and its other technical specialists** who undertook the engagement.

[Emphasis added]

- c. The EIA acknowledges a range of economic impacts from the WRL Project that would be “highly localised” and “highly variable”, yet relies upon further plans and frameworks to identify, avoid or minimise any localised impacts.
- d. The EIA concludes it is “unlikely” that some “highly localised” economic impacts extend to the broader region or industries, despite stakeholder consultation not

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<sup>48</sup> Page 58, Technical Report G: Economic Impact Assessment.



- having been detailed to indicate the breadth or extent to which economic concerns raised by stakeholders prevail at a local, regional or industry level.
- e. Once further consultation and development of plans and strategies to address local impacts are eventually undertaken, this will likely reveal matters resulting in different or additional impacts beyond those anticipated in the EIA.
  - f. Reputational impacts to tourism operators through perceived construction obstacles or ongoing detraction in visual amenity during operation are not considered.
131. Council is concerned that all EPRs recommended by the EIA do not provide for consultation with Council in the preparation and approval of key plans that encompass business impact mitigation and support, local employment and training initiatives and the procurement of local goods and services.
132. Council is concerned that financial compensation is prioritised in the EIA as the WRL Project's response to minimising stakeholder impacts, rather than avoiding adverse effects in the first instance. Furthermore, various stakeholder compensation payments which apply to the WRL Project may not adequately quantify or compensate for actual stakeholder losses. This presents a risk that negative socioeconomic impacts from the WRL Project will be exacerbated and have not been adequately assessed in the EIA.
- a. The EIA does not consider impacts to landholders relating to insurance.
  - b. Council has concerns with respect to compulsory acquisition of easement land and its potential tax implications.
133. Council is concerned that the development and construction expenditure estimates considered in the EIA are presented without other relevant cost estimates. Cost estimates for delivering the various categories of stakeholder compensation payments and significant financial investment required to facilitate certain impact mitigation programs recommended by the EES, such as the off-site landscaping program at EPR LV2. It is Council's view that the non-construction and development related expenditure required for the WRL Project is substantial and may undermine WRL Project feasibility when compared with alternatives.
134. More generally, consistent with the Council's views on the assessment of project alternatives, Council is concerned about economic assessment of the WRL Project and its alternatives.

## Water

135. Water is a fundamental part of the landscape within Moorabool Shire, with many identified water bodies being impacted by the Project Route. Water, particularly waterways and reservoirs, have significant environmental, cultural and social values. Notwithstanding this, the EES “splits” water into two distinct groundwater and surface water impact assessments, which are focussed on physical impacts.
136. The Proposed Route will traverse numerous waterways and key water supply infrastructure such as reservoirs.
137. Council is concerned about impacts to water arising from the WRL Project, including:
  - a. Groundwater impacts from intrusive works at towers and road construction;
  - b. Surface water impacts during construction and operation.
138. Siting infrastructure across and around water bodies (particularly around water supply assets, such as reservoirs) risks impacts to water quality during construction and long-term operational impacts associated with line clearance and vegetation removal.
139. Technical Report T: Surface Water Impact Assessment and Technical Report S: Groundwater Impact Assessment, describe the extensive construction works and ground disturbance. It also describes the sensitivity of numerous water assets and areas impacted by the WRL Project.
140. Against this backdrop, it is deeply concerning that assessment of water impacts was through a desktop only report. No fieldwork was conducted.
141. Council disagrees with the findings of EES and the approach to mitigation, which relies on adverse impacts to water bodies being managed through post-approval management plans.
142. To the extent that management plans are utilised, it is imperative that Council is meaningfully consulted in relation to its engineering and other requirements in the site-specific Surface Water Management Plans (SWMPs) and Environmental Management Plans (EMPs) to ensure appropriate conditions for water protection are secured.

143. The Proposed Route has not adequately taken account of the avoidance of impacts around water supply infrastructure and the planning policy:
- a. Clause 14.02-1S Catchment planning and management which has the following strategies:
    1. Ensure the continued availability of clean, high-quality drinking water by protecting water catchments and water supply facilities.
    2. Retain natural drainage corridors with vegetated buffer zones at least 30 metres wide along each side of a waterway to:
      - a. Maintain the natural drainage function, stream habitat and wildlife corridors and landscape values,
      - b. Minimise erosion of stream banks and verges, and
      - c. Reduce polluted surface runoff from adjacent land uses.
  - b. Clause 14.02-2S which has the aims to protect reservoirs from potential contamination.
144. Consents under the *Water Act* 1989 are likely to be required in relation to works crossing and around water bodies. There is no clarity whether this will result in modifications to the Proposed Route, or design or siting of infrastructure or construction works.

## Agriculture and forestry

145. Council is concerned that the Agriculture and Forestry Impact Assessment (AFIA) has not adequately met the EES scoping requirements to assess and describe impacts of the WRL Project at a local scale.
146. Impacts at an individual property level were assessed primarily by desktop or from public access points. Council is concerned that steps undertaken to assess impacts to individual properties considered operational factors that could only be validated through consultation with the relevant landholders:

Identification of **property inherent attributes**

Identification of **significant infrastructure** on the property

Identification of **highest value use for each property** (with each property assigned one category)

Consideration of the **impact of the construction of Project infrastructure** on the property

Consideration of the **impact of the operation of Project infrastructure** on the property<sup>49</sup>

[Emphasis added]

147. The report does not include consultation with an adequate representative sample of directly affected landholders to validate its desktop assessment findings. Interviews were completed with just 14 individuals (or **6%**) of the total 229 directly affected landholders identified by the WRL Project. This is less than the AFIA's initial target of achieving a 10% representative sample.<sup>50</sup>

[Emphasis added]

148. An understanding of local impacts cannot be gained without assessment of impacts at an individual property scale. This was not considered a key input in the AFIA approach:

While the analysis is based on property-level data, the EES scoping requirements state that the assessment must describe impacts of the overall Project at the '...local, regional and national scales', not at an individual property scale.<sup>51</sup>

149. The AFIA does not consider undergrounding alternatives as a means of ameliorating potential WRL Project impacts. The report notes that "the [peer] reviewer requested that the assessment examine the option of undergrounding the transmission line," but that this "was not in scope".
150. Quantification of economic impacts did not include potential impacts from isolation or redundancy of agricultural land caused by the Proposed Route, "as it is not possible to provide an accurate estimate of the economic impact of these," with no explanation as to why. This issue is highlighted as a "significant concern for landholders."

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<sup>49</sup> Pages 45-46, Technical Report H: Agriculture and Forestry Impact Assessment.

<sup>50</sup> Pages 46-47, Technical Report H: Agriculture and Forestry Impact Assessment.

<sup>51</sup> Page 49, Technical Report H: Agriculture and Forestry Impact Assessment.

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151. Contribution of the local agricultural sector to Moorabool Shire's tourism brand has not been considered in the EES.
  152. Once further consultation and development of plans and strategic to understand address local impacts are eventually undertaken by the WRL Project, this will likely reveal matters resulting in different or additional impacts beyond those anticipated in the AFIA.
  153. Uncertainty around further “route refinements” and disruptions during construction and operation have not been considered in the AFIA, in terms of the potential adverse effects to mental health and productivity of directly affected landholders to continue farming operations.
  154. Council is concerned that potential biosecurity breaches, acknowledged as the “most significant potential impacts of the whole WRL Project to the agricultural and forestry industries” identified by the AFIA, if realised, would be catastrophic. Council therefore considers these impacts to be unacceptable:

**Biosecurity breaches** which in a worst-case scenario could have **long-term, potentially irreversible impacts** on market access, production costs, and land and commodity values.<sup>52</sup>

[Emphasis added]

155. Impacts identified in the AFIA are inconsistent with relevant state policy that seeks to protect productive agricultural land within 100km of Melbourne.<sup>53</sup>
156. It is reasonable for Council to be included in plans and strategies seeking to mitigate impacts to Moorabool Shire's agricultural industries and that require engagement with its communities.

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<sup>52</sup> Page 9, Technical Report H: Agriculture and Forestry Impact Assessment.

<sup>53</sup> See Planning for Melbourne's Green Wedges and Agricultural Land, Department of Transport and Planning 2024.

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## Concerns about Implementation

### General concerns

157. Council has a number of concerns with respect to proposed WRL Project delivery and implementation. These include:
- a. The Proposed Route is not necessarily the final route for the WRL Project;
  - b. The Incorporated Document and the EPRs provide flexibility to permit a significantly different project, with potentially significantly different environmental effects. This uncertainty coupled with limited opportunities to participate when the ultimate route is progressed, creates an atmosphere which may unnecessarily cause social concern and social impacts which could be alleviated by providing more detail now;
  - c. Secondary consents including other consents may impact the Proposed Route and the design and siting of infrastructure. The evaluation of secondary consents is incomplete;
  - d. Too much is left to approval after the hearing is completed; and
  - e. Too much is left to approval by the Minister and proponent without Council involvement.
158. Having regard to the above, insufficient consultation and engagement provisions are built into the proposed approvals framework; and the drafting of certain parts of the documents are too broad.
159. Many key aspects of the WRL Project are to be left to a later consent process to resolve.
160. The provisions are very broad and allow the Minister to approve various documents which can be different to the form of the documents exhibited with the EES.
161. The use of the Specific Controls Overlay (**SCO**) and the Incorporated Document effectively exclude any other controls in the Planning Scheme and removes Council from the decision making. This is unacceptable.
162. Council reserves its rights in relation to the efficacy of using the EES process in this way having regard to the requirements of the *Environmental Effects Act 1978* properly applied.

## **Lack of specificity in works**

163. The Incorporated Document should require approval of the location and general categories of works permitted given the sensitivities of this corridor.

164. Instead at 4.2 it states:

The use and development of the Project Land for the purposes of, or related to, the Project includes, but is not limited to:

b) Any building or works or associated infrastructure activities for the Project.

165. At 4.3 Ancillary activities to the use and development of the Project Land for the purposes of the WRL Project includes, but is not limited to:

j) Storage and assembly of materials and equipment required for the Project, including concrete batching plants where required.

## **Extent to which works may commence ahead of an approved environmental management plan**

166. Council is concerned about the works that can be permitted prior to environmental management documents being approved. This includes the development of the temporary workforce accommodation at Ballan and the establishment of laydown areas.

167. At 4.8.1:

“Before the use or development starts (excluding Preparatory Buildings and Works under Clause 4.12 and development and use associated with the temporary Workforce Accommodation sites under Clause 4.13), an Environmental Management Framework must be prepared to the satisfaction of the Minister for Planning.”

## **Community Benefit**

168. The EES does not commit to compensation or investment of any kind for Moorabool Shire.

169. There is no guaranteed economic development. While employment, training and local business opportunities are mentioned, they are not guaranteed to result in lasting local workforce development or positive local economic benefits.

170. There are no EPRs recommending any specific community benefit sharing outcomes as related to the social impacts documented in the EES.

## Planning concerns, the PSA and Incorporated Document

171. Council disputes the characterisation of social, economic and environmental effects and net community benefit in the draft strategic justification report.
172. There is a very limited role for Council in Clauses 4.4 and 4.5 of the Incorporated Document.
173. The Incorporated Document can but need not, provide for input by land managers and relevant authorities including councils as to various matters.
174. The SCO is not like other overlays which seek to exclude third party involvement post approval of a plan.
175. The Incorporated Document can provide for input by land managers and relevant authorities, including councils, as to various matters rather than what it seeks to do now being curtail / confine that role, e.g.:

4.8.3 “The consultation with relevant authorities including, but not limited to, councils, the Head, Transport for Victoria, the Department of Transport and Planning, Heritage Victoria, relevant floodplain management authority, relevant fire authority, relevant water authorities, Department of Energy, Environment and Climate Action (DEECA), Parks Victoria [NOTE: TBC] and the Environment Protection Authority as relevant.”

4.8.2 A description of the form and extent of any consultation undertaken concerning the amendment(s) with relevant councils, relevant government agencies and other stakeholders as required.

176. It is noted that several key processes and documents are yet to be developed. These will all have a significant impact on residents, businesses and economic growth in the municipality. Council suggests that such documents should be developed with Council input. The documents include:
- a. Business Mitigation and Support Strategy (EPRs EC1 & EC3)
  - b. Local Procurement Plan (EPR EC2)
  - c. Communications and Stakeholder Engagement Management Plan (EPR EM5)
  - d. Complaints Management System (EPR EM7)



- e. Residential Mitigation and Support Strategy (EPR EM10)
  - f. Private Domain Landscape Screening Program (EPR LV2)
  - g. Air Quality Management Plan (EPR AQ1)
  - h. Decommissioning Management Plan (EPR EM11)
  - i. Agriculture and Forestry Business Mitigation and Support Strategy (EPR AF1)
  - j. Traffic Management Plans (EPR T1)
  - k. Employment Initiatives Plan (EPR SC3).
177. More detail is needed regarding the procurement policy and how this will ensure local procurement.
178. It is recommended that the following text be added at the end of each of the following clauses 'The plan must be provided to Moorabool Shire Council for consultation prior to approval':
- a. 4.13.2 (temporary workforce accommodation plan),
  - b. 4.13.3 (construction bushfire management plan),
  - c. 4.13.4 (emergency management plan)
  - d. 4.13.5 (construction environmental management plan)
  - e. 4.13.8 (decommissioning plan).
179. Clause 4.5 Development Plans there is no specification that the development plans must be consulted with stakeholders including Council. Rather it states only the amendment of development plans must be accompanied with a statement on engagement with stakeholders (Clause 4.5.3).
180. The public normally contact Council directly regarding amenity complaints related to land use / development. This poses the question as to who would be responsible for planning enforcement for the WRL Project.
181. Table 29.5 states that EMF and EPRs are prepared by Ausnet; Reviewed verified by DTP; and Approved by Minister for Planning. There is no reference to Council's involvement in reviewing of EPRs.
182. The Incorporated Document should include a requirement to monitor and manage the environmental effects of the WRL Project for all components of the WRL

Project where relevant. This includes for the establishment of construction compounds and the categories of permitted works to ensure that environment effects are minimised as far as possible and appropriate consultation with stakeholders occurs.

183. Key plans for approval ought to be referenced directly in the Incorporated Document.
184. Should specify key design elements it considered necessary in the document to provide overarching parameters for further plans to be approved.
185. The Incorporated Document as drafted does not provide a direct mechanism for notice of proposals to approve final plans to those who may be impacted. Should be enhanced as a matter of fair process, given the nature and extent of works likely to be in close proximity to sensitive uses.
186. Some aspects of the existing planning and building framework should be incorporated into the requirements of the Incorporated Document where there is no conflict or detriment to the WRL Project to do so.

## Environmental Performance Requirements

187. Environmental Performance Requirements (**EPR**) are fundamental to effective environmental protection.
188. The exhibited list of EPRs is not comprehensive and do not adequately minimise risk.
189. The EPRs are insufficiently detailed and vague.
190. Council will provide comments on the EPRs in the course of the hearing to assist the Inquiry and Advisory Committee.

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## Conclusion

191. The WRL Inquiry and Advisory Committee should not be satisfied that the WRL Project should proceed based on the EES and PSA before it.
192. The EES is ill considered and incomplete. The risks have not been properly identified nor assessed.
193. It is not a sufficiently rigorous assessment upon which to base approval of a project that will result in a scar on the landscape and unacceptable impacts to Moorabool Shire and Victorians.
194. Whilst the need for a transmission project is acknowledged, that need is not the end of the assessment of whether the proposal is in the net community benefit. It is not a complete answer to justify the risks associated with the proposed WRL Project.
195. The planning tools used will effectively cut out Council in all significant decision making. This is of particular concern where Council and other parties have not been inadequately liaised with – and not genuinely and meaningfully consulted.
196. In these circumstances where the outcome of an approval will be to switch off all the ordinary planning controls and safeguards, the analysis and consultation has to be rigorous – it is not.
197. Council reserves its rights to make further submissions to the WRL Inquiry and Advisory Committee, including the right to expand on these matters and to respond to any other matters raised by the parties at the Inquiry and Advisory Committee hearing.

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