



Latrobe City Council Submission to Offshore Wind Transmission – Draft Options Assessment Method

August 2023



1. Introduction

The Department Energy, Environment and Climate Action is seeking feedback on the VicGrid Offshore Wind Transmission – Draft Options Assessment Method. The Options Assessment method will be used to make decisions about where infrastructure will go. Feedback received from the engagement process will inform the Final Assessment Method.

Submissions on the proposed changes are required by 27 August 2023.

Latrobe City Council provides some comments around the proposed draft options assessment method, but specifically the submission focuses on:

- Project objectives and guiding principles; and
- Draft assessment criteria rating approach.

2. Submission

2.1 Draft Assessment Criteria

2.1.1 Project Objectives and Guiding Principles

On pages 6-8 of the report, the objectives and guiding principles for the assessment method are identified.

Latrobe City Council does not have any concerns about the 3 objectives:

- *Objective 1 - Ensure investment in viable transmission infrastructure that is fit-for-purpose, resilient and built with future needs in mind.*
- *Objective 2 - Contribute to regional development opportunities, including community benefits and governance, and economic development in the energy sector.*
- *Objective 3 - Maintain transmission system security, reliability, strength and enabling the transport of generation to load.*

and believe they are a fair representation of what the high-level objectives for the assessment method should be to maximise positive outcomes and respond to community comments and concerns through previous engagement processes.

There are 6 guiding principles listed which are based on minimising negative outcomes:

- *Guiding principle 1 - Minimise impact on host landholders and communities, including visual amenity.*
- *Guiding principle 2 - Minimise impact on the environment.*
- *Guiding Principle 3 - Minimise impact on Traditional Owners' cultural values and aspirations.*
- *Guiding Principle 4 - Minimise impact on existing and future land use.*
- *Guiding Principle 5 - Minimise cost impacts to energy consumers and generators.*
- *Guiding Principle 6 - Limit engineering complexities during construction and impacts on existing infrastructure.*

Latrobe City Council offer the following comments in relation to the guiding principles.

Guiding Principle 1

Additional wording should be included in this principle stating other impacts which will be minimised including land required for easements. The considerations should also include whether there are already easements on the land being required for other infrastructure (i.e. transmission lines for other renewable project, basslink, major gas and oil pipelines) and cumulative impacts of land required.

Guiding Principle 2

Additional wording should be included to not only consider the impacts on the environment, but the impact the environment will have on any proposed transmission i.e. growing vegetation, bushfire implications, flooding implications etc. The impact of the transmission project *must not* be considered in isolation of all the other renewable or related projects occurring across the state.

Guiding Principle 3, 5 and 6

Latrobe City Council has no comments on guiding principles 3, 5 and 6.

Guiding principle 4

The consideration section for this guiding principle should be expanded as it mainly focuses on agricultural, forestry and tourism related impacts. Considerations should also be given to future land uses such as residential and other uses proposed in structure plans and framework plans.

General comment

All 6 of the guiding principles only require consideration of the effect of these impacts, the assessment method should also provide further detail on how this will be considered i.e. what information needs to be prepared to make a consideration, options to mitigate impacts etc. Council requests that it is provided an opportunity to review these additional details and comment on them before the assessment method is finalised.

Latrobe City Council also notes that all objectives and guiding principles are to be 'equally considered' in the assessment. Latrobe City Council is supportive of this approach. However, have noted in the past that things like cost and environmental impacts held more weight in past decision making and whether the principles and guidelines will have an equal weight in the assessment. Latrobe City Council believes that how they are going to be equally considered this should be specified in the assessment method and that Council is provided an opportunity to review and comment on this additional information before the assessment method is finalised.

2.1.2 Draft assessment criteria rating approach

The draft assessment criteria is a rating from 1 (no impact) – 5 (extreme impact), ratings 2 – 5 have further description about when this rating will be used. Latrobe City Council offer no comments on rating approach 1.

The following comments relate to the rating approaches 2 – 5, which are:

- Rating 2 (Minimal Impact) is defined as *'Impacts confined to a small number of locations, generally small in magnitude and short-term and of a scale significant at a local level'*.
- Rating 3 (Moderate Impact) *Impacts affecting a large number of locations within the project area, potentially small in magnitude and long-term or large in magnitude and short-term, and of a scale significant at a council level.*
- Rating 4 (Major Impact) *Impacts affecting a significant portion of the project area, generally large in magnitude and long-term in nature and of a scale significant at a regional level.*
- Rating 5 (Extreme Impact) *Impacts are widespread across the project area and beyond, of vast magnitude, long-term in nature and of a scale significant at a state level.*

Latrobe City Council believes that the descriptors are subjective and will depend on who is undertaking the assessment at the time as to what they believe being small, short-term, medium, long-term, wide-spread etc scales are. Therefore, what these need to be quantitated in a number, area, distance or some other quantitative measure for each objective and guiding principle.

This information needs to be included in the draft assessment method so it is transparent and further comments should be sought from the community in relation to these measures. Latrobe requests that when the qualitative and quantitative measures are developed that it is provided an opportunity to review and comment on before the assessment method is finalised.

2.2 Implementation

As part of the engagement package, the purpose of the draft assessment method is to assist the Government in making decisions where transmission infrastructure will go. What is not clear is whether this is an additional assessment or whether it will supersede other requirements to be completed i.e. Environment Effects Statement, Planning Scheme Amendment process etc.

Latrobe City Council require clarification on how it is intended this assessment method to be used.

3.0 Conclusion

The draft assessment method prepared is intended to be used as a decision-making tool where transmissions infrastructure will go. However, it is not clear whether this method is intended to supersede any other processes or just additional requirements required for the developments.

Latrobe City Council believes that the rating system does not provide enough quantitative measurements and is still subjective to the person undertaking the assessment. There needs to be further work undertaken on what these measurements of rating will be (i.e. size of land impacted by vegetation removal, number of species affected, number of properties affected, cost range from infrastructure etc), and further consultation with the community in relation to the detail before the assessment method is finalised.

Minor wording changes to the guiding principles in the document have also been requested.

Latrobe City Council would be happy to have further discussion with the department in relation to our submission.