



31 May 2023

Email: ISP@aemo.com.au

Dear Sir/Madam

Draft 2023 Transmission Expansion Options Report

Council welcomes the opportunity to make a submission on the Draft 2023 Transmission Expansion Options Report and consents for this submission to be published on the AEMO website. Council has made a number of submissions to earlier Integrated System Plan (ISP) consultation processes and would like this submission to be considered alongside our previous submissions, as many of the issues raised earlier have not been resolved. Council calls for undergrounding of high voltage powerlines, and for this preferred option to be consistently factored into ISP scenarios, assumptions and costing.

Council would like clarification on how the ongoing maintenance costs of transmission lines are considered in decisions about transmission line development, including predicted damage due to extreme weather events. For instance, undergrounding of transmission lines may have a greater upfront cost, but how is this offset over the life of the line by reduced maintenance costs?

Mortlake South Wind Farm has installed an underground transmission line. A case study of the costs and benefits (economic, social and environmental) of this project could inform further decision making by AEMO and transmission line developers.

In September 2022 Council set a new position on the development of wind farms in the Shire. This position calls for a pause on the approval of any new wind farms until such time as the State Government has carried out strategic planning including setting a threshold for the number of turbines in Moyne (Attachment 1). Additionally, Council continues to call for undergrounding of transmission infrastructure, seeking greater community benefits and that proposals minimise impacts on townships and the environment. Addressing decommissioning of wind farms and transmission infrastructure is key.



Council put forward a successful motion to the Municipal Association of Victoria's State Council meeting held on 19 May 2023 that infrastructure to support renewable energy transmission across Victoria be developed using existing easements, be located where practicable underground and require co-location of connecting lines to reduce the impact on agriculture, the visual landscape, recognise risks of bushfire and protect amenity (Attachment 2).

Council understands that the 2022 ISP predicted up to 3450 MW of wind energy will be built by 2040 in the South West Victorian Renewable Energy Zone (SWVREZ) and a new 500kV transmission line is proposed to transport this electricity. In addition, over 3550 MW of offshore wind is predicted for the Portland Coast Offshore Wind Zone (PCOWZ) which now extends to the coastline adjacent to Moyne Shire.

Clarification is required on the relationship between the development of the Mortlake Turn-In project (presently underway) and the predicted timing of the new 500 kV transmission line (which is outlined in section 5.6.9 pages 130 - 131) in the SWVREZ. Will the completion of the Mortlake Turn-In bring the development of this proposed transmission line forward?

It should be noted that Option 2 and 3 on page 130 will impact on the recently declared Budj Bim Cultural Landscape World Heritage Area and this should be listed as a known risk and constraint to development. Direct engagement with Traditional Owner groups will be critical at the earliest stages of option development, including during this ISP process.

Transmission expansion cannot be seen in isolation of the generation development it will facilitate; therefore a strategic land use planning approach is required. **There has been no REZ integrated planning process activated in Victoria**, or for the SWVREZ, therefore the ISP needs to be an integrated plan that includes generation development over time and within the REZ spatial landscape and considers social acceptance as a core decision making criteria for new transmission.

The cumulative impacts of transmission infrastructure and wind farms is already an issue for Council and its community. Noise, visual, traffic, road, housing, and environmental impacts are consistently raised by the community as areas of concern. Greater development of the SWVREZ, coupled with development in the PCOWZ and investment in new transmission infrastructure, will result in further clusters of renewable energy generation facilities in the Moyne Shire unless new rules are put in place.



New transmission and generation infrastructure will exacerbate cumulative social and environmental impacts. Transmission options should consider development thresholds for generation facilities (upper limits) that will limit cumulative impacts and the further development of clusters and further loss of social licence in Moyne.

Since our last submission another wind farm has been proposed for Moyne Shire and a planning permit application has been lodged without any consultation with Council or the community.

The greater focus on gaining social licence and community consultation in the transmission planning and development process is admirable, however this focus needs to translate to best practice by companies if social acceptance in REZ is to be achieved.

Council welcomes the establishment of the Social Licence Advisory Council and urges AEMO to place a priority on these issues and developing methods for integrating social licence and cumulative impacts into transmission expansion options and decision making.

Within the Shire there are now 6 operational wind farms; 3 under construction; 6 seeking planning and/or environmental approval. If all these wind farms are constructed the Shire will host approximately 723 turbines, generating about 3 GW of electricity and covering over 12 % of Moyne Shire's rural land area. These wind farms are creating 2 distinct geographical clusters in the northeast and west of the Shire as can be seen by the attached map (Attachment 3).

Council requests a meeting with AEMO representatives to discuss our queries and provide AEMO with an update on our lived experience of the continuing decline of social licence for the energy transition and its negative cumulative impacts.

Please contact Michelle Grainger, Manager Energy Projects at mgrainger@moyne.vic.gov.au to establish a suitable time for this meeting or if you have any queries about this submission.

Yours sincerely

A handwritten signature in black ink that reads "Brett Davis". The signature is fluid and cursive.

Brett Davis
Chief Executive Officer



Attachments:

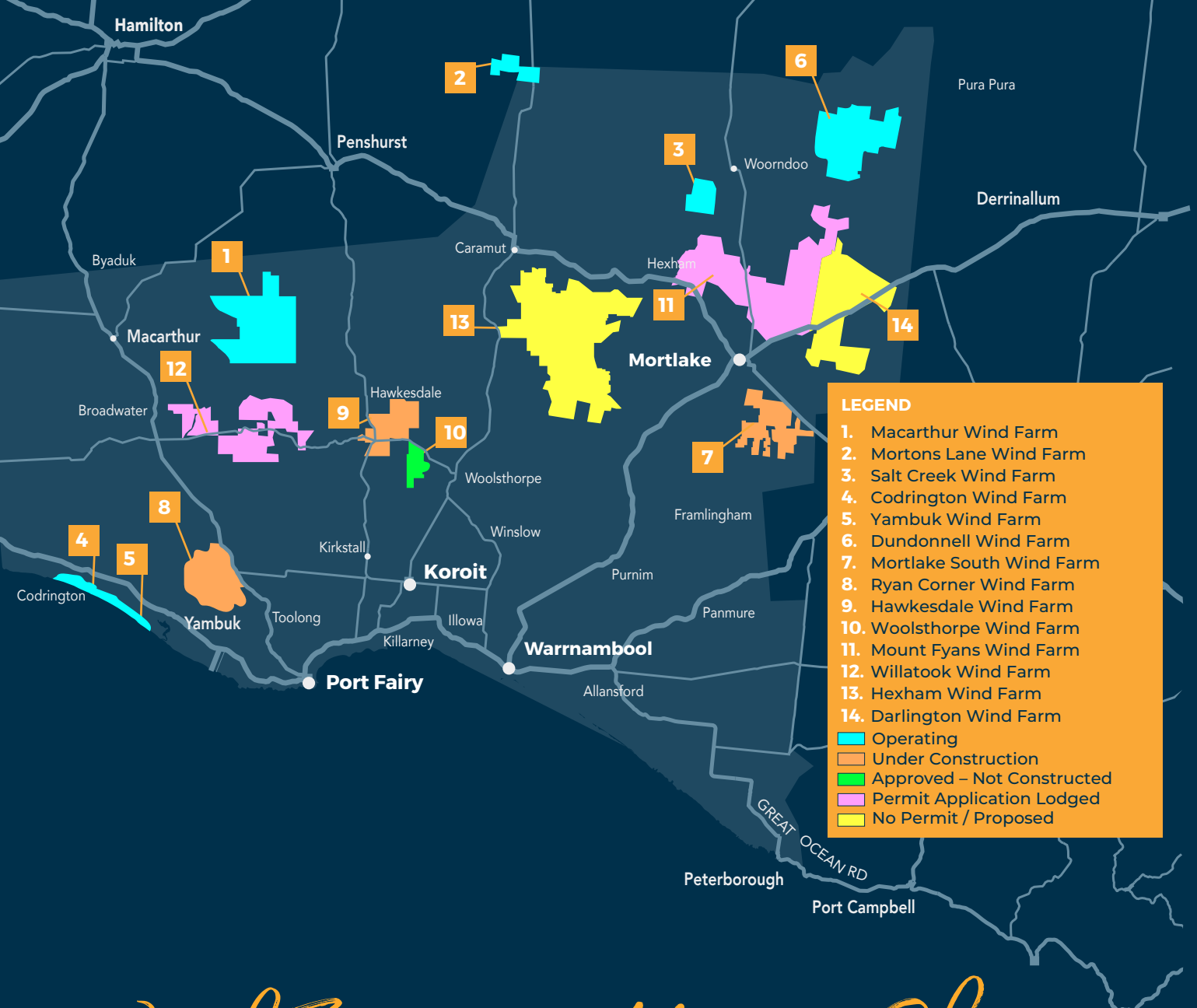
1. Moyne Shire Council Wind Farm Advocacy Brochure
2. MAV State Council Meeting Motion 38 19 May 2023.
3. Moyne Shire Energy Projects Map

MOYNE
SHIRE



Moyne Shire Council
**Wind Farm
Advocacy**





Wind Farms in Moyne Shire

The cumulative impacts of wind farms and transmission infrastructure is a current issue for Moyne Shire Council and its community. Noise, traffic, environmental, agricultural, visual, housing, social and economic impacts are consistently raised by the community as areas of concern.

As at January 2023 Moyne Shire has 6 operating wind farms, 3 projects under construction, 4 projects seeking planning approval and one in the feasibility stage. 282 turbines are operating, 110 under construction, 268 seeking planning approval and feasibility studies for up to 61 more. If all these wind farms are constructed the Shire will host approximately 720 turbines, generating about 3 GW of electricity. Wind farms will cover approximately 12% of Moyne Shire's rural land area, equivalent to the size of over 100 Melbourne CBDs. These wind farms are creating 2 distinct geographical clusters; in the west near Hawkesdale, Macarthur and Woolsthorpe and in the north east surrounding Mortlake.

Decommissioning will be the next challenge to face Moyne with Yambuk and Codrington wind farms. Council will need multi-agency support during this process.



Council's Current Position

In September 2022 Council set a new position on wind farm development in the Shire. The position was informed by the results from an extensive community consultation process and independent telephone survey of 400 residents.

Moyne Shire Council strongly recommends that the State Government pause the issuing of all wind farm planning permits in the Shire until strategic land use planning in the South West Renewable Energy Zone (SWREZ) is completed in consultation with Moyne Shire and other affected Councils and communities.

This is supported by ensuring that strategic planning must provide for:

- a. Increased wind farm turbine buffers to 5 km from towns and settlements, 2 km from houses and 1 km from neighbouring property boundaries;
- b. A methodology developed to consider cumulative impacts of wind farm development and used to assess all future planning permit applications. Assessment should include flora, fauna, vegetation communities, agriculture, emergency management, visual amenity, noise, traffic, road condition and housing availability;
- c. An agreed cap on development for Moyne Shire that considers the number, location and density of turbines; distance between individual wind farms; development constraints; and cumulative impacts on residents and the environment;
- d. Significant long term economic and social benefits provided by companies and the State government for local communities and residents, incorporating local decision making. Economic development through the use of local businesses, employment and training during construction and operation of wind farms.
- e. Undergrounding of high voltage power lines where technically feasible and where there are no significant environmental or heritage impacts. Where not feasible, high voltage powerlines and infrastructure should be shared between wind farm developments;
- f. A decommissioning policy that includes statewide decommissioning guidelines, a strategic plan for reusing and recycling components within the State (preferably in SWREZ) and a standardised system for financial security deposit from companies before construction commences;
- g. Assessment to ensure prime agricultural land and food & fibre production in the Shire is not adversely impacted;
- h. Processes that ensure significant flora, fauna and vegetation communities are protected from the impacts of development;
- i. Wind farm development buffers placed around airstrips and airports, and height thresholds on turbines which will retain current Minimum Safe Altitude (MSA) levels, and not impede on current Obstacle Limitation Surfaces (OLS).



Learnings

- VRET supported projects (Dundonnell and Mortlake South) set new standards for community benefit sharing. In 2023 wind farm developers are offering far in excess of those standards.
- Developments with onsite or adjacent quarries significantly reduce traffic and road impacts during construction. Onsite quarries have many advantages and should be encouraged.
- The Mortlake South Wind Farm has shown that underground transmission lines are economically and technically feasible.
- Policies and planning decisions are creating clusters of wind farms. Better guidelines for the assessment of cumulative impacts is required.
- Technology is resulting in taller turbines. Buffer requirements to residences or environmentally sensitive areas have not been reviewed to take on board these changes.
- Although developments in Moyne Shire generate substantial power for Victoria, Moyne residents and business are not adequately compensated through subsidised electricity.
- Council as responsible authority for administration and enforcement of planning permits has recognised the need for a dedicated compliance officer.
- State Government needs to collate impacts and benefits from reporting by operational wind farms - to improve outcomes and refine frameworks such as BAM Plans, Brolga protection and cumulative visual impacts.

Fast Facts

- The wind energy industry is now 20 years old in Victoria and each new project and approval should be benefiting from changes in technology, construction methods and impacts, environmental monitoring, economic and social impacts and benefits. We are happy to contribute to this by sharing our experience.
- In 21/22 financial year Council collected \$1.4 million in rates from operating wind farms.
- It is estimated that wind farms in Moyne Shire, if operating at full capacity, generate enough electricity to power over 500,000 households and abate 3.4 million tonnes of CO2 per annum.
- Since 2005 wind farm community funding programs have allocated over \$1 million to local community projects in Moyne and the South West region.
- The length of the blades at Ryan Corner and Hawkesdale wind farms will be the same as the entire height of the turbines at the Codrington wind farm. Proposed turbine tip heights now reach up to 260 metres.
- Wind farm developers are now offering up to \$3000 per turbine per year to local community funding programs.
- 3 wind farms are offering funding for tertiary education scholarships or local education programs.

Motion 38. Renewable Energy Transmission Infrastructure

Submitting Council: [Moynes Shire Council](#)

Motion:

That the MAV advocate to the Minister for Climate Action, Energy & Resources and State Electricity Commission that infrastructure to support the renewable energy transmission across Victoria be developed using existing easements, be located where practicable underground and require co-location of connecting lines to reduce the impact on agriculture, the visual landscape, recognise risks of bushfire and protect amenity.

Submitting Council Confirmation and Rationale:

Council Resolution Date	28/02/2023	
MAV Strategy 2021-2025 Priority or 'Other – Of significance to Local Government'	Strategy Priority 3: Well-planned, connected and resilient built environment	
Is the motion repetitive in a form or substance of a motion or item considered at the most recently held meeting of the State Council?	No	

Council has advocated strongly to state government on a range of issues associated with renewable energy development including:

- Lack of strategic planning and associated cluster siting of windfarms and the associated cumulative impacts on local communities.
- Safety and amenity impact of transmission lines to connect to the electricity grid and the need to utilise underground transmission.
- A lack of local community benefit from the wind farm developments.
- No mandating of local content in the supply of wind farm equipment so as to maximise the economic benefits from these large-scale investments.

This motion seeks MAV support to address the increasing impacts of transmission lines. The transition to renewable energy needs to be supported by appropriate transmission infrastructure. Grid reliability and security of power is key to community safety and the economic prosperity of Victorians.

The current approach by the government and authorities such as AEMO needs to take a strategic approach, consider the lifetime costings and balance social and environmental factors, as well as the economics of supplying power.

The State (VicGrid) is developing clear direction for transmission from Offshore Wind Farms and this approach should be similarly applied to the whole network.

Wind Farm Status

- Operating
- Under construction
- Approved - not constructed
- Permit application lodged
- Proposed

Transmission Lines

- Woolsthorpe Proposed
- Mount Fyans Proposed
- Hawkesdale/Ryan Corner
- Mortlake South Underground
- Macarthur
- Dundonnell
- Salt Creek
- 66 KV
- 500 KV

Gas

- Gas Pipelines
- Power station (operating)
- Power station (proposed)
- CO2 Sequestration
- Extraction

No	Location	Status
1	Macarthur	Operating
2	Mortons Lane	Operating
3	Salt Creek	Operating
4	Yambuk	Operating
5	Codrington	Operating
6	Dundonnell	Operating
7	Mortlake South	Under Construction
8	Ryan Corner	Under Construction
9	Hawkesdale	Under Construction
10	Woolsthorpe	Approved - not Constructed
11	Mt Fyans	Permit Application Lodged
12	Willatook	Permit Application Lodged
13	Hexham	Proposed
14	Darlington	Proposed



This map may be based on third party information which has not been formally verified by the Moyne Shire Council and may not be to scale. Unless expressly agreed otherwise this map is intended as an indicative map and Moyne Shire Council does not endorse its complete accuracy.