

**INQUIRY AND ADVISORY COMMITTEE ON WESTERN RENEWABLES LINK ENVIRONMENT
EFFECTS STATEMENT AND DRAFT PLANNING SCHEME AMENDMENT GC209**

SUBMISSION ON BEHALF OF HEPBURN SHIRE COUNCIL

1. This submission is made on behalf of Hepburn Shire Council (**Council**). Council has been a member of the Technical Reference Group (**TRG**) throughout the development of the Western Renewables Link (**Project**) and has over the course of its engagement through the TRG raised concerns regarding the Project.
2. Council is opposed to the exhibited Project. A number of concerns that Council has raised over a period of years remain outstanding and unaddressed including the adoption of an overhead technology in lieu of undergrounding. Following a resolution in May 2021, Council raised its wide-ranging concerns and its proposed undergrounding solution to the proponent, AEMO, DELWP and 33 state and federal ministers by letter dated 29 July 2021.
3. Council's primary concerns with the environmental effects of the Project are:
 - 3.1. The adverse impact on high quality agricultural land within the Shire, which forms part of the Central Highlands food bowl, an area of importance to Victoria, both economically and in terms of food security. Large areas of land within the Shire affected by the Project have been identified as Class 1, which is the highest level of productive land identified in the Agricultural Land Capability Assessment (Agriculture Victoria (October 2018) and Rural Hepburn: Agricultural Land Study and Rural Settlement Strategy (October 2024). There is substantial and ongoing investment in farming infrastructure and improvement in this area contributing to employment and export revenue for the area and Victoria. The Project will cause significant impacts to the productivity of large areas of prime agricultural land including by taking prime agricultural land out of production and restricting agricultural activities such as irrigation and tractor use on land around the proposed infrastructure;
 - 3.2. The significant likely adverse impacts of the Project on tourism within Hepburn Shire and the broader region, including potential adverse impacts of the Project on the success of the UNESCO Victorian Goldfields World Heritage Bid, which has been the result of 35 years of advocacy and the work of 15 councils in conjunction with the Dja Dja Wurrung Clans Aboriginal Corporation, the Victorian Goldfields Tourism Executive and Heritage Victoria. If successful, the World Heritage Bid will not only protect the heritage fabric and tourist attraction of the Victorian Goldfields, but is anticipated to add \$25m in visitation to the Goldfields each year;
 - 3.3. Potential adverse impacts on heritage sites of local, regional and state significance;
 - 3.4. The increased fire risk caused by the Project, and the impact of the proposed electricity transmission towers on the capacity and safety of the Country Fire Authority and Fire Rescue Victoria personnel to fight bush and wildfires where they do arise. This impact extends not only to the potential for tower failure and collapse in extreme bushfire conditions, but to the risk of smoke caused arcing during fire events and the 'no go' zones required around the towers at all times to ensure the safety of firefighters restricting access and preventing the use of aerial firefighting strategies;
 - 3.5. The adverse impact of the Project on the visual amenity currently enjoyed by residents and visitors to the Shire and broader region, including the impact on significant heritage and cultural landscapes¹;
 - 3.6. The potential adverse impacts on biodiversity and habitat, including due to potential aerial strike impacts on brolga, wedge-tailed eagles and black swans and the fragmentation of core habitat connectivity;

¹ This inherently links to the tourism impact concerns articulated above.

- 3.7. The potential for land use conflicts, including between the existing use of land for agriculture and tourism and the proposed use of land for the Project;
- 3.8. The social effects of the Project. There exists significant community concern and opposition to the Project and repeated requests from Council and the community for a project premised upon an undergrounding solution to be properly explored. Council has observed concern in its community in relation to the impacts of the Project and a lack of genuine consultation by the proponent;
- 3.9. The adoption of an overhead solution in the Project for the transmission line which cumulatively results in unacceptable environmental impacts as detailed in this submission. An undergrounding solution is viable and would:
 - a. improve the reliability and resilience of the infrastructure to bush fires or severe weather events;
 - b. remove the risk of bushfire ignition and restrictions on access for emergency services and aerial firefighting;
 - c. significantly reduce impact to flora and fauna including by aligning the cabling along roadways;
 - d. largely eliminate the visual impact of the transmission line, and consequential impacts on tourism and amenity of residents and visitors to the area; and
 - e. effectively eliminate potential land use conflicts once construction is completed.
 - f. Reduce impacts on agriculture.
- 3.10. Concerns in relation to the substance and form of the PSA, including the unnecessarily broad application of the Specific Controls Overlay Schedule 8 to land to facilitate the Project and the consequential uncertainty as to the final Project alignment within the associated incorporated document. Council considers this uncertainty has the potential to seriously undermine various assessments undertaken for the EES (e.g. visual impact) if significant changes are made to the alignment after the EES process.
4. Hepburn Shire has a rich cultural history which began with the Dja Dja Wurrung People, the Traditional Owners and custodians of the area. It is bounded by Central Goldfields and Mount Alexander Shires in the north, Macedon Ranges Shire in the east, Moorabool Shire and the City of Ballarat in the south, and Pyrenees Shire in the west.
5. Council is deeply proactive on climate issues and supportive of renewable energy, having made a commitment through the Z-Net pilot in partnership with the community and business to pursue 100% renewable energy targets. Since commencing the Z-Net pilot with the Hepburn Wind project, which provides the local community with energy, Council has expanded its footprint for innovation in stationary energy, transportation, agriculture, waste and wastewater and land use change space.
6. It is telling then that despite its commitment to renewable energy, Council considers the Project does not deliver an acceptable renewable project in its proposed overhead form and will cause greater detriment to our community (and the wider Victorian community) than benefit.
7. Hepburn Shire is one of the significantly impacted municipalities arising from the Project, with planned 500kv transmission lines being proposed within its municipal boundary, crossing some of the highest value and most productive agricultural land in Australia.

8. The Project should not be approved in its current form. If it is to be delivered, the Project must incorporate underground cabling technology. By taking the transmission lines underground, in addition to the clear visual amenity benefits, the Project can adopt a more agile alignment, will avoid and minimise its wide-ranging negative impacts and maximise its capacity, reliability and resistance to technical faults, natural disasters and inclement weather.

IMPACT ON AGRICULTURE

9. The Central Highlands agricultural food-bowl, comprising 6 municipalities in central Victoria,² is critical to the State of Victoria, both economically and in terms of food security. It has access to major population centres of Ballarat, Melbourne and Geelong and generates in excess of \$10.2 billion of gross regional product per annum.³
10. The Inquiry into securing the Victorian food supply,⁴ and the Victorian Government response,⁵ highlights the importance of protecting agricultural land to secure the Victorian food supply.
11. Hepburn Shire hosts some of the best and most fertile soils in Australia, forming part of the 79% of land in the Central Highlands region being used for primary production.⁶ Large parts of the Shire are rated as Classes 1 and 2 for the agricultural productivity of the land.⁷ With its proximity to the vast majority of the Victorian population in Melbourne, Geelong, Ballarat and Bendigo, the Shire's importance to Victorian food security and the economy cannot be overstated.
12. The Project will have direct impact on agricultural production through the introduction of non-farming infrastructure, unreasonably wide easements and likely restrictions on agricultural development and activities such as irrigation, tractor use and use of aviation for agricultural purposes on the remaining land around the proposed infrastructure.
13. Due to the life of the proposed infrastructure (up to 80 years for the transmission lines before likely upgrades/renewal projects), it must be considered that these impacts, and the removal of the affected land from agricultural production, will be permanent, resulting in:
 - 13.1. reduced food security in Victoria and consequential increases in the cost of living;
 - 13.2. economic harm within the Shire, particularly to the agricultural industry but also extending to a range of tourist, pasture to plate and hospitality businesses on which many residents' livelihoods depend; and
 - 13.3. potentially long term state-wide economic impacts.

IMPACT ON TOURISM

14. Tourism is one of the core pillars on which the Shire's economy is built. In the 12 months to March 2022, the Spa Country region, located in Hepburn and the Macedon Ranges, attracted

² Ararat, Pyrenees, Ballarat, Hepburn, Golden Plains and Moorabool.

³ Central Highlands Regional Economic Development Strategy (Department of Jobs, Precincts and Regions, March 2022), p 6.

⁴ Report on Parliamentary Inquiry into Food Security in Victoria (Victorian Parliament Legislative Council Legal and Social Issues Committee, November 2024).

⁵ Victorian Government response to the Parliamentary Inquiry into Food Security in Victoria (Victorian State Government, June 2025).

⁶ Central Highlands Regional Economic Development Strategy (Department of Jobs, Precincts and Regions, March 2022), p 11.

⁷ Agricultural Land Capability Assessment (Agriculture Victoria (October 2018) and Rural Hepburn: Agricultural Land Study and Rural Settlement Strategy (October 2024).

a total estimated spend of \$434million million.⁸ Tourism is the largest contributor to the economy in Hepburn, directly supporting 18.8% of jobs as estimated by Remplan.⁹ By way of contrast, nationally, Remplan estimates tourism supports just 6.7% of jobs. Consistent with this the proponent has identified that through the Spa Country Tourism Region (Creswick-Daylesford-Ballan), tourism supports 37.4% of all jobs,¹⁰ and contributes 9.9% to the gross value add within the region.¹¹ This highlights the importance of tourism within Hepburn Shire.

15. The Project will have significant, material and lasting impacts on tourism in this Shire and a broader region where visitation is heavily attracted to open country settings within a day trip of Melbourne. The EES understates the numerous concerns Council has raised over the course of the consultation period about Project impacts on the Shire's valuable tourism economy that has a strong basis in the area's natural and farming landscapes.
16. Tourism within the regions and more particularly within Hepburn, is driven by a range of factors, such as the desire to take a scenic drive, experience diverse natural landscapes, experience nature, enjoy local produce and dining / drinking experiences. The Shire's offerings in each of these categories is unique and, in many cases, dependent on the preservation of its natural vistas.
17. A key driver of tourism within Hepburn is its pasture to table dining experience offerings. Beyond the tourism impacts of the Project arising impact on natural vistas through Hepburn, as outlined above, the Project will have negative impacts on agricultural production and the operation of these pasture to table businesses, exacerbating the Project's impacts on tourism.
18. By interrupting and interfering with the Shire's natural vistas and landscapes, the placement of the proposed 85m high transmission towers through the municipality degrades these environmental qualities and risks a significant regional economic driver.
19. The Evaluation Objective at 14.1 of Chapter 14 of the EES (reflecting 4.4 of the Scoping Requirements)¹² is to:

Avoid, or minimise where avoidance is not possible, adverse effects on land use, social fabric of the community, businesses including farming and tourism, local and state infrastructure, aviation safety and to affected and neighbouring landowners during construction and operation of the project.
20. Council considers the Project fails to adequately avoid the likely impacts on tourism within the Shire and the broader region. This is particularly so where the option to underground the Project would eliminate these and other impacts to a large extent.
21. The Project will impact on tourism in Hepburn in a manner and degree which the EES material does not appropriately address and which the Project cannot fully offset or mitigate while it remains an above ground proposal.
22. The predicted adverse effect on tourism within Hepburn would have a disproportionate economic impact in the municipality, the full weight of which must be taken into account.

Implications of Victorian Goldfields World Heritage Bid on tourism

23. The Project jeopardises the Victorian Goldfields World Heritage Bid (discussed below). If successful, the Victorian Goldfields World Heritage Bid not only will preserve the existing

⁸ Visitor Economy strong in Hepburn Shire, 1 September 2022: <https://www.hepburn.vic.gov.au/Council/News/Latest-news/Visitor-Economy-strong-in-Hepburn-Shire..>

⁹ <https://app.remplan.com.au/hepburn/economy/tourism/employment?zidx=8kENf8sEL#locality=creswick-clunes~daylesford>.

¹⁰ EES Chapter 14, p 14-6.

¹¹ EES Chapter 14, p 14-8.

¹² Scoping Requirements: Western Renewables Link Environment Effects Statement (Department of Transport and Planning, November 2023), p 20.

tourism through the Shire as part of the Victorian Goldfields, but is anticipated to bring economic growth to Hepburn.

IMPACT ON VICTORIAN GOLDFIELDS WORLD HERITAGE BID

24. Early in 2025, the Victorian Goldfields were added to Australia's World Heritage Tentative List. Following 35 years of advocacy, this represents a significant step towards recognition of the Victorian Goldfields under the UNESCO World Heritage Convention (**World Heritage Bid**).
25. 15 municipal Councils, the Dja Dja Wurrung Clans Aboriginal Corporation, the Victorian Goldfields Tourism Executive and Heritage Victoria have all come together to advocate for the World Heritage Bid, which will bring significant benefits to regional Victorians and the Victorian economy.
26. The Justification of Outstanding Universal Value for the Victorian Goldfields describes the Victorian Goldfields, of which the Shire is a part, as follows:

Victorian Goldfields represents the most extensive, coherent, and best-surviving nineteenth century global gold rush landscape anywhere in the world.

27. As noted by the Victorian Goldfields World Heritage Bid:

A World Heritage listing for the Victorian Goldfields will bring dual benefits: visitors will enjoy the wider Goldfields experience centred on the proposed UNESCO World Heritage label; crucially it will also bring pervasive and transforming benefits to the whole region. The National Institute of Economic and Industry Research has conservatively estimated an added 2% (or \$25 million) in visitation to the Goldfields region each year.

28. The proposed 85m transmission towers and sprawling 500kv transmission lines will mar 'the most extensive, coherent, and best-surviving nineteenth century global gold rush landscape anywhere in the world' and will put at significant risk the World Heritage Bid and the economic benefits it will provide to the regions if successful including over \$250m in regional Victorian income and business development every decade.

HERITAGE

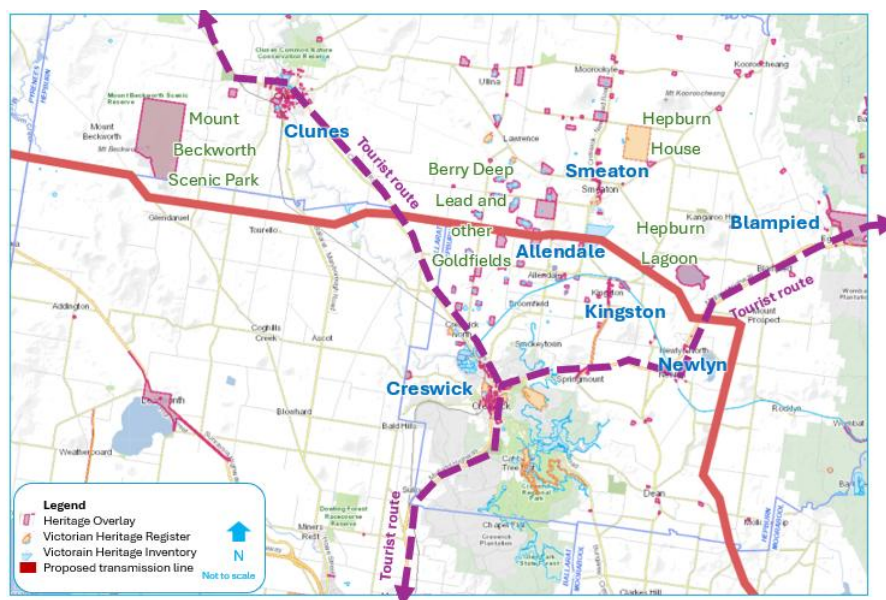


Figure 1: Map showing tourist routes, heritage overlays and sites, and the proposed transmission alignment (Hepburn Shire Council, 2025)

29. As shown above, the proposed transmission corridor traverses a landscape rich in cultural heritage, including known historic sites and areas with high archaeological sensitivity. These include early European settlement remnants, heritage listed homesteads, outbuildings and infrastructure. The introduction of large scale transmission infrastructure risks direct disturbance to these sites and their settings potentially breaching heritage protections and heritage overlays. Particularly as the EES material focusses on mitigation when intersecting with heritage values rather than avoidance.
30. Heritage significance is not limited to physical structures. It also includes the broader landscape context. Many heritage places derive their value from their visual and spatial relationship to the surrounding environment, both looking from within and towards the heritage asset. The construction of towering transmission lines would irreversibly alter these settings, diminishing the interpretive and experiential qualities that contribute to their significance. The visual obstruction would permanently impact the understanding of the heritage significance of the place within its setting.
31. Council wishes to raise concerns regarding the treatment of the Victorian Goldfields Heritage Landscape in Technical Report C: Historical Heritage Impact Assessment. The report fails to adequately recognise the landscape as a cohesive and culturally significant heritage entity, instead treating individual heritage listed mining sites in isolation.
32. The Victorian Goldfields Heritage landscape is composed of numerous mining sites, each individually covered by heritage overlays. While these sites have been documented separately, they collectively form a tangible and interconnected representation of Victoria's rich gold mining history. The landscape's significance lies not only in the individual sites but in their spatial and historical relationship to one another. Together they illustrate the scale, complexity and legacy of gold mining activity in the region.
33. Technical Report C's approach overlooks this broader context. It excludes heritage sites that fall outside of the WRL easement, even where they are covered by HO's and contribute to the overall narrative of the landscape. This fragmented assessment undermines the integrity of the heritage values and risks diminishing the understanding of the area's historical importance.
34. Council asserts that the significance of the Victorian Goldfields heritage landscape must be understood holistically. The cumulative value of the mining sites, when read together, provides a more accurate and meaningful interpretation of the region's heritage. This perspective is consistent with best practice in heritage management which recognises entire landscapes as interconnected systems rather than isolated points of interest.
35. The affected area is not just a collection of isolated heritage sites, it also forms part of the broader Victorian Goldfields heritage landscape (as can be seen by the bid to list the Victorian goldfields as a UNESCO site). The cumulative impact of infrastructure development in this visually exposed landscape risks eroding the integrity and legibility of the landscape and subsequently also undermining this bid.
36. The volcanic plains are defined by a topography of flat lava fields that became home to Victoria's goldfields. The deep lead landscape is one of high visual quality in its current condition. However, major infrastructure projects, such as the WRL, will likely negatively impact UNESCO's assessment of the area's world heritage values.
37. Council is concerned by the limited use of site inspections and an over reliance on desktop assessments to evaluate the condition and potential impacts of the project on specific heritage places. Council considers the route and placement of infrastructure will adversely affect the significance of historical heritage sites in the municipality. This, coupled with the lack of genuine consultation by the proponent, has led to the inappropriate proposals to build over the Bullarook Streamside Reserve and heritage listed Kerrins Bridge, and the removal of vegetation and the National Trust listed Algerian Oak.
38. Council should be involved in the development, assessment and approval of any plans to mitigate against impacts on heritage sites.

INCREASED BUSHFIRE RISK

39. Hepburn Shire is subject to increasingly frequent and severe bushfire risk conditions. The municipality is located amongst the Wombat State Forest (with a number of settlements abutting this forest) and has expansive pastoral land which presents significant grass and canopy fire risk. Except for a small area in the heart of Clunes, the whole of Hepburn municipality is designated as being bushfire prone, with significant areas also covered by Bushfire Management Overlays (**BMOs**) under the Hepburn Planning Scheme.
40. Council is responsible for emergency management planning. It takes this responsibility seriously and the Hepburn community should not be asked to tolerate increased fire risk.
41. Research undertaken by Country Fire Authority Research and Development identified that that climate change is increasing the frequency, severity, and timing of dangerous bushfire weather conditions in Victoria, during the spring and summer periods.¹³ This research demonstrates that on average, the present day fire season is starting a month earlier than it was in the 1990's. Further, the number of days that have 'very high' fire danger is increasing. This projected increase in risk is acknowledged in the EES materials at Technical Report K.¹⁴
42. Fire seasons are now longer and more extreme than just a few decades ago. Council understands that modelling of future climate change projections shows these trends are likely to continue — conditions will be hotter, drier and with more extreme weather events. This is expected to lead to worse fire seasons, including more frequent large fires (like the 2019/20 season) and more extreme fire behaviour.
43. The change in fire risk profile will be exacerbated by the introduction of the Project and the associated overhead transmission lines. This includes both a direct risk and the obstruction to effective fire-fighting and management if a bush or wildfire event occurs.
44. Council considers the EES material does not appropriately assess the impact of the Project and downplays the risk of bushfire being caused by the infrastructure is underestimated by the EES assessments. This is particularly the case in relation to the extent to which the Project will exacerbate the already increasing bush and wildfire risk within the municipality and broader region. For example:
 - 44.1. The amount of land situated within the BMO is expressed by the assessment in Technical Report K in both hectares and percentage of both easement area. The assessment notes that as a percentage of easement area the land located within the BMO is only 12%. Expressed in this way, the area does not sound large. However, the total land area within the easement affected by the BMO is approximately 134 hectares. This is a large area of land with significant potential for bushfire ignition and spread.
 - 44.2. The transmission lines will create a large buffer zone in which fire fighting is not possible due the buffer distance required from the towers preventing use of aerial fire fighting equipment, and the presence of the high voltage electric cables causing risk associated with the use of water. The required easement is proposed to be between 70m – 100m wide along its 190km length. This translates to between 1,330ha – 1,900ha of easement area along the alignment in which fire fighting may be restricted or prevented.
 - 44.3. The EES asserts it is unlikely that tower collapse would occur at the same time as a bushfire event. However, tower collapse is connected to high wind events. The most significant destructive bushfires in Victoria's history are also associated with high wind events. The likelihood of tower collapse on a catastrophic, extreme or severe fire

¹³ Council letter dated 29 July 2021, circulated to 33 State and Federal Ministers, including Shadow Ministers, Members for the electorate and industry bodies such as AEMO, and DELWP.

¹⁴ EES Technical Report K, p 56.

danger day is actually high and the likelihood of tower collapse during a bushfire event is high.

- 44.4. The option of undergrounding the transmission line is not discussed within Technical Report K. Although this option is considered elsewhere in the 'Undergrounding Report'¹⁵, the life safety benefits of undergrounding the transmission line do not appear to have been given enough weight within the decision making process. Though wildfire risks associated with overhead transmission lines will be effectively entirely negated by undergrounding the transmission lines, the benefit of this has been ignored by the EES materials.
- 44.5. Council considers additional bushfire modelling is required both with and without the Project to understand its impact on future fire ignition, spread and suppression.
- 45. Council considers an assessment under the National Emergency Risk Assessment Guidelines (NERAG) or similar is required. Council understands NERAG is a common methodology used to assess risk through a likelihood v consequence framework would be an appropriate methodology to use to assess the Project in bushfire risk/impact terms. Council considers that if consequence becomes part of the risk assessment, the outcome is likely to be potentially catastrophic. The risk assessment should include comparative analysis of risk in an undergrounding scenario.

VISUAL IMPACT

- 46. Council considers the visual impact caused by the above ground Project has not been fully assessed and cannot be appropriately assessed based on the documents exhibited as part of the EES.
- 47. There are two reasons for this:
 - 47.1. First, there are significant viewpoints that have not have been photographed/montaged and included in Technical Report D for assessment; and
 - 47.2. Second, there is significant potential for the alignment, and therefore the areas affected, to change due to the proposed area and drafting of the Specific Controls Overlay Schedule 8 and micro-siting provisions. Even if the alignment was to change only within the limitations of the micro-siting provisions, this does not mitigate the potential that the elevation of the alignment may change significantly or the effectiveness of screening currently relied on may reduce, causing a change in the appropriate visual impact classification.
- 48. Visual impacts have been generally understated and without regard to cumulative impacts nor consequential impacts on relevant sectors such as tourism throughout Hepburn Shire and the broader region. The existence of the Project through the Shire and broader region will have a significant cumulative impact on these important areas and severely detract from the vistas that draw visitors to the Shire.

IMPACT ON BIODIVERSITY AND HABITAT

- 49. The Project threatens impacts on biodiversity and habitat of threatened fauna that are not appropriately considered, avoided or mitigated by the EES.
- 50. In particular, Council considers that:

¹⁵ EES Attachment I: Project development and assessment of alternatives, p

- 50.1. The risk the transmission lines pose for local extinction of the small population of Brolga that resides within the Hepburn Shire has been given insufficient weight and the EES provides insufficient avoidance and mitigation measures;
- 50.2. The findings and implications of a recent, highly relevant Tasmanian study on Wedge-tailed eagles and powerline strike should be considered in detail as part of the EES given the prevalence of Wedge-tailed eagle records in the WRL vicinity;¹⁶
- 50.3. The EES fails to recognise the impact of the project on potential for recovering habitat connectivity between core habitat areas and does not mitigate the likely 'extinction debt' in the landscape. A regional biolink analysis is needed to confirm the importance of re-establishing connectivity in areas covered by the WRL.

Brolga

- 51. Council considers the Project fails to give due weight and properly address the risk the overhead powerlines pose for local extinction of the small population of Brolga that resides within the Hepburn Shire. While some consideration has been given to this by the EES materials, the avoidance and mitigation measures proposed are insufficient to appropriately mitigate the potential for significant impacts on the Bolga population.
- 52. The EES Chapter 8 identifies the likelihood of occurrence of Brolga in the study area as 'Moderate'.¹⁷ However, information provided to Council, including photographs, show that the species is well documented as a regular visitor around the Project area between Andersons Road Clunes and Creswick-Lawrence Road. The likelihood of Brolga occurrence in the relevant area should be identified as 'Known' or 'High'.
- 53. Although Council understands the overall Brolga numbers in the municipality are small, the overall population in south-western Victorian is only approximately 900 birds.¹⁸ As noted in the Handbook for the development of renewable energy in Victoria, 'small numbers of mortalities can pose a significant risk to the Brolga, because the species is long-lived, has a low reproductive rate and a small and declining population size.'¹⁹
- 54. The EES identifies that '*Individuals have been observed in the study area, however, these observations are generally in areas not generally considered important habitat, such as stubble fields.*'²⁰ This minimises the importance of feeding habitat such as stubble fields. Further, Brolga regularly use farm dams and waterbodies along Tourello Creek in the vicinity of the Project.
- 55. With respect to the vulnerability of Brolga to collision, in some cases the ratings provided by the EES Chapter 8 appear inconsistent with other statements made.
- 56. At table 8.9 'Priority species', Brolga are assessed as having a 'Mild concern' of elevated risk of collision. This is at odds with a study on a similar Crane species (Sime et al 2024) where the elevated risk due to high wing loading, size and flight behaviour is identified as often resulting in fatal collisions and accounting for a high proportion (up to 39%) of reintroduced population fatalities. The rating in the EES Chapter 8 table 8.9 is also at odds with the statement on page 8-36 that the '*area is considered high risk for Brolgas*' and on p 8-63 that the '*vulnerability of Brolga (Antigone rubicunda) to collisions with power lines is well known*'.

¹⁶ 'Fine-scale spatial risk models to predict avian collisions with power lines', (Pay et al, Journal of Applied Ecology, 2025), 62,1820–1830.

¹⁷ EES Chapter 8 – Biodiversity and Habitat, p 8-27, table 8.5.

¹⁸ Per surveys conducted by Department of Energy, Environment and Climate Action; State Wide Integrated Flora and Fauna Teams 2025: https://www.swifft.net.au/cb_pages/sp_brolga.php#2025.

¹⁹ Handbook for the development of renewable energy in Victoria (Department of Energy, Environment and Climate Action, May 2025), p 31.

²⁰ EES Chapter 8 – Biodiversity and Habitat, p 8-27, table 8.5.

57. Given the presence of Brolga in the Project Area, and the noted risks of Brolga collision with the powerlines, Council considers the level of concern at table 8.9 should be elevated from 'Mild Concern' to 'Concern' and that serious consideration should be given to additional mitigation approaches.

Risk of aerial strike

58. Species such as wedge tailed eagles and black swans are also vulnerable to aerial strike.
59. Wedge tailed eagles were specifically identified at eleven locations scattered through the properties of interest and 1km buffer. Locally, the species is a well recognised and cherished, with community records including at least one breeding location.
60. While the level of impact and required mitigation for Wedge-tailed eagles is an emerging field of study, a recent study conducted Pay et al ('Fine-scale spatial risk models to predict avian collisions with power lines') should be reviewed in detail and incorporated into the EES, as it is highly applicable due to the species specific and long-term nature of the study. Of particular relevance are its findings relating to increased risks in autumn and winter and within mosaics of open and forested landscapes, and their implications for management and conservation.

Habitat Connectivity

61. Impact on existing habitat connectivity is poorly or inconsistently recognised by the EES. The Project is likely to impact on potential for recovering habitat to provide connectivity between core habitat areas and thus mitigate likely 'extinction debt' in the landscape.
62. The concept of habitat connectivity is inconsistently applied by the EES. At page 8-7, 'nature reserves' are identified as providing 'biolinks' and thus providing connectivity across the landscape. However, this characterisation of reserves as 'biolinks' fails to recognise the gaps in connectivity between these reserves which cause them to often constitute more or less isolated 'core habitats' that themselves are in need of reconnection via revegetated biolinks to address habitat fragmentation impacts contributing to 'extinction debt'.
63. 'Extinction debt' is the concept that *'Protection of existing habitats may not be sufficient to protect species from extinction. However, the long time scales of extinction debt may allow for habitat restoration in order to prevent extinction'* (Kuussaari et al 2009). While it is difficult to evaluate, priority locations for reestablishing connectivity may be identified by analysis of relict species occurrences, historical connection and recognition of faunal movement needs.
64. The Project has sought to avoid locations in Hepburn Shire that would require clearing that would further fragment wooded landscape. However, this approach relies on siting within cleared areas of the landscape where Council considers there is evident benefit to re-establish connectivity between core habitats through revegetation.
65. While regional biolink analysis is needed to confirm the importance of re-establishing connectivity in areas covered by the WRL, Council considers connectivity of habitat should be established through wooded linkages between:
- 65.1. An east-west corridor between Creswick State Forest and the Wombat Forest;
- 65.2. A north-south linkage between Mt Beckworth and Mt Bolton; and
- 65.3. North south linkages along Birch Creek and Creswick Creeks.
66. The isolation of the Creswick Forest populations of Koala and Brush-tailed Phascogale evident in Atlas of Living Australia, iNaturalist and community records demonstrates the importance of re-establishing connection between the Creswick and Wombat Forests and on future revegetation.

67. If approved in its current form, the Project would preclude the possibility of re-establishing these areas of habitat connectivity, and would instead introduce a serious risk fatalities associated with transmission line collision.

SOCIAL IMPACTS

68. There exists strong opposition to the Project within the local community. The Project lacks any social licence and Council has observed increasing community opposition during the preparation of the EES. Council is concerned that the Project has already had a significant detrimental social impact and that the concerns of the community have been dismissed, with the form of the Project having not meaningfully evaluated the undergrounding option. The Project has induced the greatest level of community opposition to any proposal in the Shire's history. This is demonstrated by thousands of signs throughout the community, the creation of the 'Piss Off Ausnet' hill and has been borne out through Council's own engagement with community members.
69. These impacts have been identified in EES Chapter 21, as follows:²¹

*The Project would be more likely to necessitate long-term changes to the way farming occurs in Section 2, with a greater proportion of affected landholders potentially required to adapt to the Project. Approximately 50 per cent of properties in Section 2 accommodate a dwelling, of which 12 are within 300m of the proposed easement. The Project may challenge the current sense of connection felt by many landholders in this section to their property and rural district, which may lead to an enduring sense of loss, with potential implications for the quality of life and wellbeing of affected individuals. The residual impact of the Project's effects on land use and amenity for directly affected landholders in Section 2 would be moderate during construction and major during operation (as outlined in Table 8-6 in **Technical Report F: Social Impact Assessment**).*

70. What isn't addressed by the EES is that, if not appropriately managed, the Project has the potential to tear through the Shire's social fabric due to the wide gamut of other impacts it will cause, impacting on not just the quality of life of residents in close proximity of the Project, but across the Shire.
71. These impacts are assessed as being 'major' during the operational phase of the Project. Given the 80-year life of the transmission lines, the operational phase is likely to be the longest phase of the Project, before potential renewal and upgrades of the infrastructure to increase its life are considered. The Project and its impacts will shape the municipality for decades to come.

LAND USE PLANNING

72. Many of the impacts noted through this submission also relate to the need to avoid land use conflicts between the Project and various regional, tourism and agricultural land uses which already exist in the Shire and the broader region, and the potential cumulative impacts associated with the Project's interface with other future infrastructure projects.
73. Section 4.4 of the Scoping Requirements includes the following evaluation objective:²²

Avoid, or minimise where avoidance is not possible, adverse effects on land use, social fabric of the community, businesses including farming and tourism, local and state infrastructure, aviation safety and to affected and neighbouring landowners during construction and operation of the project.

²¹ ESS Chapter 21, p 21-18.

²² Scoping Requirements: Western Renewables Link Environment Effects Statement (Department of Transport and Planning, November 2023), p 20.

74. The Project proposes a 70m – 100m easement width along its alignment, creating a serious land use constraints and conflict over the area affected.
75. As discussed below at paragraphs 88 – 100, the approach taken by the EES in:
- 75.1. proposing an SCO area that follows property boundaries regardless of the extent to which the proposed alignment may touch those properties; and
- 75.2. providing for the potential realignment of the Project anywhere within the SCO area with minimal further assessment requirements,
- exacerbates this issue by creating significant uncertainty as to what the final alignment will be. This uncertainty is not resolved elsewhere in the EES materials.
76. Council considers the EES fails to properly consider and mitigate potential land use planning impacts. To this end the proposed Environmental Management Plan does not adequately ameliorate, offset or otherwise manage the issues raised in this submission.

PROPOSED SOLUTION – UNDERGROUNDING

77. Section 3.4 of the Scoping Requirements states that the:²³

EES will need to document the basis upon which it has chosen its preferred alignment as it stands at the time of EES exhibition. Alignment selection can be a very important way of avoiding or minimising adverse impacts for linear infrastructure projects. Key aspects of the project, for which the EES will need to demonstrate consideration of feasible alternatives, include:

- *the boundaries of the original area of interest;*
- *potential corridors and alignments within the area of interest, including criteria for excluding portions of the area from further consideration;*
- *the rationale for the preferred mode of construction (overhead or underground, including potential for partial underground construction); and*
- *other feasible alternatives raised through feedback from the community or other stakeholders.*

78. Council supports an alternative project through construction of underground transmission lines. The EES material has provided a high level review of this alternative, but has otherwise dismissed the concept as being too costly or too hard to achieve.
79. However, an independent report prepared by Amplitude Consultants in June 2021, which was commissioned by Moorabool Shire Council with the support of Hepburn Shire and Melton City Council (**Amplitude Report**), has confirmed that undergrounding of the transmission line assets by way of a High Voltage Direct Current system is not only feasible, but preferable to the installation of towers and overhead cabling.
80. Following a comparative assessment of the proposed overhead transmission approach and underground options, the Amplitude Report concluded that:

It was determined that not only is a HVDC system utilising underground cables a technically feasible alternative, but it is also likely to be more reliable and efficient for

²³ Scoping Requirements: Western Renewables Link Environment Effects Statement (Department of Transport and Planning, November 2023), p 12.

the movement of renewable energy to major centres whilst presenting significantly reduced impact to social and environmental factors.²⁴

81. From a feasibility perspective, the Amplitude Report concluded that an underground HVDC system could be achieved at a cost of approximately \$2.7b. This cost, being approximately 5.7 times the cost of the proposed overhead solution, is far less than the estimated 10 times cost estimate for an underground identified in the EES. While it acknowledges an underground solution would come at a higher initial cost, Council considers this would be outweighed by the benefits achieved and significant impacts that would be avoided by the undergrounding of the cables.
82. A number of Council's concerns raised in this submission would be addressed by adopting an underground solution or ameliorated. This is demonstrated by the key points identified by Amplitude as to why the HVDC underground option will cause the least adverse impact, which are summarised as follows:²⁵
 - *Little to no risk of underground cables causing bushfires;*
 - *Little to no risk of interruption to power transmission, or underground cables being affected, during bush fires or severe weather events. Power does not need to be switched off during bush fires to aid firefighting, and is highly unlikely to be disrupted due to smoke causing flashovers and potentially tripping the line.*
 - *Little to no impact to access e.g. for emergency services or aviation operations.*
 - *Minimal impact to private land or current land use once construction is completed as the easement could be designed to fit within existing road reserves.*
 - *Significantly reduced impact to flora and fauna due to the possible location of the cable along roadways.*
 - *No visual impact concerning the transmission line as the cables are buried underground.*
 - *Equivalent or reduced visual and land-use impact from the converter station as it would be expected to occupy a relatively similar area as a typical AC terminal station with much of the equipment being housed indoors.*
 - *No audible noise along the transmission line.*
 - *Little to no electromagnetic field impacts.*
83. The feasibility assessment conducted in the Amplitude Report is referenced in the Attachment II of the EES. At Attachment II the proponent considers '*The Amplitude and AusNet cost estimates for conceptual underground HVDC transmission designs are not directly comparable as the cost estimates have been developed using different designs, assumptions and levels of detail.*'²⁶ This conclusion misses the point.
84. The Amplitude Report demonstrates that by adopting a different design, it is possible to feasibly adopt an underground infrastructure approach that achieves all the benefits set out at paragraph 82 above. That this has been dismissed and not further investigated as an option on the basis it is not the same design as the proponent has considered highlights issues with consultation and consideration of alternatives.

²⁴ Western Victorian Transmission Network Project: High-Level HVDC Alternative Scoping Report (Amplitude Consultants, 17 June 2021), p v.

²⁵ Western Victorian Transmission Network Project: High-Level HVDC Alternative Scoping Report (Amplitude Consultants, 17 June 2021), p v.

²⁶ EES Attachment II, p 22.

85. Finally, the Syncline Community Cable, a proposed 265km 1.5GW-2GW HVDC underground transmission link connecting the Jeffcot Renewable Energy Hub to the Melbourne Renewable Energy Hub demonstrates that the undergrounding of such transmission lines is possible and feasible. Per its April 2025 fact sheet, the Syncline Community Cable is proposed to traverse approximately 100km of its route in the road medians of Calder Freeway and Old Calder Highway before traversing private agricultural land for the balance of its trip.²⁷
86. As currently proposed, the Syncline Community Cable will remove only 8 large trees across the entirety of its 265km length, will impact only approximately 35ha of native vegetation and will present zero avifauna collision risk. This contrasts with the Project, which seeks to clear 229.71ha of native vegetation and 844 large trees across its shorter 190km length and clear and present avifauna collision risk along its entirety.²⁸
87. Council considers the Syncline Community Cable is one (good) example of a proposal utilising underground cabling technology in Victoria, but notes this is a growing trend overseas in places such as Riyadh where existing and proposed overhead transmission lines are being brought underground to improve grid reliability and aesthetics, and USA where Pacific Gas & Electric is undertaking a large scale program to underground powerlines to permanently reduce wildfire risk, improve reliability and lower long-term operating costs.

ISSUES ARISING IN RESPECT OF THE DRAFT PLANNING SCHEME AMENDMENT

88. Council also holds concerns in relation to the nature and framing of the draft planning scheme amendment.

The area of proposed Specific Controls Overlay Schedule 8 requiring applications to the Minister for Planning and referrals to Ausnet is too broad

89. The Project seeks to utilise a Specific Controls Overlay Schedule 8 (**SCO8**) and an incorporated document (currently in draft dated June 2025) as an approval mechanism.
90. The footprint of the proposed SCO8 and noted 'project land' is disproportionate to the needs of the Project and instead appears to follow the property boundaries of the land over which it will be located. This results in significant variation in the area to be affected. The SCO8, which corresponds to the project area in the draft planning scheme amendment, is highly variable along the length of the Project. In some parts the SCO8 aligns closely with the footprint of the overall transmission infrastructure, but in others it strays far from what can be considered a reasonable project area footprint.
91. This has ramifications for the large sections of the alignment where the SCO8 is proposed to be applied over a wide area. Under proposed changes to clause 66.06 in each of the relevant planning schemes, all planning permit applications within the SCO8 area will need to be referred to Ausnet as a referral authority, regardless of the nature of the application or proximity to the Project. Additionally, due to changes proposed to clause 72.01, all planning permit applications in the SCO8 area will be determined by the Minister for Planning as the planning authority.
92. It is unreasonable and cumbersome to:
- 92.1. subject ongoing ordinary land use and development on the broad area of SCO8 affected land to a Ministerial permit process; and
 - 92.2. allow appeal rights by an entity that will have easement rights in respect of the area that is actually required for the Project,

²⁷ Syncline Community Cable Fact Sheet 1 (April 2025).

²⁸ EES Chapter 8, p 8-67.

in circumstances where the plans for the transmission infrastructure are to be approved and become a publicly known consideration.

93. In addition, there is no need to burden the public service with business-as-usual farming and other applications in a Farming Zone.

Alignment uncertainty arising from extent of Specific Controls Overlay and micro-siting process

94. The breadth of the SCO8 area also creates the potential for significant post-approval variation of the alignment.
95. Clause 4.5 of the Western Renewables Link Incorporated Document (June 2025) (**Incorporated Document**) requires that:

Before development starts, Development Plans must be approved and endorsed by the Minister for Planning. The Plans must be generally in accordance with the Development Plans [Plan reference submitted for Minister's Assessment, Date]. The Development Plans must be drawn to scale and must include: the route for the transmission line; the location of transmission towers and terminal stations; the location of access tracks; typical elevations of the transmission towers; the layout and typical elevations of the terminal stations (including dimensions where appropriate); and the details of materials and finishes for the terminal stations and transmission towers.

96. Currently, while the indicative alignment is the subject of the EES, no development plans for the purposes of clause 4.5 appear to have been provided. The ultimate alignment, then, may be anywhere within the SCO8 area, which has been identified by the EES as the Project Land. This creates significant uncertainty as to the impacts of the Project in its ultimate alignment, which may be subject to change for a wide variety of reasons.
97. Though Council maintains its position as to the adequacy of the visual impact assessments within the EES, even where for instance visual impacts have been assessed, the ultimate position, and so elevation, of the towers may change significantly due to the topography of where they are eventually sited. The efficacy of screening relied upon by the Project is also subject to change in response to post-approval relocation of towers within the SCO8 area. This may make any assessments undertaken to date redundant and similarly undermines assessments reliant upon the extent of visual impact, e.g. tourism.

Micro-siting

98. The uncertainty as to impacts is exacerbated by the proposed micro-siting provisions within the Incorporated Document. Clause 4.7 of the Incorporated Document provides a mechanism for a micro-siting plan to be approved by the Minister with no further assessment enabling the micro-siting of towers and stringing pads no more than 50m in any direction from the locations as shown in the endorsed Development Plans.
99. Changes brought about by micro-siting are subject to the caveat that micro-siting:²⁹

must not result in a material adverse impact to native vegetation, listed threatened species and their habitats or listed threatened communities. In addition, for both the towers and stringing pads, they must not be moved closer than within 30 metres of a designated water way without consultation and approval from the relevant catchment management authority or Melbourne Water Corporation as relevant.

100. Council understands the importance of providing some flexibility in the approved alignment without the need for a complete readvertising and reassessment of the Project through an EES, however there are outstanding concerns in the community that micro-siting may result in

²⁹ EES Attachment III: Draft Planning Scheme Amendment Strategic Justification Report, p 13; mirrored in Appendix B, draft Incorporated Document, cl 4.7.1(d).

material adverse visual and other impacts to the community, industry and the local economy. On the current wording, consideration of these issues is not provided. As part of any approval, Council seeks a requirement that:

- 100.1. the final alignment selected and included in the Development Plans required to be submitted for endorsement under cl 4.7 of the draft Incorporated Document must not result in any greater adverse visual or other impact than the assessed siting of infrastructure in the EES; and
- 100.2. micro-siting must not result in any greater adverse visual or other impact than the approved siting of infrastructure on the endorsed Development Plans.

CONCLUSION

- 101. For these reasons, Council opposes the Project in its current overhead form and considers that any major transmission project through the municipality should be constructed underground to appropriately avoid and minimise potential adverse impacts.

8 September 2025

HARWOOD ANDREWS

on behalf of
Hepburn Shire Council