

Ministers and Local Politicians

14 December 2021

Via email

Dear Minister,

Re: Unacceptable Setback Distances for WVTNP

Moorabool Shire Council (Council) has significant concerns regarding the setback distances of the proposed route of the Western Victoria Transmission Network Project (WVTNP) announced on 26 November 2021 by AusNet Services (AusNet).

From a high-level review of the final route, we have found that there are several sections within Moorabool Shire where clusters of residences are well within 100m of the alignment. This is most notable in the Gordon, Ballan and Darley sections of the alignment, where the nearest point of the transmission line to residences is as little as 56m, 46m and 16m respectively. There are also instances where the route is immediately on top of a residence and therefore has zero setback.

Attached is a figure prepared by Council that visually highlights the vast number of dwellings that are within 100m (red), between 100-200m (orange) and between 200-300m (yellow) of the proposed single route.

I refer to recommendation 5.2.9.5 of the Australian Energy Infrastructure Commissioner's 2020 Annual Report, which states:

In relation to proposed transmission lines, a transmission line that is less than 220 kV should have a setback distance of 100 metres from a residence, while a powerline that is 220 kV or greater should have a setback distance of 200 metres. Transmission lines should also be set back from public roads, with the suggested setback distance of the transmission line towers measured as the tower height plus 20 metres.

In addition, AusNet released a document that outlines the route selection criteria used. The criteria stipulated a target separation of 300m from houses and other sensitive facilities.

There are specific issues here that need to be addressed:

1. This outcome does not deliver on AusNet's route selection criteria, which prescribe a target separation of **at least 300m** from houses and other sensitive facilities.
2. In several instances the proposed single route also does not achieve the 200m setback from energy infrastructure recommended by the Commissioner.



3. Through our experiences with wind farm infrastructure, we also understand the risk of significant property dissection due to access tracks and easements, which make minimum setback requirements even more important.
4. Landowner compensation extends only to the impacted landowner and does not recognise the impacts to surrounding neighbours, even if the tower is geographically closer to their homes.
5. There is growing international evidence to suggest that setback distances from energy infrastructure should be calculated based on the appropriate distance needed to achieve safe levels of long-term Electro-Magnetic Field (EMF) exposure, rather than imposing arbitrary setbacks that do not reflect the technological variability of high voltage transmission lines.
6. AusNet need to provide a more balanced and objective analysis on underground options rather than comparing high impact and unrealistic scenarios for undergrounding. There are far more optimal technologies that significantly lessen the constraints used to eliminate undergrounding as a viable option.

The independent report¹ commissioned by Moorabool Council confirms utilising HVDC underground cables is a viable, low-impact alternative to the project currently being planned. This approach would eliminate the significant visual impacts of 40m to 80m transmission towers with between 40m and 100m easements, and their unnecessary burden on the community at large.

It is important to note that Council does not dispute the importance of this significant renewable energy infrastructure project and is supportive of the transition to renewable energy. However, Council is mindful of achieving long-term sustainable outcomes where the impact to the regional community and the natural environment is not unreasonably compromised.

We are calling on you to request the project align with AusNet's own selection criteria and the recommendations put forth by the Australian Energy Infrastructure Commissioner.

We also encourage the Government to consider the long-term impacts of the multiple transmission upgrades that are forecast across the State and how to ensure a best practice approach is utilised in all cases. It is vital to minimise and plan for common issues that may delay, and in some cases prevent, the much-needed transmission infrastructure.

Please contact Vanessa Osborn, Major Developments Coordinator, should your office wish to discuss further any of the matters raised above on (03) 5366 1344 or via email: vosborn@moorabool.vic.gov.au

Regards,



Cr Tom Sullivan
Mayor

¹ The report can be found on our website: <https://www.moorabool.vic.gov.au/western-victoria-transmission-network-project>

