

5 April 2023

Australian Energy Market Operator – Victorian Planning
Level 22, 530 Collins Street
MELBOURNE VIC 3000
Mailto: VNIWestRITT@aemo.com.au

To whom it may concern,

Thank you for the opportunity to make a submission to the Victoria to New South Wales Interconnector West (VNI West) Consultation Report – Options Assessment. This is an important project for future power security which will significantly impact on the community and landscape of Loddon Shire.

At its Scheduled Council Meeting on 28 March 2023 Loddon Shire Council resolved:

That Council authorise the Mayor to submit a response to the VNI West Consultation Report on behalf of Loddon Shire Council including but not limited to the following items:

- 1. Council understands the importance of a reliable energy network to the Victorian and Australian community.*
- 2. Consultation has not met the expectations of our community. We expect people to be meaningfully engaged and informed of issues which may impact upon them.*
- 3. Loddon Shire is within the Murray Renewable Energy Zone (REZ) and seeks the highest capacity transmission to enable additional power generation and therefore value sharing to our community.*
- 4. Loddon Shire Council is opposed to transmission lines crossing multiple areas of our municipality with a preference for consolidation on a single alignment with minimal impact.*
- 5. Council requests AVP provide clear information to land owners about the impact transmission lines will have upon their rights, particularly any limitations on farming operations.*

Consultation

In mid-2022 AEMO and Transgrid released the Regulatory Investment Test for Transmission (RITT) - Project Assessment Draft Report (PADR) examining the alignments of this transmission line between Dinawan, New South Wales and North Ballarat in Victoria. The preferred alignment was identified as passing via Kerang. Council was expecting further detail of this alignment to be released in February 2023 and was not aware that a further 5 alignment options through our municipality would be released in a further options assessment. With all of these new options passing through our municipality, it is disappointing that AEMO did not consult local government to understand the local context required to complete a meaningful multi-criteria analysis.

For the past 6-12 months, Councils across the region have been discussing best methods for AVP to undertake meaningful consultation. This includes engagement with local media, community groups and newsletters, the use of face-to-face engagement, a presence at local events, information on farming practices which are permitted/not-permitted around or under the transmission lines, FAQs, and more. While some of these suggestions have been taken up, most have not but may be in the next stage of project development when the precise alignment is determined. During this consultation period, drop in sessions were not effectively advertised and conducted at times which are not conducive for meaningful engagement. Only one session was provided within Loddon Shire, however AVP added an additional session to assist with better promotion and provide opportunity for more people to be informed of the project.

As a result of this consultation gap, Council has received a significant number of enquiries from our agricultural land holders regarding the impact of this proposal upon their activities. In addition, the local Victorian Farmers Federation has been advocating for their members to ensure impact is minimised and the best outcome is achieved. It is disappointing that this consultation has not proactively addressed many of the questions landholders need to understand in considering the merits of the project proposal.

Community Benefit by Maximising Capacity

Loddon Shire located within the Murray River Renewable Energy Zone (REZ). Renewable energy zones are areas in our state with the greatest potential for renewable energy, such as wind, sunshine, rain, tides, waves and geothermal heat. These zones ensure a mix of energy generation in acknowledgement that the wind does not always blow and the sun does not always shine.

Australian Energy Market Operator - Victorian Planning's (AVP) new preferred option (Option 5) offers the lowest (+3,410 MW) indicative improvement to REZ transmission limits of all seven options assessed, while option 3A has the highest improvement (+6,490 MW) at almost double the capacity improvement. A significant part of AVP's rationale to preference the lowest improvement option is the ability of Option 5 to transmit power from the wind farms in western Victoria into NSW. Therefore, the ability to transmit from Western Victoria to NSW appears to override increasing generation within the Murray Renewable Energy Zone. This is unacceptable to the Loddon Shire community who are seeking to maximise community benefit sharing as a result of this project.

Multi-criteria Assessment

The February 2023 Consultation Report has added social and environmental impacts as part of the non-statutory multi-criteria assessment. This assessment allocates a percentage weighting to categories as specified in the criteria. This assessment is desktop based and we believe that it lacks significant understanding of the landscape in our region including:

- Areas of cultural significance – from our discussions with AEMO it is understood that traditional owner engagement has not yet occurred. Consultation with traditional owners will identify a number of culturally sensitive areas and potential secret or sacred object locations which must not be disturbed.
- There are areas with strong cultural and environmental sensitivity along the alignment which have not been identified. The consultation report rates these alignments as low value and we believe this is incorrect. For example the following areas of cultural or environmental significance are within the alignment options:
 - Kow Swamp
 - Boort Lakes
 - Mount Terrick Terrick
 - Terrick Terrick National Park
 - Roslynmead Nature Conservation Reserve
 - Little Kotta Nature Conservation Reserve
 - Mount Hope creek
 - Loddon River, Terrapee Nature Conservation Reserve
 - Woolshed Swamp Wildlife Reserve
 - Buckrabanyule Nature Conservation Reserve
 - Mysia Nature Conservation Reserve and Mysia Bushland reserve
 - Lake Marmal
 - Kinypanial Creek Grasslands
- There is a level of social license to consolidate transmission lines along one alignment. There is no appetite for a spider web of transmission infrastructure across our municipality. Loddon Shire Council has approved planning permits for a number of solar farms along the original alignment as a reflection of market confidence. These solar farm proponents have been consulting with the community through that process to proactively build trust.
- The transmission lines are likely to be 15m above ground at the lowest point with 80m towers at 450m spans. There will also be an easement of 100m (50m either side). This infrastructure and easement will impact on land values and limit productive agricultural land available for farmers. The Victorian Government has offered a payment of \$8,000 per year, per kilometre for land holders who have transmission lines passing through their property. This payment continues for 25 years despite the infrastructure being in place for 50-100 years. It is our opinion that this payment should be reconsidered given the impact upon productive agriculture, land values and the project lifecycle.
- The assessment does not adequately recognise the high value horticulture in our area. For example the area between Lake Marmal and Boort is a high value horticultural area. Boort hosts the largest Olive Grove in the southern hemisphere comprising around 14,000 acres. There are large vineyards traversing the alignment. Further to the south is irrigation supplied from the Waranga channel with

travelling irrigators and centre pivots as well as new horticultural developments near Fernihurst. The option 5 alignment should better consider the quality soils, horticulture, high value irrigation, cultural heritage, and natural waterways.

- The assessment does not adequately consider the impact of bypassing Bendigo. This is a short sighted approach which will result in future duplication of infrastructure at a significant financial and social cost. Not connecting to Bendigo results in heavy loading of the Kerang- Bendigo 220kv line due to shared network loading and limits the achievable REZ transmission limit. AEMO is suggesting they will consider upgrades when there is required demand, however there are already identified projects around Mitiamo, Kerang and Pyramid Hill which will exceed the limits of this line.

Thank you for the opportunity to provide input into this important project which will significantly impact on our community and landscape. We hope to continue working with AVP to ensure the best outcome is achieved for everyone.

If you have any questions or would like further information, please contact Lincoln Fitzgerald, Chief Executive Officer on (03) 5494 1200 or loddon@loddon.vic.gov.au

Yours sincerely



Daniel Straub
MAYOR