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2 March 2020

AEMO
Via email

info@esb.org.au

Dear Sir/Madam,

Submission to AEMO Draft 2020 ISP

Council welcomes the opportunity to make a submission on the Draft 2020 Integrated System Plan and consents for this submission to be published by AEMO on their website.

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

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.

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. Nominating this area for Phase 1 development will signal to developers a preferred area for feasibility studies and subsequent wind farm construction.

The Council understands the context for REZ development is a complex planning and regulatory environment requiring coordination at the federal, state and local level. In creating a road map for future development which will impact disproportionately on rural communities, Council is of the view that it is AEMO's role to ensure there is a duty of care to facilitate a collaborative and coordinated approach to minimise the cumulative social and environmental impacts of REZ development across all levels of government. This occurs in other sectors such as telecommunications, where co-location of infrastructure needs to be considered as part of any installation of new towers. This is mandated through a Code of Practice at the federal level and is reflected in state planning policy in planning schemes.

It is noted that the ISP states that Phase 1 REZ development will occur where there is good alignment with community interests, however there is no mechanism at federal or state level to ensure this alignment is a part of the decision making process for clusters of development applications in a REZ. Section B1 outlines the timeframes for consultation. It is noted that a REZ candidate webinar is planned for August 2020, just before the response to stakeholder consultation is published in the same month. This timeframe and consultation format will not give Councils in candidate REZ time to raise and work through issues with AEMO. An earlier meeting with Councils impacted by potential Phase 1 REZ nominations is required.

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. The need for proactive coordination of power line infrastructure within REZ should be signalled in the ISP, with suggestions on how this can be facilitated through AEMO regulatory pathways and advocacy.

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. Under grounding of the Mortlake South wind farm transmission line shows that this is a plausible option. The feasibility of moving to undergrounding over the life of the ISP should be discussed and costs modelled from the time point where this would be technically feasible.

Should you wish to discuss the issues raised in this submission, please call
Michelle Grainger, Executive Manager Major Projects

Yours faithfully



Bill Millard
Chief Executive Officer

Enc .Council resolutions, November 2018, Moyne Shire Energy Map.

