



Contact: Michelle Grainger
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8 September 2020

Electricity Security Board
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Dear Sir/Madam,

Submission on Rez Planning Consultation Paper and Draft Rule Change

Council welcomes the opportunity to make a submission on the REZ Planning Consultation Paper and consents for this submission to be published on the ESB website. Council is pleased that the consultation paper recognises the potential for significant community impacts from REZ development and attempts to address these issues through coordinated planning in REZs that takes into account community views.

Moyne Shire forms a large proportion of the South West Victoria candidate REZ and is the major growth area for wind energy facility development in Victoria.

Council currently opposes any further wind farms in Moyne Shire. Council is of the view that its stated position has not been recognised in the development of your consultation paper.

Additionally, Council is disappointed that your paper has not considered the suite of recommendations regarding system and consultation improvements as recommended in the 2017, 2018 and 2019 Annual Reports from the Office of the National Wind Farm Commissioner.

The cumulative impacts of wind farms, is a current issue for Council and its community. Noise, visual, traffic, road, accommodation and environmental impacts are consistently raised by the community as areas of concern. Council resolved on the 27 November 2018 (see attached) to oppose any further wind farm development until recommendations 8.2.1 - 8.2.7 in the National Wind Farm Commissioners 2017 annual report were implemented in the Victorian context. This resolution was restated by Council on 25 August 2020.

Many of the issue raised in this resolution will be exacerbated with the further development of the Moyne section of the South West Victoria REZ, which is listed in the ISP as a phase 1 development zone due to its wind resource and transmission capacity.

A major issue of concern for the Council and its residents is the proliferation of power lines associated with wind energy generation facilities impacting on visual amenity, agricultural operations, bushfire management and road safety. There is a need for proactive coordination of power line infrastructure within the REZ.

Moyne Shire has successfully advocated for power line sharing (Dundonnell and Mt Fyans wind farms) and under grounding (Mortlake South wind farm) to reduce impacts, however a government led strategic approach to infrastructure planning in REZ, beyond the planning of major transmission lines, is required. Communities and key stakeholders will continue to put pressure on network planners and developers to place transmission lines underground and this should be incorporated into REZ design plans.

In the Victorian context the uncertainty and complexity of wind farm noise assessment and compliance reduces community acceptance of renewable energy development. Designating EPA as the authority responsible for noise assessment and compliance would improve community and Council support for further development in the South West Victorian REZ.

Wind farm development result in major impacts to the roads, particularly during construction. Access to south-west Victoria by renewable energy projects requires a standard of road greater than that which exists. REZ design plans should provide greater funding streams for local and regional roads.

Development of a designated REZ should include demonstrable local and community benefits such as access to lower utility process, more readily available green power, industry attraction to towns, value adding to agriculture and local training opportunities in the renewable energy industry. These benefits should be enduring, not just realised during the construction stage of facilities, and factored into design plan implementation.

To strengthen the approach to REZ planning Council makes the following comments and recommendations specific to the consultation paper:

- As a REZ selected for development requires community support, a mechanism for determining this support is required. A REZ will contain many communities with a wide variety of views. One way to determine these views is to work through Local Councils, who understand local views.
- Local government needs to be recognised in the paper as a land use and development planning authority alongside state governments.
- As well as land use, economic and social impacts, REZ development will have environmental impacts. These need to be factored into any REZ design plans.
- Undergrounding of transmission and other power lines needs to be incorporated into design plans where technically feasible. This will reduce land use, environmental and social impacts; and make it easier to gain social licence for REZ development.
- Engagement with Local Councils and community needs to be at the “involvement” level early in the planning process, in addition to the more formal consultation phase where submissions are sought on a draft plan.
- A minimum 4-week consultation period will not allow genuine and meaningful engagement. Most Local Councils and community groups only meet monthly. To enable them to give due consideration to draft development plans, a 60-day consultation period should be the minimum standard.

- A REZ design report should also include an initial assessment of likely social and environmental impacts and community views and outline how these have been addressed in the design.
- The assumption that the Jurisdictional Planning Body (JPB) has specialist knowledge of the local communities in a REZ is incorrect. AEMO is the JPB for Victoria and in Council's view does not contain this knowledge, therefore working closely with local government will be important.

Within Moyne Shire there are 5 operational wind farms, 2 under construction, 3 with permits but not yet constructed and 3 seeking permits or in the feasibility stage. If all these wind farms are constructed the Shire will host approximately 800 turbines, generating about 3 GW of electricity and covering over 12 % of Moyne Shire's land area. These wind farms are creating 2 distinct geographical clusters in the north west and east of the Shire as can be seen by the attached map.

Should you have any queries about this submission please don't hesitate to contact Michelle Grainger, Executive Manager, Major Projects at mgrainger@moyne.vic.gov.au

Yours faithfully,



Bill Millard
Chief Executive Officer

Enc. Council resolutions November 2018; Moyne Shire Wind Farm Map