Planning Panels Victoria

Western Renewables Link

Inquiry and Advisory Committee Report

Planning and Environment Act 1987

Environment Effects Act 1978

8 May 2026

VICTORIA State Government

Planning Panels Victoria acknowledges the Wurundjeri Woi Wurrung People as the traditional custodians of the land on which our office is located. We pay our respects to their Elders past and present.

Environment Effects Act 1978 - Inquiry report under section 9(1)

Planning and Environment Act 1987 - Advisory Committee report under section 151(1)

Western Renewables Link

8 May 2026

Sarah Carlisle, Chair

Michael Kirsch, Deputy Chair

Sandra Brizga, Member

Colin McIntosh, Member

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Glossary and abbreviations

Note: All legislation is Victorian unless indicated otherwise.

ACHIA	Aboriginal Cultural Heritage Impact Assessment
AEMO	Australian Energy Markey Operator
AFIA	Agriculture and Forestry Impact Assessment
AIA	Aviation Impact Assessment
BD1 Report	Biodiversity Report 1 on Ecological Surveys Required by EPR BD1, Jacobs, 4 September 2025
BGLC	Barengi Gadjin Land Council Aboriginal Corporation
BIA	Biodiversity Impact Assessment
BMO	Bushfire Management Overlay
CAAP 92-1 (1)	*Civil Aviation Authority CAAP 92-1 (1) Guidelines for aeroplane landing areas 1992*
CASA	Civil Aviation Safety Authority
CBA	cost benefit analysis
CEC	Clean Energy Council
CEC Guidelines	*Community engagement and benefit sharing in Renewable Energy Development in Victoria*, Clean Energy Council, 2021
CEMP	Construction Environmental Management Plan
CFA SOP	CFA Standard Operating Procedure 11.04 *Working Near Electrical Structures and Conductors*
CGE	computable general equilibrium
Charleson Group	the Charlesons, Fords, Henderson-Drifes, Mr May and the Bouchiers, who jointly presented submissions and evidence to the IAC
CHMP	Cultural Heritage Management Plan
CMA	Catchment Management Authority
conductor	line or wire carrying live electricity
CVA	cultural values assessment
D[number]	tabled document [number]
DDO	Design and Development Overlay
DEECA	Department of Energy, Environment and Climate Action
DELWP	Department of Environment, Land, Water and

	Planning (former)
DJAARA	Dja Dja Wurrung Clans Aboriginal Council
DTP	Department of Transport and Planning
EE Act	*Environment Effects Act 1978*
EES	Environment Effects Statement
EIA	Economic Impacts Assessment
EMF	Environmental Management Framework
EP Act	*Environment Protection Act 2017*
EPA	Environment Protection Authority Victoria
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
EPR	Environmental Performance Requirement
ESMS	Electricity Safety Management Scheme
ESO	Environmental Significance Overlay
ESV	Energy Safe Victoria
ESV Bushfire Guidelines	*Electricity Transmission Lines: Bushfire Management and Community Safety*, Energy Safe Victoria and others
FFG Act	*Flora and Fauna Guarantee Act 1988*
GBGW	Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia threatened ecological community
GDE	groundwater dependent ecosystems
GWZ	Green Wedge Zone
Hepburn Council	Hepburn Shire Council
HVAC	high voltage alternating current
HVDC	high voltage direct current
IAC	Inquiry and Advisory Committee
Incorporated Document	draft Western Renewables Link Incorporated Document
KDPA	Kingston and District Power Alliance
kV	kilovolt
LAC Act	*Land Acquisition and Compensation Act 1986*
LPA	Livestock Production Assurance

LUPIA	Land Use and Planning Impact Assessment
LVIA	Landscape and Visual Impact Assessment
Melton Air Services	Melton Air Services Investments Pty Ltd
Melton Council	Melton City Council
MNES	matters of national environmental significance
Moorabool Council	Moorabool Shire Council
Native Vegetation Guidelines	*Guidelines for the removal, destruction or* lopping *of native vegetation* Version 1.1 (August 2025)
Noise Protocol	*Noise limit and assessment protocol for the control of noise from commercial, industrial, and trade premises and entertainment venues,* EPA Publication 1826.5
NTGVVP	Natural Temperate Grassland of the Victorian Volcanic Plain threatened ecological community
OEMP	Operational Environmental Management Plan
OLS	Obstacle Limitation Surface
PAMP	Property Access and Management Plan
PANS-OPS	Procedures for Aircraft Navigation Services – Aircraft Operations
PCRZ	Public Conservation and Resource Zone
PE Act	*Planning and Environment Act 1987*
pin data	data provided by the community on the Project's Social Pinpoint online mapping tool
Project	Western Renewables Link
Project Area	as defined in Chapter 2.1(ii)
Project Land	as defined in Chapter 2.1(ii)
Proponent	AusNet Transmission Group Pty Ltd (AusNet Services)
Proposed Route	as defined in Chapter 2.1(ii)
PSA	planning scheme amendment
RAP	Registered Aboriginal Party
RCZ	Rural Conservation Zone
REZ	Renewable Energy Zone
REZ Community Benefits Plan	draft Renewable Energy Zone Community Benefits Plan released for consultation by VicGrid in 2024
RFI	Request for Information

RIT-T	Regulatory Investment Test for Transmission
RLB	Rider Levett Bucknall
RLZ	Rural Living Zone
RWY	runway (at an airport or aerodrome)
S[number]	submission [number]
SCO	Specific Controls Overlay
Scoping Requirements	Scoping Requirements for Western Renewables Link Effects Statement, November 2023
SIA	Social Impact Assessment
SLO	Significant Landscape Overlay
SWVLAS	South West Victorian Landscape Assessment Study
TEC	Threatened Ecological Community
TIA	Transport Impact Assessment
TMP	Traffic Management Plan
TN[number]	Technical Note [number]
TRG	Technical Reference Group
VCAT	Victorian Civil and Administrative Tribunal
VFR	Visual Flight Rules
VPP	Victoria Planning Provisions
WTOAC	Wadawurrung Traditional Owners Aboriginal Corporation
WWCHAC	Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation
WYRGGW	White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland threatened ecological community

Overview

Project summary	
The Project	Western Renewables Link
Brief description	The Project is a proposed 500 kilovolt (kV) double circuit overhead electricity transmission line. It will connect proposed and committed renewable energy developments in the Western Victoria Renewable Energy Zone to the electricity grid and provide a direct connection between the New South Wales and Victorian grids.
Project location	The Project extends over 190 kilometres from Bulgana in western Victoria to Sydenham in Melbourne's north-west.
The Proponent	Ausnet Services
Draft Planning Scheme Amendment	Draft Amendment GC209 to the Ballarat, Hepburn, Melton, Moorabool, Northern Grampians and Pyrenees Planning Schemes
Exhibition	Monday 30 June to Monday 25 August 2025
Submissions	Number of Submissions: 534 Refer to Appendix B

Inquiry and Advisory Committee Process	
The IAC	Sarah Carlisle, Chair Michael Kirsch, Deputy Chair Sandra Brizga, Member Colin McIntosh, Member
Supported by	Planning Panels Victoria staff including Amy Selvaraj, Manager Major Projects, Planning Panels Victoria and Sarah Vojinovic, Project Support Officer, Planning Panels Victoria
Directions Hearing	Video conference and in person, Planning Panels Victoria, 15 September 2025
Panel Hearing	Video conference and in person, 53 sitting days (including 2 concurrent hearing days) across 15 weeks at the following locations between: - 27 October to 18 December 2025 at Karstens, Melbourne - 20 to 29 January 2026 at Planning Panels Victoria, Melbourne - 2 to 27 February 2026 at Mercure Ballarat Hotel and Conference Centre, Ballarat - 2 to 3 March 2026 at Planning Panels Victoria, Melbourne
Site inspections	Accompanied (whole route), 28 and 29 October 2025 Accompanied (site specific), 5 13, 20 and 27 February 2026 Unaccompanied on various dates

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Parties to the Hearing	Refer to Appendix C
Citation	Western Renewables Link Project EES [2026] PPV
Date of this report	8 May 2026

Executive summary

The Project

The Project consists of a new overhead double circuit high voltage alternating current (HVAC) 500kV transmission line, around 190 kilometres long, from near Bulgana in Victoria's west to Sydenham in Melbourne's northwest. The Project will provide additional transmission capacity between the Western Renewable Energy Zone and the Victorian and national energy grids. The transmission line will connect to a terminal station at each end of the line. Easements will be used for construction, occupation, operation and maintenance of the new transmission line on freehold land.

The Project will require temporary infrastructure to facilitate construction, including:

- five laydown areas
- two workforce accommodation facilities
- access tracks.

The Environment Effects Statement

The Environmental Effects Statement (EES) was exhibited from Monday 30 June to Monday 25 August 2025. The EES included various technical and summary reports, an Environmental Management Framework (EMF), and a draft Offset Management Strategy. An updated biodiversity report, independent peer review reports and program change advice related to the Project's construction and delivery were exhibited with the EES.

The IAC is generally satisfied the assessments of impacts in the Technical Reports forming part of the EES are sound and appropriate to enable a proper assessment of the Project's likely impacts. More work will be required as the detailed design of the Project is finalised, including further surveys for biodiversity values in the Project Area. This further survey work is required under the EMF.

The draft Planning Scheme Amendment

Attachment III of the EES included draft Planning Scheme Amendment GC209 (draft PSA) which is the proposed planning approval for the Project. The draft PSA would apply the Specific Controls Overlay and an Incorporated Document to facilitate the use and buildings and works associated with the Project, subject to conditions.

Submissions

The IAC received 534 submissions to the EES, most of which opposed the Project. The opposing submissions raised general concerns about the adequacy of the EES, the development and assessment of project alternatives, the rationale for the Project and the adequacy of consultation. More specific issues were raised in relation to biodiversity, heritage, landscape, bushfire, economic, agriculture, aviation, transport and social impacts.

Submitters included directly affected landowners, those in proximity to the Project and local communities as well as each of the six Councils in the municipalities traversed by the Project. Many submitters argued that the Project's adverse impacts could only be satisfactorily addressed if the Project was abandoned, re-routed or developed underground.

Submissions in support of the Project highlighted environmental benefits associated with the transition to renewable energy.

The Inquiry and Advisory Committee

The Western Renewables Link Inquiry and Advisory Committee (IAC) was appointed by the Minister for Planning as an:

- Inquiry under the *Environment Effects Act 1978*
- Advisory Committee under the *Planning and Environment Act 1987*.

The IAC's Terms of Reference also require it to review impacts on matters of national environmental significance (MNES) under the *Environment Protection, Biodiversity and Conservation Act 1999* (Cth).

The Hearing was held over 53 sitting days in Melbourne and Ballarat between 27 October 2025 and 3 March 2026.

Assessment and conclusions

The IAC has considered the EES, draft PSA, all submissions, evidence and other material presented during the Hearing process.

The IAC acknowledges the widespread concerns about specific Project impacts, as well as broader issues related to Project alternatives and the adequacy of the consultation about Project development.

Many submissions advocated for undergrounding the whole Project. The IAC considers that recommending such a significant change would be beyond the scope of the IAC's task as outlined in the Terms of Reference. The IAC has focussed on assessing the significance and acceptability of the exhibited Project's impacts, and whether any modifications to the Project are required to manage its significant environmental effects.

Based on the assessment to date, it is clear the Project would have many impacts, some of which are significant. Even after application of the mitigation measures outlined in the EMF, residual impacts on biodiversity and landscape values will be significant. The Project is also likely to have significant residual social impacts in many parts of the surrounding area. Bushfire impacts in the Darley area would remain significant notwithstanding the implementation of the IAC's recommended bushfire measures outlined in the Incorporated Document.

When considered in isolation, the landscape and visual impacts of the Project in some areas and for some residents, and bushfire impacts in the Darley area, would likely be unacceptable. However, they need to be weighed against the Project's contribution to climate change and renewable energy initiatives. The IAC is satisfied the Project's State-wide benefits would be significant and consistent with the legislative and policy

framework for addressing climate change. In this context, the IAC concludes that, subject to adopting its recommendations, these individual impacts will be acceptable in most locations, and the Project would result in a net community benefit.

Many landholders, particularly those directly affected by the Project, will experience impacts that cannot be effectively mitigated. This is unavoidable given the intrusive nature of an overhead transmission line and the nature of the land uses in some of the areas it will traverse. The IAC has considered this when balancing its assessment of impacts and reaching its conclusion that overall, the Project will deliver a net community benefit. The IAC acknowledges that its conclusion may not be accepted by many landholders and submitters.

Submissions indicated various areas and locations of particular concern. The IAC assessed the cumulative impacts of the Project in these areas. In most locations, it has found impacts will be acceptable.

In the Darley area, the Project's impacts, particularly landscape, bushfire, social and potentially biodiversity impacts, would be very significant. The IAC considers that cumulatively, the impacts in the Darley area would be unacceptable.

The IAC recommends the exhibited above ground proposal should not be pursued in the Darley area. The Proponent should further investigate alternatives that avoid or better mitigate impacts in this highly sensitive and constrained area. The IAC acknowledges that this recommendation will potentially have significant cost implications. The IAC considers this to be justified given the unacceptable level of cumulative impact in the Darley area.

While alternative options in the Darley area are further investigated, approvals for the rest of the Project could proceed, allowing detailed design to be completed and construction to commence.

The exhibited EMF and draft PSA were the subject of extensive submissions and evidence, and the Proponent proposed wide ranging changes during the Hearing that were responsive to expert evidence and the concerns raised in submissions. The IAC generally supports those changes and has recommended several further changes to better address some of the Project's anticipated significant environmental effects.

Primary recommendations

The IAC recommends:

1. **If the Project proceeds, approve draft Planning Scheme Amendment GC209 with the following changes:**
    - **(a) excise the section of the Proposed Route through Darley, extending from the Korkuperrimul Creek through to Gisborne Road, from the Specific Controls Overlay**
    - **(b) make the changes to the draft Incorporated Document shown in Appendix E:1**
    - **(c) modify the schedule to clause 72.01 in the relevant planning schemes to establish the Minister for Planning as responsible for administering**

and enforcing the Project's Specific Control Overlay, not the whole planning scheme.

2. **If the Project proceeds, amend the Environmental Management Framework as follows:**
    - **(a) make the changes to the Environmental Management Framework shown in Appendix E:2**
    - **(b) review the Environmental Management Framework for consistency, clarity and to address any consequential changes resulting from other recommendations in this Report, including the recommendation to excise the section of the Proposed Route through Darley**
    - **(c) replace relevant references to AEMO with VicGrid.**
3. **If the Project proceeds, include conditions on the approval under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) consistent with:**
    - **(a) the relevant native vegetation offset conditions (clause 4.10) in the Incorporated Document as shown in Appendix E:1**
    - **(b) the relevant biodiversity (BD) Environmental Performance Requirements in the Environmental Management Framework as shown in Appendix E:2.**

The IAC has also recommended several changes to the Incorporated Document and Environmental Management Framework. A consolidated list of these recommendations are contained in Table 26.

PART A: INTRODUCTION AND BACKGROUND

1 The Inquiry process

1.1 Background

The Proponent (Ausnet Services) referred the Project in its original form to the Minister for Planning under the *Environment Effects Act 1978* for a decision whether an Environmental Effects Statement (EES) was required. The Minister decided an EES was required on 4 August 2020.

The Proponent lodged a new referral on 11 August 2023 that included various project changes including the deletion of a new terminal north of the existing Sydenham Terminal. The Minister decided an EES was required for the Project described in the new referral on 22 August 2023 for the following reasons:

- The area of interest for the project supports significant environmental values, including native vegetation and ecological values, residential and agricultural and other land uses, heritage values, visual and landscape values and other social values, potential aggregate impacts on which are of at least regional significance.
- Multiple alignment and design alternatives for the project within the area of interest require rigorous and transparent assessment and refinement in relation to opportunities for avoidance and/or minimisation of potentially significant effects to inform both project and statutory decision-making.
- An EES process will provide a robust, transparent and integrated framework through which:
  i. the project's potential environmental effects can be rigorously assessed, including in the context of the comparative effects of feasible siting, alignment, design and operational alternatives for key components of the project; and
  ii. the effectiveness and acceptability of proposed measures to avoid, minimise, manage and offset environmental effects and related risks can be evaluated/ examined.
- An EES responds to community interest in project siting, alignment and design alternatives by providing appropriate opportunities for public input.
- The construction of a new Sydenham Terminal Station is excluded from this decision as that is excluded from the referral, and is no longer proposed as part of the project.

The Project was determined to be a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), on 2 September 2020. This was because of likely significant impacts on matters of national environmental significance (MNES).

The EES forms the basis of the assessment of environmental impacts under the EPBC Act, pursuant to the Bilateral Agreement between the Commonwealth and Victorian governments.

1.2 The Inquiry and Advisory Committee

The Inquiry and Advisory Committee (IAC) was appointed on 17 July 2025 pursuant to:

- section 9(1) of the *Environment Effects Act 1978* (EE Act) as an Inquiry
- part 7, section 151(1) of *the Planning and Environment Act 1987* (PE Act) as an Advisory Committee, to consider the draft planning scheme amendment (PSA) GC209.

The IAC's Terms of Reference set out the scope of the IAC's role and how to conduct the IAC process. A copy is provided in Appendix A.

The IAC's purpose is described in Clauses 4, 5 and 6 of its Terms of Reference.

Clause 4 requires the IAC (as an inquiry under the EE Act) to:

a. review and consider the environment effects statement (EES), the other exhibited documents and submissions received in relation to the project, with a focus on matters where there is potential for significant environmental effects, in particular for biodiversity and ecology, Aboriginal and historic cultural heritage values, landscape and visual values, land use and the community;
b. consider and report on the significance and acceptability of likely environmental effects of the project, having regard to relevant policy and legislation and relevant evaluation objectives in the EES scoping requirements;
c. consider and report on potential significant impacts on relevant matters of national environmental significance protected under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), including the significance and acceptability of residual impacts;
d. identify any additional mitigation measures and/or project modifications beyond those identified in the EES the IAC considers necessary and effective to avoid, mitigate or manage the significant environmental effects of the project consistent with relevant policy and legislation; and
e. advise on how these modifications and measures should be implemented through the necessary approvals and consents for the project.

Clause 5 requires the IAC (as an advisory committee under the PE Act) to:

a. review draft PSA GC209 which has been prepared to apply a Specific Controls Overlay (SCO) and establish planning approval for the project under an incorporated document;
b. consider issues raised in public submissions received in relation to the draft PSA; and
c. recommend any changes to the draft PSA that it considers necessary.

Clause 6 requires the IAC to prepare a report of its findings and recommendations to the Minister on the environmental effects and draft PSA.

Clause 35 of the Terms of Reference requires the IAC's report to contain:

a. analysis and conclusions with respect to the environmental effects of the project and their significance and acceptability;
b. findings on whether acceptable environmental outcomes can be achieved, having regard to legislation, policy, best practice, and the principles and objectives of ecologically sustainable development;
c. recommendations and/or specific measures that it considers necessary and appropriate to prevent, mitigate or offset adverse significant environmental effects;
d. recommendations relating to the project alternatives considered through the EES and any feasible modifications to the design or management of the project that would offer improved environmental outcomes, particularly in relation to reducing/mitigating significant environmental effects;
e. recommendations for any appropriate conditions that may be lawfully imposed on any approval for the project, including with respect to the structure or content of the draft PSA;
f. recommendations as to the structure and content of the proposed environmental management framework, including with respect to monitoring of environmental effects and contingency plans;
g. specific findings and recommendations about the predicted impacts on matters of national environmental significance and their acceptability, including appropriate controls and environmental management.

1.3 Scoping Requirements

The matters to be assessed in the EES are described in the Scoping Requirements for Western Renewables Link Effects Statement, November 2023 (Scoping Requirements).

The Scoping Requirements include the following evaluation objectives:

Table 1 Evaluation objectives

Impact/effect	Evaluation objective
Biodiversity and habitat	Avoid, and where avoidance is not possible, minimise potential adverse effects on protected native vegetation and animals (particularly listed threatened species and their habitat and listed ecological communities), as well as address offset requirements consistent with state and Commonwealth policies.
Cultural heritage	Avoid, or minimise where avoidance is not possible, adverse effects on Aboriginal cultural heritage and historic heritage values.
Landscape and visual	Avoid, or minimise where avoidance is not possible, and manage potential adverse effects on landscape and visual amenity.
Land use and socioeconomic	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.
Community amenity, safety, roads and transport	Avoid, or minimise where avoidance is not possible, adverse effects for community amenity, health and safety, with regard to construction noise, vibration, dust, lighting, waste, greenhouse gas emissions, transport network, operational noise, fire risk management and electromagnetic radiation.
Catchment values and hydrology	Maintain the functions and values of aquatic environments, surface water and groundwater quality and stream flows and prevent adverse effects on protected beneficial uses.

1.4 Exhibition and submissions

The EES including the draft PSA was exhibited from Monday 30 June to Monday 25 August 2025.

A total of 534 submissions were received. These are listed in Appendix B, and included:

- submissions from 13 government agencies:
  - Country Fire Authority (CFA)
  - Department of Energy, Environment and Climate Action (DEECA)
  - Department of Transport and Planning (DTP) on behalf of Head Transport for Victoria
  - Environment Protection Authority (EPA)
  - Parks Victoria
  - VicGrid
  - City of Ballarat (Ballarat Council)

  - Hepburn Shire Council (Hepburn Council)
  - Melton City Council (Melton Council)
  - Moorabool Shire Council (Moorabool Council)
  - Northern Grampians Shire Council (Northern Grampians Council)
  - Pyrenees Shire Council (Pyrenees Council)
  - Wimmera Catchment Management Authority (CMA)
- 4 from Registered Aboriginal Parties (RAPs):
  - Barengi Gadjin Land Council Aboriginal Corporation (BGLC)
  - Dja Dja Wurrung Clans Aboriginal Corporation (DJAARA)
  - Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC)
  - Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation
- 24 from environment or community groups
- 8 from aviation sector groups
- 493 from individual members of the community and farming businesses.

A full list of submitters is provided in Appendix B.

Submissions raised the following key themes/issues:

- options for undergrounding all or part of the transmission line
- options for alternative routes
- energy and infrastructure policy
- economic impacts, including impacts on agriculture, forestry, tourism and other local businesses
- amenity impacts
- visual and landscape character impacts, including general areas and specific sites
- habitat, biodiversity, flora and fauna impacts including general impacts and impacts on specific areas and species
- heritage impacts, including impacts on historic and aboriginal cultural heritage
- community, health and social impacts
- road and transport impacts during construction
- impacts on aviation, including the operation of Melton Aerodrome
- increased bushfire risk
- exposure to electromagnetic interference and electric and magnetic fields
- the adequacy of consultation, compensation and benefit sharing
- compulsory acquisition
- property devaluation.

1.5 Request for information

The IAC prepared a Request for Information (RFI) (D48) that was provided to the Proponent on 23 September 2025. The RFI directed the Proponent to provide further information about various matters based on the IAC's preliminary review of the EES and submissions.

The Proponent responded to the RFI through written responses (D85, D167, D217 and D320), submissions (D85, D203 and D319), evidence (D91, D93, D110, D111, D119, D123 and

D124), technical notes (D127 and D277) and various other information that was tabled during the Hearing.

1.6 Site inspections

The IAC undertook an initial accompanied site inspection of the Proposed Route and surrounding areas on 28 and 29 October 2025 in accordance with the itinerary and maps in D125 and D126.

To understand the Project's farming and visual impacts the IAC undertook further accompanied inspections of a number of representative sites along the alignment that were nominated by groups or individuals:

- Charleson group: Onsite inspection of farming properties, including equipment and operations in Glendaruel/Tourello, Kingston and Plumpton on 5 February 2026 in accordance with the itinerary in D420 and Allendale on 13 February 2026 (D524).
- Kingston District Power Alliance (KDPA): Onsite inspection of farming properties, including equipment and operations in Smeaton, Blampied and Mount Prospect, Kingston Showgrounds and a local business in Newlyn North on 13 February 2026 in accordance with the itinerary in D535.[1]
- Submitters 162, 427 and 342: inspection of properties in the area north of Darley on 20 February 2026 in accordance with D446. An onsite inspection was conducted of the property nominated by submitters 162 and 427 and inspection of the property nominated by submitter 342 was conducted from the public realm.
- Submitters 312 and 313: Onsite inspection of farming properties and operations in Myrniong and Korobeit on 27 February 2026 in accordance with the itinerary in D423.

The IAC thanks the Proponent and those parties above for facilitating the accompanied site inspections.

The IAC undertook various unaccompanied inspections that were confined to public places. These included:

- the urban parts of Darley including Pamela Court, Par Court, Augusta Place, Links Road, St Andrews Way and Fairway Crescent
- the rural area north of Darley including Swans Road, Lerderderg Gorge Road, Camerons Road, Seereys Rd and Russells Road
- the Bald Hill Activation Area
- Melton Aerodrome
- Macpherson Park
- Bacchus Marsh Golf Club
- Hepburn Lagoon
- the Bullarook Streamside Reserve.

[1] The IAC wrote to VFF (D414) providing them with the opportunity to inspect their nominated sites (D78). VFF confirmed on 29 January 2026 (D479) they would not be putting forward their own itinerary and endorsed the itinerary proposed by KDPA.

1.7 Hearings

A Directions Hearing was held on 15 September 2025. At the Directions Hearing the IAC explained its role, made various declarations, noted the submissions and information received, discussed various procedural issues and proposed directions relating to the main Hearing and site inspections. An audio recording was made available on the Engage Victoria website.

The main Hearing was held in Melbourne (weeks 1 to 10 and 15) and Ballarat (weeks 11 to 14) over 53 sitting days between 27 October 2025 and 3 March 2026.

Two concurrent hearing sessions were held (one in Melbourne and Ballarat), as well as two closed sessions in Ballarat to hear from parties who requested to have their submission heard on a confidential basis. Parties who requested to present to the IAC Hearing are listed in Appendix C.

Audio recordings of the Hearing and tabled documents were made available on the Engage Victoria website (except for closed hearing sessions and confidential documents).

1.8 Project documentation

The exhibited EES included an Environmental Management Framework (EMF) in EES Chapter 29 and draft PSA in EES Attachment III. The PSA material included a draft Western Renewables Link Incorporated Document (Incorporated Document).

The IAC directed the Proponent to provide 'Day 1' versions of the EMF (D209) and Incorporated Document (D208) at the commencement of the Hearing on 27 October 2025. The Proponent circulated:

- a Day 2 version of the EMF (D379) on 9 December 2025
- Day 3 versions of the EMF (D652) and Incorporated Document (D653) on 2 March 2026
- corrections to references to AEMO in Day 3 EMF (D690) on 16 March 2026.

Parties were given the opportunity to provide written drafting comments on the Day 3 versions following the close of the Hearing. Thirteen parties elected to do so:

- Ballarat Group of Fire Brigades
- BGLC, DJAARA and WTOAC (confidential combined comments)
- Blampied Kooroocheang Landcare Group
- Ballarat Council
- Hepburn Council
- Northern Grampians Council
- Melton Council
- Moorabool Council
- Darren Edwards
- Dr Joanna Lidgett
- Nathan Lidgett.

The Councils provided a consolidated set of drafting comments which reflected changes agreed by all Councils (D594, D595 and D596). The IAC thanks Moorabool Council for

coordinating this exercise, and all the Councils for their input. This was of considerable assistance to the IAC.

Several of the Councils put in further drafting comments in addition to the consolidated proposed changes in D594, D595 and D596.

The IAC directed that drafting comments on the Day 3 Project documents must only relate to drafting issues, not broader issues. Several of the parties' drafting comments extended beyond drafting. The IAC has not had regard to material that did not meet the IAC's directions.

The IAC has used the Proponent's Day 3 versions as the starting point for its recommended Incorporated Document and EMF in Appendix E.

1.9 The Report

This Report has four Parts:

- Part A provides a summary of the IAC process and the Project
- Part B provides the IAC's review and analysis of the Project's effects
- Part C provides the IAC's integrated assessment of the Project, including a net community benefit analysis of the draft PSA
- Part D provides the IAC's implementation advice.

1.10 General approach and limitations

The IAC is not tasked with recommending whether the Project should be approved. Its task is to consider and report on the Project's potential environmental effects, their significance and acceptability. To that end, this Report provides an analysis of the EES and the draft PSA and an integrated assessment of the environmental, social and economic impacts of the Project, having regard to the evaluation objectives in the Scoping Requirements and relevant policy and legislation.

The IAC has considered the exhibited material, all written submissions received in response to the exhibited material, together with evidence, submissions and other material provided to the IAC during the Hearing. All relevant material put before the IAC has been considered, although not all material is specifically referenced in this Report.

It is not the IAC's role to:

- assess whether the EES met the Scoping Requirements
- assess or critique the network planning process or the Regulatory Investment Test for Transmission (RIT-T) process under the national electricity laws
- consider whether the Victorian or national policy framework appropriately balances support for renewable energy and the need to transition to net zero with impacts on amenity, agricultural land and farming communities
- assess the merit of the Proponent's consultation process in relation to Project development
- assess whether the Project has a social licence.

1.11 Acknowledgements

The IAC thanks all who participated in the IAC process, through making submissions, presenting evidence and contributing to site inspections. The IAC appreciates the time people put into their submissions, and the way in which parties participated in the Hearing.

The IAC thanks the Proponent for its assistance in setting up and hosting the Hearing and document sharing platform, and providing technical support to the IAC and parties. This ensured a smoothly run and efficient Hearing process.

The IAC particularly thanks the office of Planning Panels Victoria for its support and assistance throughout the process, with special acknowledgment to Amy Selvaraj and Sarah Vojinovic.

2 The Project

This chapter provides a high-level overview of the key elements of the Project drawn from the EES. It provides context for the discussion of specific issues in Part B of this Report. During the Hearing the Proponent provided additional and revised information about the Project. Where relevant, this information is discussed in Part B.

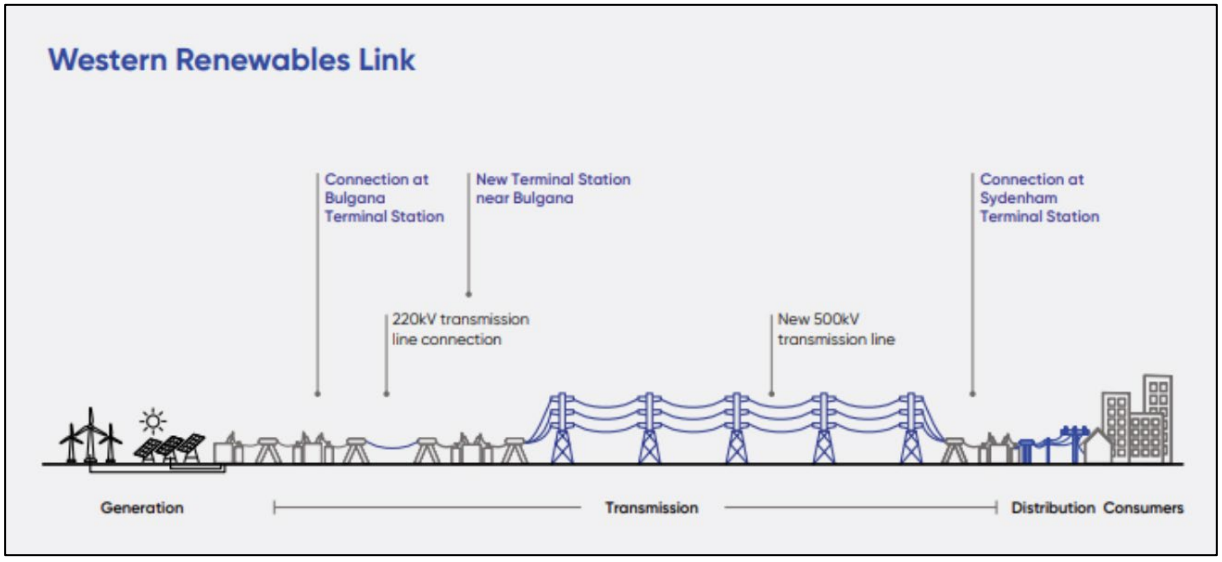
Readers should refer to the relevant sections of the EES documentation and the Proponent's submissions for more specific or detailed information about the Project.

2.1 Project description

(i) Overview

The Project consists of a new overhead double circuit high voltage alternating current (HVAC) 500kV transmission line, approximately 190 kilometres long, from near Bulgana in Victoria's west to Sydenham in Melbourne's northwest. The Project will provide additional transmission capacity between the Western Renewable Energy Zone (REZ) and the Victorian and national energy grids. An overview of the Project is shown in Figure 1.

Figure 1 Project overview

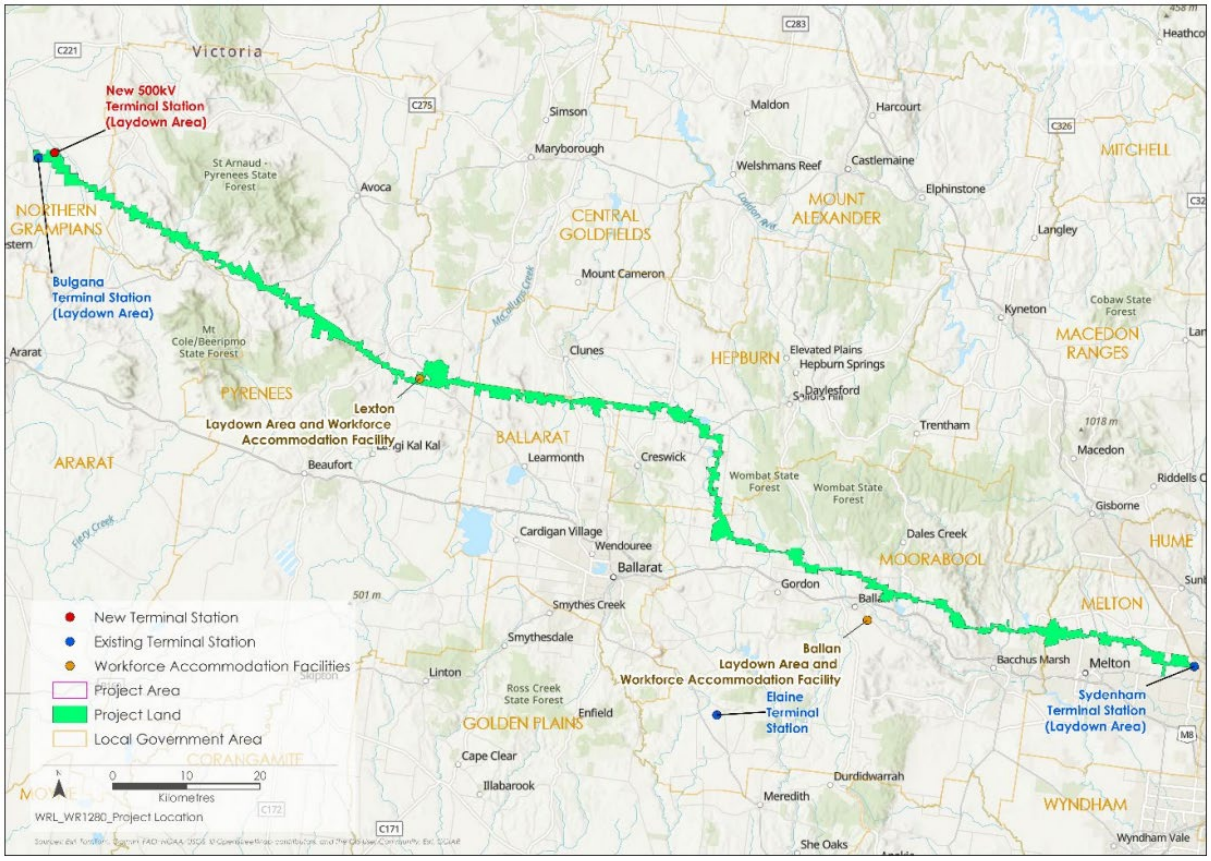


SOURCE: EES Chapter 6, figure 6.1

(ii) Project route

The proposed route and location of key components are shown in Figure 2.

Figure 2 Project location and proposed route



SOURCE: EES Chapter 6, figure 6.2

The proposed route commences at the existing Bulgana Terminal Station with a 220kV transmission line connection to the new 500kV terminal station approximately 2 kilometres to the northeast. It then runs southeast from the new 500kV terminal station, parallel to the existing Ballarat to Horsham transmission line for around 60 kilometres.

East of Lexton, the route deviates from the Ballarat to Horsham transmission line, passing through the northern section of the Waubra Wind Farm between Mount Bolton and Mount Beckworth. Continuing east, it passes through the Berry Deep Leads Mining Landscape (part of the UNESCO world heritage bid for goldfields landscapes) and continues north of Allendale and Kingston.

North of Kingston, the route turns southeast to Mount Prospect. From Mount Prospect to near Dean, it runs parallel to the existing Ballarat to Bendigo transmission line. Near Dean, the route deviates from the existing transmission line to run south, then east through Bolwarrah, Bunding and Myrniong to Darley.

The route then continues eastward crossing Merrimu Reservoir north of Long Forest and along the northern boundary of MacPherson Park at Melton, where it connects to the existing electricity network at the Sydenham Terminal Station.

The EES uses the following terms to describe the land on which the Project will be constructed. These terms are also used in this Report where relevant:

- The **Proposed Route** is around 100 to 170 metres wide and encompasses the future easement (including a buffer either side), and the terminal station areas.

- The **Project Land** encompasses all land parcels that could be used for the purpose of temporary Project construction and permanent operational components. The Project Land corresponds with the extent of the SCO. This generally includes the entire land parcel intersected by a Project component.
- The **Project Area** is contained within the Project Land and encompasses all areas that would be used to support the construction and operation of the Project.

This Report also refers to:

- study areas, which are defined in the Technical Reports forming part of the EES
- the area surrounding the Proposed Route, being the areas through which the Project is proposed to traverse (which is broader than the defined Project Area).

(iii) Terminal stations

Terminal stations transfer power between different voltage levels, stabilise voltage levels along the transmission line, move electrical energy from one point to another and monitor and protect the transmission network. The transmission line will connect to a terminal station at each end of the line, allowing for the flow of energy from the western Victoria REZ to the existing 500kV transmission network at Sydenham Terminal Station.

The Project includes a new 500kV terminal station approximately 2 kilometres northeast of the existing Bulgana Terminal Station. The new terminal station will connect to the existing Bulgana Terminal Station via a single circuit 220kV transmission. As part of the works, the existing Bulgana Terminal Station will also be expanded.

Works at the existing Elaine terminal station include relocating and diverting existing 220kV lines into the terminal station and to an adjacent bay.

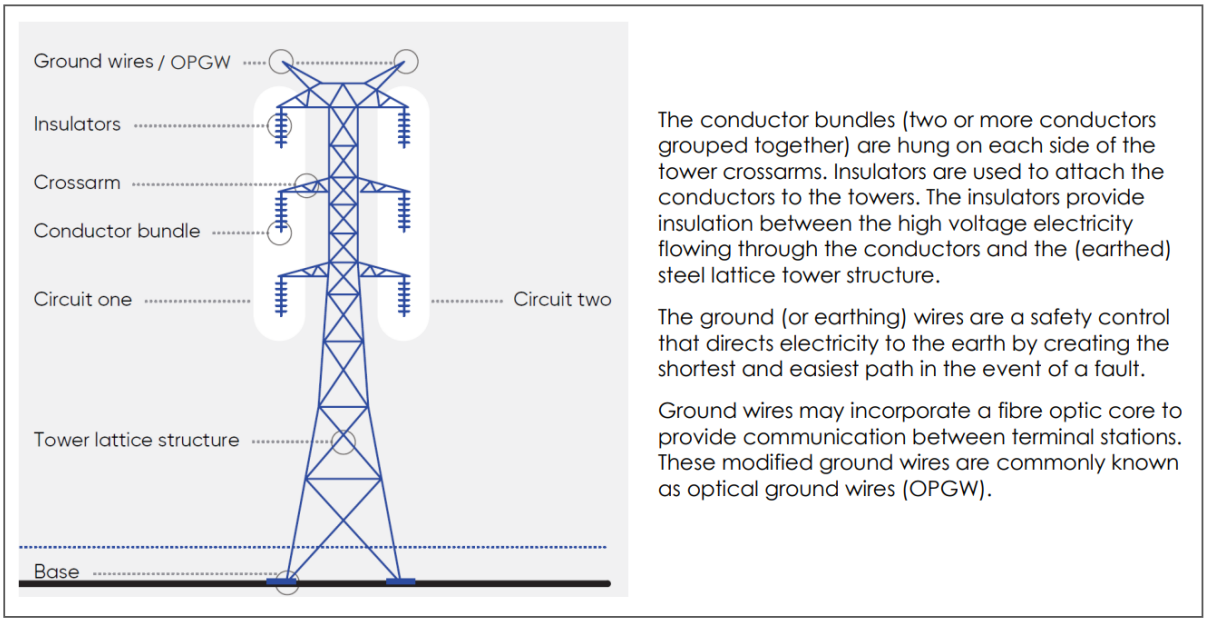
The Project will connect into the existing Sydenham Terminal Station that is being rebuilt as part of a separate project. The connection works include the modification of a 500kV bay (to be constructed as part of the separate project) and a new 500kV bay extension with associated infrastructure.

(iv) Transmission towers

The EES nominated double circuit steel lattice towers as the preferred tower configuration for most of the route. These are used elsewhere in Victoria and within the national energy network and are described in Figure 3.

Other tower configurations (single circuit 550kV and 220kV) are used for smaller sections of the route.

Figure 3 Example of double circuit lattice tower features



SOURCE: EES Chapter 6, figure 6.4

The approximate number and arrangement of towers is shown in Table 2.

Table 2 Tower numbers and arrangements

Tower type	Quantity
500kV double circuit suspension tower	328
500kV double circuit strain tower	90
500kV single circuit suspension or strain tower (pair of towers) (The 220kV route is expected to be eight sets of paired single circuit 500kV lattice towers (16 in total), strung with 220kV conductors)	36 (18 sets)

SOURCE: EES Chapter 6, table 6.2

Suspension towers will be erected where the transmission line is in a straight line or has a very small deviation angle (up to 15 degrees).

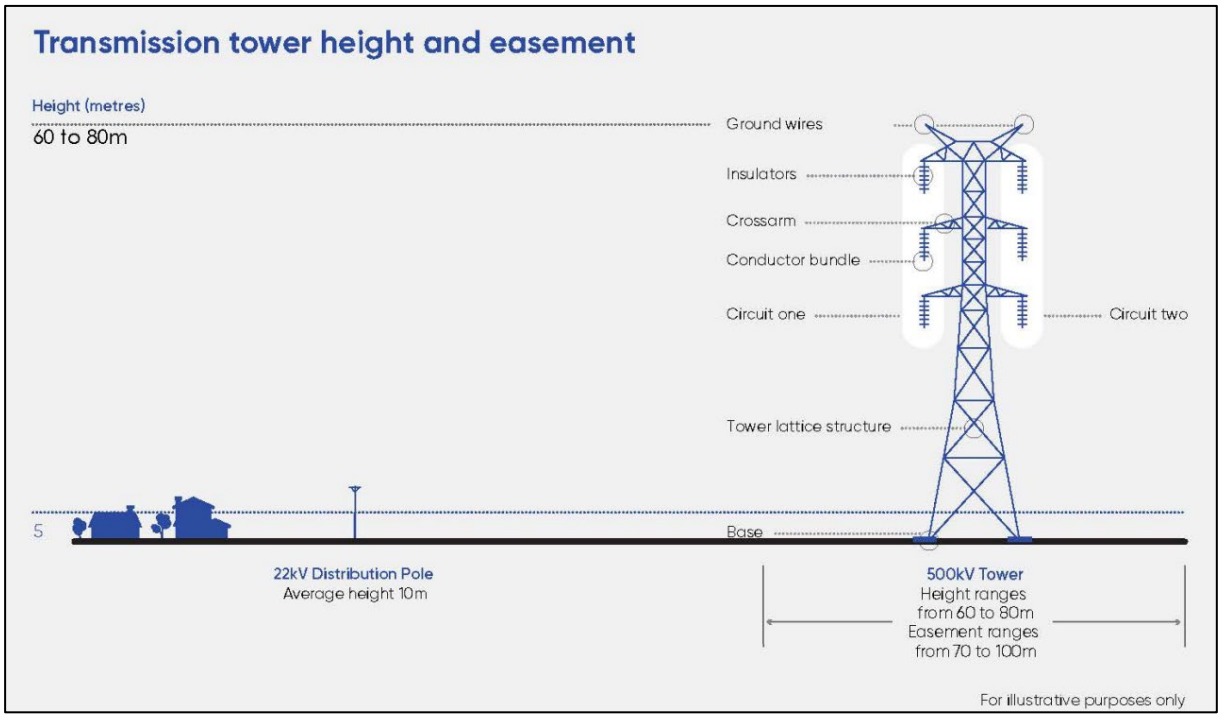
Strain towers will generally be erected at locations where the transmission line changes direction beyond 15 degrees. Generally, strain towers are larger at the base and heavier compared to suspension towers.

The height of individual towers will be determined by factors such as topography, the distance between two towers, minimum ground clearance, the vertical spacing between conductors and the vertical clearance between the ground wire and top conductor.

500kV double circuit towers

The proposed 500kV double circuit towers are typically between 60 and 80 metres high, as shown in Figure 4.

Figure 4 Typical 500kV double circuit tower height



SOURCE: EES Chapter 6, Figure 6.6

Four separate concrete pile footings (or foundations) will be required for each tower. These will typically be 1.8 metres in diameter and 9 metres deep. It is not intended that any base material or concrete pad will be laid between the tower footings.

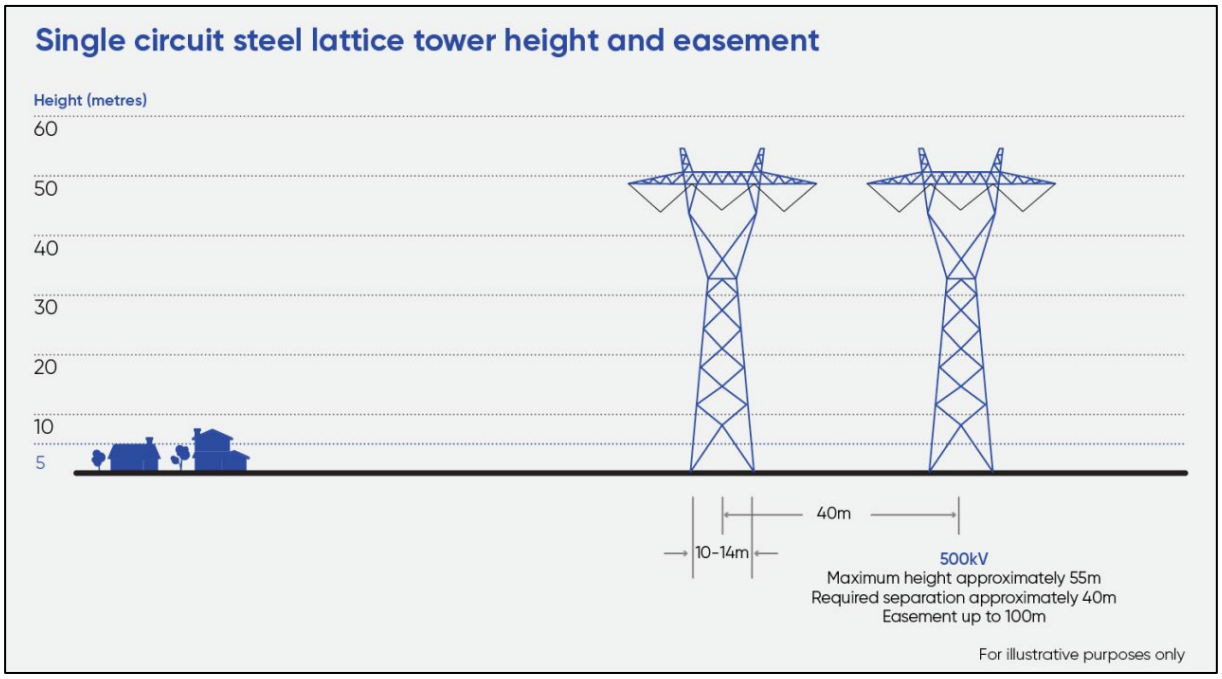
500kV single circuit towers

500 kV single circuit towers are proposed in the vicinity of the Melton Aerodrome and Melbourne Airport for air safety reasons. Towers of 35 to 45 metres will be provided in pairs, as shown in Figure 5. This arrangement typically requires a separation distance of around 40 metres (centre to centre) within an easement up to 100 metres wide. The towers generally have a smaller base footprint than the double circuit towers.

220kV transmission line

A new 2.5 kilometre section of 220kV transmission line will connect the existing Bulgana Terminal Station and the new terminal station near Bulgana. This connection will use eight pairs of 500kV single circuit towers strung with 220kV conductors. The Project will transition directly from 500kV double circuit towers to 500kV single circuit towers.

Figure 5 Typical 500kV single circuit tower height



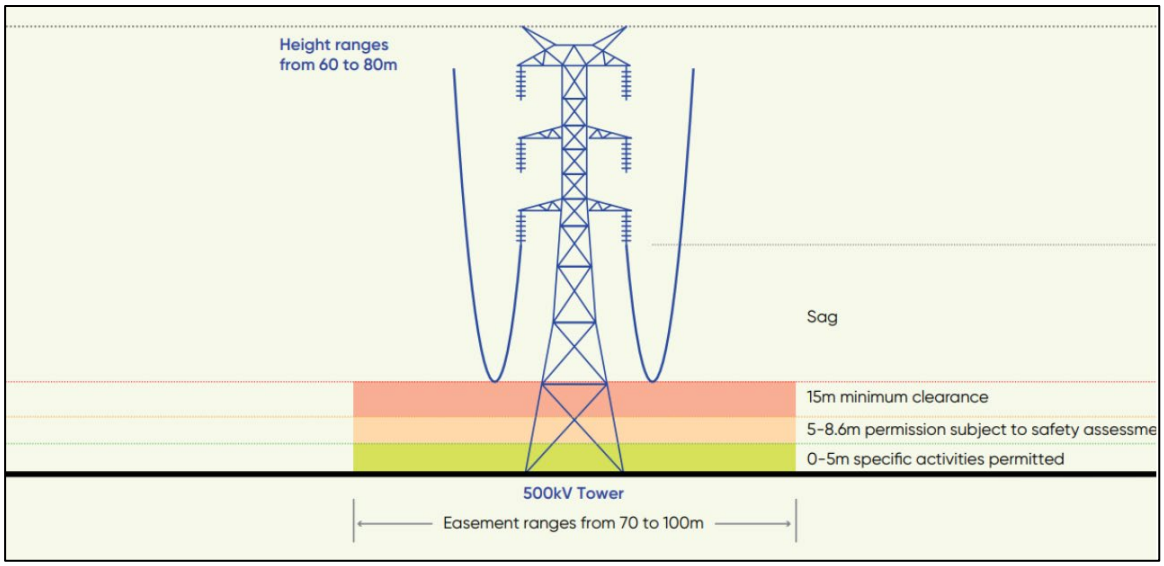
SOURCE: EES Chapter 6, figure 6.10

(v) Conductors

The conductors (also referred to as lines or wires) strung between the towers sag around the midpoint between two towers. The spacing between towers is determined by the sag and the required ground clearance. The typical minimum ground clearance for transmission conductors is 15 metres. Closer to the towers the distance will be higher, ranging from 29 to 37 metres. These height clearances allow for electrical safety separation and for vehicles and equipment to work beneath the transmission line.

The typical span between towers to achieve the minimum ground clearance ranges from 450 to 550 metres.

Figure 6 Transmission conductor clearances



SOURCE: EES Chapter 6, figure 6.13

(vi) Easements and land access

Easements will be used for construction, occupation, operation and maintenance of the new transmission line on freehold land. Easements can be negotiated and agreed or compulsorily acquired under the *Electricity Industry Act 2000*. Affected landholders will be paid compensation for an easement.

Easement width can vary depending on the design of the towers and safety matters such as fire safety, electric and magnetic fields and distance from existing infrastructure and facilities. The easement width for most of the transmission line ranges from 70 to 100 metres. In some sections where adjacent to an existing transmission line, the easement is around 55 metres wide. The widest section of easement is 115 metres where the Project crosses the Korkuperrimul Creek. Indicative easements are shown on Figure 4 and Figure 7.

On Crown land, authority to access, construct and operate the transmission line will be determined on a parcel-by-parcel basis. This is typically established through a lease, licence or consent to occupy and conduct activities on land, secured by entering into agreements with the relevant government agency or Crown land administrator.

Carriageway easements will also be obtained for permanent access tracks if these are outside the transmission line easement. These access tracks are shown in the EES and will enable AusNet to travel from a public access point (generally a road) to the transmission line easement. If access is required over another separate property title (owned by the same or another landholder), a carriageway easement will be used to ensure ongoing access to the easement for operation, maintenance and repair activities. The total length of all access tracks is approximately 155 kilometres.

Issues associated with easements are discussed in the EES and landholder guides produced by the Proponent, including:

- Easement safety and permitted activities, October 2024
- Option for Easement process, compensation and benefits, July 2025.

(vii) Construction infrastructure

Project construction will include:

- construction of the towers and the transmission line works and associated access tracks
- construction works at the terminal stations
- site rehabilitation works
- testing and commissioning activities.

The Project will require temporary infrastructure to facilitate construction, including:

- five laydown areas
- two workforce accommodation facilities
- access tracks.

Laydown areas

Two of the laydown areas will be located at the existing Bulgana and Sydenham terminal station sites, one at the new terminal station near Bulgana. Two intermediate laydown

areas are to be co-located with workforce accommodation facilities southeast of Lexton and southeast of Ballan.

The laydown areas will contain portable site offices, meeting rooms, lunchrooms, toilet block, water tanks, generator, tool sheds, workshop spaces, a pre-start meeting area, parking, and temporary vehicle washdown areas.

The size of the laydown areas and co-located workforce accommodation facilities will vary, depending on storage requirements. The Lexton site will be up to 12 hectares and the Ballan site will be up to 24 hectares, as these areas need to accommodate large quantities of steel members for the towers and transmission line materials.

Once construction is completed, all temporary laydown areas will be reinstated.

Workforce accommodation facilities

The Lexton and Ballan workforce accommodation facilities are intended to minimise effects of a large influx of construction workers on the small rural towns and communities in the area surrounding the Proposed Route. Each facility will accommodate around 350 personnel and include individual demountable accommodation units, meeting rooms, medical facilities, offices, communal kitchen and meal areas, gym facilities and the like.

Temporary access tracks

Temporary access tracks will be required in some locations to enable the transport of plant and equipment to construction sites. Following construction, temporary access tracks will be reinstated to previous conditions.

(viii) Construction program

The EES outlined an indicative construction program expected to take approximately two years, depending on engaging contractors and obtaining approvals. The construction program assumed two construction fronts working in parallel from each end of the Project and meeting towards the centre.

The Proponent subsequently reviewed the program and proposed one construction work front commencing at the western end and moving east along the route to complete the Project. This would extend the construction period to three years. The Proponent provided advice on the consequential changes that this would have on various elements of the construction program (D60).

(ix) Decommissioning

The EES notes the service life is around 45 years for a terminal station and 80 years for a transmission line, at which time the infrastructure will either be decommissioned or upgraded to extend its service life. Decommissioning activities will be planned and carried out in accordance with regulatory requirements at the time. A Decommissioning Management Plan is required under Environmental Performance Requirement (EPR) EM11.

The draft Incorporated Document requires the Minister for Planning approve a decommissioning plan for the workforce accommodation facilities.

2.2 Project area

The Proposed Route traverses the Northern Grampians, Pyrenees, Ballarat, Hepburn, Moorabool and Melton municipalities.

The Registered Aboriginal Parties (RAPs) and traditional owners within the area are the Barengi Gadjin Land Council Aboriginal Corporation, Eastern Maar Aboriginal Corporation, Dja Dja Wurrung Clans Aboriginal Council, Wadawurrung Traditional Owners Aboriginal Corporation and Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation.

(i) The area of interest

The first stage in the route selection process was to define an 'area of interest', which the EES defines as:

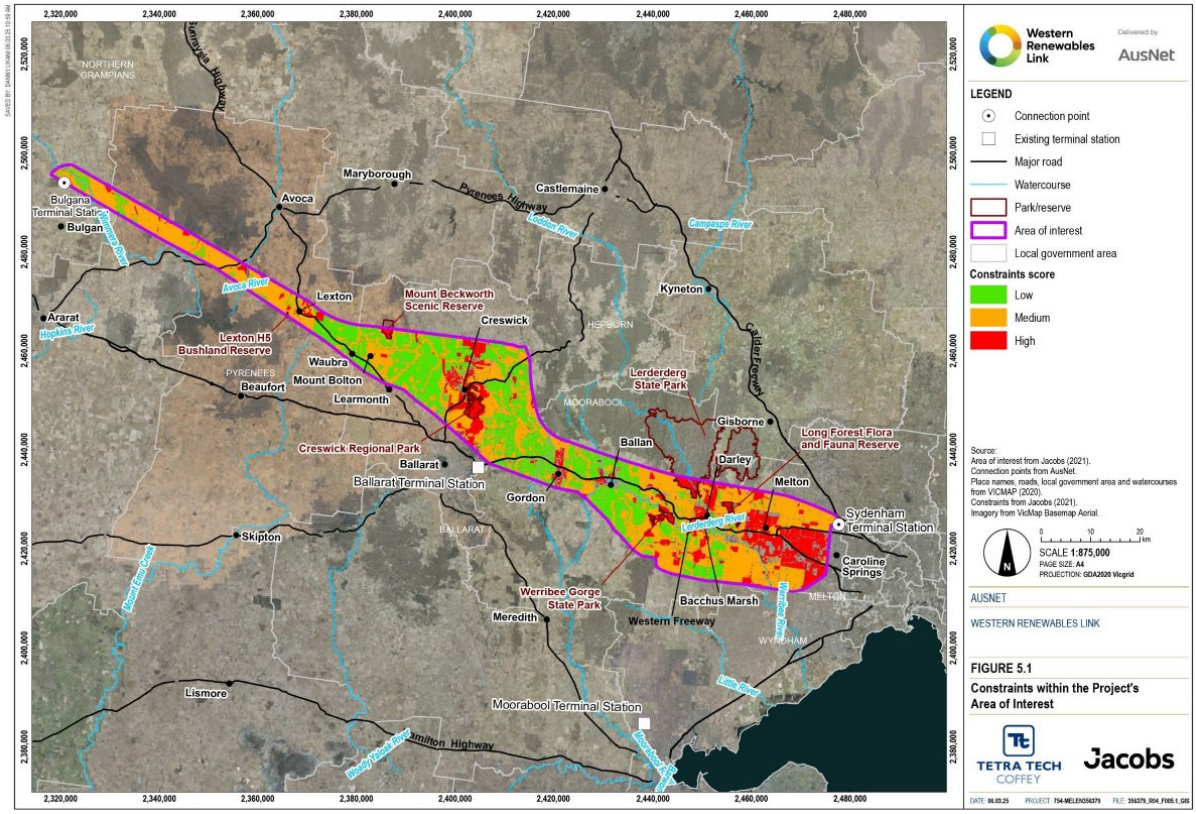
> … the broad geographical area between Bulgana and Sydenham investigated to understand the constraints and opportunities to identify corridors for further investigation to inform the selection of the single corridor and Proposed Route.

The area of interest was large enough to allow consideration of what the EES describes as "*feasible alternatives*" for a transmission line connecting the Bulgana and Sydenham terminal stations. It includes parts of the existing Horsham to Ballarat transmission line and parts of the existing Ballarat to Bendigo transmission line.

Constraints on land within the area of interest were assessed. Constraints included terrain, the presence of plantations, parks and reserves, land use, planning controls including Heritage Overlays, Significant Landscape Overlays (SLOs) and Environmental Significance Overlays (ESOs), and areas of Aboriginal cultural heritage sensitivity.

The combined constraints mapping is contained in Figure 5.1 in EES Attachment I, extracted in Figure 7.

Figure 7 Constraints within the area of interest



Source: EES Attachment I Fig 5.1

(ii) Selection of the Proposed Route

The next stage of the route selection process was to select the Proposed Route within the area of interest. The selection process was explained in detail in the Proponent's Part A submission (D85) and on Day 1 of the Hearing, in a presentation from Barton Napier (of the Proponent) (D194). Mr Napier also explained the route selection process on the accompanied site visit.

In short, feasible potential corridors were identified within the area of interest, seeking to avoid areas with high constraints (mapped in Figure 7). It was not possible to avoid all constrained land within the area of interest, and various 'pinch points' (areas with high constraints) exist along the Proposed Route, including at Darley.

Other considerations affecting the selection of the Proposed Route included:

- making the route as direct as possible between Bulgana and Sydenham
- improving overall network resilience by separating the project from existing transmission infrastructure connecting western Victoria to Melbourne, but otherwise co-locating with existing infrastructure where technically feasible
- avoiding settlements and areas with higher dwelling densities
- constructability considerations including terrain and geotechnical conditions.

(iii) The Project Area

As explained in Chapter 2.1(ii), the Proposed Route (containing the easement) sits within the Project Area. The Project Area comprises Crown land, freehold land, railway land and

government roads. The number of parcels of land affected by the transmission line are included in Table 3.

Land within the Proposed Route, and the land that will be permanently occupied by the transmission towers, includes up to 2,228 hectares of agricultural and forestry land. The area directly constrained at ground level by the towers will be approximately 35 hectares), plus any land required for access tracks and other infrastructure, totalling 239 hectares.

Table 3 Land parcels affected by the transmission line

Intersected parcels	Project Land	Proposed Route	Land occupied and accessed	Towers
Crown land	82	60	22	10
Freehold land	537	440	97	272
Railway land	11	6	5	0
Government road	197	145	52	0
Total	827	651	176	282

Source: EES Technical Report E, table 6.1

2.3 The VNI West project and Bulgana terminal station

Submitters, including Northern Grampians Council, submitted that the Bulgana terminal station should be assessed as part of the VNI West project instead of the Project. They argued that the terminal station was required because of the VNI West project and should assessed in that context.

The Bulgana terminal station was exhibited as part of the Project and must be considered by the IAC consistent with its Terms of Reference.

2.4 Acquisition, compensation and community benefits

This section provides an overview of the proposed acquisition, compensation and community benefit arrangements proposed in connection with the Project. These matters are discussed more fully in the EES, TN01 (D127), TN03 (D204), TN04 (D205) and Landholder Guides prepared by the Proponent:

- Option for easement process, compensation and benefits
- Enhanced Support for Landholders: More Certainty, More Flexibility
- Land access for field surveys and investigations.

(i) Land Acquisition and Compensation Act

Easements will be required for the construction and operation of the transmission line and related infrastructure, to protect public safety and provide access to the transmission line for inspections and maintenance.

The *Land Acquisition and Compensation Act 1986* (LAC Act) applies to the acquisition of easements for the Project pursuant to section 86(2) of the *Electricity Industry Act 2000*. The acquisition process requires a Notice of Intention to Acquire followed by a Notice of

Acquisition. When the Notice of Acquisition is gazetted, the interest in the land vests in the Authority (the Proponent) and the landowner (claimant) has an entitlement for compensation. Following gazettal, the Authority must make an offer of compensation to the claimant.

Section 41 of the LAC Act provides "*general principles on which compensation is to be based*". These are summarised in TN03 as:

a. the market value of the interest on the date of acquisition which means the amount of money that would have been paid for that interest if it had been sold on that date by a willing but not anxious seller to a willing but not anxious purchaser;
b. any special value to the claimant on the date of acquisition which means the value of any pecuniary advantage, in addition to market value, to a claimant which is incidental to his ownership or occupation of that land;
c. any loss attributable to severance which means the amount of any reduction in the market value of any other interest of the claimant in the acquired land or any interest of the claimant in other land used in conjunction with the acquired land which is caused by its severance from the acquired land;
d. any loss attributable to disturbance which means any pecuniary loss suffered by a claimant as the natural, direct and reasonable consequence of the fact that an interest of the claimant in that land has been divested or diminished, being a pecuniary loss for which provision is not otherwise made;
e. the enhancement or depreciation in value of the interest of the claimant, at the date of acquisition, in other land adjoining or severed from the acquired land by reason of the implementation of the purpose for which the land was acquired;
f. any legal, valuation and other professional expenses necessarily incurred by the claimant by reason of the acquisition of the interest.

Section 44 of the LAC Act provides for additional compensation up to 10 percent of the market value of the land (solatium) to compensate the claimant for intangible and non-pecuniary disadvantages resulting from the acquisition.

Sections 80 and 82 of the LAC Act provide for compensation to be determined by the Victorian Civil and Administrative Tribunal (VCAT) or the Supreme Court (for claims exceeding $400,000) where there is no agreement about the amount of compensation.

(ii) Renewable Energy Zone Community Benefits Plan

VicGrid released a draft Renewable Energy Zone Community Benefits Plan in 2024 (D180) (the REZ Community Benefits Plan) in accordance with the Victorian Transmission Investment Framework. VicGrid advised the plan was being finalised following consultation and would apply to the Project. The plan's benefits would be in addition to:

- statutory compensation under the LAC Act, the *Traditional Owner Settlement Act 2010* and *Native Title Act 1993*
- discretionary payments by energy generation, storage and transmission developers as part of their community benefit sharing initiatives.

VicGrid described four categories of community benefits provided for under the REZ Community Benefits Plan:

a) Landholders who host new electricity transmission infrastructure will receive payments of $8,000 per kilometre of typical area of hosted transmission per year for 25 years.
b) The REZ Community Energy Fund will fund projects that improve energy outcomes, or create benefits from the energy transition, for communities in regions hosting REZs and new transmission infrastructure.

c) The Victorian Government will work in partnership with Traditional Owners to co-design benefits for Traditional Owners of Country and Sea Country affected by Renewable Energy Zones and related transmission infrastructure.

d) Payments to significantly impacted neighbours in recognition of the visual amenity impact of new or upgraded transmission infrastructure will be made by transmission companies in accordance with guidance developed by VicGrid.

VicGrid advised:

> All the community benefits outlined under the draft REZ Community Benefits Plan will be available to landholders, communities, Traditional Owners and significantly impacted neighbours affected by the WRL. However, significantly impacted neighbours will only be eligible for payments once. VicGrid is working with AusNet to ensure that those impacted by the WRL will not be worse off under the WRL community benefits schemes than they would be under the final REZ Community Benefits Plan.

(iii) Project specific compensation and community benefits

Options for Easements

The Proponent advised it has obtained some of the easements required for the Project through voluntary Options for Easement and continues to seek to negotiate Options for Easement with landholders. Acquiring easements through Options for Easement negates the need for compulsory acquisition. As of 26 October 2025 approximately 181 landholders were yet to sign Options for Easements.

TN04 describes the Options for Easement process that includes a Compensation for Easement Amount based on independent valuation of the difference between market value before and after the easement in addition to loss of special value and loss due to severance where applicable.

The Options for Easement proposals also provide for:

- Legal and professional advice on the Options for Easement up to a value of $10,000 or greater subject to agreement. It is not dependent on the Options for Easement being agreed.
- An upfront Option Fee of $50,000 ($30,000 of which is an advance of Options for Easement compensation) payable after the Options for Easement is signed by both parties. If the Project does not proceed, landowners will retain the upfront payment.
- An Option Exercise Disturbance Fee including a Production Loss Fee (where applicable) for the value of lost crops and other disturbances resulting from construction.
- A Construction Licence Fee based on the temporary construction area and a specified rate of return based on current land use. Lifestyle properties are provided a standard $5,000 fee.
- A Land Rehabilitation Offset Payment for 12 months after construction that is equal to the previous year's Construction Licence Fee.
- Reimbursements for legal costs related to easement registration.

If voluntary agreement for an easement cannot be reached with a landholder under the Options for Easement process, easements will be compulsorily acquired in accordance with the EI Act and LAC Act.

Land Access Consents

A Land Access Consent documents land access arrangements and protocols during project related investigations and are separate to Options for Easements. Land Access Consents were used to facilitate the preparation of the EES and will be used in the future where further investigations are required. A Landholder Participation Fee of $20,000 for five days site access is payable to landholders who sign Land Access Consents. If more than five days access is required, a further $2,000 per day is paid to landholders up to a maximum of $30,000 with a total payment cap of $50,000. Associated legal fees up to $1,000 are reimbursed.

Voluntary Hosting Benefit

The Voluntary Hosting Benefit is valued at $46,000/hectare based on the area of the easement and is available to landholders who agree to an Options for Easement prior to the approval and gazettal of the PSA.

Benefit Sharing Program

The Project includes a Benefit Sharing Program that includes the following elements:

Table 4 Benefit Sharing Program

Stream	Indicative value
WRL Community Partnerships and Investments	$30M, of which $15M will be delivered during the development phase plus in-kind support
WRL Community Benefit Fund	$25M
Traditional Owner Benefit Sharing	Negotiated or paid in confidence
Landholder benefit payments	$8,000 per km of transmission line for 25 years
Near Neighbour Benefit Program	$20,000 or $40,000 per dwelling within 1km of the edge of the easement
Local benefits of construction	$170M local spend target Local jobs and opportunities

Source: TN01 Benefit Sharing (D127), paragraph 5

3 Threshold issues

3.1 Project alternatives

(i) Introduction

The issue is whether the IAC's task extends to considering and making recommendations on:

- partial or full undergrounding of the Project
- alternative routes outside the area of interest.

Clause 35 of the terms of reference states (IAC emphasis):

> The IAC must produce a written report for the Minister for Planning containing its:
>
> ....
>
> c. recommendations and/or specific measures thot it considers necessary and appropriate to prevent, mitigate or offset adverse significant environmental effects;
>
> d. recommendations relating to the project alternatives considered through the EES and any feasible modifications to the design or management of the project that would offer improved environmental outcomes, particularly in relation to reducing/mitigating significant environmental effects.

Item 2 of the IAC's RFI asked the Proponent to:

> Provide submissions on the IAC's scope to recommend Project alternatives and modifications including, but not limited to, undergrounding the transmission line, rerouting the transmission line and changing the design of transmission towers.

The Proponent provided an initial response in D167, with detailed further responses in its Part B submission (D203) and reply submission (D650 and D651).

Other key information includes:

- D104 – Expert evidence of Les Brand for Moorabool Council
- D139 – Expert evidence of Rod Touzel for Melton Council
- D171 – Expert evidence of Rod Touzel for Hepburn Council
- D186 – Joint Expert Statement on Undergrounding (Les Brand and Rod Touzel)
- D206 – TN05 Relative Costs of Fully Overhead, Fully Underground and Partially Underground Transmission Lines
- D255 – Unit cost calculations of Rod Touzel
- D257 – Costs report prepared by Rider Levett Bucknall (RLB) for the Proponent on fully underground HVDC conceptual configuration (August 2023)
- D258 – Costs report prepared by RLB for the Proponent on partial underground HVAC conceptual configurations (February 2023)
- D352 – Cost comparison RLB and Brand
- D631 – Further material from Rod Touzel regarding underground trench design
- D655 – Costs report, summary of cost estimates RLB and Brand
- D656 – Costs report, summary of Touzel cost estimates
- D657 – Costs report, Touzel cost estimates with indirect costs and contingency added.

(ii) What did the EES say?

Project alternatives are addressed in:

- EES Attachment I (Project development and assessment of alternatives)
- EES Attachment II (Assessment of feasibility for an underground 500kV transmission line for Western Renewables Link).

EES Attachment I discusses project alternatives that were considered and assessed, including options for partial undergrounding at Darley (one of the key 'pinch points' along the Proposed Route). It also discusses what are described as 'alternative projects', including:

- the RIT-T Option B3 alternative route
- the Mortlake to Moorabool alternative route.

These 'alternative projects' sit largely outside the area of interest.

Attachment I explains why the alternatives do not meet the Project objectives and are not considered feasible.

EES Attachment II provides high level analysis and costings of a conceptual fully undergrounded project, based on a potential high voltage direct current (HVDC) design prepared by Mott MacDonald. Attachment II states that the Mott MacDonald design was "*suitable for planning phase cost estimate*", and that the "*cost estimates and cost ratios discussed in this section are presented to illustrate the cost difference between overhead transmission lines and underground cables*".

Attachment II concluded that a fully undergrounded project would be technically feasible, but it would not meet Project objectives because it would:

- cost significantly more to construct
- not be able to be delivered within the required timeframes.

Further, while an underground option would have some advantages in terms of mitigating some of the Project's environmental effects, other effects (such as impacts on Aboriginal cultural heritage, geology, landform and soils, traffic, and biodiversity) could be more significant than for an overhead project.

(iii) Evidence and submissions

Submissions on undergrounding

Many community submitters argued the Project should be fully or partially undergrounded, as undergrounding is technically feasible and would dramatically reduce the Project's impacts. They pointed to underground transmission projects in other parts of the world, submitting that overhead transmission infrastructure:

- represents old and outdated technology that falls well short of best practice
- would result in a legacy of impacts felt by generations, which could be avoided by undergrounding.

They submitted the EES failed to meet the Scoping Requirements because it did not include a full cost benefit assessment of underground alternatives, and did not fully assess the environmental, social and economic benefits of undergrounding through a triple bottom line assessment.

The Proponent submitted that the IAC's task does not extend to being able to recommend a fully undergrounded project because (among other things) a fully undergrounded project:

- has not been designed or assessed in the EES – any such project would essentially be a different project to that before the IAC
- has not been referred to the Minister under the EE Act for assessment
- would have to be designed, a route identified, the community consulted and the impacts of the project assessed, resulting in very significant delays
- is not feasible and would not meet the Project objectives, because of the additional cost and delays.

The Proponent explained that the partial undergrounding options at Darley explored in EES Attachment I were rejected for similar reasons that a fully underground project was not pursued (including cost and delays). Further, while undergrounding through Darley may mitigate some impacts (particularly biodiversity and landscape and visual impacts) in the Darley area, it would potentially aggravate other impacts (as documented in EES Attachments I and II).

The Proponent submitted it may be within the IAC's remit to recommend partial undergrounding in Darley or elsewhere, but the IAC could only do so if the partial undergrounding was:

- both feasible and wholly within the area of interest
- of an extent that could reasonably be regarded as a modification to the Project (not a different project)
- necessary to ensure the overall environmental effects of the Project were acceptable.

The Proponent submitted the IAC should not recommend partial undergrounding, because:

- undergrounding is not feasible, including because of the additional cost
- the environmental effects of the overhead Project are acceptable
- a fully or extensively undergrounded project would probably need to be configured with HVDC cables, and as a result:
  - it would be difficult for renewable energy generation projects (which generate in alternating current) to readily connect to the Project
  - the need to incorporate AC/DC converter stations would add significantly to the cost of the Project and result in significant delays because converter stations have long lead times.

The Proponent submitted partial or full undergrounding would compromise the reliability and security of Victoria's electricity system and would fail to address the urgent need for the Project identified through the extensive electricity network planning processes undertaken over the past decade by the Australian Energy Markey Operator (AEMO) and more recently VicGrid.

Moorabool, Melton and Hepburn Councils disagreed with the Proponent's submission that the IAC should not consider undergrounding, or that it could only consider undergrounding if it found the impacts of the overhead Project were unacceptable.

Moorabool Council submitted that consistent with the Terms of Reference, the IAC is in fact required to make recommendations with regard to undergrounding alternatives. It submitted:

- the Minister's referral decision and Scoping Requirements expressly required analysis of "*alternative corridors, alignments, site locations, designs or other options for the planning, construction or operation of the Project*"
- EES Attachments I and II included consideration of both a partial and fully undergrounded project, suggesting that the Proponent "*clearly considered that such alternatives were in the purview of [the] alternatives assessment*".

Ballarat, Hepburn and Melton Councils broadly supported Moorabool Council's submissions, and specifically called for the IAC to recommend that design work and costings be undertaken for undergrounding the Project within their municipalities in order to reduce and mitigate the adverse impacts of the Project as proposed in its overhead form.

Evidence on undergrounding

Moorabool Council presented evidence on costs of overhead and underground transmission lines from Les Brand of Amplitude. Mr Brand considered that while underground options may have more impacts during construction (due to the trenching required), those impacts would be localised and limited in duration. Construction impacts on waterways could be managed with horizontal directional drilling. Further, impacts of an underground project during the operational phase would be minimal, compared to the permanent impacts of the overhead Project.

On cost comparisons between overhead and underground transmission lines, Mr Brand considered the RLB costings of a fully underground project in D257 were not likely to be accurate, as they were based on:

- desktop assessments only, with no field survey work
- HVDC, not HVAC which would be significantly cheaper.

Mr Brand prepared his own costings of the overhead Project and underground HVAC options, based on the AEMO transmission cost database. He concluded the EES and RLB had significantly underestimated the costs of the overhead Project, and overestimated the cost of underground. He advised:

- his costing of the overhead Project was 39 percent higher than RLB's estimate (noting he had included certain essential cost items that RLB had not included)
- the RLB costings were based on 2023 dollars, and the current cost differential between overhead and underground HVAC projects is significantly less than it was in 2023.

On delays, Mr Brand disputed assertions that an underground project would take much longer to construct than the overhead Project. He noted:

- a HVAC underground project would not require converter stations, reducing both the time and costs of an underground project
- there are several suppliers of HVAC underground cables, and cables should be readily available with careful project planning

- the changes to the Project's construction program (detailed in Chapter 2.1) mean that the overhead Project would take a full year longer to construct than originally anticipated.

He concluded:

> In my view, with an immediate commencement of preliminary design and scoping activities, and a willingness to engage a cable supplier using an early engagement model (which is fast becoming the norm for high voltage cables and other power transmission equipment) it should be possible for the cables to be designed, manufactured, installed and tested by Q3 2029.

Melton and Hepburn Councils engaged Rod Touzel of Worley Consulting to present evidence on undergrounding. Key points from Mr Touzel's evidence were:

- consistent with Mr Brand's evidence, HVAC would be significantly cheaper than the HVDC options assessed in the EES and costed by RLB
- the total easement width for a HVAC underground project would be 28 to 30 metres (significantly less than the 70 to 100 metres required for the overhead Project), reducing both acquisition costs and impacts on directly affected landowners
- consistent with Mr Brand's evidence, there are multiple suppliers of appropriate HVAC underground cables, and with careful project planning these should be readily available and should not unduly delay the project completion date
- HVAC underground transmission lines over 30 to 40 kilometres would require reactive power compensation stations ('shunt reactors') to be installed to control and maintain voltage stability, but these are relatively small scale and could be integrated with transition stations for a partially undergrounded project
- shunt reactors would have a lead time, but with careful project planning their delivery should not compromise the overall project schedule.

Mr Touzel presented high level costings for partial HVAC underground options prepared by a colleague (Ken Barber of Worley Consulting). While they were prepared by Mr Barber, they are referred to in this Report as the Touzel costings, to avoid confusion. The Touzel costings were based on cost data owned by Worley, not the AEMO transmission cost database (on which Mr Brand's costings were based). They were significantly lower than both Mr Brand's and RLB's costings.

Cost comparisons

The various costings presented to the IAC were difficult to compare, as they used different input data, costed different partial undergrounding options and included both HVAC and HVDC underground options (the costs of which differ substantially).

RLB costed the full overhead Project, a full underground HVDC option, and four partial underground HVAC options:

- 6 kilometres at Darley (in Moorabool shire)
- 21 kilometres at Melton (the full extent of the project in Melton)
- 6 kilometres at Melton (the section around MacPherson Park)
- 10 kilometres at Hepburn (the full extent of the project in Hepburn).

Mr Brand costed the full overhead Project, a full underground HVDC option and one partial undergrounding HVAC option (6 kilometres at Darley).

The Touzel costings did not cost the overhead Project or a full underground option. They costed three partial undergrounding HVAC options:

- 6 kilometres at Melton
- 21 kilometres at Melton
- 10 kilometres at Hepburn.

The Proponent provided comparisons of the various costings in tabled documents D655, D656 and D657. The Touzel costings did not include a contingency or indirect costs. D657 adds indirect costs and a 30 percent contingency to the Touzel costings to make them more comparable with the RLB costings.

The IAC has summarised the various costings in Table 5 and Table 6. The figures are based on:

- those in D655, D656 and D657 which the IAC has rounded for ease of comparison
- the adjusted Touzel costings (D657).

Table 5 compares the costs of the overhead Project to a fully undergrounded HVDC project.

Table 5 Comparative costs – fully underground versus fully overhead

Option	RLB	Brand
Overhead	$1.5 billion	$1.4 - $1.6 billion
Fully underground HVDC	$8.6 billion plus converter stations ($3.4 billion) = $12 billion total	$8.7 - $8.9 billion plus converter stations ($5.3 billion) = $13.1 – $14.2 billion total

Source: TD655, TD656 and TD657

Table 6 compares the costs of partial underground HVAC options to the equivalent length of overhead. The overhead costings are based on per kilometre rates sourced from D655:

- RLB's per kilometre rate is $7.86 million
- Mr Brand's per kilometre rate is $7.26 million to $7.87 million.

The Touzel costings did not provide a per kilometre rate for overhead.

Table 6 Comparative costs – partial underground versus overhead (equivalent distance based on per km rates)

Option	RLB	Brand	Touzel
6 kilometres at Darley			
Overhead	$47 million	$43 - $47 million	Not costed
Underground	$468 million	$378 - $479 million	Not costed
21 kilometres through Melton			
Overhead	$165 million	$152 - $165 million	Not costed
Underground	$1.5 billion	Not costed	$1.1 billion
6 kilometres at Melton (MacPherson Park and Melton Aerodrome area)			
Overhead	$47 million	$43 - $47 million	Not costed

Option	RLB	Brand	Touzel
Underground	$468 million	Not costed	$380 - $405 million
10 kilometres though Hepburn			
Overhead	$79 million	$436 - $472 million	Not costed
Underground	$748 million	Not costed	$564 - $572 million

Source: D655, D656 and D657

Although direct comparisons are difficult, the costings in Table 5 and Table 6 suggest that:

- a fully undergrounded project (including converter stations) would cost more than 10 times the overhead Project (in the order of $10.5 billion more)
- sections of partial undergrounding would cost in the order of 7 to 10 times more than the cost of the equivalent section of overhead.

The comparisons also demonstrate that:

- although they used different inputs, Mr Brand's costings for either overhead or underground were not that dissimilar to RLB's
- the adjusted Touzel costings for undergrounding options are around 24 to 25 percent lower than those of RLB.

Alternative routes

Several community submitters argued the Project should be re-routed, including fully co-locating the Project with existing 220kV transmission lines or adopting what they regarded as the preferable and less impactful routes already considered in the EES (the RIT-T Option B3 alternative route and the Mortlake to Moorabool alternative route). They pointed to the fact that VicGrid policy encourages corridor optimisation, and co-locating the Project with existing transmission infrastructure would minimise its impacts.

The Proponent submitted (in D167) that the IAC's task does not extend to enabling the IAC to recommend a different route to that assessed in the EES. While it could potentially make recommendations for modifications to the Proposed Route, any recommendations for route modifications would have to be based on the same principles as any recommendations for partial undergrounding, namely, the modifications must be:

- feasible
- wholly within the area of interest
- properly regarded as a modification to the Project (not a different project)
- necessary to ensure the overall environmental effects of the Project were acceptable.

(iv) Discussion

The Terms of Reference require the IAC to inquire into and report on the significance and acceptability of the likely environmental effects of the Project. The 'Project' is the project described in the EES, namely an overhead transmission line from Bulgana to Sydenham, generally aligned within the area of interest.

Undergrounding

The Ministerial Guidelines for the Assessment of Environmental Effects distinguish between modification 'to' a project and modification 'for' a project. The IAC does not find this distinction particularly clear or helpful.

The Terms of Reference require the IAC to consider whether project modifications are necessary and effective to avoid, mitigate or manage the significant environmental effects of the Project.

The IAC has proceeded on the basis that it is open to the IAC to consider project modifications involving undergrounding, provided the extent of undergrounding can be properly described as a modification 'to' the Project. The IAC does not consider its task extends to recommending a different project. Full undergrounding, for example, might be considered a different project.

The extent of undergrounding that may be open to the IAC to consider is a matter of judgement. The IAC has applied its judgement based on the principle that the recommended modification must not change the project so much that it could no longer be considered to be the same project as that described in the EES.

The IAC does not consider that it must reach a finding of unacceptable environmental impacts in order to consider undergrounding. Consistent with the Terms of Reference, a finding that the Project will have significant environmental impacts in a particular area is sufficient to trigger a consideration of whether undergrounding is necessary to avoid or mitigate those significant impacts in that area.

The IAC is satisfied on the basis of the information before it that undergrounding will cost significantly more than the overhead Project. The additional costs must be proportionate and justified to mitigate the impact of an overhead transmission line.

Submissions urged the IAC to find that the EES did not meet the Scoping Requirements because it did not fully assess the benefits and impacts of undergrounding, and compare those to the true cost of the impacts of the overhead Project. They considered the EES should have undertaken a more holistic assessment of the costs and benefits of overhead and underground alternatives, including (for example) that an underground project would reduce maintenance and repair costs over the life of the project, and would avoid disaster recovery costs if, say, the overhead Project were to cause a bushfire or extreme winds resulted in tower collapse.

The IAC's task is to consider the EES and the project before it. It is not to consider whether the EES met the Scoping Requirements. Whether the Scoping Requirements required the EES to have considered the costs and benefits of undergrounding options in more detail were matters for the Minister in deciding whether the EES was suitable to be authorised for exhibition.

Alternative routes

The IAC's task does not extend to considering alternative routes that go beyond the area of interest. Those would be different projects to that described in the EES. The IAC has therefore not considered submissions that called for the Project to be realigned outside

the area of interest. This includes the alternative project alignments discussed in EES Attachment I, which are outside the area of interest.

Cost benefit analysis and triple bottom line assessment

The IAC does not consider the EES required a full cost benefit assessment of or a triple bottom line assessment of the Project, for the reasons set out in Chapter 9.2.

3.2 Renewable energy legislation and policy

EES Chapter 2 (Project rationale) provides an overview of the legislative and policy context for the Project, including a discussion of the Project's contribution to the National Electricity Market and relationship to the Western Victoria Renewable Energy Zone (REZ).

The Proponent provided further background information in submissions and relied on the evidence of Mr Bolt (D109) about how the Project related to national and State climate change and energy commitments. Mr Bolt described how the Project would contribute to mitigating climate change by providing transmission capacity to enable the growth of wind and solar power.

The Proponent also relied on Mr Milner's evidence (D107) that described the land use planning framework for renewable energy infrastructure including recent planning scheme amendments that implemented Plan for Victoria 2025, the 2025 Victorian Transmission Plan and recent changes to the *Climate Change Act 2017*. Mr Milner concluded that the policy framework provided strategic justification for the Project.

VicGrid provided an overview of the policy context, the National Electricity Market, the energy transition and the Victorian Transmission Plan (D176).

While some submitters acknowledged the policy context for climate change action, others were generally critical of renewable energy policies and related infrastructure plans, including the Project. Some argued the Project was unnecessary or ill-conceived.

The IAC is satisfied the Project is consistent with renewable energy legislation and policy and that submissions about the merits of this framework are not relevant to the IAC's assessment of the Project.

3.3 Consultation on project development

The IAC received many submissions about the adequacy of the consultation undertaken by the Proponent during project development. Submitters were strongly of the view that the consultation had been entirely inadequate. They described it as disrespectful, hollow, tokenistic, disingenuous and oriented toward justifying predetermined outcomes (including the route selection and the overhead option), rather than really listening to and considering community input. One submitter described the consultation as "*a process in which engagement existed, but influence did not*".

Many submitters described early consultation sessions at which the community was asked to identify significant places and features in the area, including through the Project's Social Pinpoint online mapping tool (pin data). They said Proponent representatives were seen throwing notes from the consultation sessions in the bin, and the pin data was ultimately ignored in selecting the Proposed Route. Submitters

asserted that the flaws in the Proponent's consultation process had resulted in a collapse of trust between the Proponent and the community, and an erosion of confidence in institutions including the State Government and VicGrid.

The IAC's task is to assess the acceptability of the likely environmental effects of the Project, not the shortcomings of the consultation process. While these can be difficult to disaggregate (particularly in relation to social impacts), the community's strong dissatisfaction with the consultation process and outcomes to date are not impacts of the Project.

That said, the consultation process to date has resulted in significant distrust between the Proponent and the community. This is likely to influence the potential or capacity for the community to positively engage with the Project in future. This has the potential to increase the social impacts of the Project, and to influence the effectiveness of many of the EPRs, which require landowners and other stakeholders to have ongoing engagement with the Project. These issues are explored in Chapter 13.

The IAC process afforded extensive opportunities to the community to be heard, both by making submissions on the EES and by participating in the Hearing. Through the many community submissions received, the IAC has been able to develop a good understanding of the environmental, scenic, economic and cultural qualities in the area surrounding the Proposed Route that are of value to the community, and their concerns in relation to the Project's impacts on those values.

3.4 Desktop analysis

Several submitters raised concerns that the Technical Reports were based largely on desktop analysis and not on proper field work. The Proponent, and the experts who appeared before the IAC who authored the Technical Reports, explained that in many cases access to private land had been sought and denied. This limited the extent of field work that the Proponent's technical advisers were able to undertake.

The extent of fieldwork may not have been sufficient to inform an assessment of the Project's impacts on every directly affected landholder or near neighbour. However it is not the purpose of an EES to assess impacts on individuals. Its purpose is to assess impacts at a community level, and on the environment. On the whole, the IAC is satisfied the amount of fieldwork undertaken for the Technical Reports was adequate to gain a general understanding of the area surrounding the Proposed Route, its physical features, land uses, landscape values and other opportunities and constraints. This was generally sufficient to inform an assessment of the Project's impacts on the environment, and its impacts at a community level.

The extent of fieldwork is further discussed in the relevant issue chapters in Part B.

PART B: ENVIRONMENTAL EFFECTS

4 Biodiversity

4.1 Introduction

The evaluation objective is:

> Avoid, and where avoidance is not possible, minimise potential adverse effects on protected native vegetation and animals (particularly listed threatened species and their habitat and listed ecological communities), as well as address offset requirements consistent with state and Commonwealth policies.

Biodiversity effects are assessed in:

- EES Chapter 8 Biodiversity and Habitat
- EES Chapter 27 Matters of National Environmental Significance
- EES Technical Report A Biodiversity Impact Assessment (BIA)
- EES Attachment V Offset Management Strategy.

The exhibited EMF included the following EPRs:

- BD1 Complete ecological surveys and finalise design
- BD2 Develop and implement a Vegetation Management Plan
- BD3 Develop and implement a Fauna Management Plan
- BD4 Develop and implement Threatened Fauna Management Plans
- BD5 Develop and implement a Collision Risk Management Plan
- BD6 Develop and implement measures to manage riparian and aquatic habitat
- BD7 Develop and implement an Operational Vegetation and Habitat Management Plan
- BD8 Complete ecological surveys and finalise design for TEC – White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland.

Table 7 lists the experts providing evidence on biodiversity effects.

Table 7 Evidence on biodiversity effects

Party	Expert	Firm	Expertise	Document number
Proponent	Brett Lane	Nature Advisory	Biodiversity	D122
Proponent	Andrew Stephens	Jacobs Group	Biodiversity	D123, D124

The Proponent provided the following Technical Notes:

- TN02 – Vegetation Risk Clearance Footprint, Partial Clearance and Darley Vegetation Removal (D128)
- TN09 – Further Avoidance and Minimisation of Biodiversity Impacts (D278).

Other key documents are:

- Biodiversity Report 1 on Ecological Surveys Required by EPR BD1 (the 'BD1 Report') (D49)
- Updated Draft Offset Management Strategy (D50)
- Independent peer review of BIA (D53)
- EPBC Act Offsets - Quality of impacted area (D658).

The IAC has had regard to relevant legislation, policy and guidelines, including:

- Commonwealth legislation, policy and guidelines
  - EPBC Act
  - Matters of National Environmental Significance - Significant impact assessment guidelines 1.1
  - EPBC Act Environmental Offset Policy
- Victorian legislation, policy and guidelines
  - *Flora and Fauna Guarantee Act 1988* (FFG Act)
  - *Wildlife Act 1975*
  - *Water Act 1989*
  - *Catchment and Land Protection Act 1994*
  - *Fisheries Act 1995*
  - *Heritage Rivers Act 1992*
  - *Guidelines for the removal, destruction or lopping of native vegetation* Version 1.1 (August 2025) (the Native Vegetation Guidelines).

4.2 Methodology

(i) Key issue

The key issue is:

- whether the methodology of the BIA (specifically field work) was appropriate.

(ii) What did the EES say?

The BIA was based on:

- desktop studies, including reviews of public databases, publications by local councils and Catchment Management Authorities (CMAs), and remote-sensed data
- consultation with regulatory authorities and key stakeholders
- reviewing community data including pin data
- field surveys, including general field surveys and targeted surveys for selected flora and fauna groups and species.

Field surveys

Field surveys were completed for 67 percent of the Project Area. Nine percent of the Project Area did not require field survey because the use of the land (such as cropping and quarries) does not support biodiversity values. Where field surveys were required but access was unavailable, desktop sources were used to undertake habitat and native vegetation mapping. A conservative approach was taken for the unsurveyed areas, by assuming the potential presence of native vegetation, Threatened Ecological Communities (TECs) and threatened species habitat.

BD1 Report

The BD1 Report presents the results of work undertaken by the Proponent's biodiversity consultant after the completion of the EES to address the requirements set out in the exhibited version of EPR BD1. It includes:

- revised assessments of biodiversity impacts based on the results of additional field surveys and refinement of the Project description

- recalculated offset requirements based on the revised assessment.

The additional field surveys were completed between July 2024 and May 2025 (when additional land access was provided), increasing the total area that has been fully assessed from 76 percent of the Project Area (67 percent surveyed and 9 percent not requiring assessment) to 79 percent.

Independent peer review

The independent peer review stated the biodiversity assessments in Technical Report A were generally sound. It noted ground-based survey of the land parcels that could not be accessed will be required to confirm the Project's overall impacts and offset requirements.

(iii) Evidence and submissions

Mr Lane, who undertook the independent peer review of the BIA, advised that:

- the BIA comprehensively addressed the applicable Victorian and Commonwealth regulatory frameworks
- the review of available information on biodiversity was comprehensive
- the 'likelihood of occurrence' findings were comprehensive and based on conservative assumptions
- the field survey methods met regulatory guidelines
- the desktop method used to assess inaccessible land was valid and conservative
- the biodiversity information in the EES is as complete as possible and sufficient to inform the EES.

Many submitters (including Moorabool and Pyrenees Councils) were critical of the gaps in the field surveys, submitting the BIA was inadequate because of insufficient spatial coverage of the field surveys and inadequate field assessment for some species. Moorabool Council submitted that *"Once further and/or detailed studies are eventually undertaken, they may reveal matters that necessitate changes to the Proposed Route, design or siting of infrastructure"*. Some submitters argued that all the field surveys should have been completed prior to the EES being completed. The Blampied Kooroocheang Landcare Group submitted the EMF and Incorporated Document should require all outstanding ecological surveys across the full project area to be completed prior to any vegetation removal or commencement of construction.

Mr Stephens gave evidence that the gaps in the field surveys were due to property access being denied. A method based on desktop information was applied to the unsurveyed areas, similar to the approach taken on other large projects with challenging access, such as the Melbourne Strategic Assessment. Mr Stephens advised the area of native vegetation loss calculated in the EES was a worst case scenario based on a conservative assessment methodology.

Mr Lane was satisfied that the method was appropriate and "*represents the next best assessment to a field visit and its conservative assumptions inherently address the precautionary principle*". He advised that while this is not an ideal situation, EPR BD1 requires completion of the field surveys prior to the finalisation of the detailed design.

Mr Stephens advised field surveys will continue to be conducted in accordance with EPR BD1 as access to the land becomes available. He noted some areas, such as cropping land, quarries and existing roads, did not require surveys, as they do not support biodiversity values.

DEECA was satisfied impacts to native vegetation were assessed in the EES and BD1 Report in accordance with the Native Vegetation Guidelines using both field data and modelled data. It "*supported the use of modelled data and indirect assessment methods where site access was not achievable*", and noted the methods for assessing native vegetation loss to date have been informed by and supported by DEECA.

(iv) Discussion

The IAC accepts the evidence of Mr Stephens and Mr Lane that the native vegetation assessment in the EES and BD1 Report is adequate for the current stage of the Project. It notes that 79 percent of the Project Area has been fully assessed (either surveyed or no survey required). The methodology based on desktop studies and modelling used for the other 21 percent is a reasonable and conservative approach that complies with the Native Vegetation Guidelines. It is a common approach used in other studies with constraints on access. Field surveys must be completed in accordance with EPR BD1 prior to the finalisation of the detailed design.

The IAC considers that EPR BD1 adequately sets out the outstanding ecological survey requirements and does not agree with Blampied Kooroocheang Landcare Group that any further requirements need to be set out in the EMF or Incorporated Document.

(v) Findings

The IAC finds:

- The methodology in the BIA was appropriate.
- The extent of field work undertaken to date is sufficient for this stage in the approval process, noting that field surveys will be fully completed before finalisation of the detailed design.

4.3 Native vegetation impacts

(i) Key issues

The key issues are whether:

- native vegetation impacts are acceptable
- the route selection appropriately avoided and minimised native vegetation impacts
- the EPRs and other mitigation strategies are appropriate, including the 'partial clearance' and 'minimised risk clearance' approaches outlined in TN02.

(ii) What did the EES say?

The Project requires native vegetation removal for transmission tower construction and to provide required clearances under the conductors to comply with the *Electricity Safety Act 1998* (Vic). The electrical safety statutory framework includes comprehensive

vegetation management requirements that will apply in the easement throughout the operations phase, to minimise bushfire risk.

The BIA assumed vegetation greater than three metres high will be removed to comply with electrical safety requirements and vegetation between one and three metres high would be managed to limit density to manage potential fuel hazards and bushfire risks.

The route selection and refinement process sought to avoid large contiguous areas of native vegetation by avoiding national parks and conservation areas, co-locating the Project with an existing 200 kilovolt transmission line within the Lexton Bushland Reserve, and avoiding other areas with important biodiversity values. Transmission towers and access tracks were located to avoid wetland and riparian areas, patches of native grassland and known nesting trees.

Existing native vegetation in the Project Area was mapped based on desktop studies (including DEECA modelling) and field surveys in accordance with the Native Vegetation Guidelines. Where survey access was not available, the assessments applied a conservative approach to the interpretation of modelling and remote-sensed data. The field surveys (including those to be completed under EPR BD1) will be used to inform micro-siting and no-go zones.

Based on the construction footprint in the EES, a total of 238.607 hectares of native vegetation and 991 large trees will be lost. This is a conservative estimate, based on the assumption that all vegetation within the easement will be directly impacted, whereas in practice not all areas will need to be cleared. Native vegetation offsets must be in place prior to the removal of any native vegetation.

Mr Stephens advised that the GIS layers used for the assessments of vegetation loss in the EES and BD1 Report were based on:

- the removal of vegetation in the easement corridor if it was more than four metres in height (rather than three metres as stated in the EES and BD1 Report)
- thinning for fuel load reduction if greater than two metres in height (rather than one metre as stated in the EES and BD1 Report).

BD1 Report

The BD1 Report presented a more refined assessment of native vegetation losses. It shows a smaller total area of native vegetation loss than the BIA but greater impact on large trees (Table 8). The reasons for the difference are because the BD1 Report:

- incorporated additional field survey data
- incorporated 'no go zones' in the easement corridor construction footprint, reducing the footprint from 1,614 to 1,389 hectares
- assessed impacts to Notional Root Zones and canopy associated with the construction footprint.

Table 8 Project impact to native vegetation comparing the EES and BD1 Report

Native vegetation impacts	BD1 Report totals	Exhibited Biodiversity IA
Patches	173.26ha	229.71ha
Large canopy trees in patches	1000	844

Scattered trees	Large	172	147
	Small	94	66
Total Native Vegetation Removal Report Area[2]		**186.264ha**	**238.607ha**

Source: Table ES-1. Project impact to native vegetation - BD1 Report

Independent peer review

The independent peer review (authored by Mr Lane) raised several issues, some of which were addressed to Mr Lane's satisfaction through revisions to the BIA prior to the EES exhibition. Others were addressed through additional documentation including:

- the BD 1 Report (assessment of Notional Root Zone Impacts)
- TN02 (explanation of partial clearance method)
- Day 1 EPRs (amendment to BD2 to address Melbourne Yellow Gum impacts, and a new EPR BD9 to address understorey impacts).

(iii) Evidence and submissions

Many submitters expressed concern about impacts on native vegetation, including:

- failure to meet the 'avoid and minimise' principle in the evaluation objective
- impacts on native vegetation, including loss of iconic old-growth Eucalypts, Buloke Woodlands, Grey Box–Red Gum Grassy Woodlands, and Riverine Swamp Woodlands
- effects of disturbance, including weed introduction and spread, and soil-borne diseases
- increased erosion due to vegetation removal
- impacts on biolinks and biodiversity corridors, including habitat loss and fragmentation.

Extent of impacted vegetation

The Councils (including Melton, Moorabool and Pyrenees Shire) expressed concern about native vegetation loss within their municipalities.

Mr Stephens noted the BD1 Report generally supported the BIA, with the refined assessment showing:

- an increase in impacts to large patch trees and scattered trees, but a decrease in patch impacts
- overall, a decrease in total vegetation impacts
- no notable change in the significance of the impact to biodiversity values.

Mr Lane advised that although the extent of proposed native vegetation removal is significant across the whole Project Area, it is comparatively limited relative to the extent of the construction footprint. DEECA submitted "*the overall level of impact is proportionate to the scale and nature of the Project*".

Route selection

Mr Stephens and Mr Lane advised the route selection process avoided large vegetated and protected areas, including the Wombat-Lerderderg National Park, Werribee Gorge State Park, Long Forest Flora and Fauna Reserve, Creswick Regional Park, Pyrenees

Range State Forest, Mt Beckworth Scenic Reserve and Ben More Bushland Reserve. Mr Stephens and Mr Lane advised 20 percent of the Project Area contains native vegetation and much of the route is in areas of lower strategic biodiversity values with scattered patches of native vegetation.

Mr Lane confirmed much of the development footprint has been sited in agricultural land and much of the affected native vegetation is lower quality vegetation due to past disturbances. He advised the exceptions are in three bushland areas (Lexton Bushland Reserve, Haydens Hill and the Darley to Long Forest area). The majority of Project infrastructure avoids major habitat areas such as state forests and bushland reserves. He considered the Project design and route selection clearly demonstrated avoidance and minimisation along most of the route.

In answer to a question from the IAC, the Proponent explained that avoidance of high biodiversity value areas during route selection was based on the public conservation estate. It did not consider the private conservation estate (such as land subject to Trust for Nature covenants). However, the Project Area does not include any land subject to a Trust for Nature conservation covenant.

DEECA endorsed the route selection, submitting:

> … the Proponent has made significant efforts through the route selection process to avoid areas of high biodiversity and ecological value along the Proposed Route. DEECA's position is that there is unlikely to be an alternative alignment that would further minimise biodiversity impacts, including the loss of native vegetation, without undermining the objectives of the proposed use and development

Mitigation measures

Mr Stephens and Mr Lane advised there are notable impacts to areas of native vegetation at Lexton, Haydens Hill and Darley to Long Forest, which represent a substantial proportion of the Project's overall biodiversity impact. These areas were of particular focus for the application of mitigations through EPRs and other strategies such as the modified clearance approaches for meeting electrical and fire safety requirements at key locations, outlined in TN02.

Mr Stephens and Mr Lane confirmed potential impacts on native vegetation have been minimised through:

- locating construction and operational access, laydown areas and tower sites to reduce impacts
- no go zones
- modified clearance approaches.

Mr Stephens advised that even standard Project-wide electrical safety vegetation clearance should be undertaken sensitively and non-target native vegetation retained within the easement. He advised that retention of native vegetation (so far as possible) can be complemented with habitat replacement measures such as rope bridges, glider poles, hollow salvage, nest boxes and log salvage, to help mitigate habitat loss and fragmentation.

In TN02 the Proponent provided more information in relation to two modified clearance approaches, 'partial clearance' and 'minimised risk clearance'.

'Partial clearance' requires trees greater than four metres high to be removed but allows the full understorey to be retained. It was proposed for the following locations (and was applied in the EES and BD1 Report assessments at these locations):

- south of the Wombat-Lerderderg National Park at Darley
- south of Haydens Hill
- southwest of Lexton.

'Minimised risk clearance' further reduces vegetation loss by determining maximum permitted vegetation heights based on detailed consideration of the terrain, allowing taller trees to remain in deeper valleys. The Proponent submitted this approach is not routinely justified due to operational complexities. However it proposes this approach in the Darley to Long Forest area, where it would greatly reduce vegetation loss.

In response to evidence and submissions in relation to the importance of understorey vegetation, the Proponent included a new EPR BD9 (Understorey retention plan) in the Day 1 EMF to clarify the obligations in relation to understorey retention.

Mr Lane advised it might be possible to further reduce biodiversity impacts in key parts of the easement by increasing tower heights. The Proponent undertook further investigations to determine the feasibility of doing this, and the results are presented in TN09.

TN09 showed that subject to a fire risk assessment, it might be possible to significantly reduce or avoid vegetation removal at Lexton and Haydens Hill by applying a minimised risk clearance approach together with higher towers. This was reflected in a new (Day 1) EPR BD10. The Proponent subsequently undertook additional fire risk assessment for the Haydens Hill and Lexton areas, which showed that the approach outlined in TN09 would result in:

- manageable fire risk at the Lexton Bushland Reserve
- unacceptable fire risk at Haydens Hill.

The approach was not feasible at Haydens Hill because the vegetation in that area is currently immature and flame height modelling demonstrated it will generate unacceptable flame heights when the vegetation reaches full height.

On that basis, the Proponent indicated it is continuing to investigate the feasibility of retaining more vegetation at the Lexton Bushland Reserve, but would not further investigate options to retain more vegetation in the Haydens Hill area. The Day 3 version of EPR BD10 was modified to reflect this.

Mr Stephens' evidence was that the 'partial clearance' approach would benefit:

- understorey flora, including FFG listed Fragrant Saltbush, Bacchus Marsh Wattle and Brittle Greenhood
- fauna that use understorey shrubs such as woodland birds, including threatened species
- fauna that use ground level habitat such as the FFG listed Brown Toadlet
- fauna that move across the landscape at ground level such as the FFG listed Brush-tailed Phascogale
- FFG and EPBC listed Grey-headed flying fox.

He gave evidence that the bespoke 'minimised risk clearance' approach proposed for Darley will provide benefits through:

- retaining FFG listed Fragrant Saltbush (more than 2000 individuals), Bacchus Marsh Wattle (more than 350 individuals), Melbourne Yellow Gum (more than 700 individuals) and Austral Tobacco (more than 200 individuals)
- minimising impacts to habitat or potential habitat for the FFG listed Brush-tailed Phascogale and Brittle Greenhood.

DEECA submitted it had worked with the Proponent to identify areas where the retention of understorey would offer the highest value, such as the Lexton Bushland Reserve, but encouraged the Proponent to look at additional opportunities to apply the proposed mitigations. DEECA was satisfied with the mitigation measures outlined in TN02 and TN09.

Ballarat Council submitted the results from monitoring in relation to EPR BD2 (Construction Vegetation Management Plan) should be made publicly available in real time or close to real time. The Proponent responded that this is not necessary, as monitoring data will be reviewed by the Independent Environmental Auditor and the audit summary reports will be made publicly available.

(iv) Discussion

While the IAC acknowledges the concerns expressed by many submitters regarding native vegetation loss, it is satisfied that the Proponent has made reasonable efforts to avoid and minimise native vegetation loss through route selection and refinement, and the mitigation measures in the EMF and the partial and minimised risk clearance approaches outlined in TN02 and TN09.

The greatest impacts on native vegetation will occur at Lexton, the Darley to Long Forest area to the south of the Wombat-Lerderderg National Park and the Haydens Hill area. The modified clearance approaches outlined in TN02 and TN09 (if they can be implemented) would mitigate some of these impacts.

EPR BD10 (Day 3 version) requires further investigation of the partial clearance approach in the Lexton Bushland Reserve area, which the IAC supports. It does not require further investigation in the Darley area or the Haydens Hill area.

The implementation of the bespoke minimised risk clearance approach at Darley is subject to ESV approval. TN02 indicated modelling of fuel density and flame height was conducted to confirm that fire risks associated with the fuel load below the transmission line would be acceptable. However the bespoke clearance approach at Darley will require ESV approval, and there is no guarantee that ESV approval would be granted. The IAC considers the bespoke clearance approach in Darley may require further investigation from a fire risk perspective. It recommends EPR BD10 be modified to reflect this.

Partial clearance would provide benefits in terms of reduced impacts on native vegetation at Haydens Hill, but the modelling of flame heights around Haydens Hill with the retained vegetation at full maturity demonstrates an unacceptable fire risk. The policy framework requires priority to be given to the protection of human life from

bushfire risk over other considerations. On this basis, the IAC accepts that further investigation of a partial clearance approach at Haydens Hill is not warranted.

DEECA encouraged the Proponent to look at additional opportunities to apply the proposed understorey retention approach outlined in EPR BD9 along the Proposed Route. The IAC supports this, and considers that a similar approach should be adopted for investigations into the partial clearance approach. There are other areas of high biodiversity value along the Proposed Route discussed in this Chapter where a partial clearance approach could deliver additional biodiversity benefits, and the IAC recommends changes to EPR BD10 to reflect this.

The IAC is satisfied that the residual amount of native vegetation loss assessed in the BIA and BD1 Report is proportionate to the scale of the Project. With the implementation of the Day 1 biodiversity EPRs and the further changes recommended by the IAC (including further investigations into partial clearance approaches), the IAC is satisfied that residual impacts to native vegetation are generally acceptable. Offsets will be required to vegetation that is lost. See Chapter 4.8 for further discussion of offsets.

The IAC agrees with the Proponent that provision of real time monitoring data in relation to EPR BD2 is not required.

(v) Findings and recommendations

The IAC finds:

- Native vegetation impacts have been appropriately avoided and minimised, and are acceptable subject to implementation of the IAC's recommended EPRs.
- Native vegetation offsets will be required to address residual losses, as discussed in Chapter 4.8.

The IAC recommends:

Environmental Management Framework

Include the following changes:

- Amend EPR BD10 to require further investigation of the partial clearance approach in other areas of higher biodiversity value (other than the Lexton Bushland Reserve area), including the Darley area and other areas identified by the IAC in this Report.
- Amend EPRs BD1, BD2, BD6, BD7 and BD9 to reflect the IAC's recommended changes to EPR BD10.

4.4 Collision risk

(i) Key issue

The key issue is:

- whether the risks of fauna collisions, particularly Brolga and Wedge-tailed Eagle, have been appropriately minimised and are acceptable.

(ii) What did the EES say?

The presence of the towers and conductors in the landscape has the potential to create collision and electrocution hazards for some bird and bat species.

The BIA presented a collision and electrocution risk assessment for 18 bird and bat 'species of interest' that occur in the Project Area. It assessed collision risk for these species on a four-point scale, identifying:

- no species with an 'extreme' level of concern
- three species of 'concern' (Wedge-tailed eagle, Black Swan, White-bellied sea eagle)
- nine species of 'mild 'concern (Brolga, Australian Pelican, Fork-tailed Swift, Little Eagle, Magpie Goose, Square Tailed Kite, Swift Parrot, White Throated Needletail and Grey-Headed Flying Fox)
- six species of 'minimal' concern (Black Falcon, Bush Stone-curlew, Chestnut-rumped Heathwren, Grey Goshawk, Musk Duck and Painted Honeyeater).

Project-related collision risks are unlikely to have population level impacts on any species occurring in the Project Area but effects on individual birds and bats are possible. This risk will be addressed through a Collision Risk Management Plan as set out in EPR BD5, applied within the key collision risk areas shown in Figure 8-1 of the BIA. The key collision risk areas are associated with proximity to preferred bird habitat (such as wetlands, forested areas, feeding sites). Mitigation measures include larger diameter ground wires above conductors (to increase visibility) and vertical line marking ('bird flappers').

(iii) Evidence and submissions

Mr Stephens gave evidence that collision risk with transmission lines is not well documented in Australia. He said the collision risk assessment was based on available literature. The collision risk assessment and proposed mitigation measures are consistent with the *Handbook for the development of renewable energy in Victoria: Guidance to avoid, minimise, mitigate and compensate for impacts on threatened bird and bat species* (DEECA 2025) (the Handbook).

Many submitters expressed concern about powerline collision risks, including for Brolgas, Black Swan, raptors (especially Wedge-tailed Eagles), migratory birds and bats. Mr Stephens and Mr Lane gave evidence confirming collision risks would be adequately mitigated through the mitigation measures proposed in the EES. Mr Lane advised that taller towers would also be beneficial for reducing collision risk, because most bird flight paths are less than 40 metres above ground level.

The Hepburn Lagoon area was a key area of concern in relation to Brolga. Hepburn Council submitted the Project poses a risk of local extinction of the small population of Brolga in the Shire. It cited the Handbook, which states:

> 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.

DEECA submitted the area between Hepburn Lagoon and Lexton presented the highest collision risk to Brolga. DEECA supported the requirement in EPR BD05 to install bird flappers in the areas of highest collision risk.

Mr Stephens and Mr Lane considered the Project is unlikely to have a material impact on Brolga. They advised collision by Brolgas is unlikely to occur frequently because Brolga tend to fly at or just above tree height, which is below the height of the proposed transmission lines. They noted the Project Area is outside the two main areas where Brolga occurs in Victoria.

Many submitters expressed concern about collision risks to Wedge-tailed Eagle. Hepburn Council submitted the findings of a Tasmanian study on Wedge-tailed eagles and powerline strike[2] should be considered in detail. Mr Stephens provided detailed commentary on this paper in his evidence, advising the paper (published after the EES biodiversity assessment was completed) proposes a model based on GPS tracking data to prioritise locations for collision risk mitigation. A similar model could not be developed for the Project due to the unavailability of GPS tracking data for relevant species.

Moorabool Council expressed particular concern about collision risk in the vicinity of the Wombat-Lerderderg National Park, where birds and bats moving between the National Park and surrounding land will need to cross the Project alignment.

DEECA noted the EES identified Magpie Goose as having a moderate likelihood of occurrence in the Project Area and may use inundated areas during floods. It submitted that, like Brolga, collision risk was relevant to Magpie Goose, and the use of bird flappers as required by EPR BD5 would be appropriate.

The Proponent's Day 3 version of EPR BD5 proposed insertion of a provision for data collected as part of the carcass monitoring plan to be reviewed annually to confirm the ongoing requirements for carcass monitoring.

The Blampied Kooroocheang Landcare Group and Ballarat Council submitted the results from the carcass monitoring plan should be reported publicly. Ballarat Council submitted reporting should be in real-time or close to real time. The Proponent responded that this is not necessary, as monitoring data will be reviewed by the Independent Environmental Auditor and the audit summary reports will be made publicly available.

(iv) Discussion

The IAC notes there is significant community concern regarding collision risk, particularly for large birds such as Brolga and Wedge-tailed Eagle. It accepts the advice of Mr Stephens and Mr Lane that the collision risk assessment in the EES was appropriate but constrained by the limited Australian literature about collision risk.

It also accepts the advice of Mr Stephens and Mr Lane that collision risks can be acceptably mitigated through EPR BD5, which requires the development and implementation of a Collision Risk Management Plan in consultation with DEECA. Given the limited information about collision risk available for the preparation of the EES, it is important that the Collision Risk Management Plan be informed by the current state of knowledge regarding collision risk. The Pay et al. paper cited by Hepburn Council indicates collision risk is an active area of research.

[2] Pay et al ('Fine-scale spatial risk models to predict avian collisions with power lines').

The map of key collision risk areas (BIA, Figure 8-1) reflects the key areas of concern raised by submitters including Hepburn and Moorabool Councils.

The IAC notes community concerns regarding collision risk for Brolga in the Hepburn Lagoon area. It notes the Hepburn Lagoon area is a priority area for the Collision Risk Management Plan (EPR BD5), reflecting the importance of this area for Brolga.

The carcass monitoring plan proposed in EPR BD5 should extend over a period of several years that span a representative range of climatic conditions, to ensure monitoring accounts for variations in bird movements. The carcass monitoring plan should be reviewed periodically, taking into account the effects of climatic variability on bird and bat movements, rather than annually, to confirm the ongoing requirements for carcass monitoring. This addition is included in the IAC's recommended EMF.

Given the high degree of public interest in collision risk and the limited Australian information available regarding collision risk, the IAC agrees with the Blampied Kooroocheang Landcare Group and Ballarat Council that the results of the carcass monitoring should be published in a timely manner. EPR BD5 should be amended to require annual public reporting of the carcass monitoring results.

(v) Finding and recommendation

The IAC finds:

- The EES has appropriately assessed collision risks, which can be satisfactorily mitigated through EPR BD5 as amended by the IAC.

The IAC recommends:

Environmental Management Framework

Include the following change:

- Amend EPR BD5 to require:
  - annual publication of the results of the carcass monitoring program
  - periodic review of the carcass monitoring plan taking into account the effects of climatic variability on bird and bat movements.

4.5 Threatened species and ecological communities

(i) Key issues

The key issues are:

- impacts on TECs, in particular the EPBC listed:
  - Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia (GBGW)
  - Natural Temperate Grassland of the Victorian Volcanic Plain (NTGVVP)
  - White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (WYRGGW)
- impacts on threatened flora species, in particular the FFG listed:
  - Melbourne Yellow Gum
  - Brittle Greenhood
- impacts on threatened fauna species, in particular the EPBC and FFG listed:

- Golden Sun Moth
- Striped Legless Lizard
- Victorian Grassland Earless Dragon
- Southern Greater Glider.

(ii) What did the EES say?

The Project has the potential to impact threatened species and communities, including by:

- direct removal of vegetation
- habitat loss, alteration and fragmentation
- disturbance of fauna associated with electric and magnetic fields
- collision risk for fauna.

The BIA assessed the presence of threatened flora and fauna species and TECs based on biological databases, habitat mapping and targeted field surveys. Not all land parcels were accessible during the field surveys. As previously noted, a conservative approach was taken to the unsurveyed areas, by assuming habitat to be present if indicated by the desktop studies.

The EPRs include measures to mitigate impacts, including Threatened Fauna Management Plans (EPR BD4), other measures to protect biodiversity, and measures to manage construction noise and dust, biosecurity, and maintain appropriate setbacks from waterways.

Threatened ecological communities

Residual impacts are predicted on three EPBC listed TECs, including:

- a 'high' residual impact on GBGW
- a 'moderate' residual impact on NTGVVP
- a 'moderate' residual impact on WYRGGW (if present).

The Project may have:

- a 'moderate' residual impact on three FFG Act listed TECs:
  - Creekline Grassy Woodland (Goldfields) Community
  - Rocky Chenopod Open Scrub Community
  - Western (Basalt) Plains Grasslands Community
- a 'low – moderate' residual impact on three FFG Act listed TECs
  - Grey Box - Buloke Grassy Woodland Community
  - Victorian Temperate Woodland Bird Community (habitat)
  - Western Basalt Plains (River Red-gum) Grassy Woodland.

Threatened flora species

Six EPBC Act listed threatened flora species may occur in the Project Area, although none were recorded in the field surveys. The BIA assessed 'moderate' impact on Swamp Fireweed and 'low-moderate' impact on Matted Flax-lily and Small Golden Moth Orchid. Matted Flax-lily and Small Golden Moth Orchid are also listed under the FFG Act.

Forty three threatened flora species listed solely under the FFG Act may occur in the Project Area. The BIA assessed:

- 'high' residual impacts for Brittle Greenhood and Melbourne Yellow Gum

- 'moderate' residual impacts for Buloke, Brookers Gum, Yarra Gum, Bacchus Marsh Wattle, and Fragrant Saltbush
- 'low-moderate' residual impacts for Cane Spear-grass, Floodplain Fireweed and Glaucous Flax-Lily.

Threatened fauna species

Fifteen EPBC Act listed threatened fauna species may occur in the Project Area. The BIA assessed:

- 'moderate' residual impacts for Golden Sun Moth, Striped Legless Lizard and Victorian Grassland Earless Dragon
- 'low-moderate' residual impacts for Growling Grass-Frog, Blue-winged Parrot, Brown Treecreeper, Diamond Firetail, Gang Gang Cockatoo, Hooded Robin, Swift Parrot, Southern Greater Glider and Grey Headed Flying-fox.

Twelve of the 15 EPBC Act listed threatened fauna species that may occur in the Project Area (including 10 of the 12 with 'low-moderate' or greater residual impacts) are also listed under the FFG Act.

Twenty six threatened fauna species listed solely under the FFG Act may occur in the Project Area. The BIA assessed:

- 'moderate' residual impacts for Tussock Skink
- 'low-moderate' residual impacts for Brown Toadlet, Barking Owl, Masked Owl, Powerful Owl, Square-tailed Kite, White-bellied Sea Eagle, Western Burrowing Crayfish, Brush-tailed Phascogale, Fat-tailed Dunnart, and Platypus.

BD1 Report

The BD1 Report updated the areas of habitat for TECs and threatened flora and fauna species that would be impacted by the Project, with impacted areas decreasing for some values and increasing for others. The significance of impacts to EPBC Act and FFG Act listed threatened species and TECs remained consistent with the EES.

(iii) Evidence and submissions

Mr Stephens gave evidence of examples where an 'iterative avoidance' approach was used to avoid impacts on threatened species, including route modifications at:

- the Kingston Stock Route, to avoid an area of EPBC listed NTGVVP TEC
- the Moorabool River East Branch, to avoid a Powerful Owl nesting tree
- the Long Forest Merrimu area, to avoid most of the biodiversity impacts on the Long Forest Flora and Fauna Reserve
- Haydens Hill, to reduce overall native vegetation loss and avoid Brookers Gum, Melbourne Yellow Gum, Yarra Gum and high quality habitat for Greater Glider.

Mr Lane gave evidence that:

> … notwithstanding access limitations, that the assessment was comprehensive in its coverage (desktop information and field assessments) of EPBC Act- and FFG Act-listed matters (flora and fauna species, and listed threatened communities), as well as thorough and precautionary in assessing the impacts and risks to biodiversity.

Mr Lane was satisfied the EPRs were generally detailed and comprehensive and provided the means to avoid impacts on TECs and threatened species where feasible.

DEECA submitted it was satisfied that for FFG Act listed threatened species and communities:

- the species identified in the EES and BD1 Report reflect the species most likely to be present in the Project Area
- potential impacts of the Project on threatened species and communities were adequately considered
- the Day 1 EPRs set out appropriate mitigation measures for impacts on threatened species and TECs.

Threatened ecological communities

Mr Lane gave evidence confirming impacts to TECs were appropriately identified in the EES as likely to be significant for EPBC listed NTGVVP and GBGW, and advised further surveys showed that EPBC listed WYRGGW is also likely to be significantly impacted. He advised the impacted areas of these communities are very small compared to their remaining extent in Victoria.

Ballarat Council expressed concern about impacts on NTGVVP. It submitted EPR BD2 should be amended to insert a requirement to "*collect seeds from the critically endangered NTGVVP within the Project Area and use in revegetation and remediation for the Project*". The Proponent disagreed, arguing that this community "*is listed under the EPBC Act and will be addressed in any approval issued under the EPBC Act.*"

DEECA identified impacts on the following two FFG listed communities as being of greatest concern:

- Rocky Chenopod Open Scrub Community
- Victorian Temperate Woodland Bird Community.

However, it submitted it was satisfied that mitigation measures in the updated EPRs, including understorey retention, would adequately address Project impacts.

Threatened flora

Many submitters expressed concern about impacts on threatened flora, particularly in the Darley-Coimadai-Lerderderg corridor and at Dean, Gordon and Newlyn. The Blampied Kooroocheang Landcare Group and Bald Hills Creswick Landcare Group both expressed concern about impacts on Yarra Gum. Bald Hills Creswick Landcare Group requested the opportunity to document each Yarra Gum that is to be removed in their local area, and to collect seed before trees are removed, to maintain local genetic diversity.

DEECA identified Melbourne Yellow Gum and Brittle Greenhood as the threatened flora species of most concern and made submissions regarding additional mitigations to further reduce potential impacts on these species, which have been reflected in the Proponent's Day 1 amendments to the EPRs.

Mr Stephens gave evidence that EPBC listed threatened flora species were not recorded in the Project Area but may be present in areas yet to be surveyed. If present, avoidance by micro-siting is likely to be possible. He advised the Proposed Route had been revised in the Haydens Hill area to avoid large populations of FFG listed Brookers Gum, Melbourne Yellow Gum and Yarra Gum, crossing an area where the Yarra Gum population is less dense.

Mr Lane advised the Project will have significant impacts on the FFG listed Melbourne Yellow Gum, Brittle Greenhood and Bacchus Marsh Wattle but impacts on other threatened flora species will not be significant.

Melbourne Yellow Gum

In response to concerns raised through the independent peer review process about impacts to the endangered Melbourne Yellow Gum, the Proponent proposed additional measures in the Day 1 EPRs and in TN02 to mitigate impacts to this species. These measures, which were endorsed by DEECA, include:

- the bespoke clearance approach at Darley (TN02), involving strategic siting of transmission towers in elevated parts of the landscape, applying a clearance distance of 8.4 metres between the transmission line and vegetation (rather than a 4 metre height limit for vegetation), and implementing a site-specific approach to vegetation management to address electrical safety requirements and fire risk
- collection of seeds from Melbourne Yellow Gums within the Project Area and development of a program for growing them for future revegetation projects outside the Project Area.

DEECA noted the advice in the BD1 Report that loss of 500 individuals of Melbourne Yellow Gum was unavoidable. It did not consider these impacts to be unacceptable at a species level.

Mr Lane's evidence was that while the Project would have a significant impact on Melbourne Yellow Gum, this would be acceptable. Taking the additional measures proposed by the Proponent into account, his evidence was *"avoidance and minimisation measures have been particularly refined in the Darley area to minimise impacts on the population of the threatened Melbourne Yellow Gum trees."* He advised the field surveys for the Project had increased the known population of this species, with over 2,000 specimens detected in the surveyed areas in and around the Project Area.

Brittle Greenhood

Brittle Greenhood (critically endangered) is an understorey species. DEECA noted the additional survey information in the BD1 Report showed substantially less impacts on Brittle Greenhood than indicated in the BIA. DEECA noted EPR BD2 requires avoidance of the use of heavy machinery where Brittle Greenhood occurs and supported the Proponent's Day 1 changes to EPR BD7 and inclusion of a new EPR BD9 in relation to understorey protection. Mr Lane advised EPR BD2 aims to establish no go zones and minimise ground disturbance to understorey values like Brittle Greenhood but he considered it remains unclear how ground disturbance will be minimised where canopy tree removal occurs.

Bacchus Marsh Wattle

Bacchus Marsh Wattle is listed as vulnerable under the FFG Act. Mr Lane advised that based on prior DEECA population estimates, impacts on this species were considered significant (removal of 451 trees from a population of about 8,000 individuals). However subsequent field assessments have identified over 12,000 individuals in the survey area alone. The residual impact can be addressed through replanting locally sourced

Bacchus Marsh Wattle in the Project Area including the easement because this species is typically less than three metres tall (and therefore not a fire risk underneath transmission lines).

Unexpected finds

Ballarat Council submitted EPR BD2 should be amended to require the Construction Vegetation Management Plan to include a requirement for measures to minimise impacts to threatened flora to be applied to any other threatened indigenous flora identified during the construction phase, in addition to those species that are specifically named in EPR BD2. The Proponent argued this was unnecessary because while the plan requires "*particular focus*" on the species listed in EPR BD2, it is not strictly limited to these species.

Threatened fauna

Many submitters expressed concern regarding impacts on threatened fauna. DEECA identified Brolga, Magpie Goose and Victorian Grassland Earless Dragon as the threatened fauna species of most concern. Submissions regarding the implications of collision risk for Brolga and Magpie Goose are outlined in Chapter 4.4 (collision risk).

Mr Stephens gave the following evidence about EPBC listed threatened fauna species:

- Golden Sun Moth was opportunistically recorded in the Project Area. Two hundred and fifty hectares of suitable habitat was identified in the Project Area, of which 21.48 hectares may be impacted by ground disturbance. Grassland habitat can be retained in the easement corridor because it is under the maximum vegetation heights for clearing (4 metres) or thinning (2 metres).
- Southern Greater Glider was not recorded in the Project Area, but 13.71 hectares of potential habitat may be impacted. The impacted habitat is only a tiny portion of the potential habitat in the wider study area (42,030 hectares) but the Project may increase habitat fragmentation.
- Striped Legless Lizard was not recorded during surveys for the Project, but 1.44 hectares of potential habitat may be impacted in discrete areas associated with tower structures and access tracks resulting in changes in soil structure and terrestrial cover. Grassland habitat can be retained in the easement corridor.
- Victorian Grassland Earless Dragon was not recorded during surveys, but 3.48 hectares of potential habitat may be impacted in discrete areas associated with tower structures and access tracks. Grassland habitat can be retained in the easement corridor.
- Growling Grass Frog is present in the Project Area. It is associated with aquatic habitat and adjacent grassy areas, which are not expected to be impacted by the Project (they will be avoided and protected through EPR BD4). Also, the potentially impacted habitat in the Project Area is very small compared to the wider habitat area for this species.
- EPBC listed bird species are unlikely to be significantly impacted by the Project because the extent of potential habitat impacted by the Project is a tiny portion of the potential habitat in the wider area.
- Grey-headed Flying Fox is unlikely to be significantly impacted by the Project. No camps have been recorded in the Project Area, but a temporary camp was

recorded nearby at Darley. Impacts on potential foraging habitat are likely to be inconsequential relative to the much greater extent of foraging habitat across the landscape.

Mr Lane responded to submitters' concerns about the implications of habitat fragmentation for threatened fauna species by advising:

> The areas of threatened fauna species habitat proposed to be removed are already fragmented and in many cases occur in small patches.

Mr Lane advised habitat fragmentation will affect tree-dwelling fauna. Understorey retention means ground-dwelling fauna will be less affected except during construction. Birds, including tree-dwelling species, will be able to fly across the easement.

DEECA submitted it was satisfied that measures in EPR BD1 (no go zones) and EPR BD4 (Threatened Fauna Management Plan) will assist in the protection of Victorian Grassland Earless Dragon.

Ballarat Council submitted the results from monitoring in relation to EPR BD4 (Threatened Fauna Management Plan) should be made publicly available in real time or close to real time. The Proponent responded that this is not necessary, as monitoring data will be reviewed by the Independent Environmental Auditor and the audit summary reports will be made publicly available.

(iv) Discussion

Threatened ecological communities

The Project will have a high residual impact on the EPBC listed GBGW. However the IAC accepts Mr Lane's evidence that the Project will affect a very small portion of the total area of GBGW in the wider landscape. The residual impact of the Project on the NTGVVP and WYRGGW TECs is moderate but again will affect very small portions of the total area of these communities in the wider landscape.

Ballarat Council's submission that EPR BD2 should be amended to insert a requirement for seed collection from this critically endangered TEC for use in revegetation and remediation programs is consistent with the Conservation Advice for GBGW,[3] which includes the following priority action:

> Develop seed harvesting and propagation techniques to ensure that adequate supplies of seed or tubestock are available for active revegetation of sites.

The IAC recommends EPR BD2 be amended to insert a requirement for seed collection along the lines submitted by Ballarat Council.

Otherwise, the IAC accepts the advice of Mr Lane that the proposed mitigation measures adequately address the Project's impacts on TECs.

Threatened flora

With some qualifications in relation to Melbourne Yellow Gum and Brittle Greenhood, the IAC accepts Mr Lane's advice and DEECA's submissions that impacts on threatened flora

[3] https://www.environment.gov.au/biodiversity/threatened/communities/pubs/86-conservation-advice.pdf

can be acceptably managed with the Day 1 EPRs and through the Proponent's proposed partial and minimised risk clearance approaches.

Melbourne Yellow Gum

The BIA and BD1 Report assessed a 'high' residual impact on Melbourne Yellow Gum. Those assessments were based on impacts being minimised through a bespoke approach to clearing at Darley as outlined in TN02.

Implementation of the bespoke clearance approach at Darley is subject to ESV approval, which may not be given (see Chapters 4.3 and 8.8). Mr Stevens' evidence was that the bespoke approach enabled retention of more than 700 Melbourne Yellow Gums in the Darley area. If these trees are lost, along with the 500 trees estimated by Mr Lane to be unavoidably lost due to construction, the Project would lead to the loss of a sizeable proportion of the known local population of this species.

Melbourne Yellow Gum occurs in areas within and to the west of Melbourne, with the main concentration being in the Brisbane Ranges between Bacchus Marsh and Geelong. While residual impacts on Melbourne Yellow Gum in the local Darley area will be significant (particularly if the bespoke clearance approach cannot be implemented), the IAC accepts the expert evidence that the Project's impacts are not expected to jeopardise the survival of the species, and that seed collection and revegetation should mitigate impacts to this species in the longer term.

That said, if the bespoke clearance approach cannot be implemented at Darley, additional measures should be investigated to further mitigate impacts on Melbourne Yellow Gum. The IAC recommends a change to EPR BD2 to this effect.

On balance, with the IAC's recommended changes to the EPRs, the IAC is satisfied that impacts on Melbourne Yellow Gum can be managed to an acceptable level, even if the bespoke clearance approach cannot be implemented at Darley.

Brittle Greenhood

The IAC notes Mr Lane's concern about ground disturbance in Brittle Greenhood habitat when tree canopy removal occurs. Particular attention will need to be given to this issue in areas of potential habitat for Brittle Greenhood. EPR BD9 was added to the Day 1 EMF requiring an understorey retention plan, which will assist to minimise impacts on Brittle Greenhood. The IAC also recommends amending EPRs BD2 and BD9 to provide for low impact tree removal methods in these areas based on arborist advice.

The IAC agrees with Bald Hills Creswick Landcare Group's submission that it should be given the opportunity to collect seed from local Yarra Gums that are to be removed for the Project. Other Landcare Groups should be given similar opportunities for seed collection from threatened species trees that will be removed. The IAC recommends a change to EPR BD2 to this effect.

The IAC agrees with Ballarat Council that a provision to include a catch all reference in EPR BD2 for 'any other' threatened flora would be prudent, particularly given that field surveys remain to be completed for 21 percent of the Project Area. A similar change should be included in EPR BD4 in relation to threatened fauna. These additions are included in the IAC's recommended EMF.

Threatened fauna

The BIA found that the Project will not have high residual impacts on any threatened fauna species.

Golden Sun Moth's conservation status under the EPBC Act was downgraded from critically endangered to vulnerable in 2021. The Golden Sun Moth uses grassland habitat that will be impacted by ground disturbance for construction, but grassland in the easement does not need to be cleared to meet electrical safety requirements. The residual impacts of the Project are moderate but will affect a very small portion of the total area of habitat in the wider landscape.

Striped Legless Lizard and Victorian Grassland Earless Dragon have not been recorded in the Project Area. These species use grassland habitat, which will generally be retained in the easement corridor. However small areas of potential habitat may be impacted by access tracks and tower construction. Residual impacts are expected to be moderate.

Southern Greater Glider has not been recorded in the Project Area, but 'low-moderate' impacts are expected based on habitat loss and fragmentation by the easement corridor. The impacted habitat is a tiny portion of the extent of habitat in the wider landscape.

The IAC agrees with the Proponent that provision of real time monitoring data in relation to EPR BD4 is not required

(v) Findings and recommendations

The IAC finds:

- The Project will have 'high' residual impacts on:
  - one TEC, the EPBC listed GBGW
  - two threatened flora species, the FFG listed Brittle Greenhood and Melbourne Yellow Gum.
- The Project will have 'moderate' residual impacts on:
  - five TECs, including two EPBC listed TECs and three FFG listed TECs
  - six threatened flora species
  - four threatened fauna species.
- While the Project would have a significant impact on the endangered Melbourne Yellow Gum, particularly in the Darley area, on balance (and with the IAC's recommended changes to strengthen and clarify the biodiversity EPRs), this would not be unacceptable.
- With the IAC's recommended changes to strengthen and clarify the biodiversity EPRs, impacts on the critically endangered Brittle Greenhood are acceptable.
- The residual impacts on TECs and other threatened flora (including Yarra Gum) and fauna can be acceptably managed through the IAC's recommended EPRs.

The IAC recommends:

Environmental Management Framework

Include the following changes:

- Amend BD2 to require the Construction Vegetation Management Plan to identify:

  - areas in which a partial or minimised clearance approach will be implemented (depending on the outcome of the further investigations required under EPR BD10)
  - measures to minimise impacts in those areas and areas identified in the understorey retention plan in EPR BD9
  - measures to avoid the use of heavy machinery and ground disturbance in Brittle Greenhood habitat areas.
  - additional measures to mitigate impacts on Melbourne Yellow Gum if the bespoke minimised clearance approach in the Darely area cannot be implemented and the extent of clearance is more than as assessed in the BIA and BD1 report
  - low impact techniques for any removal of overstorey vegetation in Brittle Greenhood habitat and in areas for identified in the understorey retention plan based on arborist advice.
- Amend BD2 to require the Construction Vegetation Management Plan to include measures to minimise impacts on "*any other threatened indigenous flora identified during the completion of the field surveys or the construction phase of the Project*"
- Amend BD2 to require the threatened flora measures in the Construction Vegetation Management Plan to include requirements for:
  - seed collection from the Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia threatened ecological community for use in revegetation and remediation for the Project
  - local Landcare Groups to be provided the opportunity for seed collection from threatened species trees that are to be removed, including Yarra Gum.
- Amend EPR BD4 to require the Threatened Fauna Management Plans to include measures to minimise impacts to habitat for any other threatened indigenous fauna identified during the completion of the field surveys or the construction phase of the Project (in addition to the species already listed).
- Amend EPR BD7 to require the Operational Vegetation Management Plan to include:
  - practices and processes for retaining as much vegetation as reasonably practical in the easement, including in the areas in which partial clearance approaches will be implemented (subject to the further investigations required under EPR BD10)
  - low impact tree removal techniques and measures to avoid the use of heavy machinery and ground disturbance in Brittle Greenhood habitat areas.
- Amend EPRs BD2, BD4, BD6, BD7, BD8 and BD9 and BD10 to make other changes to improve clarity and implementation.

4.6 Wedge-tailed Eagle

(i) Key issue

The key issue is:

- whether impacts on Wedge-tailed Eagle (mainly collision risk) have been appropriately assessed and are acceptable.

(ii) What did the EES say?

Wedge-tailed Eagle is not listed under the FFG Act or EPBC Act but Wedge-tailed Eagle nesting sites and collision risk are important matters to the community, and this species was therefore specifically considered in the BIA. Wedge-tailed Eagles occur along the Project alignment, particularly near significant topographical features and the interface between agricultural land and forest areas.

Wedge-tailed Eagle has a relatively high collision risk rating, due to its presence along the route and its relatively large size. Wedge-tailed Eagle is expected to benefit from collision risk mitigations including vertical line marking (bird flappers) and bird diverters.

EPR BD3 (Fauna Management Plan – Construction) includes specific requirements in relation to Wedge-tailed Eagle, including mapping of active eagle nest locations and application of measures to minimise impacts, such as spatial or temporal buffers. EPR BD5 (Collision Risk Management Plan) is also relevant to Wedge-tailed Eagle.

The BD1 report and Independent Peer Review did not discuss Wedge-tailed Eagle.

(iii) Evidence and submissions

Many submitters expressed concern about potential impacts on Wedge-tailed Eagle, including collision risk and habitat loss, including loss of tall trees used as nesting sites. Submissions also stated the EES assessment of Wedge-tailed Eagle was inadequate, including a lack of targeted surveys and nest mapping, and omission of known nesting sites. The Toolern Vale Landcare Group drew attention to a pair of Wedge-tailed Eagles that had been living and nesting at Ryans Lane for over 25 years that were not included in the EES.

Kingston and District Power Alliance (KDPA) drew attention to VicGrid's 2025 Victorian Transmission Plan (D182), which noted that across the Central Highlands region *"there are known nesting sites and habitat areas for wedgetailed eagles and other birds. Managing risk to these species is an important consideration for wind developments."*

KDPA submitted:

> The fact that wedged-tailed eagles are not critically endangered doesn't mean that AusNet can just dismiss the impact. Wedged-tailed eagles have something about them, they are special to our community and people love them.

Mr Stephens confirmed that the Wedge-tailed Eagle is not a threatened species and was not specifically identified for consideration in the Scoping Requirements. However, it was considered in the EES because of its role as an apex predator, its cultural importance and community interest in the species. It also has morphological traits that predispose it to collision risk.

Mr Stephens advised the EES did not include habitat mapping or quantification of impacts because Wedge-tailed Eagle was not included in the Scoping Requirements. The EPRs include a specific measure to identify and map active eagle nest locations to

avoid or minimise impacts during breeding. Mr Stephens advised impacts on eagles will also be addressed in the Collision Risk Management Plan.

Mr Lane explained that tree removal for the Project may reduce the availability of treed nesting sites. He advised the breeding season is the most sensitive time in the life cycle of an animal and is the most appropriate time to avoid disturbance.

The key geographic areas of concern identified in submissions include Kingston, Darley and Coimadai, the Lerderderg Valley and the Long Forest and Mt Beckworth areas. Mr Stephens confirmed that Wedge-tailed Eagle records are concentrated across the northern volcanic plain (Lexton to North Creswick) and the Lerderderg to Long Forest section of the study area, consistent with the areas of concern identified in submissions.

(iv) Discussion

Although it has no formal conservation significance, Wedge-tailed Eagle is important to the community. The expert evidence indicates it will be impacted by tree clearing and collision risk (which is relatively high for this species).

Submitters have criticised the adequacy of the EES assessment of impacts on Wedge-tailed Eagle and have indicated they have significant local knowledge regarding nesting sites. The IAC recommends that EPR BD3 be amended to insert a requirement to incorporate local knowledge (such as from Landcare Groups) in the mapping of nesting sites. This addition is included in the IAC's recommended EMF.

The IAC otherwise accepts the expert evidence that the proposed mitigation measures in EPRs BD3 and BD5 provide appropriate mitigation of impacts and that residual impacts are acceptable.

(v) Finding and recommendation

The IAC finds:

- The residual impacts on Wedge-tailed Eagle can be acceptably managed through the measures outlined in the IAC's recommended EMF.

The IAC recommends:

Environmental Management Framework

Include the following change:

- Amend EPR BD3 to require local knowledge to be considered in the mapping of eagle nesting sites.

4.7 Riparian and aquatic ecosystems and biolinks

(i) Key issues

The key issues are whether:

- setbacks to waterways are appropriate
- impacts on riparian and aquatic ecosystems have been appropriately avoided and minimised and are acceptable, particularly in light of recent policy changes

- impacts on biolinks on public and private land have been appropriately avoided and minimised and are acceptable.

(ii) What did the EES say?

The Project intersects seven river basins and 16 DEECA-mapped wetlands. Conservation groups, CMAs, local councils, Traditional Owners, Landcare groups and individual landholders have undertaken numerous revegetation projects to restore riparian zones and biodiversity linkages (biolinks).

The Project will require clearing of riparian vegetation for construction of new or upgraded access tracks across waterways and to comply with electricity line safety clearances and fuel load requirements. EPR BD6 sets out measures to mitigate impacts on aquatic and riparian ecosystems.

(iii) Amendment VC278 – planning controls for waterways

Amendment VC278, which was gazetted in December 2025 and came into operation in January 2026, introduces new planning controls for waterways, including:

- development controls for 17 waterways in the Yarra (Birrarung) and Waterways of the West catchments, including Kororoit Creek and the Werribee River
- amendments to Clause 12.03-1S (River and riparian corridors, waterways, lakes, wetlands and billabongs) to:
  - clarify the spatial extent of waterway protections as applying to all land within 200 metres of the centreline of a waterway
  - strengthen policy for waterways by recognising them as integrated environmental and cultural systems within the broader landscape
- amendments to Clause 14.02-1S (Catchment planning and management) to increase the minimum waterway corridor buffer distance from 30 to 50 metres for all Victorian waterways.

(iv) Evidence and submissions

Riparian and aquatic ecosystems

A number of submitters expressed concerns about impacts on waterway and wetland ecosystems. KDPA and other submitters from the Kingston area expressed concern about impacts on waterway values at the Bullarook Streamside Reserve, including impacts on platypus and vegetation. The Bullarook Streamside Reserve is also the site of the Algerian Oak, which is discussed in Chapter 5.3.

The Proponent submitted:

> … route selection considered waterways, with a focus on larger waterways, and that overhead power lines result in minimal direct impacts to waterways and water quality as the overhead transmission line overflies watercourses and riparian vegetation to avoid disturbance.

Biolinks

Many submitters expressed concern about impacts on biolinks, including the Councils, Landcare groups, and landholders who had planted and cared for biolinks on their own land over generations. Moorabool Council submitted the EES focused on formal

conservation reserves and downplayed other land parcels that are parts of biolinks. It submitted:

> … biolinks do not have the legal status of other protected land, as they are largely in private land, Council's view is that the waterways and riparian land around waterways, particularly those recognised and supported by funding and efforts of state agencies in relation to the revegetation are important areas for biodiversity.

Submissions drew attention to impacts on specific biolinks, especially the Myrniong, Korkuperrimul Creek and Camerons Road biolinks, which connects the Wombat-Lerderderg National Park to other reserves. DEECA (S471) advised that public authorities facilitated the development of a biolink between the Brisbane Ranges National Park and Wombat-Lerderderg National Park as part of the Grow West Program, with much of the work undertaken by Landcare groups and private landholders.

Concerns were also expressed about impacts on other existing and potential biolinks, including between Creswick State Forest and the Wombat Forest, Mount Beckworth and Mount Bolton, and along Birch and Creswick Creeks.

Moorabool Council submitted vegetation loss from biolinks is contrary to the purpose of the biolinks and inconsistent with Clause 12.01-1S of the Moorabool Planning Scheme with respect to avoidance of habitat fragmentation, and avoiding land use and development impacts on important areas of biodiversity. Similarly, Melton Council submitted:

> … the project is at odds with the intent of the [Toolern Vale Landcare] group that has spent years connecting patches of vegetation, while the WRL would separate it.

A number of submitters drew attention to significant contributions made by landholders towards the establishment of biolinks (including those supported by government programs), including provision of land, and labour, and in some instances purchase of plants. They argued this investment will be lost if biolink vegetation is removed. Submitter 312 submitted that EPR BD2 should be amended to require liaison with directly affected landholders in relation to support for future revegetation opportunities, including seed collection from Melbourne Yellow Gums.

Mr Lane advised vegetation loss from biolinks will increase habitat fragmentation, limit fauna movement, isolate populations of flora and fauna, and increase the risk of invasive species establishment. However he considered the impacts to be acceptable, noting that fragmentation impacts will be addressed through a range of mitigation measures including:

- no go zones
- understorey retention in the easement corridor
- the bespoke approach to clearance at Darley, and potentially partial clearance and taller towers at Lexton, Haydens Hill and Long Forest
- glider poles
- rigorous land management measures such as weed control to mitigate threats from invasive species.

Mr Stephens gave evidence that EPR BD6, which requires specific consideration for the retention of riparian vegetation, is relevant to mitigating impacts on biolinks, because documented biolinks generally align with riparian corridors.

DEECA's submission emphasised the importance of understorey vegetation in the easement to protect the integrity of biolinks.

Several Councils, including Pyrenees Council, submitted the Project should provide for revegetation outside the easement corridor towards restoration and expansion of biolinks. The Proponent submitted funding from the Community Benefit Fund could be directed towards restoration of biolinks.

Amendment VC278

The Proponent submitted:

> VC278 does not represent a material change in policy, and the clauses that have been amended were considered, in their earlier form, in preparing the EES. The Proponent submits that the assessments documented in the EES are consistent with the practice notes and that the Project responds appropriately to the policy as amended.

Melton Council (D640, D698) submitted the Incorporated Document should be amended to require a setback distance of 50 metres from a designated waterway rather than the 30 metres provided for in clause 4.7.1(e).

The Proponent submitted the EES assessment of surface water impacts and EPRs proceeded based on a default setback of 30 metres from waterways within most CMA areas and a "*more refined process within the Melbourne Water area*" (20 metres from first and second order waterways, 30 metres from third order waterways, 50 metres from fourth or higher order waterways). It submitted the setbacks specified in EPR SW1 remain appropriate and should not be changed in response to Amendment VC278, because:

- VC278 requires consideration of the policy as it relates to setback areas, but does not introduce a requirement to avoid development in those areas
- the project route selection has involved a complex balancing of competing constraints to minimise overall impacts and re-locating works to beyond 50 metres from waterways would be a major task that is likely to introduce other impacts
- potential impacts on waterways are manageable through the EPRs
- the proposed setback distances for the Project have been accepted by the relevant CMAs.

Melton submitted the towers in the vicinity of Kororoit Creek should be undergrounded, primarily to avoid visual impacts. The Proponent confirmed there are two towers within SLO4 (Kororoit Creek Valley) but argued undergrounding was not required.

(v) Discussion

Biolinks

The IAC notes that many submitters expressed concerns about impacts of the Project on biolinks and agrees that the removal of native vegetation is contrary to the intent of the biolinks.

It accepts that the proposed mitigation measures relating to biolinks will mitigate impacts within the easement corridor to the extent reasonably practical given electrical safety requirements. In particular, understorey retention (EPR BD9) and modified electrical safety clearance requirements (TN02 and TN09) at key locations will mitigate

the effects of electrical safety clearing on habitat fragmentation, especially for ground-dwelling species.

The proposed mitigation measures will not fully mitigate the reduction in native vegetation and habitat in the local landscape. Nor will conventional offsets. Additional revegetation outside the easement corridor would assist in further mitigating the impacts of the Project on biolinks.

The IAC notes the Proponent's suggestion that funds from the Community Benefit Fund could be directed towards restoration of biolinks. EPR SC5 (a new EPR included in the Proponent's Day 1 and Day 3 versions) envisages a co-designed community benefit fund without pre-determined requirements. The IAC considers a more targeted approach is required for revegetation to mitigate impacts on biolinks and recommends a new EPR BD12 requiring support to be offered for revegetation within the biolinks impacted by the Project.

The IAC acknowledges the financial and in-kind contributions made by landholders to existing revegetation and protection of remnant vegetation in the biolinks and recommends they be offered support to replace remnant vegetation and revegetation plantings impacted by the Project with plantings on another part of their property outside the easement corridor. This should be addressed in EPR BD12.

Provision of local offsets within the same biolink (as discussed in Chapter 4.8), rather than offsets remote from impacted sites, would also help mitigate impacts on biolinks.

Amendment VC278

The IAC accepts the Proponent's submissions that the default setback from waterways need not be increased from 30 to 50 metres as submitted by Melton Council. It supports the tiered approach in EPR SW1.

SLO4 reinforces the importance of the biolink along Kororoit Creek. It states that "*Kororoit Creek has significant biodiversity*" and "*in some places remnant vegetation and canopy trees, including River Red Gums, line the creek corridor and it forms an important habitat connection*". The landscape character objectives include:

> To retain indigenous riparian vegetation and canopy trees or existing grasslands as the dominant landscape feature and enhance the revegetation and ecological improvement of the waterway corridor while managing the introduction of potential bushfire hazards.

The map in the Proponent's reply submission (Figure 29 in D651) shows the towers within SLO4 are not situated within the tree-lined riparian zone of Kororoit Creek. However, removal of large canopy trees from the Kororoit Creek riparian zone will be required for electrical safety clearances (BD1 Report, Appendix A1).

The IAC recommends EPR BD10 be amended to require investigation of a 'Minimised risk clearance' approach and/or taller towers (as proposed for Darley and the Lexton Bushland Reserve) to minimise impacts on the Kororoit Creek riparian zone. This investigation would require consideration of any impacts on Melbourne Airport's protected airspace. Taller towers could also increase the visual impact of the Project in this location, which would need to be balanced against the landscape values sought to be protected under the SLO4 that are discussed in Chapter 6.

Bullarook Streamside Reserve

The IAC agrees with Hepburn Council that the Project will constrain opportunities to establish a biolink along Birch Creek. At Bullarook Streamside Reserve, the Project alignment intersects Birch Creek at an 's' shaped bend, crossing the creek three times in 600 metres, resulting in a considerably greater length of riparian zone impact than would result from a single crossing, and a potentially significant gap in any biolink that was to be established.

Bullarook Streamside Reserve includes an Algerian Oak that is discussed in Chapter 5.3. The EES proposed removing the Oak. The Proponent tabled Technical Note TN14 that put forward two options (A and B) for saving the Oak. Neither option reduces the number of crossings of Birch Creek. The IAC notes that the option with taller towers (Option B) provides the benefit of increasing the clearance height for riparian zone vegetation, and therefore potentially imposes less constraints on a Birch Creek biolink. A 'minimised risk clearance' approach would also assist in mitigating impacts on the Birch Creek riparian zone. This is further discussed in Chapter 15.3.

(vi) Finding and recommendations

The IAC finds:

- Impacts on aquatic and riparian ecosystems and biolinks can be acceptably managed subject to the IAC's recommended EPRs.

The IAC recommends:

Environmental Management Framework

Include the following changes:

- Amend EPR BD10 to require investigation of the feasibility of using modified clearance requirements and/or higher towers to minimise impacts on the River Red Gums that line the riparian zone of Kororoit Creek.
- Add a new EPR BD12 that requires funding to support revegetation within the biolinks impacted by the Project, and offers affected landholders support for revegetation to replace remnant vegetation and native vegetation plantings within their properties.

4.8 Offsets

(i) Key issues

The key issues are whether:

- the draft offset management strategy is adequate and consistent with policy and regulatory requirements
- the required offsets will be available
- offsets should be provided in the local area.

(ii) What did the EES say?

EES Attachment IV presented a draft Offset Management Strategy in accordance with Victorian and Commonwealth requirements. It quantifies the offsets required under the Native Vegetation Guidelines and the EPBC Act Environmental Offsets Policy.

The draft Offset Management Strategy was based on a conservative 'worst-case scenario' and will be refined as the Project progresses. Final offset requirements are expected to be lower after surveys are completed, the design is refined and the effects of EPR implementation are included in the assessment of impacts.

Alternative offsets

The EES contemplates alternative offsets as a risk management approach, such as if there are any changes to the Project that make it impossible to secure a species offset. The Commonwealth and Victorian offset processes both allow for limited use of alternative offsets subject to the regulator's approval.

Offset availability

Further investigations were still in progress to confirm actual offset requirements. Some offset sites had been identified and option agreements were being used to secure offsets prior to Project approval.

Further information

The Proponent tabled a revised draft Offset Management Strategy (D50) based on the revised assessments of the extent of native vegetation loss and impacts on threatened species and ecosystems in the BD1 Report. This showed the following offset requirements:

- Victorian offsets:
  - general offsets comprising 1.864 general habitat units and 57 large trees
  - species offsets comprising 542.191 species habitat units across 22 species and 1115 large trees
- Commonwealth offsets:
  - offsets for three TECs and habitat for four threatened fauna species.

Compared to the EES draft Offset Management Strategy, the revised draft Offset Management Strategy decreased the offset requirements for general habitat units but increased the requirements for large trees (refer to Report BD1 Tables 4.1 and 4.2 for detailed comparisons). It increased the offset requirements for some threatened species and regional ecosystems, and decreased the offset requirements for others. There will be further changes to offset requirements after the field surveys are completed and detailed design is finalised.

(iii) Evidence and submissions

Draft offset management strategy

Mr Lane advised the draft Offset Management Strategy was sound and conservative as an interim approach to addressing offset requirements. There will be further changes to the offset requirements as the Project progresses. Further work is required, including

completion of detailed design, impact assessments, detailed offset site assessments and consultation with relevant regulators.

The Proponent submitted that the Commonwealth Department of Climate Change, Energy, the Environment and Water requested recalculation of Commonwealth offset requirements using a different methodology, which increased the Commonwealth offsets required.

Many submitters expressed concern about the provision of offsets at locations distant from the Project Area and expressed a strong preference for local offsets. Melton Council submitted that vegetation offsets should be sourced within the same local government area where the loss occurs. Pyrenees Council submitted it wanted local offsets, and local accountability regarding the offsets, including information sharing of offset plans, vegetation management and ongoing ecological monitoring.

Submitter 312 submitted that in the first instance, landholders should be offered replacement vegetation elsewhere on their properties for vegetation lost from their properties and given the option to host local offsets.

DEECA advised it would prefer but cannot require local offsets. The Native Vegetation Guidelines require general offsets to be sourced in the municipality or the wider CMA area but allow species offsets to be sourced anywhere in the State. This degree of flexibility is required for efficient functioning of offset markets. However, "*DEECA would encourage the Proponent (as distinct from requiring the Proponent) to consider providing offsets within proximity to native vegetation removal for the Project*".

Offset availability and alternative offsets

Mr Stephens and Mr Lane advised alternative offsets are unlikely to be required for the Project because they expected direct offsets to be available. They were supportive of the use of alternative offsets where appropriate, noting they could be used to provide significant biodiversity benefits.

Mr Stephens advised the current estimate of Project offsets (as shown in the draft Offset Management Strategy) can be sourced as direct offsets. He advised "*For a project of this scale, to have located and secured offsets that cover ALL requirements at this stage in the project cycle is unusual and provides great certainty that impacts can be offset*". The Proponent has confirmed that the revised Commonwealth offset requirements identified in its reply submission (D651) can be met.

DEECA was supportive of the inclusion of provision for alternative offsets in the draft Offset Management Strategy, submitting alternative offsetting approaches may be important for species for which direct offsets may be difficult to source due to restricted habitat. DEECA advised that if alternative offsets are to be used, they must be developed in consultation with and approved by DEECA.

DEECA acknowledged the Proponent had done significant work towards sourcing the appropriate offsets but submitted there is still significant work to be done to secure the necessary offsets. DEECA advised it is satisfied that the EMF and EPRs within it "*provide an adequate and clear framework"* for the further work to occur.

(iv) Discussion

Draft offset management strategy

The IAC accepts the expert evidence and DEECA's advice that the draft Offset Management Strategy satisfactorily addresses Victorian and Commonwealth offset requirements at the current stage of Project. It notes the offset requirements will be subject to change until the detailed design and final biodiversity assessments are completed.

The IAC agrees with submissions that local offsets would be preferable to offsets sourced in areas remote from the Proposed Route, to maintain local biodiversity values, and mitigate local habitat loss and fragmentation, particularly in situations where vegetation is lost from biolinks. However, local offsets cannot be compelled under State or Commonwealth Guidelines.

The IAC recommends offsets should be sourced locally to the extent reasonably practicable and recommends that this be reflected in the Incorporated Document.

Offset availability and alternative offsets

The IAC accepts the evidence of Mr Lane and advice from DEECA that:

- the direct offsets required for the Project are expected to be available
- alternative offsets are unlikely to be required
- the process for alternative offsets in the Victorian system, should they be required, would ensure effectiveness.

(v) Findings and recommendation

The IAC finds:

- The draft Offset Management Strategy appropriately addresses regulatory requirements and offset requirements will continue to be refined as the Project is developed.
- Offsets should be provided locally to the extent practicable.
- Direct offsets are expected to be available and alternative offsets are unlikely to be required.
- Alternative offsets would provide acceptable outcomes if required.

The IAC recommends:

Incorporated Document

Include the following change:

- Amend clause 4.10 (Native Vegetation) to include a requirement for offsets to be sourced locally to the extent reasonably practicable.

4.9 Matters of National Environmental Significance

(i) Introduction

The Project was determined to be a controlled action due to potential significant impacts on listed threatened species and ecological communities.

Clause 35(g) of the Terms of Reference states that the IAC's Report must contain:

> … specific findings and recommendations about the predicted impacts on matters of national environmental significance and their acceptability, including appropriate controls and environmental management.

(ii) Key issue

The key issue is whether impacts on MNES are acceptable.

(iii) What did the EES say?

EES Chapter 27 addressed MNES, based on assessments undertaken as part of the:

- biodiversity impact assessment (Technical Report A)
- EMI and EMF impact assessment (Technical Report E)
- groundwater impact assessment (Technical Report S)
- surface water impact assessment (Technical Report T).

The MNES assessment included:

- desktop assessments of relevant biodiversity databases, including the Victorian Biodiversity Atlas and the Commonwealth's Protected Matters Search Tool (an online tool to identify MNES in the area of a proposed project)
- desktop reviews of existing conditions reports, including previous field-based ecological investigations
- field investigations, including targeted flora and fauna surveys.

Impact assessments were undertaken in accordance with the Significant Impact Guidelines and relevant MNES specific guidelines to determine whether the Project would have a significant impact on MNES.

The EES concluded the Project may have a significant impact on the following MNES:

- three EPBC Act listed TECs:
  - Grey Box (Eucalyptus microcarpa) Grassy Woodland and Derived Native Grasslands of South-eastern Australia
  - Natural Temperate Grassland of the Victorian Volcanic Plain
  - White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland
- four EPBC Act listed threatened fauna species:
  - Golden Sun Moth
  - Southern Greater Glider
  - Striped Legless Lizard
  - Victorian Grassland Earless Dragon.

Indicative offset requirements are shown the draft Offset Management Strategy (EES Attachment V).

BD1 Report

The BD1 Report provided updated estimates of the extent of the MNES TECs and habitat areas that would be affected by the Project, but did not change conclusions in the BIA regarding the scale of impacts on MNES TECs and species.

(iv) Evidence and submissions

Mr Lane gave evidence that the EES assessment of EPBC Act-listed matters was comprehensive in its coverage, notwithstanding access limitations, and thorough and precautionary in assessing impacts to biodiversity.

Councils and other submitters raised concerns about the impact of the Project on various MNES TECs and threatened species (Chapter 4.5). Mr Stephens' and Mr Lane's evidence was that the possible and likely significant impacts of the Project on MNES can be satisfactorily addressed by offsets and would be acceptable.

(v) Discussion

Table 9 summarises impacts on MNES. The IAC notes that efforts have been made to avoid and minimise impacts on MNES through Project design and mitigation measures to the extent practicable. It agrees with Mr Lane and Mr Stephens that residual impacts on MNES after application of the IAC's recommended EMF can be acceptably addressed by offsets.

Table 9 Impacts on MNES threatened ecological communities and species

Species	Residual Impact of Project	Likelihood of a Significant Impact (EPBC Act)	IAC's Findings
Threatened ecological communities			
Grey Box (Eucalyptus microcarpa) Grassy Woodland and Derived Native Grasslands of South-eastern Australia (GBGW)	High	Likely	Refer Chapter 4.5
Natural Temperate Grassland of the Victorian Volcanic Plain (NTGVVP)	Moderate	Likely	Refer Chapter 4.5
White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (WYRGGW)	Moderate	Possible	Refer Chapter 4.5
Threatened flora species			
Matted Flax-lily	Low-moderate	Unlikely	Refer Chapter 4.5
Small Golden Moth Orchid	Low-moderate	Unlikely	Refer Chapter 4.5
Swamp Fireweed	Low-moderate	Unlikely	Refer Chapter 4.5
Threatened fauna species			
Golden Sun Moth	Moderate	Possible	Refer Chapter 4.5
Southern Greater Glider	Low-moderate	Possible	Refer Chapter 4.5
Striped Legless Lizard	Moderate	Possible	Refer Chapter 4.5
Victorian Grassland Earless Dragon	Moderate	Possible	Refer Chapter 4.5
Growling Grass Frog	Low-moderate	Unlikely	Refer Chapter 4.5

Species	Residual Impact of Project	Likelihood of a Significant Impact (EPBC Act)	IAC's Findings
Gang-gang Cockatoo	Low-moderate	Unlikely	Refer Chapter 4.5
Brown Treecreeper (south-eastern)	Low-moderate	Unlikely	Refer Chapter 4.5
Painted Honeyeater	NA	Unlikely	Refer Chapter 4.5
Swift Parrot	Low-moderate	Unlikely	Refer Chapter 4.5
Hooded Robin (south-eastern)	Low-moderate	Unlikely	Refer Chapter 4.5
Blue-winged Parrot	Low-moderate	Unlikely	Refer Chapter 4.5
Diamond Firetail	Low-moderate	Unlikely	Refer Chapter 4.5
Grey-headed Flying-fox	Low-moderate	Unlikely	Refer Chapter 4.5

(vi) Findings

The IAC finds:

- The Project is likely to have a significant impact on two MNES TECs (Grey Box Grassy Woodlands and Natural Temperate Grassland of the Victorian Volcanic Plain).
- The Project will have a possible significant impact on one MNES TEC (White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland) and four MNES threatened fauna species (Golden Sun Moth, Southern Greater Glider, Striped Legless Lizard and Victorian Grassland Earless Dragon).
- The Project avoids and minimises significant impacts on MNES to the extent reasonably practicable subject to applying the IAC's recommended EMF.
- Significant impacts on MNES can be satisfactorily addressed by offsets as set out in the draft Offset Management Strategy.

4.10 Overall conclusions on biodiversity effects

Subject to applying its recommendations, the IAC is satisfied the Project is consistent with relevant policy and legislation and relevant draft evaluation objectives. There will be significant impacts on listed FFG Act species Melbourne Yellow Gum and Brittle Greenhood. However with the IAC's recommended EPRs and offsets, these impacts can be managed to an acceptable level.

This assumes a bespoke partial clearance approach can be implemented in the Darley area, to reduce impacts on Melbourne Yellow Gum (and other species). If a bespoke clearance approach cannot be implemented, the impacts on the endangered Melbourne Yellow Gum in the Darley area will be considerably greater than assessed.

There are likely to be significant impacts on two MNES TECs and possible significant impacts on one MNES TEC and four MNES fauna species, which can all be acceptably managed through the IAC's recommended EPRs and offsets.

Otherwise, the likely biodiversity effects of the Project are not significant and the IAC is satisfied any effects are acceptable.

5 Heritage

5.1 Introduction

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects on Aboriginal cultural heritage and historic heritage values.

Heritage effects are assessed in:

- EES Chapter 9 Aboriginal Cultural Heritage
- EES Chapter 10 Historical Heritage
- EES Technical Report B Aboriginal Cultural Heritage Impact Assessment (ACHIA)[4]
- EES Technical Report C Historical Heritage Impact Assessment.

The exhibited EMF includes the following EPRs:

- ACH1 Comply with Cultural Heritage Management Plans
- ACH2 Discuss and negotiate Cultural Values Assessment (CVA) recommendations
- HH1 Design and construct to avoid and minimise impacts on heritage
- HH2 Undertake archival place recording
- HH3 Manage historical archaeological sites
- HH4 Avoid and minimise impacts to historical heritage during construction.

Table 10 lists the experts providing historic heritage evidence. No expert evidence was presented on Aboriginal Cultural Heritage.

Table 10 Evidence on heritage

Party	Expert	Firm	Expertise	Document number
Proponent	Martin Zweep	Jacobs Group	Historic heritage	D111
Charleson Group[5]	Christopher Clark	Latitude Heritage Pty Ltd	Historic heritage	D153

Other key documents are:

- EES Independent Peer Review – Historic Heritage (D56)
- Technical Note 14: Algerian Oak (D367)
- Technical Note 18: Benefit Sharing with Traditional Owners (D520)
- Technical Note 19: Status of CHMPs (D521).

The IAC has had regard to relevant policy and guidelines, including:

- *Aboriginal Heritage Act 2006*
- *Heritage Act 2017*

[4] Some of the CVAs attached to Technical Report B were redacted at the request of the RAPs. The IAC had unredacted copies of the CVAs.

[5] The Charlesons, Fords, Henderson-Drifes, Bouchiers and Mr May, who jointly presented submissions and evidence to the IAC.

- PE Act

5.2 Aboriginal cultural heritage

(i) Key issues

The key issues are whether:

- Aboriginal cultural heritage impacts have been appropriately avoided and minimised, and are acceptable
- the Environmental Management Framework is suitable for guiding ongoing engagement with Traditional Owner groups.

(ii) What did the EES say?

The ACHIA was based on six study areas developed in consultation with the RAPs and Traditional Owners, shown in Figure 8 and for which nine cultural heritage management plans (CHMPs) are currently being prepared:

- Area 1: Barengi Gadjin Land Council Aboriginal Corporation (BGLC) - CHMP 17313
- Area 2: Eastern Maar Aboriginal Corporation - CHMP 17321
- Area 3: there is no RAP for this area, so Traditional Owner groups from BGLC, Eastern Maar, and Dja Dja Wurrung Clans Aboriginal Council (DJAARA) were consulted - CHMP 17312
- Area 4: DJAARA - CHMP 17311 (western half) and CHMP 18101 (eastern half)
- Area 5: Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC) – CHMP 18108 and CHMP 20436 (Ballan Laydown Area)
- Area 6: Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation (WWCHAC) CHMP 18111 (eastern half) and CHMP 20459 (western half).

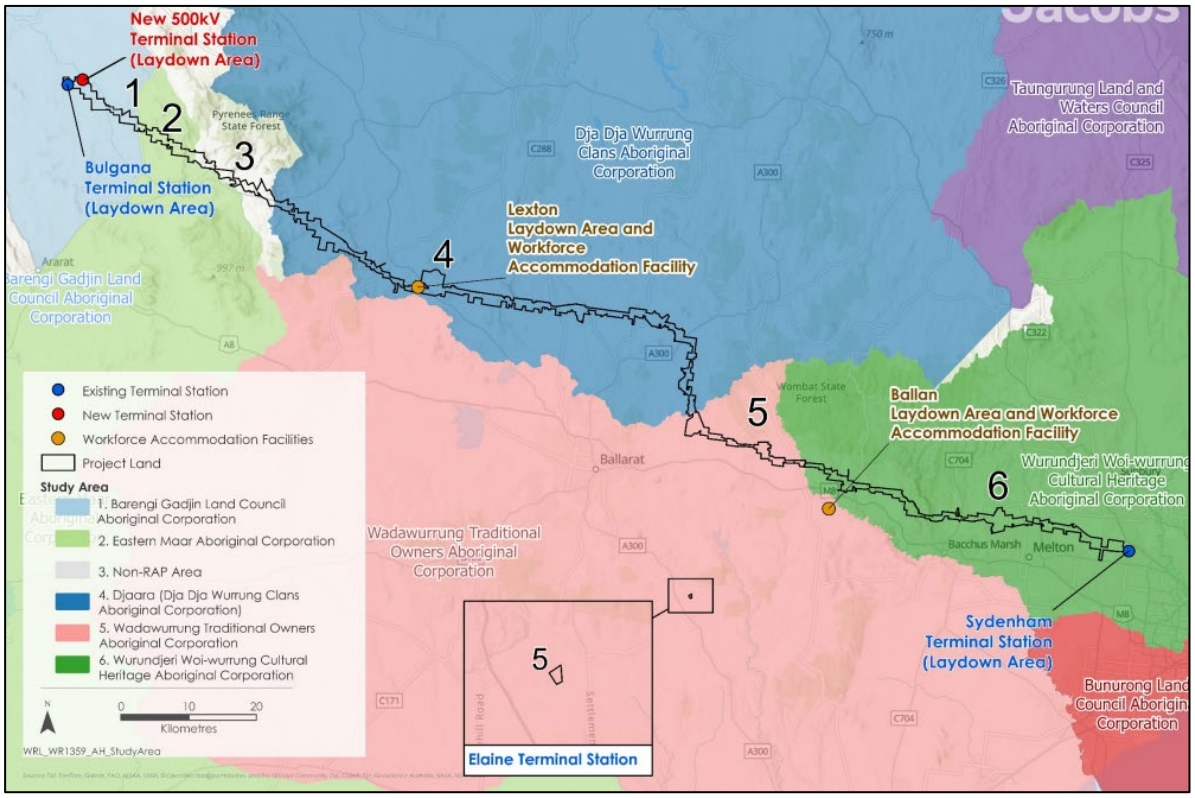
The ACHIA described the investigations and consultation that have been undertaken, including preparation of five CVAs. The assessment involved reviewing legislation, conducting desktop and field investigations, consulting stakeholders, and developing predictive models for Aboriginal place types. Predictive models estimate where cultural heritage is likely to be found within a landscape, to help guide field investigations and inform project design to avoid or minimise impacts on cultural heritage values.

The ACHIA assessed impacts on tangible and intangible cultural heritage values. It identified 79 previously recorded Aboriginal Places and documented 125 newly identified values, including artefact scatters, scarred trees, and cultural landscapes.

The Project design sought to avoid or minimise impacts on Aboriginal cultural heritage places and values by relocating infrastructure and avoiding sensitive areas. Examples include:

- relocating the alignment north in Study Area 4 to avoid highly significant cultural areas identified by DJAARA
- reducing impacts near the Lerderderg River and Merrimu Reservoir after consultation with WWCHAC.

Figure 8 ACHIA study areas and Registered Aboriginal Parties



Source: EES chapter 9 Figure 9.1

Ground disturbance and vegetation clearance during construction pose the most significant risk to tangible cultural heritage. Residual impacts are expected to 75 known Aboriginal cultural heritage values (five previously recorded, 70 newly identified), with impact ratings ranging from low to high (13 places). Places with high residual impacts include high significance artefact scatters, geomorphological features and culturally modified trees.

Management measures include site inductions, cultural heritage awareness training, marking restricted areas, salvage excavation, and ongoing consultation with RAPs and Traditional Owners. No further impacts on tangible heritage are expected during operation.

For intangible cultural values, the ACHIA assessed the visual presence of the Project would result in high residual impacts for six cultural landscapes:

- the Pyrenees Ranges
- Hepburn Lagoon
- the Wimmera River
- the Avoca River
- the Werribee River
- Kororoit Creek.

The meaning of these cultural landscapes is derived from the relationships between landforms, waterways, ecological systems, and cultural narratives. They represent cultural landmarks associated with movement, food and resource gathering, ceremony

and spiritual connection. These landscapes also hold important ecological values for the Traditional Owners.

The ACHIA recommends ongoing consultation and land management initiatives through the operations phase. The EES states this will include involving RAPs and Traditional Owner groups in finding ways to improve land management and restore healthy landscapes and ecosystems, including cultural burning, revegetation, pest management, and rewilding initiatives.

The ACHIA included an assessment of cumulative impacts and found that other projects will contribute to cumulative impacts, but all are required to prepare CHMPs to mitigate harm. The overall cumulative impact is considered moderate.

Residual impacts range from high to low, with most being low. High residual impacts are mainly associated with intangible cultural landscapes. The ACHIA concludes the Project's overall impact on cultural heritage will be moderate, with ongoing mitigation and management through CHMPs and CVAs.

(iii) Evidence and submissions

DJAARA (S436) lodged a written submission that stated:

> …the WRL EES does not sufficiently reflect legislative obligations to respect, protect and uphold our rights, or embed strong measures to achieve Traditional Owner outcomes. The WRL EES does not adequately consider Traditional Owner knowledge systems especially in relation to Caring for Country and rights to practice culture. Given the overall residual impact of the project on cultural heritage is stated to be moderate with unavoidable impacts to cultural values and biodiversity, DJAARA believes engagement with Traditional Owners must significantly improve and align with best practice standards. It is also stated that indirect impacts are probable but unquantifiable. Traditional Owners should also be empowered to have roles in management plans, monitoring programs and all efforts to protect and heal Country.

WWCHAC (S39) advocated for the protection of native species and noted the significance of Bunjil (Wedge-tailed Eagle) and kangaroo populations.

BGLC (S408) and WTOAC (S418) lodged confidential written submissions and the IAC is constrained in representing those submissions in this Report. In general terms, the submissions discussed the adequacy of the Project's response to cultural heritage matters and its provision for ongoing Traditional Owner consultation and participation.

The BGLC, WTOAC and DJAARA submissions assessed the relevant elements of the EES (which went beyond EES Chapter 9 and the ACHIA) and sought changes to various EPRs to provide for greater consultation and participation with RAPs and Traditional Owner groups. DJAARA sought:

- a new EPR EM12 to require an ongoing Traditional Owner Engagement and Communications Plan to be developed and implemented
- a new EPR ACH3 in relation to working with RAP and Traditional Owner groups
- revisions to EPRs ACH2, BD1, 2, 3, 4, 6 and 7, SW1, 2 and 3, EC2 and SC3 to provide for greater involvement of Traditional Owner groups in managing the Project's effects on biodiversity and waterways.

DJARRA also sought changes to:

- the draft Incorporated Document (clauses 4.13.5 and 4.13.8) to require Traditional Owner consultation on the temporary workforce accommodation facilities and laydown areas
- the draft Offset Management Strategy to require Traditional Owner consultation, participation and benefit sharing.

BGLC, WTOAC and DJAARA spoke in support of their written submissions in a confidential session during the Hearing.

Other submitters were concerned about the impacts the Project would have on Aboriginal cultural heritage and the adequacy of consultation with RAPs and Traditional Owner groups.

The Proponent noted that the confidential nature of these submissions limited the extent to which it could publicly respond but advised that formal discussions with the RAPs and Traditional Owner groups in relation to the matters raised in their submissions had been continuing. The Proponent agreed to various changes to the EPRs, and outlined the proposed benefit sharing arrangements in TN18, including pecuniary and non-pecuniary benefit offers.

The Proponet highlighted the following key EPR changes in the Day 1 and Day 3 versions:

a) Amending EPR EM13 to require that all persons engaged in community engagement activities should have mandatory cultural awareness and anti-racism training throughout construction and for a period of 2 years post construction with delivery of training in consultation with respective Traditional Owner groups on whose Country works are taking place.
b) A new EPR EM15 requiring the development and implementation of a Traditional Owner Engagement and Communications Plan.
c) Amending ACH2 to require the provision of support for each RAP to undertake a Cultural Values Assessment.
d) Adding Traditional Owners and Aboriginal-owned businesses to EPR EC2 being the requirement to develop and implement initiatives for procurement of goods and services from local communities.
e) Adding Traditional Owner groups to EPR SC3 being the requirement to develop and implement initiatives to maximise employment opportunities for local communities.
f) Responding to Traditional Owner requests in relation to biodiversity matters, including promoting awareness of culturally significant species, providing opportunities for Traditional Owner procurement, and providing opportunities for Traditional Owner salvage of culturally significant materials.

A more detailed response to the confidential DJAARA submission was included in confidential document D665.

The Proponent also provided an update on the preparation of the CHMPs in TN19. This included advice on the coverage of the standard and complex assessments being undertaken as part of the CHMP process, and noted that the number of previously unregistered Aboriginal values identified on the Project Land had increased from 125 to 149 as a result of further field work.

(iv) Discussion

Confidential submissions

Due to the confidential nature of submissions from the RAPs, the IAC is only able to discuss their content in general terms.

The receipt of confidential submissions is entirely appropriate when the information is confidential in nature, and/or when circumstances warrant the content to be shared confidentially or with a limited group of people. Examples are submissions that contain culturally sensitive information, or information about significant places that risk being damaged if their location were made public.

Confidential submissions present difficulties for the IAC in transparently interrogating and assessing the information presented to it, and in documenting this information in the IAC's report. The IAC has sought to address matters of substance while maintaining confidentiality. However its discussion of specific issues is necessarily constrained.

The assessment of cultural heritage impacts

The Inquiry is satisfied the ACHIA and further work associated with the CHMPs has (or will) adequately investigated and assessed potential cultural heritage impacts.

Managing cultural heritage impacts

Victoria has recently legislated a commitment to Treaty through the *Statewide Treaty Act 2025*. This, and the recent findings and recommendations of the Yoorrook Justice Commission, mean that appropriately considering and responding to Aboriginal cultural values is evolving in Victoria.

The IAC is satisfied the Proponent has sought to avoid and minimise impacts to cultural heritage through:

- route selection to avoid sensitive areas and landforms (it has not been possible to avoid all sensitive areas)
- applying mitigation measures such as cultural heritage inductions and training for construction staff.

According to the EES, route selection was undertaken in consultation with the RAPs and Traditional Owner groups, and changes were made to the Project in response to that consultation. This is positive.

Complete avoidance of harm has not been possible. Nor could it be expected on a project of this size and scale. The ACHIA assessed high residual impacts on both tangible and intangible cultural heritage values. Those impacts will be primarily managed through the CHMPs.

The Day 3 EPRs included significant changes that won't necessarily result in further avoidance of cultural heritage impacts, but will strengthen engagement with Traditional Owner groups and deepen their involvement in Project implementation. The IAC has recommended further changes to the EPRs based on the recommendations of DJAARA, WGLC and WTOAC in confidential document D692. The IAC is satisfied the Day 3 EPRs, with the IAC's recommended changes, provide an appropriate framework for creating

genuine partnerships that draw on Traditional Owners' cultural knowledge and long-term custodial responsibilities.

TN01 indicates that the Proponent's proposed benefit sharing program includes Traditional Owner benefit sharing agreements that will be negotiated or paid in confidence. TN18 provides more detail on what the benefit sharing arrangements might encompass. It confirms that benefit sharing will rely on principles of self-determination.

The IAC is satisfied that the proposed benefit sharing arrangements, together with the EPRs and the CHMPs, will ensure that:

- cultural values are identified and protected to the extent possible
- Traditional Owners will be appropriately engaged in the implementation of the Project and the management of its impacts
- Traditional Owners and First Nations communities will be offered opportunities through the implementation of the Project and will share in the benefits of the Project.

The *Leading Practice Principles: First Nations and Renewable Energy Projects* guidelines[6] document and promote a best practice approach for renewable energy projects engaging with Traditional Owners to manage and protect cultural values. They are a suitable framework to guide the Proponent's ongoing engagement with the RAPs and Traditional Owner groups, and the IAC has inserted references to the guidelines into EPR EM15 (Traditional Owner Engagement and Communication Plan).

The Project will have cumulative impacts with other renewable energy projects that have been constructed or are proposed on Country. Ongoing engagement and consultation with RAPs and Traditional Owner groups across the renewables industry is essential for identifying and delivering appropriate cultural heritage outcomes, as recognised in the *Leading Practice Principles* guidelines. The IAC encourages the Proponent to take a leading role in this industry wide engagement and set an example for other projects.

(v) Findings and recommendations

The IAC finds:

- The EES appropriately assessed Aboriginal cultural heritage effects, although further investigations are necessary and are underway as part of the CHMP process.
- Effects on Aboriginal cultural heritage can be suitably managed through the CHMPs and EPRs.
- The IAC's recommended EPRs and the Proponent's proposed benefit sharing arrangements should ensure that Traditional Owners and First Nations communities will be offered opportunities through the implementation of the Project and will share in the benefits of the Project.
- Residual impacts on Aboriginal cultural heritage will be acceptable.

The IAC recommends:

[6] These guidelines were co-authored by the Clean Energy Council and KPMG and co-designed with First Nations peoples. They were released in 2024.

Environmental Management Framework

Include the following changes:

- Amend EPR EM15 to require the Traditional Owner Engagement and Communications Plans to:
  - be prepared consistent with the *Leading Practice Principles: First Nations and Renewable Energy Projects* guidelines
  - outline how to best support Traditional Owner groups' participation in EPRs ACH2 (negotiating and implementing CVAs), ACH3 (registrations of intangible values), EC2 (procurement) and BD11 (culturally significant species and materials salvage plans) (as well as SC3).
- Amend EPR ACH2 to ensure better engagement with Traditional Owner groups and greater opportunities for self-determination in relation to CVAs.
- Amend EPR BD2 (construction vegetation management plan) to provide for Traditional Owner involvement in seed collection for Melbourne Yellow Gum.
- Amend EPR BD6 (measures to manage riparian and aquatic habitat) to provide for consultation with Traditional Owner groups with land and waterway management responsibilities.
- Amend EPR BD11 (culturally significant species and materials salvage plan) to provide for:
  - surveys (as well as salvage) by Traditional Owner groups
  - information to be provided to construction personnel on culturally significant species
  - the plan to be consistent with the engagement approach outlined in the Traditional Owner Engagement and Communications Plans.
- Amend EPR EC2 (procurement) to include a reference to the Traditional Owner Engagement and Communications Plans.
- Amend EPR SC3 (employment opportunities) to require consultation with Traditional Owner groups on aspects relating to First Nations people.

These changes are included at Appendix E:2.

5.3 Historical heritage

(i) Key issues

The issues are whether:

- the methodology of the Historical Heritage Impact Assessment in Technical Report C was appropriate, including the number of site visits undertaken
- visual impacts on heritage places have been appropriately assessed and impacts will be acceptable
- the Project will have acceptable impacts on specific heritage places and landscapes.

(ii) What did the EES say?

EES Chapter 10 and the Historical Heritage Impact Assessment provide an overview of the Project's potential historical heritage impacts including:

- physical impacts to heritage places

- visual impacts on an understanding of historical settings.

Investigations to identify places of historic heritage value (including archaeological sites) included:

- a desktop review including social pinpoint data
- consultation with regulatory authorities (including Heritage Victoria) and stakeholders
- site visits.

While many more heritage places were identified, 137 individual places were assessed, 90 of which were unregistered or previously unidentified. The Historical Heritage Impact Assessment included stand-alone assessments for places of particular significance, including the Berry Deep Leads Mining Landscape, the Haydens Hill Gold Mining Landscape and the Seven Hills Estate Tile Drains.

Of the 137 heritage places assessed, 20 were identified as potentially experiencing physical impact. Potential severe impacts (complete loss of a heritage place or object) were assessed for:

- the Algerian Oak tree at the Bullarook Streamside Reserve (which the EES proposes be removed)
- settler gravesites in Greendale
- various archaeological sites.

Many of the archaeological sites were not inspected because of access and other restrictions. For these sites, the Historical Heritage Impact Assessment found that impacts could be severe if archaeological material is present. Micro-siting may avoid impacts in some cases.

On visual impacts, the Historical Heritage Impact Assessment considered that a visual change to a place's setting does not, of itself, result in a heritage impact. A heritage impact occurs where the change in the visual setting of the heritage place has the potential to disrupt or undermine an appreciation of its heritage significance.

In assessing visual impacts, the Historical Heritage Impact Assessment considered impacts on:

- a 'conscious setting' created for the place
- significant views from a heritage place, including where there was evidence of views having influenced the design or siting of the place.

For most heritage places, the assessment concluded visibility of the Project from the place or its setting would have a low heritage impact.

The EES concluded that with the application of the EPRs, while some individual places may be significantly impacted, overall Project-wide residual impacts on historic heritage will be low to nil.

Berry Deep Leads Mining Landscape

The Project intersects the Berry Deep Leads Mining Landscape, which is located in the Hepburn Shire and is part of the UNESCO world heritage bid for goldfields landscapes. The Berry Deep Leads Mining Landscape forms part of the component known as '002 Creswick and the Deep Lead Landscape'.

The Historical Heritage Impact Assessment states that the Berry Deep Leads Mining Landscape is a historically significant cultural landscape distinctive for its ability to demonstrate a specific form of goldmining. The assessment concluded the Project would not physically impact the Berry Deep Leads Mining Landscape, but would have some visual impact.

The assessment considered the visual impact of the Project from six representative viewpoints within the Berry Deep Leads Mining Landscape. The authors of the Landscape and Visual Impact Assessment prepared photomontages for each viewpoint. The Historical Heritage Impact Assessment concluded the Project will not be visible at all points in the landscape, and where it is visible, its visual prominence may be reduced by landscape features. The assessment found:

> … in instances where the Project is visible, the landscape and the elements and features that contribute to the landscape's significance will remain legible and will continue to be seen through and beyond the Project's transmission line and towers.

The EES concluded the Project will not have a detrimental physical or visual impact on the significance or the understanding of the Berry Deep Leads Mining Landscape from a heritage perspective.

Independent peer review

The independent peer review of the Historical Heritage Impact Assessment (D56) raised no methodological concerns, concluding it was sound and in accordance with the Scoping Requirements.

On fieldwork (site visits), the peer review stated:

> There were constraints on fieldwork, which was necessarily targeted and with few exceptions, was undertaken from the public domain, but this limitation was addressed where possible by consulting other sources of information, including aerial photography.

The peer review considered the Historical Heritage Impact Assessment might be considered "*overly inclusive*" in its approach to identifying previously unidentified places of historic heritage significance, stating:

> These sites have [been] included on the basis they have been put forward or identified as having potential heritage significance, however it is likely that if a more detailed assessment was to be undertaken, many of these would be found to be of limited or no heritage significance.

On visual impacts, the peer review found the approach in the Historical Heritage Impact Assessment was "*broadly appropriate, albeit somewhat overinclusive*". The peer review stated the visual setting of a heritage place would normally include important views or visual connections *within* the place, but it is less common for longer views *from or out of* a heritage place to be defined and recognised for heritage reasons. It stated:

> … there is limited evidence to support the identification of views of heritage significance from or out of the majority of places assessed in Technical Report C.

The peer review found the assessment of the impacts on the Berry Deep Leeds Mining Landscape to be appropriate.

The peer review concluded:

- the assessment adequately addressed the Scoping Requirements and all relevant legislation, standards and guidelines

- the assessment demonstrates that the evaluation objective can be met
- the proposed historic heritage EPRs are suitable to avoid, mitigate and manage residual effects on heritage places.

(iii) Evidence and submissions

Methodology

The community was concerned that the methodology in the Historical Heritage Impact Assessment was not sufficiently comprehensive, resulting in many heritage places and values not being identified or assessed. Their concerns included limited site visits and fieldwork, the lack of consultation with local historical societies and interest groups, and a failure to properly investigate all the heritage places identified in social pinpoint data.

Community submitters identified many examples of heritage fabric or values on farming properties that had been missed, including homesteads, agricultural buildings and archaeological sites providing evidence of former agricultural activities.

Ballarat Council submitted the limited site visits and an over-reliance on desktop assessments is "*a critical flaw in Technical Report C's methodology*". Its main concerns related to the limited site inspections, submitting:

- conclusions that certain archaeological sites had no historic value without site inspections being conducted were without proper foundation
- failing to inspect sites meant that the likely impacts of the Project had not been properly assessed.

Hepburn and Moorabool Councils made similar submissions. The Councils submitted that further assessment of heritage sites affected by the Project needs to be undertaken before commencement of the detailed design, and changes made to the Project to ensure the route and placement of Project infrastructure will have no adverse impact on the significance of historical heritage places.

The Proponent submitted that the heritage assessment work in the EES was sound, demonstrating:

- comprehensive identification of heritage places
- a proportionate level of investigation (with more detailed analysis for significant heritage issues and places and less for lesser issues)
- a satisfactory framework for avoidance and minimisation of heritage impacts.

The Proponent submitted that, as Mr Zweep indicated during cross examination, a site inspection is not always needed to reach conclusions about the heritage significance of a place or the Project's likely impacts on the place's heritage values.

Visual impacts

Relying on the Historical Heritage Impact Assessment and Mr Zweep's evidence, the Proponent submitted that the visual impact was low for all heritage places assessed. It submitted visual impact in the heritage context is not about the personal appreciation of a view to or from a heritage place. Rather, it depends on the degree to which the Project would disturb the understanding of the place's setting or landscape. Significant impact only arises where the disturbance was such that the viewer "*can no longer discern the relationship between the various elements within that wider complex*".

This proposition was heavily contested by both the Councils and the community. They considered the introduction of industrial infrastructure into the settings of important heritage places and cultural landscapes would result in unacceptable impacts on the heritage values of these places.

Hepburn Council submitted:

> 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.

Ballarat Council made similar submissions.

In response, the Proponent submitted that if a place is of cultural significance because of a view, then impacting that view is significant. However, if the view contributes to the character of the place in a general sense but is not meaningfully related to why the place is historically significant, it is not a significant heritage impact.

Berry Deep Leads Mining Landscape

Along with Hepburn Council, several community submitters were concerned the Project would threaten the permanent UNESCO listing of the Victorian Goldfields. KDPA pointed to the recognition in the Burra Charter of the importance of cultural landscapes. It was concerned that the Project would locate industrial infrastructure very close to key features within the Berry Deep Leads Mining Landscape, and would be viewed for long periods of time by people travelling through the landscape or visiting key sites within it. Views looking along the section of transmission line bisecting the landscape would be particularly impactful, as demonstrated by the photomontages.

In response, the Proponent emphasised that the UNESCO tentative listing includes six components, only one of which is impacted by the Project. It submitted the wide spacing and lattice form of the towers allows visibility through the structures and allows the viewer to see the relationship between the significant features of the cultural landscape, to connect those features and to understand their connection and significance.

Mr Zweep's evidence was that the assessment area for the Berry Deep Leads Mining Landscape in the Historical Heritage Impact Assessment captured the volcanic landscape, the open agricultural nature of the landscape, the ruins of the former mine sites and their waste heaps. He stated:

> Mining is just one aspect of this landscape, albeit a highly significant one that brings the importance of the rest of the landscape together. This approach placed the mine sites into an overarching cultural landscape that encompassed multiple heritage values and themes. All of these elements were able to be placed into a single narrative to demonstrate that this is a unique and historically rich cultural landscape.

His evidence was that the landscape "*has always been dynamic, and that change is one its contributing characteristics*". Despite the visual presence of the transmission towers, the significant landscape elements that contribute to its significance would still be visible and the understanding of their relationships to each other would remain uninterrupted.

Mr Zweep's evidence was:

> The significance of place does not rest upon being located within a pristine or undisturbed visual setting. Rather, the place demonstrates a series of human interventions (mines, subdivision patterns etc.) that demonstrate an important phase in Victoria's history. These features will not be physically removed by the WRL Project and will continue to be legible.

Hepburn Council submitted that 35 years of advocacy and many years of work across multiple levels of government and agencies had gone into preparing the UNESCO nomination, and that permanent listing (if successful) would bring very significant benefits to the region, not just in terms of heritage but in terms of tourism and economic benefits. Quoting from the Justification of Outstanding Universal Value prepared as part of the UNESCO bid, it submitted:

> The proposed 80 metre 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.

Hepburn Council submitted the Historical Heritage Impact Assessment failed to adequately recognise the Berry Deep Leads Mining Landscape as a cohesive and culturally significant heritage entity. It submitted the assessment area in the Historical Heritage Impact Assessment did not cover the whole of the Landscape, and excluded heritage sites within the Landscape even where they are covered by the Heritage Overlay and contribute to the overall narrative of the Landscape. It submitted:

> 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.

KDPA made similar submissions.

In cross examination, Hepburn Council put to Mr Zweep that the whole of the master plan area for the Victorian Goldfields needed to be considered. Mr Zweep disagreed. He considered that while the master plan is based on the heritage significance of the goldfields landscapes, it is also based on experiences (such as tourism) that are being promoted through the UNESCO bid, but which he did not consider as central to the understanding of the heritage significance of the Landscape.

Heritage bridges, remnant stone walls, avenues of honour and significant trees

Several heritage places or potential archaeological sites will be directly impacted by the Project. The IAC has focussed on those of most concern to the Councils and the community.

The IAC received many submissions opposing the loss of the Algerian Oak at Bullarook Streamside Reserve. The oak was included in the National Trust of Australia's Register of Significant Trees in 2022 and named National Trust Tree of the Year 2025 (during the Hearing).

Mr Zweep's evidence was that the tree is of low historical significance, but he acknowledged the value placed on the tree by the community. He stated:

> The impact on the tree itself is defined as severe as it constitutes the loss of the tree. However, in broader terms, with regard to the landscape, and as an example of its kind, the loss of the tree is considered to be a low historical heritage impact.

The Proponent filed TN14 providing two options for avoiding impacts to the Algerian Oak:

- moving the relevant section of the transmission line slightly north (Option A)
- increasing the height of the towers on either side of the Algerian Oak (Option B).

Kerrins Bridge (which is within the Bullarook Streamside Reserve) was another heritage place that attracted significant concern from both Hepburn Council and the community. They were concerned the transmission line passing directly over the bridge would interrupt views of the bridge and its picturesque agricultural setting. Concerns were also raised about physical impacts to Kerrins Bridge during construction, from construction traffic using the bridge or inadvertent collisions with the bridge during installation of Project infrastructure.

Several community submitters pointed to the importance of the Kingston Avenue of Honour, an avenue planting of 286 elm trees in Kingston (in Hepburn Shire). The first of the trees were planted in 1918/19 to commemorate the service of men and women from the district who served in the Great War. The trees, now 108 years old, are subject to heritage protection at both State and local level and are highly valued by the local community.

Kingston Friends of the Avenue is a volunteer organisation that manages and takes care of the avenue and advocates for its preservation and protection. It submitted:

> The Avenue is experienced sequentially whether you are walking or driving. The memorial creates a story through repetition and rhythm because when you move through the Avenue in the landscape, it reminds you how many people it represents. The sequential experience is something that visitors always comment on. That repetition and rhythm is important and if it is affected or altered in anyway, it would change the experience.

Kingston Friends of the Avenue was concerned that the Project would have multiple adverse impacts on the avenue, including:

- damage from the proposed use of the avenue as a construction route, including:
  - heavy vehicle construction traffic causing compaction of tree root zones and damage to the canopy
  - the potential need for road widening to accommodate construction traffic
  - safety concerns for visitors and tourists forced to interact with construction traffic.
- visual impacts on the setting of the avenue including towers located close to the northern end of the avenue, and the views of the transmission line running along Birch's Bald Hill which would be visible from several points along the avenue.

Ballarat Council was concerned about impacts to the remnants of a drystone wall on the eastern boundary of a field on Coghills Creek Road, described in the Historical Heritage Impact Assessment as "*a rare surviving example of its type in this area*". An access track is proposed that crosses the stone wall. The Historical Heritage Impact Assessment states that if the access track cannot be relocated, the impact could be reduced by including load dispersal measures to reduce the likelihood of the remnant stones being damaged. Council submitted this was not an appropriate response, and EPRs HH1 and HH5 should be amended to ensure construction of the access track over the wall does not result in any demolition of the wall.

Melton Council pointed to several heritage places within its municipality that will be impacted by the Project, including drystone walls and Melton Park, an intact example of the Victorian Picturesque style associated with the pastoral and early horse racing

industries in Melton. The house and gardens are both subject to heritage protection, and Melton Council submitted the Project "*will have a clear and intrusive impact to Melton Park, as the alignment will be visible from both sides of the property and crosses its avenue of trees upon entry*".

In response to concerns about physical impacts to historic places, the Proponent included a new EPR HH5 in its Day 2 ERPs requiring (among other things) a pre-construction conditions survey, monitoring of the places during construction, and taking measures to protect and repair heritage fabric should any changes be detected.

Agricultural tile drainage systems

The Seven Hills Estate Field Tile Drainage System is located on land near Allendale that was originally farmed by the Birch family who were the first European settlers in the area, after whom Birch Creek is named. Part of that land is now farmed by Mr May, one of the submitters in the Charleson Group. The tile drainage system could be impacted by towers and access tracks.

Mr May has been caring for the tile drainage system for over 50 years. His original submission stated:

> With over 50 years' experience working with this system I have little faith that the proponent will be able to mitigate any damage and the only sensible conclusion to draw is that tile drainage system must be avoided by shifting the proposed route slightly south (for example). This would also reduce the length of the transmission line. [The Proponent] suggested mitigation has been done by desktop analysis without access to the site or knowledge of the size and complexity of the system.

Mr May indicated that quite apart from the heritage concerns, the tile drainage system is a functional system and damage to the system would result in localised flooding in his paddocks and the area of tower footings for around four to five months per year.

The Historical Heritage Impact Assessment discussed potential mitigations to manage impacts to the tile drainage system, including constructing the access tracks to disperse the load of construction vehicles traversing the land.

Mr Zweep's evidence was:

> I disagree with the submitter's belief that the Project will cause irreparable damage to the drainage system. I remain of the opinion that if there is impact to the drainage system from the Project, it will be limited.

The Charleson Group tendered written evidence from Christopher Clarke in relation to the tile drainage system. Mr Clark's evidence was that in accordance with the Burra Charter, avoidance of harm should be the first priority, and the Proponent should consider re-designing the Project to avoid any impact:

> Avoidance would ensure that the drainage system remains operational, and that any archaeological remains and associated heritage significance is preserved for future generations.

Mr Clark considered that if harm cannot be avoided, further assessment and investigations (including archaeological investigations) should be undertaken before works commence to determine the extent of impact and recommend mitigations.

The Charleson Group submitted the IAC cannot be satisfied that EPRs could enable the Project to proceed without causing unacceptable harm to the cultural heritage

significance of Mr May's land. The Group submitted that the Historical Heritage Impact Assessment and Mr Zweep's evidence gave insufficient consideration to avoidance, and placed "*undue weight*" on the efficacy of the EPRs to identify and avoid, mitigate or repair the tile drain system. The Group submitted:

- the proposed mitigation strategies are not supported by evidence relating to the load bearing capacity of the tiles or the nature of the surrounding soil and protection it affords (if any) in terms of load dispersal
- the preferable approach, and one that would be more consistent with the Burra Charter, would be to shift the Project south to avoid impact to the tile drainage system.

(iv) Discussion

The community's main concerns in relation to historic heritage were that the Project's direct (physical) and indirect (visual) impacts on heritage places have not been avoided and cannot be appropriately mitigated. Many (including KDPA) characterised the residual impacts as severe.

Neither the Burra Charter nor the policy framework in Victoria require avoidance of impact on heritage places. Rather, the policy framework requires a balanced approach. While avoidance should be investigated, if impacts can't be avoided, they must be managed such that the place's history and meaning can continue to be understood.

Methodology

There was a considerable level of concern in the community in relation to the number of site visits conducted to inform the assessment in the Historical Heritage Impact Assessment. Submitters who expressed those concerns included some landowners who refused access to their land to allow inspections of heritage assets and values.

While site visits are a valuable tool in the assessment of heritage values, they are not necessary in every case. Nor would this be practical given the length of the Project route.

The IAC is satisfied on the basis of the Historical Heritage Impact Assessment, the peer review and Mr Zweep's evidence that Jacobs attempted to inspect the more significant heritage sites identified in the assessment. Where site visits were not possible (including where access was denied), Jacobs undertook a comprehensive document review to assess the likely heritage values using a range of source material including old maps and documentary records.

Many of the archaeological sites identified by the assessment were not inspected. Heritage Victoria's '*Policy for determining low archaeological value*' (2018) explains that for an archaeological site to have more than low archaeological value, it must meet both the following thresholds:

- archaeological value, which can be based on (among other things) the presence of artefacts, or documentary evidence, landscape features or other information that indicates a likely presence of archaeological remains that are in a condition that will contribute to an understanding of the site

- place history, which means the site evidences an association with a historical event, process, tradition etc, and the site history is of significance within a state, regional, local, thematic or other relevant framework.

The Historical Heritage Impact Assessment contains an appropriate analysis of archaeological value and place history for archaeological sites. Site access restrictions meant that Jacobs were not able to definitively determine whether artefacts were present at all archaeological sites. However the IAC is satisfied that the Historical Heritage Impact Assessment considered documentary evidence, landscape features or other information to determine the likely presence of archaeological remains and to document and assess the site's archaeological value and place history.

Many of these archaeological sites were reported by Jacobs to Heritage Victoria, and have been included in the Victorian Heritage Inventory for the first time. As a result, consent will be required under the Heritage Act before these sites can be disturbed. This will ensure that any archaeological material discovered during Project works is properly managed.

It is inevitable that with a project of this size, not all heritage values will have been identified. However the IAC is satisfied that the level of investigation to date is proportionate and appropriate for this stage of the approval process.

The EPRs include several measures to ensure that heritage places (including as yet undiscovered heritage places and archaeological artefacts) are appropriately protected through:

- an unexpected finds protocol
- avoidance in the detailed design process
- protection measures during construction.

Although it covers much of the same ground as EPR HH1(2), the new HH5 strengthens the protection of heritage places and values from physical impacts by requiring existing conditions surveys, monitoring during construction and repair, remediation or reinstatement of any damage caused during construction works.

Visual impacts

In a heritage context, visual impact depends on the degree to which the new infrastructure would disturb the understanding of a cultural landscape or the setting of a heritage place, where that setting contributes to the place's historical significance. Visibility alone is not sufficient to demonstrate a heritage impact.

The IAC is satisfied that the concept of 'setting' applied in the Historical Heritage Impact Assessment, being the "*immediate and extended environment of a place that is part of or contributes to its cultural significance and distinctive character",* is appropriate and consistent with the Burra Charter.

The IAC does not agree with the Proponent that significant impact only arises where the disturbance to a setting or landscape is such that the viewer can no longer discern the relationship between the various elements within a setting or landscape. In some cases, visual impacts may be significant even if the various elements in the setting or landscape can continue to be seen and their relationship to one another continues to be understood.

Whether visibility of the Project amounts to a significant heritage impact will be a matter of judgement. It will depend on the setting or landscape, the elements within it, their proximity to one another and whether the elements were consciously established in a particular setting or with a particular spatial relationship to one another. Interruption of significant view lines will be more significant if the view line was a factor in the design or placement of a heritage place for example.

The Historical Heritage Impact Assessment appropriately recognised the importance of the relationship between visual impacts and the design of a heritage place and its setting. No examples were brought to the IAC's attention where the Historical Heritage Impact Assessment had failed to recognise that the setting of a particular heritage place was consciously designed or created around particular view lines. No examples were provided that demonstrated that the setting is so critical to the place's historical significance that it is incapable of accommodating visual change without destroying the understanding of the place's historical significance.

The IAC agrees with the finding in the Historical Heritage Impact Assessment that from a heritage perspective, visual impacts of the Project are low.

Berry Deep Leads Mining Landscape

The IAC is satisfied that the stand-alone assessment of the Project's impacts on the Berry Deep Leads Mining Landscape in the Historical Heritage Impact Assessment was comprehensive and appropriate, and its conclusions on the Project's impacts on the Landscape are justified.

Several parties, including KDPA and Hepburn Council, considered the study area was too narrowly defined, and that the Landscape had not been assessed as a cohesive and culturally significant heritage entity.

Cultural landscapes are defined in the UNESCO *Operational Guidelines for the Implementation of the World Heritage Convention* as follows:[7]

> Cultural landscapes … are cultural properties and represent the "combined works of nature and of man" designated in Article 1 of the Convention. They are illustrative of the evolution of human society and settlement over time, under the influence of the physical constraints and/or opportunities presented by their natural environment and of successive social, economic and cultural forces, both external and internal.

The peer review considered the Historical Heritage Impact Assessment's assessment of the Berry Deep Leads Mining Landscape in detail. It concluded:

> **Comment:** The *cultural landscape* approach adopted in Appendix B takes a broad view of the heritage values of the area, looking beyond the individual heritage-listed sites and approaching the area as an integrated layered entity. This approach allows for a more holistic consideration of values and of potential impacts.
>
> The approach is also aligned with the approach in the WHL Tentative Listing documentation, where the broader proposed serial listing itself with its various rural and urban components is conceived of as a *serial cultural landscape*, specifically a *highly legible relict and associative cultural landscape.*

7 UNESCO, *Operational Guidelines for the Implementation of the World Heritage Convention*, 31 July 2024, page 47

In cross examination, Hepburn Council put it to Mr Zweep that the study area should have included all of the elements in the master plan prepared in support of the UNESCO bid. The IAC does not consider that this was necessary. The study area was sufficiently broad to capture all of the critical elements that contribute to the cultural and heritage significance of the Landscape and the changing land uses over time that have contributed to that significance. The study area included not just the remnants of former mining activities (such as mullock heaps and old mining infrastructure), but also the volcanic and pastoral character of the landscape and agricultural settlement and subdivision patterns.

In the IAC's view, the study area was sufficient to form a proper understanding of the cultural and heritage significance of the Landscape, consistent with the description of cultural landscapes in the UNESCO Guidelines.

The key question remaining is whether the Project's impacts on the Berry Deep Leads Mining Landscape are acceptable.

The Project's impacts on the Landscape are visual, not physical. The transmission line proposes to traverse the Landscape for some distance, and Project infrastructure will be visible from many points within the Landscape. It will be seen by people who are at fixed points or locations within the Landscape (not limited to the six viewpoints assessed in the Historical Heritage Impact Assessment), as well as those moving through the Landscape.

The Berry Deep Leads Mining Landscape is not a landscape that was consciously designed with regard to its visual setting. Nor were the elements within it placed or designed having regard to visual qualities or considerations. The location of the remnants of mining infrastructure and mullock heaps reflect where the resource was located, not any particular consciously designed visual factors.

While there is no doubt that the Project will introduce a significant visual change in parts of the Berry Deep Leads Mining Landscape, the IAC does not consider that it will significantly compromise the understanding of the Landscape, the relationship between the various elements within the Landscape, or the heritage values within it. The IAC agrees with the assessment in the peer review:

> It is clear that of the historical layers that are present and demonstrated, the critical one and the reason for the identification of the Berry Deep Leads Mining Landscape as a landscape of heritage significance, is the history of deep lead mining - as is indicated in the Tentative List documentation for the WHL nomination for the Victorian Goldfields.
>
> In this regard, even with the visual presence of the Project the ability to appreciate the relic mining sites, their characteristic/recognisable forms and distribution across the landscape, and their relationship with the volcanic geomorphology will all be maintained.
>
> There will be a visual impact and views within the landscape - including the mining sites - will be affected by the Project infrastructure, but not in a manner that would prevent an understanding of the identified values.

The IAC understands the concerns of the Councils and community that the Project could threaten the permanent UNESCO listing of the Victorian Goldfields. However no persuasive evidence was put before the IAC that demonstrated that this is likely. The UNESCO bid covers six geographically disparate components and many elements within those geographic areas. Most of the components will not be impacted by the Project. The Berry Deep Leads Mining Landscape forms part of one of those components, and for

the reasons stated above, the IAC does not consider that the Project will fundamentally undermine the heritage value of the Berry Deep Leads Mining Landscape.

Heritage bridges, remnant stone walls and significant trees

Submitters brought many examples of heritage places that will be impacted by the Project to the attention of the IAC. While some places will be more significantly impacted than others, none of the examples brought to the IAC's attention were of such high heritage value to justify a finding that the Project would have unacceptable impacts to heritage places, individually or collectively.

The IAC accepts Mr Zweep's evidence that, notwithstanding its inclusion in the National Trust Register of Significant Trees, the Algerian Oak in the Bullarook Streamside Reserve does not have significant heritage value. The IAC does not consider that either of the Project modifications outlined in TN14 designed to save the oak are necessary from a heritage perspective.

That said, the tree is clearly highly valued by the local community, and the Proponent may therefore wish to pursue options to save the tree. These options are discussed further in Chapter 15.3.

The Project will introduce visual change to the settings of many of the heritage places brought to the IAC's attention, particularly Kerrins Bridge, the Bullarook Streamside Reserve and Melton Park. Visual change will also be introduced into the settings for the Kingston Avenue of Honour, the Coimadai Avenue of Honour and the two avenues of honour referred to in Ballarat Council's submission.

No material put before the IAC demonstrated that the settings of any of these places were designed around particular visual considerations that are fundamental to their historic significance. Accordingly, even where the Project could introduce significant visual change to the settings of these places, the IAC does not consider that the heritage impacts of that visual change are unacceptable.

Physical impacts to heritage places during construction of the Project will need to be carefully managed, particularly for Kerrins Bridge and the Kingston Avenue of Honour. The IAC is satisfied that EPRs HH1, HH4 and HH5 establish an appropriate framework for managing any physical impacts of construction. The traffic EPRs will also assist.

Agricultural tiled drainage systems

The Historical Heritage Impact Assessment undertook a standalone assessment of the Seven Hills Estate Tile Drainage System and found that it is of local historical, archaeological and representative significance. Mr Clark's assessment did not dispute these findings.

It is likely that the Project will damage or even destroy parts of the tile drainage system. The tile drainage system is clearly of great importance to Mr May from both a historic and functional perspective. However the IAC was not persuaded on the material before it that the heritage value of the tile drainage system is so high as to justify re-routing the Project to avoid it. While localised parts of the system will be impacted, perhaps severely, a significant proportion of the system will not be physically impacted. The remaining

portion should provide a sufficient understanding of the historic significance of the system.

The tile drainage system is not currently subject to any heritage controls. Jacobs nominated the system for inclusion on the Victorian Heritage Inventory. The system is now registered, and any disturbance to the system will require consent under the *Heritage Act 2017*. While this will not avoid impacts to the system, it will ensure that impacts to its heritage values are appropriately managed.

Damage to part of the tile drainage system resulting from Project construction could potentially affect the functioning of the remainder of the system and should be repaired in accordance with EPR HH05 in consultation with the landholder to ensure the existing functionality of the system is maintained.

Environmental Management Framework

The Councils proposed several changes to the historic heritage EPRs in their consolidated Day 3 version (D595). Ballarat and Hepburn Councils requested further changes in D643.

The IAC has reviewed the requested changes and has recommended changes to ensure appropriate consultation with the relevant statutory authority and/or the owner of the heritage place in relation to archival recording and repair or reinstatement works. It does not consider that any further changes are warranted, including:

- amendments to HH4 to refer to specific heritage places
- a new HH6 requiring preparation of heritage assessments (this work has already been done in the Historical Heritage Impact Assessment).

The IAC notes Mr May's submissions that the Project alignment within the property could be modified to reduce impacts on the drainage system. The IAC discusses the scope for reviewing the siting of project infrastructure in Chapter 15.5.

(v) Findings and recommendation

The IAC finds:

- The methodology in the Historical Heritage Impact Assessment was appropriate and proportionate to the potential heritage impacts of the Project.
- Site visits of every heritage place that could be potentially impacted are not necessary for the purposes of an EES for large scale infrastructure such as the Project.
- While some heritage places will be more significantly impacted than others, none of the specific examples brought to the IAC's attention have such high heritage value, individually or collectively, as to justify a finding that the Project in the form and on the route proposed would have unacceptable impacts to heritage.
- The Project will introduce visual change to the Berry Deep Leads Mining Landscape, but this is not so significant as to fundamentally undermine its character as a cultural landscape or its heritage values.
- Registration of a number of previously unidentified sites on the Victorian Heritage Inventory will ensure that heritage impacts to these sites (including archaeological sites) are appropriately managed.

- The Day 3 EPRs are generally appropriate to ensure that heritage values, including any that have not yet been identified, will be appropriately managed.

The IAC recommends:

Environmental Management Framework

Include the following change/s

- Amend EPR HH1, HH2 and HH5 to ensure appropriate consultation with the relevant statutory authority and/or the owner of the heritage place in relation to archival recording and repair or reinstatement works.

These changes are included at Appendix E:2.

5.4 Overall conclusions on heritage effects

Subject to applying its recommendation, the IAC is satisfied Project is consistent with relevant policy and legislation and the relevant draft evaluation objective relating to heritage. While impacts on some heritage places will be more significant than others, the IAC considers that overall, the likely heritage effects of the Project are acceptable.

6 Landscape and visual

6.1 Introduction

(i) Key information

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, and manage potential adverse effects on landscape and visual amenity.

Landscape and visual effects are assessed in:

- EES Chapter 11 Landscape and Visual
- EES Technical Report D Landscape and Visual Impact Assessment (LVIA).

The exhibited EMF includes the following EPRs:

- LV1 Minimise visual impacts – Public domain
- LV2 Minimise visual impacts – Private domain landscape screening program.

Table 11 lists the expert evidence on landscape and visual impacts.

Table 11 Evidence on landscape and visual

Party	Expert	Firm	Expertise	Document number
LVIA methodology				
Proponent	Steve Schutt	Hansen Partnership	Landscape and visual	D106
Proponent	Hayden Burge	Landform Architects	Landscape and visual	D119
Proponent	Rob Milner	Milner Planning Advisory	Planning	D107
Melton Council	Chris Goss	Orbit Solutions Pty Ltd	Landscape and visual	D113 (Part A – methodology)
Melton Council	Chris Goss	Orbit Solutions Pty Ltd	Landscape and visual	D200, D201, D201(a), D201(b), D202, D202(a), D202(b) (Part B – visual impacts)
Hepburn Council	Brendan Papworth	Papworth Design Pty Ltd	Landscape and visual	D135 (Part A – methodology)
Hepburn Council	Brendan Papworth	Papworth Design Pty Ltd	Landscape and visual	D154, D154(a) (Part B – visual impacts)
Joint Expert Statement on LVIA methodology				D191

Other key documents are:

- independent peer review, landscape and visual (D57)
- professionally prepared photomontages of the Project that were not included in the LVIA (D243 prepared by Mr Goss for Hepburn Council, and D666 and D667 prepared by Mr Burge for landowners)
- various photographs provided by submitters of views from their homes and properties.

The IAC has had regard to relevant policy and guidelines, including:

- clause 12.05 of the planning schemes (Significant Environments and Landscapes)
- policies in the planning schemes that identify and seek to protect landscape values, including the Municipal Planning Statements
- planning controls that apply to the Project Area and surrounding areas, including the Farming Zone, the Rural Living Zone (RLZ), SLOs, Design and Development Overlays (DDOs) and ESOs that recognised landscape values and visual amenity
- the South West Victorian Landscape Assessment Study (SWVLAS).

(ii) What did the EES say?

The Project design sought to avoid and minimise visual impact, including through:

- avoiding areas within the Public Conservation and Resource Zone (PCRZ), including national and state parks, scenic reserves, flora and fauna reserves and bushland areas
- where practical, avoiding direct impacts to:
  - areas within a SLO or a relevant ESO
  - historic landscape features and areas within Heritage Overlays.

Key aspects of the methodology applied in the LVIA included:

- defining an appropriate study area, which included the Project Area and the area within 9.2 kilometres of the Proposed Route (the Project would be barely visible beyond 9.2 kilometres)
- defining four broad landscape character areas and nine landscape character units, and assessing landscape and visual conditions within each and the sensitivity of each to visual change
- field investigations and site inspections to select 119 viewpoints across the area surrounding the Proposed Route and document and photograph the views from these viewpoints
- preparing photomontages for some viewpoints providing an indication of how the Project infrastructure will appear in the views
- assessing the visual impact from each viewpoint, based on criteria widely recognised and applied in landscape and visual impact assessments (including the sensitivity of the landscape, viewer sensitivity, the degree of change, distance, viewer numbers and duration)
- evaluating and rating initial and residual impacts as 'nil', 'negligible', 'low', 'moderate' and 'high' (the LVIA explains what each of these ratings means).

The LVIA includes the following figure which demonstrates the relationship between distance and dominance of the transmission towers in a viewer's vertical field of view.

Figure 9 Visual impact – relationship between distance and visual dominance

Source: Technical Report D Figure 4-2

Technical Report E (the Land Use and Planning Impact Assessment) indicates that the Project directly impacts a small amount of land within SLOs, including:

- two of the volcanic cones protected by the Hepburn SLO1 (Volcanic Peaks Landscape Area and Ridges and Escarpments Area):
  - three towers and access tracks are located within the SLO1 that applies to the volcanic cone to the near south west of Mount Prospect
  - one tower is located within the SLO1 that applies to the volcanic cone directly east of Newlyn
- a short section of transmission lines (no towers) traverses the north eastern edge of the Ballarat SLO1 that protects Mount Bolton
- one tower and an access track is located within the Moorabool SLO1 (Scenic Hilltops and Ridge Line Areas) that applies to the immediate east of the area known as the Highlands, to the south of the Wombat-Lerderderg National Park
- a small section of access track is located within the Melton SLO1 (Volcanic Hills and Cones) that applies to Mount Kororoit, near the intersection of Leakes and Holden Roads.

After the LVIA and Land Use and Planning Impact Assessment were prepared, the SLO4 was added to the Melton Planning Scheme which applies along the Kororoit Creek Valley. This is explored in Chapter 6.5.

The LVIA assessed the impact of the Project on public viewpoints within the various landscape character areas as follows:

- impacts to Plains and Volcanic Cones landscapes will be low, except for Newlyn Reservoir (moderate) and two viewpoints along the Buried Rivers of Gold tourist drive
- impacts to Vegetated Hills and Farming landscapes will be low, except Mt Beckworth Scenic Reserve (moderate to low)
- impacts to Rolling Farmland and Waterbodies landscapes will be low, except for Bolwarrah Weir (high)

- impacts to Peri-urban and Townships landscapes will be nil to low, except Merrimu Reserve (moderate to high), the view toward Mount Kororoit from Holden/Leakes Road (high), Swans Road (moderate to low) and Lerderderg Gorge Road (moderate to low).

The LVIA concluded that with the exception of elevated dwellings on the north facing slopes in Darley, dwellings in developed areas will not generally be highly impacted due to screening provided by existing built form, fencing and vegetation. Multiple dwellings in rural areas will be moderately to highly impacted, particularly those that are in open farming areas and are oriented to take in views that will be interrupted by the Project.

Independent peer review

Mr Schutt was the author of the independent peer review of the LVIA (D57). The peer review included a comprehensive review of the LVIA methodology, and noted that the methodology drew on guidance from a number of Australian and international reference texts that are widely accepted and applied in the industry. The peer review considered the methodology utilises both quantitative and qualitative criteria, which it considered appropriate and necessary. It found the methodology to be broadly appropriate, describing some aspects as best practice.[8] The peer review concluded the methodology met the Scoping Requirements.

6.2 Methodology

(i) The key issues

The key issues are whether the methodology of the LVIA was appropriate in respect to:

- the characterisation of landscape character and viewer sensitivity
- viewpoint selection
- accuracy and utility of photomontages
- impact ratings, specifically whether the LVIA should have included ratings of 'very high' and 'extreme/catastrophic'
- the effectiveness of landscape screening as a mitigation
- the assessment of cumulative effects.

(ii) Evidence and submissions

Submissions raised a range of concerns with the LVIA methodology, including:

- whether landscape character and viewer sensitivity were correctly defined and applied
- appropriateness of viewpoint selection, including whether key public, heritage or tourist locations were omitted

[8] The only aspect of the LVIA methodology which the peer review disagreed with related to the percentage of the vertical field of view that would be taken up by an 80 metre tower. Mr Schutt considered the LVIA adopted a conservative approach, assuming that at a distance of 1 kilometre the tower would take up 50 percent of the vertical field of view, whereas he considered it would only take up 25 percent. The peer review states (in paragraph 19) "*I do not consider this to be a shortcoming of the LVIA, in that the resultant study area extent comfortably includes all land beyond which visible project infrastructure would no longer cause a recognisable visual impact greater than a low level*".

- the adequacy of stakeholder engagement in shaping the viewpoint selection and understanding community concerns
- photomontage accuracy, scale, and realism
- whether the LVIA sufficiently addressed cumulative impacts
- criticism of landscape screening as a mitigation
- criticism of the failure to consider undergrounding as a mitigation option.

As noted above, Mr Schutt's independent peer review of the LVIA included a comprehensive review of the methodology and found it to be appropriate.

Mr Goss and Mr Papworth both provided evidence in relation to the LVIA methodology. Mr Papworth's evidence raised a number of concerns with the methodology, which are addressed below. Mr Goss' evidence did not address the methodology in the LVIA. Rather he provided material that explained his own methodology for conducting LVIAs.

The IAC directed the experts to meet to identify areas of agreement and disagreement in relation to methodology. The Joint Expert Statement records a high level of agreement in relation to most aspects of the methodology. There was disagreement in relation to:

- viewer sensitivity – Mr Papworth considered that a single viewer sensitivity rating for each landscape character unit is insufficient to capture the unique landscapes in Hepburn Shire and the range of sensitivity one might find within each unit
- impact ratings – Mr Schutt, Mr Papworth and Mr Goss all considered the impact ratings could be more granular and should include a 'very high' rating. Mr Papworth considered an 'extreme/catastrophic' rating should also be included
- whether views from highways and tourist vantage points were sufficiently assessed (this is addressed in Chapter 6.3).

Mr Burge was cross examined extensively by the Councils in relation to whether the Project's visual impacts were consistent with planning controls and policies in both Hepburn and other municipalities. His answers indicated he had considered the planning controls and policies in detail, including the objective in Victorian Planning Provisions (VPP) clause 12.05 of protecting and enhancing significant landscapes and ensuring development preserves natural qualities. Mr Burge explained that these objectives had influenced his recommendation that the Project adopt a double circuit design of single slimmer (albeit taller) towers for most of the route.

Mr Milner gave planning evidence for the Proponent. He stated:

> To the community the visual impact of the Project upon the landscape would be among the most self-evident 'costs' of facilitating the transmission of renewable energy between generators and consumers.

His evidence was:

> In concluding on the net community benefit implications and weight to be given to visual impacts it is relevant to observe how energy generation and transmission infrastructure is an established and evolving visual characteristic of rural and regional landscapes.

He considered the visual impact of the Project is "*a major regional community impact*", but he considered it to be acceptable to the wider community because of the access it enables to critical sustainable energy. He noted the Project design has sought to minimise visual impact, including through co-location with existing transmission

infrastructure for a third of the route. He noted the Project avoids Distinctive Areas and Landscapes, only impacts SLOs on the periphery, and avoids State and National Parks.

Pyrenees Council submitted the LVIA methodology undervalued the significance of landscapes in Pyrenees, with minimal community consultation about landscape values in the Shire. It submitted Pyrenees will be particularly impacted by cumulative visual impacts of the Project and other renewable energy projects present or planned in the Shire. Pyrenees Council called for a comprehensive assessment and mitigation of landscape and visual impacts, with genuine community engagement. Ballarat and Hepburn Councils raised similar concerns.

Relying on the LVIA and Mr Schutt's independent peer review and evidence, the Proponent submitted the methodology of the LVIA was comprehensive, robust and appropriate. The Proponent submitted the issue about the granularity of the impact ratings does not change the substance of the technical work in the LVIA, and should not have any significant bearing on the assessment of the acceptability of the Project:

> When the LVIA is read as a whole and used in a proper way, splitting of 'high' impacts into two categories being 'high' and 'very high' is not a material point. These are ultimately qualitative labels.

Viewpoint selection

Hepburn Council submitted the LVIA failed to identify and assess visual impacts from key locations within Hepburn Shire. Mr Papworth identified numerous locations that had not been assessed, and recommended further photomontages be prepared to understand the impacts in these locations.

Hepburn Council engaged Mr Goss of Orbit Solutions to prepare photomontages from five of the key locations identified by Mr Papworth (D243). It submitted:

> The photomontages prepared by Orbit Solutions demonstrate the scale of impact not readily apparent from the LVIA due to the choice made to exclude these locations from visual assessment. When viewing these photomontages, it's easy to appreciate why they were excluded.

Neither the independent peer review nor Mr Schutt's evidence pointed to concerns that the 119 viewpoints selected in the LVIA:[9]

- were not representative
- were not sufficient to develop an understanding of the Project's visual impacts on both the public and private realms
- disguised the worst visual impacts of the Project.

However the independent peer review stated that the LVIA could have explained the rationale for the selection of each viewpoint, to allow a clearer appreciation of the reasons why each viewpoint was considered representative of other locations within the study area which have not been assessed.

The Joint Expert Statement indicated that all the experts agreed with the following:

> Impact on sensitive, significant landscape values, landforms and communities - *Viewpoints must represent significant, sensitive, and high-impact locations*

[9] The LVIA included 119 viewpoint assessments, 57 views from dwellings and 62 views from the public realm. Not all viewpoints had photomontages prepared.

As noted above Mr Papworth identified further key locations that he thought should have been assessed. He also had some concerns about the selection of views from public roads and tourist vantage points, which are discussed in Chapter 6.3.

All experts agreed that the methodology set out in Section 4.7.1 of the LVIA was appropriate to identify dwellings for inclusion in the assessment. Impacts on dwellings are discussed further in Chapter 6.4.

Accuracy and utility of the photomontages

All experts agreed that it is not necessary to prepare a photomontage for every viewpoint. Neither Mr Goss nor Mr Papworth raised any concerns about the methodology for the preparation of photomontages or their accuracy.

Mr Schutt's evidence responded to the concerns raised in submissions. He did not agree that the photomontages are misleading and not to scale. His evidence was that an experienced practitioner is able to develop an understanding of landscape change and visual impact of new infrastructure without photomontages. However he considered a properly constructed photomontage "*is the most reliable and informative means of demonstrating the visual effect of the Project*". He considered the methodology for the preparation of photomontages was robust and verifiable.

Impact ratings

Mr Schutt considered the impact ratings in the LVIA could be refined to include both a 'high' impact and a 'very high' impact. However this would not result in any impact levels currently assessed as 'moderate' being elevated to 'high'. Rather, it would separate impacts currently assessed as 'high' into two impact levels – 'high' and 'very high'. He explained:

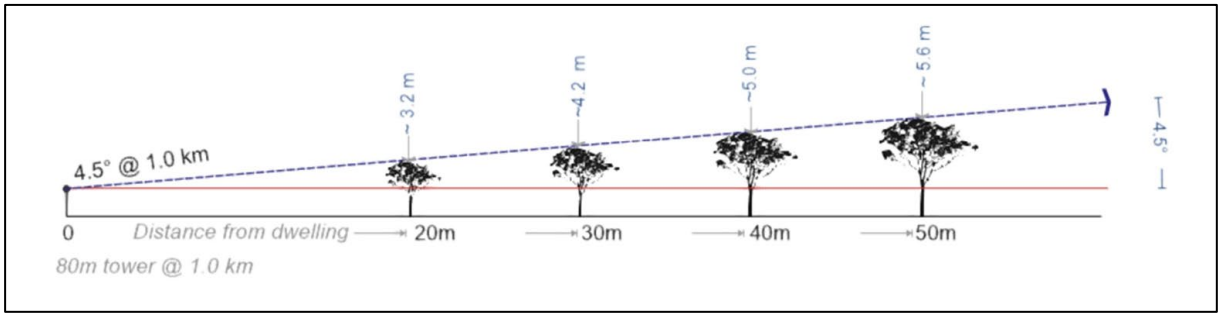
> It is my opinion that the inclusion of a 'very high' impact level within the Scale of Effects would address the perception that there is an imbalance in the impact rankings, by providing for two levels of impact above a moderate level and two levels of impact below a moderate level…

As noted above, Mr Papworth considered the LVIA should have included an 'extreme/catastrophic' rating.

Landscape screening

Mr Schutt and Mr Burge addressed whether landscape screening can effectively mitigate the visual impact of 80 metre high transmission towers. They explained that screening vegetation does not need to achieve a height of 80 metres to screen views of the towers. It only needs to achieve a height which interrupts lines of sight to the towers. This height decreases with distance, as demonstrated by Figure 10.

Figure 10 Height of vegetation required to screen views of 80 metre high infrastructure



Source: Technical Report D Table 13.1

Mr Schutt and Mr Burge both noted the LVIA recognised the limitations of screening as a mitigation of visual impact, acknowledging that:

- in some cases, screening around dwellings would not be effective in obscuring views because the tower is too close to the dwelling for the vegetation to achieve the necessary heights to fully screen the tower
- in other cases, screening would obscure highly valued views, and screening around private dwellings should therefore be at the option of the resident (as provided for in EPR LV2).

Mr Papworth considered vegetation screening is not an acceptable mitigation to reduce visual impacts on dwellings in Hepburn. He stated:

> The suggestion that residents could reduce the visual impacts to "low" with extensive planting around their properties and dwellings is, in my opinion, unacceptable given the setting of this character area with its distinctive volcanic cones and rural landscapes. The environments of residents would change from one where any views across the landscape would change to one where they are enclosed by vegetation with no views out. And whenever they would leave or return to their property, they might either be dwarfed in the landscape by the transmission towers or for the towers to be very dominant in their view.

Ballarat Council pointed to the limitations of landscape screening in mitigating the visual impacts to the six dwellings within Ballarat assessed in the LVIA, submitting that screening vegetation:

- will take time to grow to a sufficient height to achieve the desired screening
- would remove the views presently enjoyed from some dwellings that had been specifically designed to take in views
- does not offer a permanent solution, because removal of or changes to the vegetation is possible over the life of the Project (including during different seasons)
- could result in increased fire risk.

It submitted:

> Given these limitations, Council submits that undergrounding the transmission lines would be more effective as a permanent solution to preserve important views and the amenity of local residents.

It submitted undergrounding would also mitigate impacts on residents and community members who regularly see the Project as they go about their daily lives.

The other Councils also supported undergrounding as the most effective way to avoid the Project's visual impacts.

Moorabool Council submitted the landscape and visual EPRs (LV1 and LV2) require amendment:

- the maintenance period for landscape screening should be 5 years, consistent with the recommendation of the IAC for the West Gate Tunnel Project
- the EPRs should include consultation with Council to determine suitable plant species options for screening relative to each local area.

Cumulative effects

Mr Schutt considered the proposed Joel Joel Battery Energy Storage System Project should have been considered as part of the cumulative impact assessment.

Ballarat Council submitted the cumulative impacts of the Project and Nyaninyak Wind Farm should be considered because there will be 'spatial overlap' between the two projects. It submitted:

> As no assessment has been undertaken, it is not clear to Council whether those impacts would be acceptable.

It submitted undergrounding would reduce the cumulative impact of the Project and other projects like the Nyaninyak Wind Farm.

(iii) Discussion

The IAC considers the methodology for the LVIA was fit for purpose and that landscape and visual impacts have been appropriately assessed. The LVIA applied the appropriate guidelines and industry best practice. It used a tailored approach to undertake a comprehensive assessment of the Project and the surrounding area, appropriately identified representative viewpoints, assessed impacts through field work and photomontages (as well as wire frame diagrams), and recommended mitigation measures to minimise and manage potential adverse effects.

The IAC accepts Mr Milner's evidence that the Project design has, in the main, avoided areas that are subject to specific planning controls that protect landscape values. However for the reasons stated in Chapters 6.4 and 6.5, just because the Project largely avoids land to which visually protective planning controls apply, does not mean it has successfully avoided impacts on protected landscape values.

The IAC is satisfied on the basis of Mr Burge's evidence under cross examination that he had appropriate regard to the applicable planning controls and policies relating to landscapes in undertaking his assessment of the Project's visual impact in the LVIA.

In some cases, the IAC considers that the Project's visual impacts will not meet policy objectives that seek to protect and preserve significant landscape values identified in the planning schemes, for the reasons set out in later parts of this Chapter. However the IAC agrees with Mr Milner that the Project's landscape impacts must be balanced against the benefits of the Project to the broader community in an integrated assessment of whether the Project delivers a net community benefit. This is provided in Chapter 16.

Landscape character and viewer sensitivity

None of the experts identified any issue with the way the LVIA characterised the area surrounding the Proposed Route into four broad landscape character areas, and nine landscape character units.

Mr Papworth was concerned that a single sensitivity rating for each landscape character unit in Hepburn was problematic, but did not clearly articulate what the implications were.

Hepburn includes most of the nine landscape character units identified in the LVIA, including Cleared Hilly Farmland and Cleared Flat Farmland (low viewer sensitivity), Townships and Rural Residential (medium viewer sensitivity) and Volcanic Cones, Heritage Landscapes and Water Bodies and Waterways (all high viewer sensitivity).

Landscape character unit classifications are necessarily broad and general in nature. They cannot capture the nuance of the unique and varied terrain and character within each unit, or the different sensitivities of different locations or viewers within each unit.

For a large scale project that covers such a broad area, classifying the area into landscape character units with a single viewer sensitivity rating for each unit is a practical and appropriate approach. The IAC considers the classifications accurately reflect the different types of landscape character in Hepburn and the sensitivities assigned to each character unit are broadly appropriate.

The sensitivity of the landscape character unit is one of a multitude of factors that are considered in the assessment of landscape and visual impact. A viewer sensitivity rating of 'low' will not automatically result in a visual impact of 'low' for that landscape character unit. Importantly, for dwellings viewer sensitivity is always rated as 'high', even if the dwelling is located in a landscape character unit with a low viewer sensitivity rating.

Viewpoint selection

Extrapolating impacts from selective representative viewpoints is an acceptable approach in assessing landscape and visual impacts. It is neither possible nor necessary to assess every view that could be impacted by the Project.

There will always be debate around whether the representative viewpoints are appropriate. There will always be criticism to the effect that important or sensitive viewpoints were not assessed, and that if a particular viewpoint selected was 50 or 100 metres further down the road, or over the next rise, the view of the Project would be worse.

Given the length of the Proposed Route, it is inevitable that the LVIA will not have assessed every significant viewpoint that the Councils and community consider should have been assessed. The additional photomontages prepared by Mr Goss for Melton Council and Hepburn Council demonstrate that other viewpoints could have been selected, which would have shown significant visual impacts.

Representative viewpoints are not intended to represent all of the worst case views of a project. They should represent a range of views that reflects the range of conditions in the area surrounding the Proposed Route, including ameliorating features such as roadside vegetation.

The IAC is satisfied on the basis of the evidence that the 119 viewpoints selected in the LVIA were appropriately representative, and were sufficient to develop a broad understanding of the Project's visual impacts on both the public and private realms. The testing of the LVIA through submissions and the IAC process have added to the IAC's understanding of the visual impacts of the Project.

The IAC agrees with Mr Schutt that the representative nature of each viewpoint could have been better explained in the LVIA, but it does not consider that this undermines the methodology or the accuracy of the assessment.

The IAC also notes that Mr Burge prepared photomontages for a considerable number of landowners to help them better understand the impacts of the Project on their dwellings. Several of these additional photomontages were presented to the IAC by the relevant submitters.

Accuracy and utility of the photomontages

While photomontages have their limitations and can never truly capture the experience of a viewer in a landscape, the IAC agrees with Mr Schutt that they are a useful tool in understanding the likely visual impacts of a project. The IAC is satisfied that the professionally prepared photomontages used an appropriate, verifiable and replicable methodology.

Impact ratings

The impact ratings in the LVIA should have included a 'very high' rating. At some viewpoints, impacts will be very significant and not able to be mitigated. This includes dwellings on the northern slopes in Darley and dwellings in open rural areas that are within 2 kilometres of the Project, where the towers will be either visually dominant or highly visible in the landscape. Stopping the ratings at 'high' risks understating the impacts on some viewpoints.

That said, the IAC does not agree with the argument put by some submitters that the impact ratings make it difficult to achieve an overall impact level of 'high'. The LVIA's description of 'high' visual impact includes situations "*where significant adverse effects cannot be avoided, remedied or mitigated*". The IAC accepts Mr Schutt's evidence that introducing a 'very high' rating would simply provide a more granular understanding of the impacts that are already classified as 'high'. It would not result in the reclassification of any impacts assessed as 'moderate' into 'high' or 'very high'.

The IAC does not support Mr Papworth's recommendation of introducing a rating of 'extreme/catastrophic'. This is emotive language, and while it may be more reflective of how some landowners and viewers feel about the visual impact of the Project, it is not appropriate for an objective impact assessment.

Landscape screening

Landscape screening can be an effective tool to mitigate the Project's visual impacts in some situations, although it has limitations. This was fairly recognised in both the LVIA and the evidence of Mr Schutt and Mr Burge.

EPR LV1 deals with minimising the visual impacts of the Project on the public domain. It recommends landscape screening be considered for Merrimu Reservoir and War

Memorial, Bald Hills Activation Area and Bolwarrah Weir, in consultation with the land managers. For some public locations, it may be possible to use screening in combination with other mitigations such as redesigning and reorienting the facilities so views are directed away from the Project.

For some dwellings, the Project will not be able to be fully screened, because the towers will be too close. For others that are more distant from the Project, landscape screening could screen views of the Project but might also obscure highly valued views that the residents want to retain. The significance and acceptability of these impacts is discussed in more detail in Chapter 6.4.

Cumulative impacts

The peer review found that the cumulative impact assessment in the LVIA was broadly appropriate, but the Joel Joel BESS Project should have been considered as part of the cumulative impact assessment. The LVIA also did not consider the cumulative impacts of the Nyaninyuk Wind Farm Project which (at the time the LVIA was prepared) was not well advanced.

The implications of not having included these projects are not clear and it is not possible for the IAC to reach a finding on whether the cumulative impacts in these localised areas would be acceptable. However in the context of the whole Project, it does not consider the failure to assess the cumulative impacts of these two projects fundamentally undermines the robustness of the LVIA.

Undergrounding

Undergrounding would clearly ameliorate the landscape and visual impacts of the Project in most locations. However it was not within the scope of the LVIA to consider an underground project. The lack of discussion of undergrounding as a mitigating measure in the LVIA is not a methodological shortcoming of the assessment.

(iv) Findings

The IAC finds:

- The methodology of the LVIA was robust and appropriate to assess the visual impacts of the Project.
- The LVIA should have included an impact rating of 'very high', however this does not affect the overall robustness of the LVIA and would not result in 'moderate' or lower impacts being upgraded to 'high' or 'very high'.

6.3 Public roads and tourist vantage points

(i) The key issue

The issue is:

- whether the LVIA appropriately considered visual impacts for people moving through the landscape on public roads or stopping at tourist vantage points.

(ii) Evidence and submissions

The Proponent submitted the Project has been designed to minimise impacts on key roads (including tourist routes) by crossing those roads at or near right angles (rather than running parallel). It highlighted Midland Highway as a key example, and submitted that by crossing main roads at right angles, the experience of the Project for people travelling along the road will be of short duration.

Community submitters were concerned that the LVIA only assessed visual impacts from static photomontages which do not capture the visual impact of the Project for people moving through the landscape. Mr Schutt noted that there are visualisation technologies such as augmented reality and virtual reality which potentially could have demonstrated the experience of moving through a landscape. However he said:

> These are – in my observation – emerging technologies, which to date have been utilised only occasionally in the assessment of landscape and visual impacts of major infrastructure projects in Victoria.

He did not consider that the Scoping Requirements required the LVIA to assess the Project's impacts on the experience of moving through the landscape.

Relying on the evidence of Mr Papworth, Hepburn Council submitted the visual experience of travelling through Hepburn Shire along public roads and tourist routes will be significantly impacted, and the LVIA's assessment of selected static viewpoints in the Shire does not capture the true impact for people moving through the landscape on public roads and tourist routes.

It submitted that based on the Environmental and Landscape Values Plan[10] in Clause 02.04 of the Hepburn Planning Scheme and Mr Papworth's assessment, areas around Creswick, Allendale, Kingston, Newlyn North and Dean are particularly sensitive and should have received further analysis in the LVIA. It had particular concerns about the Buried Rivers of Gold Tourist Drive, which extends through the area subject to the UNESCO tentative listing (discussed in Chapter 5.3).

Mr Papworth was critical of the LVIA for not assessing the visual impact 'experience' for people travelling along a highway or road who will drive alongside the transmission lines, or toward and under them. He considered local roads in Hepburn Shire are not necessarily less visually significant than major roads simply by virtue of having lower traffic volumes and therefore less receptors visually exposed to the Project. Hepburn is a tourist destination, and tourism should be considered as part of the overall landscape experience. This includes journeys that do not necessarily include major roads.

At Mr Papworth's request, Hepburn Council engaged Mr Goss to prepare additional photomontages and wire frame images showing the Project from local roads in Hepburn that the Project proposes to cross or run alongside (D243). These images demonstrate the Project infrastructure will be visually dominant at or near the crossing point, and very prominent where it runs parallel to and in close proximity to local roads.

[10] The Environmental and Landscape Values Plan in Clause 02.04 was extracted in Hepburn Council's main submission (D381). It identifies Significant Landscapes and Significant View Corridors in the Shire.

The Proponent submitted that Mr Papworth's assessment relies too heavily on visibility of the Project and fails to take proper account of other factors relevant to the assessment of visual impacts, including viewer numbers and duration of view. It submitted this is a key weakness in Mr Papworth's evidence, and results in an assessment of visual impact on public roads that is disproportionately high.

Hepburn Council cross examined Mr Burge in relation to visual impacts on road users. He confirmed that in his view:

- viewer numbers and duration of views are relevant in assessing the visual impact of the Project (lower viewer numbers and views of short duration are less impactful)
- visual impacts are higher at locations where people stop and linger.

He explained that the LVIA sought to identify key vantage points rather than any location along any road. It focussed on significant and sensitive viewpoints as required by the Scoping Requirements. He acknowledged that there will be many other views from roads that will have impacts that were not specifically assessed in the LVIA, but confirmed he considered the key vantage points had been assessed.

(iii) Discussion

The IAC acknowledges that the Project design has sought to include right angle crossings of major roads and tourist routes where practicable, to minimise the duration of views of the Project for people travelling along the roads. This is an appropriate approach.

The significance of the visual impact of a piece of infrastructure is a complex assessment that depends on much more than visibility. It is well accepted in landscape and visual impact assessment methodology that viewer numbers and the duration of views are key considerations that influence the significance of a visual impact. Transient views of infrastructure from locations with fewer visitor numbers are less impactful than longer duration views from locations where more viewers congregate.

The LVIA assessed views from a number of tourist and other vantage points along the Project route where tourists or road users are more likely to stop, linger and recreate, including the Mount Beckworth Scenic Reserve, Ben Nevis, six vantage points along the Buried Rivers of Gold Tourist Route, Newlyn Reservoir, Bullarook Streamside Reserve, the Kingston Avenue of Honour, Mount Blackwood, Moorabool Reservoir, Merrimu Reservoir, Bolwarrah Weir, Pykes Creek Reservoir, Lerderderg Gorge, the lookout at Bald Hill Recreation Reserve.

The IAC is satisfied that the LVIA's approach to assessing the visual impacts of views from roads was adequate to inform a consideration of the Project's visual impacts.

(iv) Finding

The IAC finds:

- The LVIA's approach to assessing the visual impacts of views from roads was adequate to inform a consideration of the Project's visual impacts.

6.4 Residents

(i) The key issue

The issue is:

- whether visual impacts on residents have been appropriately assessed and are acceptable.

Impacts on residents in Darley are addressed in Chapter 6.5.

(ii) Evidence and submissions

Proponent

The Proponent submitted the Project was designed to maximise distance to dwellings and thereby minimise landscape and visual impacts on residents so far as practicable. It submitted visual impact to a dwelling is an amenity impact, and is just one aspect of the overall amenity of a dwelling. The acceptability of a reduction in visual amenity should be considered having regard to:

- reasonable visual amenity expectations set by the planning scheme
- the need to balance the impacts on the individual with the interests of all Victorians in the cost effective and reliable supply of renewable energy into the grid.

The Proponent submitted views to and across neighbouring land are "*opportunistic and borrowed*" and there can be no reasonable expectation of 'no change' beyond an individual's property boundaries.

It submitted that in most cases, views of the Project from dwellings can be screened through plantings. It acknowledged that in some cases, screening would block or reduce favoured views, but residents will have a choice between maintaining their view (with the Project added to the landscape) or screening. It submitted neither outcome can be fairly considered catastrophic or unacceptable:

> This is based on the simple observation that many dwellings in Victoria have no views, and many more have views that include views of essential infrastructure such as overhead transmission and distribution lines, major roads and freeways, elevated and non-elevated rail lines and more.

The Proponent pointed to the fact that directly affected landowners will be paid compensation, and payments will be available under the Near Neighbour Benefit Program to neighbours within 1 kilometre of the route in rural areas and in Darley (or 200 metres of the route in urban areas).

The number of impacted dwellings

Figure 9 demonstrates that if views to the Project were uninterrupted (not screened by vegetation, blocked by topography and so on), the Project would be:

- highly visible at 2 kilometres
- visually dominant at 1 kilometre.

Recognising that the Project would still be visually prominent at distances of 4 to 5 kilometres, the IAC sought to understand how many dwellings were located within the 1 to 2 kilometre range, where the most significant impacts would be experienced. On the

Proponent's figures (taken from the LVIA), around 7,410 dwellings will be located within 2 kilometres of the Project, including:[11]

- 1,250 in rural areas (1,030 in farming areas and 220 in rural townships)
- just over 6,000 in urban settings.

The Proponent submitted that most of the 7,410 dwellings located within 2 kilometres of the Project are within urban settings which don't enjoy long range uninterrupted views (with the exception of Darley). Impacts on visual amenity of dwellings in urban settings (except Darley) will therefore be lower.

Regarding rural dwellings, the Proponent submitted that the density of rural dwellings within 0 to 1 kilometre of the route (where impacts are highest) is significantly lower than the density within 1 to 2 kilometres. Further, most rural dwellings are set among existing vegetation including gardens and windbreaks which will assist in screening or filtering views in the direction of the Project.

The LVIA assessed impacts on dwellings based on representative viewpoints from a number of dwellings (as discussed in Chapter 6.2). The LVIA concluded that 14 to 29 percent of the representative rural dwellings assessed would experience a residual visual impact of 'moderate' or above. While these proportions cannot be applied to all 1,250 rural dwellings with any precision, the proportions clearly demonstrate that the number of highly impacted dwellings within rural areas will be much lower than 1,250.

The Proponent submitted that even if all 7,410 dwellings within 2 kilometres of the Project route were to suffer high impact, that would not necessarily render the Project unacceptable given the critical need for, and significant benefits of, the Project for more than 7 million Victorians.

Moorabool Council contested the Proponent's data concerning the number of dwellings within 2 kilometres of the route, submitting that in Moorabool alone, 1,173 dwellings are located within 2 kilometres of the Project, 58 of which are within 300 metres. At that distance, the visual impacts would be entirely unacceptable.

In its reply submissions the Proponent concluded:

> The WRL Project will have high visual impacts for a large number of dwellings, likely in the order of several hundred (this order of magnitude is not, however, large in the context of a project spanning 190 kilometres in length).
>
> These impacts are acceptable when balanced against the benefits of the WRL Project, the reasonable amenity expectations set by planning schemes along the route and the evidence that such impacts have been avoided and minimised so far as practicable.

Reasonable expectations set by the planning schemes

The Proponent submitted that most of the 1,030 dwellings in farming areas within 2 kilometres of the route are in the Farming Zone. The Farming Zone and most of the other zones which the Project traverses do not prioritise residential amenity. The Proponent submitted that residents in these areas "*can have no legitimate expectation that views across other land will be protected, or residential amenity remain unaffected by development on other land*".

[11] The numbers of dwellings referred to in this chapter are not precise, as precise numbers were not available.

The Proponent submitted the exception is the 205 dwellings in the Rural Living Zone (RLZ). The RLZ is one of the few zones along the Project route that does prioritise visual amenity. However, only about 900 metres of the route is in the RLZ, where dwelling densities are limited.

The SLO is the key overlay that creates a legitimate expectation that visual amenity will be protected, although the Proponent acknowledged other overlays are relevant including the Design and Development Overlay (DDO) and Heritage Overlay. It submitted that with some minor exceptions, the Project avoids land in the SLO and Heritage Overlay.

(iii) Discussion

The IAC accepts that the Project has been sited to maximise distance to dwellings (and thereby minimise landscape and visual impacts on residents so far as practicable), while seeking as direct a route as possible between Bulgana and Sydenham. This was clear from Mr Napier's presentation on the route selection process on Day 1 of the Hearing (D194) and his explanation on the accompanied site visit.

There is no legal right to a view in Victorian law. However, a view forms part of the amenity of a dwelling. Residential amenity (specifically visual amenity) is a relevant consideration under some of the planning controls that apply to the Proposed Route and surrounding area, and a decision maker must consider whether visual impacts are acceptable. Acceptability in this context is an objective concept, informed by the expectations set by the planning scheme. The extent of the impact (the number of highly impacted dwellings) is also relevant.

The Proponent pointed to the fact that directly affected landowners will be compensated for the acquisition of the easement, and near neighbours who will be visually impacted will benefit from the Near Neighbour Benefit Program.

The number of impacted dwellings

In assessing whether the visual impacts of the Project are acceptable, the IAC is required to consider impacts on the receptor. The receptor is the residents, not the dwelling. Residents in the area surrounding the Proposed Route will experience the visual impacts of the Project in multiple ways. That will include the views from the static viewpoints around their dwellings assessed in the LVIA, but it will also include impacts they experience moving through the landscape and going about their daily activities.

Therefore, while the number of highly impacted dwellings is a useful indicator of the likely extent of high visual impacts on residents, it is not the sole consideration.

It is not clear from the material before the IAC precisely how many dwellings will be likely to experience high residual visual impacts. Thousands of dwellings are within close enough range for the Project to potentially be visually dominant or highly visible. However for many of these, views to the Project will be partially or fully screened by topography, vegetation or existing structures in the landscape.

Many hundreds if not thousands of residents will see the Project infrastructure when moving through the landscape. For some, views of the Project from their dwellings will be difficult or impossible to screen because there is insufficient distance between the

dwelling and the Project. These residents will have little relief from the visual impacts of the Project. For others, screening from their dwelling may be possible, but would result in the loss of highly valued views around which dwellings have been designed and built to take advantage of the views. Impacts on these residents will be very significant.

Reasonable expectations set by the planning schemes

The planning controls inform planning decision makers of the landscape values and features that are significant in the area.

The IAC accepts that the planning controls also inform the reasonable expectations of residents in relation to the level of protection of visual amenity and outlook from their properties.

The Proponent emphasised that the Project generally avoids areas subject to 'visually protective' planning controls such as the SLO, and that under the controls that apply to both the Project Area and the surrounding area in which dwellings are located (including the Farming Zone), visual amenity is not a weighty consideration in planning decision making.

The IAC agrees that visual amenity is not a weighty consideration under the Farming Zone. However the full suite of planning controls that apply to the Project Area and the surrounding areas in which the affected dwellings are located need to be considered. As noted by Mr Milner and in Chapter 7, this includes SLOs that specifically recognise and protect the significant volcanic landscapes of western Victoria identified in the SWVLAS.

By way of example, the 'Statement of nature and key elements of landscape' in the Hepburn SLO1 states:

> The volcanic peaks have significance for their prominence in the rural landscapes of the grasslands and woodlands in the Shire. The peaks and ridgelines of these features are important visual elements of the local rural landscapes and form a part of the significant grassy plains of western Victoria.
>
> Ridge lines and escarpments form an important visual element in Victoria's Central Highlands and Macedon ranges.

The objectives of the Hepburn SLO1 are:

- To maintain the visual significance of the woodlands and grasslands of the peaks and hilltop features of these areas.
- To maintain the visual significance of the ridges and escarpments.
- To protect these areas from intrusive and dominant development.
- To protect significant geological sites from development.

The Hepburn SLO1 has not been applied as a blanket control across the whole of Hepburn's volcanic landscape. Nor has the Ballarat SLO1. Rather, the SLOs have been applied to the more significant volcanic peaks in those landscapes.

Nevertheless, the SLOs inform the decision maker of the values that are present in the landscapes. Both the Statement of nature and key elements and the objectives of the Hepburn SLO1 emphasise the importance of the landscape as a cohesive visual unit. The Ballarat SLO1 does the same. The values that are sought to be protected are not limited to just the volcanic peaks to which the SLOs have been applied. The SLOs set an expectation that the landscapes are valued and will be protected as cohesive units.

The RLZ and Rural Conservation Zone (RCZ) are also 'visually protective' controls that apply to the Project Area and the surrounding area in which resident receptors are located.

It is not clear from the material before the IAC how many dwellings in the area surrounding the Proposed Route benefit from 'visually protective' planning controls such as the RLZ, RCZ and SLOs. Nor is it clear how many of those dwellings may suffer high visual impacts that cannot be mitigated. On the Proponent's assessment, several hundred dwellings will likely be highly visually impacted. The number of residents likely to experience high visual impacts is therefore likely to extend into the high hundreds.

Impacts of this order of magnitude are clearly significant. However the significant extent of high visual impact does not necessarily render the Project's visual impacts unacceptable. The visual impacts on those many individuals must be balanced against the impacts across the Project, and the benefits that the Project will bring to the Victorian community in an integrated assessment.

(iv) Findings

The IAC finds:

- The LVIA's approach to assessing the Project's visual impacts on private viewpoints is broadly appropriate, however:
  - the number of impacted dwellings is an indicator of the number of impacted receptors (residents), but is not the sole consideration
  - impacts on residents moving around the landscape are also relevant.
- The significance of visual impacts on residents in the RLZ, RCZ and the significant volcanic landscapes is elevated, due to the visually sensitive nature of the landscapes and the expectations set by the planning schemes.
- It is not possible on the material before the IAC to quantify the number of residents that will suffer high or very high impacts, but across the Project it is likely to be in the high hundreds.

6.5 Specific locations and landscape features

Submitters raised many examples of landscapes and landscape features that they consider will be unacceptably visually impacted by the Project. The IAC has focussed on those of most concern to the Councils and the community.

Many of the locations discussed in this chapter were assessed in the LVIA. The IAC supports the LVIA's assessment of the scale of impact in several cases. For others, it has reached a different conclusion, and considers the impacts will be higher than as assessed in the LVIA.

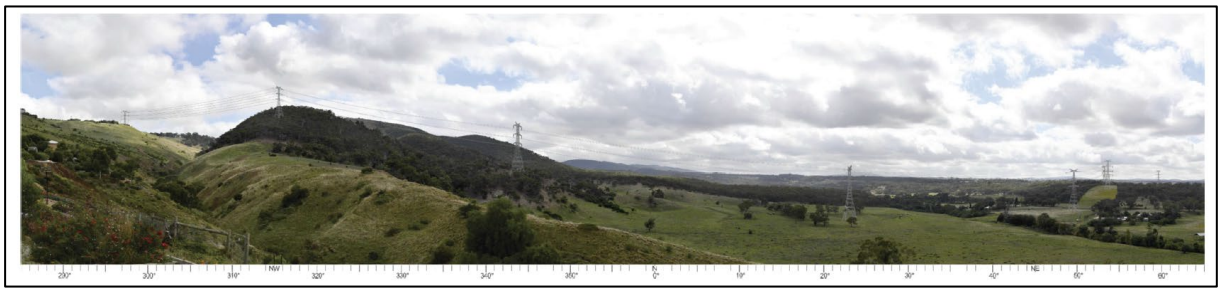
The IAC has included photomontages where available, but notes that these are indicative only at this scale. To get a more accurate sense of the likely impact of the Project, photomontages need to be viewed in A0 size. The IAC requested A0 print outs of several of these montages, and has considered those in its assessment of the scale of impact.

(i) Darley

Evidence and submissions

The LVIA assessed seven representative viewpoints from private dwellings in Darley, and concluded that 30 dwellings in Pamela Court, Augusta Place and St Andrews Way would experience a high visual impact which could not be mitigated. Photomontages from two representative viewpoints, one in Pamela Court (assessed as a 'high' residual impact) and one in Fairway Crescent (assessed as a 'moderate' visual impact), are extracted below.

Figure 11 Photomontage – Pamela Court viewpoint



Source: LVIA Figure 12-70

Figure 12 Photomontage – Fairway Crescent viewpoint

Source: LVIA Figure 12-76

Darley residents submitted the visual impacts on their dwellings would be unacceptable. They considered the 7 viewpoints in Darley assessed in the LVIA were not sufficient to fully assess the impacts on Darley residents, many of whom had purchased their properties and built their houses and gardens to capture the spectacular views to the north toward the Wombat-Lerderderg National Park. They considered the landscape character unit ascribed to Darley in the LVIA ('Township') did not capture the sensitivity of the landscape, which should have been characterised as 'Parks and Forests' (which has a viewer sensitivity of 'high'). Residents strongly disputed the LVIA's assessment of the impacts on Darley as 'high', submitting that 'extreme' or 'catastrophic' would have been more accurate ratings.

Mr Schutt considered the characterisation of the landscape around Darley as 'Township' was appropriate, noting that regardless of the characterisation of the landscape unit, residents were always rated as having high viewer sensitivity.

Mr Schutt considered the seven viewpoints were representative of dwellings in Darley that will be most impacted visually by the Project, and supported the LVIA's assessment

of a high visual impact on the 30 dwellings in the most affected streets (Pamela Court, Augusta Place and St Andrews Way). However he considered high visual impacts in Darley would be more widespread. In his view, impacts on dwellings in Fairway Crescent, Banadell Avenue, Swans Road, Chambers Court and Egan Court (which the LVIA rated as 'moderate') would be similar to those in Pamela Court, Augusta Place and St Andrews Way. He considered 65 dwellings would experience high residual visual impacts (where mitigation would not be possible).

The Proponent acknowledged that there will be a high visual impact in Darley that cannot be mitigated, but "*there is a risk of the significance of visual impacts in Darley becoming overvalued or overstated*". It submitted the views enjoyed from Darley are from suburban dwellings across a partly modified landscape to a State Park (which has since been gazetted as a National Park). While the views are valued by residents, the landscape is not identified as being of any particular value by the Moorabool Planning Scheme.

The Proponent submitted the IAC should prefer the view of Mr Burge on the number of highly impacted dwellings (30 dwellings) to that of Mr Schutt (65 dwellings). It submitted:

- the photomontage from the viewpoint in Fairview Crescent (extracted in Figure 12) demonstrates that at this distance the towers are not dominating in scale or bulk, and the sense of an open rural setting is retained
- the existing views from these slightly more distant viewpoints is across a modified landscape, foregrounded by houses and (for some) includes the quarry to the east of Darley.

Moorabool Council submitted the impacts on Darley are "*on the face of the evidence unacceptable*", and the Project can and should be undergrounded to minimise those impacts. Regarding reasonable expectations set by the planning scheme, Moorabool Council submitted:

> … it strains credibility to suggest that one ought be blamed for stating that a transmission line of such height and presence in the landscape, especially a state forest landscape would not be within what might be reasonably expected.

It submitted that legitimate expectations are informed by the SLOs and DDOs that apply in and around Darley, which include objectives to enhance visual amenity and ensure that built form appropriately addresses ridgelines around the Wombat-Lerderderg National Park.

The Proponent responded:

> The argument put by some submitters and Moorabool City [sic] Council is that the broader Victorian community should be required to pay an additional $369 million to preserve the current amenity offer of a limited number of dwellings via undergrounding the WRL Project through Darley. This would be an extraordinary impost upon the broader community of Victoria, to merely protect the existing views of a relatively small number of residents. It would be an outcome at odds with fundamental principles relating to the assessment of acceptable as distinct from ideal or optimal outcomes.

Discussion

Many dwellings in Darley enjoy spectacular views across valleys and ridgelines toward the Wombat-Lerderderg National Park. For many, those views extend across open rural land with relatively little urban infrastructure present.

The IAC acknowledges the residents' view that the Darley area should have been characterised as the more sensitive 'Parks and Forests' landscape character unit. However ultimately this would have made little difference to the LVIA's assessment of 'high' visual impact on some Darley residents, as the LVIA assessed all residents as having high viewer sensitivity regardless of the characterisation of the landscape unit.

For residents in Pamela Court, Augusta Place and St Andrews Way, with largely uninterrupted views to the north towards the National Park, the visual impact of the Project will be very high. The IAC considers residents in more distant streets such as Fairway Crescent will also be highly impacted, notwithstanding the fact that their views currently include urban or industrial infrastructure. The IAC prefers Mr Schutt's evidence in this regard to that of Mr Burge. There are also a number of dwellings in the non-urban parts of Darley, along Swans Road, Camerons Road and Lerderderg Gorge Road, who's views will be significantly impacted, some severely.

Most (but not all) of the planning controls that apply to the parts of Darley that will be most visually impacted by the Project include some recognition and protection of residential amenity and/or landscape values. This includes the Neighbourhood Residential Zone, the Low Density Residential Zone, the RLZ, the RCZ and the DDO14.[12]

The Moorabool SLO1 identifies that the ridges and hilltops in the area to the south of the Wombat-Lerderderg National Park are significant from a landscape perspective. The SLO1 does not extend to the urbanised northern slopes of Darley or the areas around Camerons Road and Lerderderg Gorge Road, but it does protect landscape features that are visible from those areas.

Together, the planning controls and policies in the Moorabool Planning Scheme indicate that Darley sits within a highly visually sensitive landscape. The planning scheme creates a legitimate expectation that the landscape features and values in the area, and the visual amenity of its residents, will be considered in planning decisions.

As is the case for residents in rural areas impacted by the Project, a significant number of highly impacted residents does not necessarily justify a finding that the visual impacts of the Project are unacceptable. The visual impacts on Darley residents must be balanced as part of the integrated assessment of the Project's impacts.

Chapter 15.1 includes a specific discussion of the cumulative impacts of the Project in the Darley area. Chapter 16 includes the IAC's integrated assessment.

Findings

The IAC finds:

- The planning scheme identifies the landscape around Darley and the Wombat-Lerderderg National Park as highly visually sensitive.

[12] Regarding DDOs, the DDO14 applies to a 1.9 kilometre section of the Project route around Camerons Road. Its design objectives specifically protect the treed landscape values of the area, and seek to ensure buildings are sited to protect the nature conservation values of the Lerderderg State Park. The DDO2 applies to large parts of the Shire. The IAC does not consider that this control seeks to protect landscape values more broadly. Rather, it is directed at ensuring buildings and works are constructed from non-reflective materials.

- The planning scheme sets a legitimate expectation that the residential and visual amenity of residents in Darley will be considered in planning decisions.
- The LIVA's assessment of the number of highly impacted dwellings in Darley is understated. At least 65 dwellings in the urban parts of Darely will experience very high visual impact, as well as an unquantified number of dwellings in the non-urban parts of Darley.
- In isolation, these impacts could be considered unacceptable. However impacts must be balanced against the benefits of the Project and the costs to the broader community in mitigating those impacts.

(ii) Volcanic and other significant landscapes

Evidence and submissions

Ballarat Council submitted the Project poses a significant threat to the landscape and visual amenity of the Ballarat region, particularly the volcanic cones landscapes in Ballarat and surrounding regions. It submitted these landscapes include "*iconic geological formations that contribute profoundly to the visual identity, scientific value, and cultural heritage of the area*". These landforms are recognised in planning schemes through SLOs "*due to their rarity, prominence and aesthetic contribution to the regional character*".

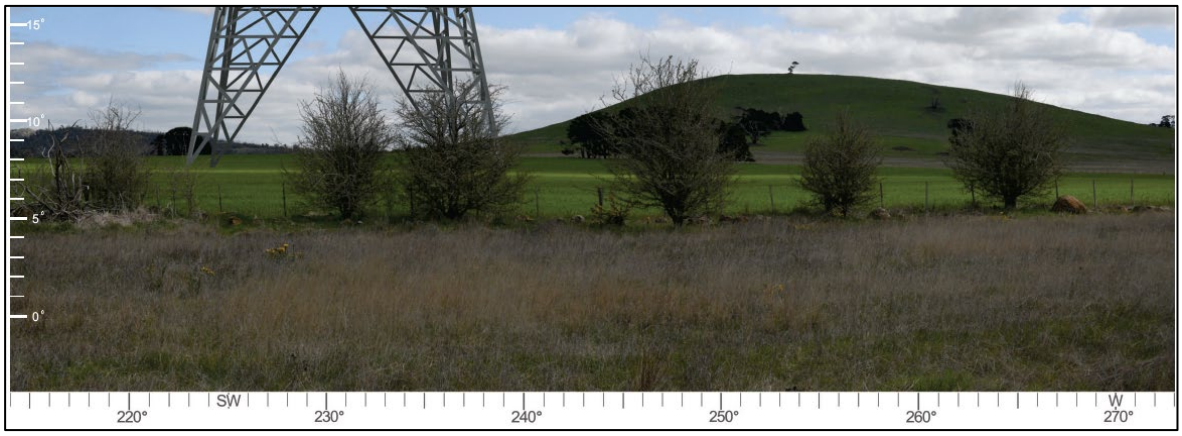
Ballarat Council was particularly concerned about the impacts on Mount Bolton, which the Ballarat SLO1 describes as follows:

> Mount Bolton is a unique granite outcrop containing a remnant mature forest, including old age class and kangaroo grassland community, which provides a unique range of habitat not widely represented in the region.

Ballarat Council submitted the unique volcanic cones provide a landmark within the landscape and serve as "*visual anchors and points of orientation across the landscape*" which contribute to the visual identity of the area. The towers will interrupt long distance views to the volcanic cone landforms and landscapes, diminish the prominence of the cones and impact on the scenic quality of the landscape and its natural features and landforms.

Ballarat Council was also concerned about the Project's visual impact on Mount Gap which is also protected by the SLO1 and is closer to the Proposed Route than Mount Bolton. The LVIA includes a photomontage showing the view from Coghills Creek Road to Mount Bolton (extracted in Figure 13), and assesses a 'moderate' impact (largely due to the fact that the viewpoint is on a public road and views are therefore transient). Ballarat Council submitted that based on the photomontage alone, this assessment cannot be supported.

Figure 13 Photomontage – Mount Gap viewpoint



Source: LVIA Part 6 Image 9

Ballarat Council submitted:

> Council is also concerned that mitigation of impacts on the volcanic cone landscapes within the City of Ballarat will be difficult given the otherwise generally flat and open nature of the landscape. Accordingly, the towers will be highly visible from a range of vantage points and view lines.
>
> In Council's submission, the most effective mitigation option would be to underground the transmission lines through the volcanic cones landscape.

Pyrenees Council submitted that while SLOs do not apply in Pyrenees, its landscapes are central to the Shire's identity, tourism and community. It submitted the Project presents a significant threat to the landscape values and visual amenity of the region during both the construction and operation phases.

Discussion

There is no doubt that the volcanic landscapes in Ballarat and surrounding municipalities are highly valued and contribute significantly to the landscape character of the area. These landscapes are recognised in the planning schemes and associated strategies (for example Ballarat Council's *Rural Land Use Strategy 2010*), and many of the volcanic features within the landscapes are directly protected by SLOs.

The SWLVAS demonstrates that there are significant landscapes in other municipalities (including Pyrenees and Northern Grampians), notwithstanding that they may not be currently protected by SLOs.

The IAC accepts that the Proposed Route generally avoids the SLOs (with some minor exceptions). However as previously noted, the SLOs inform the decision maker of the values that are present in the landscapes more broadly. It is too narrow a reading of the planning schemes to suggest that unless the Project infrastructure directly traverses land to which an SLO applies, it has successfully avoided impacts on the landscape values protected by those SLOs.

The Project will impact the volcanic and other significant landscapes in Ballarat and beyond in different ways and to different extents. In some locations, where the Project infrastructure is close or stands above the skyline, impacts will be high. In other locations, impacts will be lower, softened by distance. In some parts of the landscapes, the Project will have no impact at all as it will be screened by topography.

As is the case with impacts on residents, the fact that the Project will have impacts on highly valued landscapes (very significant impacts in some locations) does not necessarily mean those impacts will be unacceptable. The impacts need to be balanced and weighed against the benefits of the Project in an integrated assessment.

Findings

The IAC finds:

- The Project will have very high visual impact on some parts of the highly valued landscapes through which the Project traverses, including the volcanic cones landscapes identified and protected by various SLOs.
- The impacts need to be balanced and weighed against the benefits of the Project in an integrated assessment.

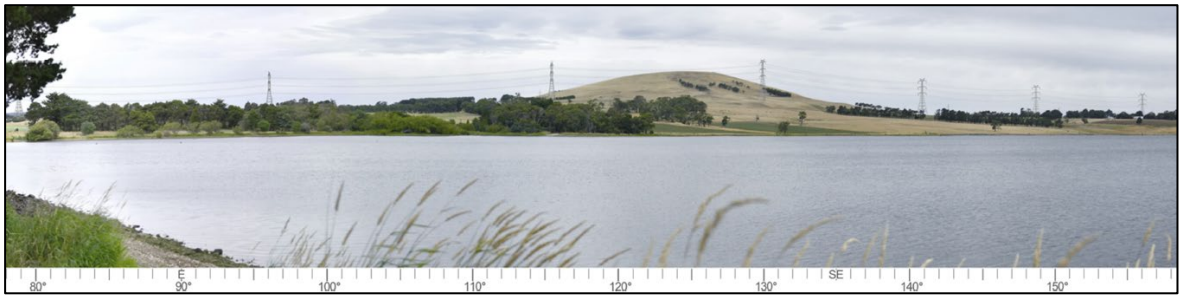
(iii) Newlyn Reservoir

Newlyn Reservoir is located to the east of the small rural township of Newlyn, within the Plains and Volcanic Cones Landscape Character Unit. Mount Bullarook is to the east of the Reservoir. After crossing the Midland Highway to the north of the Reservoir, the Proposed Route runs south between the Reservoir and Blampied-Mollongghip Road.

Evidence and submissions

Newlyn Reservoir was assessed in the LVIA, with a photomontage prepared from Viewpoint PVC 7[13] looking east toward the Project and to the volcanic cone of Mount Bullarook which is protected by the Hepburn SLO1.

Figure 14 Photomontage – Newlyn Reservoir viewpoint



Source: LVIA Fig 11-109

The LVIA recognised that the area is valued by locals and visitors. Where visible, the towers will be "*dominant features*" in views that are static and long in duration. However, views from public areas that are set back from the shoreline are screened or filtered by vegetation, or are oriented away from the Proposed Route.

The LVIA considered that where it could be seen, the Project would be a "*background element*" to the Reservoir, added to views that include the volcanic cone and towers along the existing 220kV Ballarat to Bendigo transmission line. Landscape screening would remove views across the Reservoir to Mount Bullarook, and therefore was not recommended.

[13] 'PVC' refers to the Plains and Volcanic Cones Landscape Character unit in which Newlyn Reservoir sits.

Hepburn Council submitted the LVIA's assessment of 'moderate' visual impact at Newlyn Reservoir is not supportable. Relying on Mr Papworth's evidence, Council submitted the Landscape Character / Viewer Sensitivity of the area around Newlyn Reservoir is properly characterised as 'high', not 'moderate to high' as assessed in the LVIA, noting that Mount Bullarook is a prominent volcanic cone recognised and protected by the Hepburn SLO1.

Hepburn Council disagreed with Mr Burge's assessment that the existing Bendigo transmission line (which passes by the volcanic cone) is noticeable, submitting it can barely be seen in the photomontage extracted in Figure 14. It submitted:

> By contrast, the Project's towers will appear prominently across the front of the volcanic cone, and dominate the appreciation of this sensitive landscape. Despite a high number of tourists visiting the location and the recognised significance of the sensitive landscape, the LVIA considers the change 'Additive' and so only of a 'Moderate' impact. Council strongly disputes this characterisation.

Discussion

The land to the east of Newlyn Reservoir though which the Project traverses is identified in Hepburn Council's Environmental and Landscape Values Plan as a significant landscape. The Environmental and Landscape Values Plan does not identify views across the Reservoir toward Mount Bullarook as significant, although significant view corridors are identified along the Midland Highway and the Blampied-Mollongghip Road.

The IAC considers the visual impact of the Project on views from the western shoreline of Newlyn Reservoir should be rated as at least 'high', not 'moderate'. The photomontage extracted in Figure 14 demonstrates that the towers will be highly visible, sitting above the horizon with little to no screening from existing vegetation. The IAC does not consider they are fairly described as a 'background element' in this view. Further, the LVIA described viewer type and numbers at Newlyn Reservoir as 'Tourist – High'.

Screening is not desirable at this location given it would remove the view across the Reservoir toward the volcanic cone of Mount Bullarook in the background. The impact will not be able to be mitigated without losing the valued view.

While the towers will represent a dominant element in the landscape and in views from the Reservoir toward Mount Bullarook, the photomontage in Figure 14 demonstrates that relationship between the Reservoir and Mount Bullarook can still be seen and understood. Further, the IAC accepts the finding in the LVIA that not all views across the Reservoir will be impacted by the Project. Views to the west and south west will remain uninterrupted, although the landscapes to the west and south are not identified as significant.

On balance, while the Project will have a high impact on a landscape identified in Hepburn's Environmental and Landscape Values Plan as significant, the IAC does not consider that the impact is unacceptable.

Findings

The IAC finds:

- The LVIA's assessment of 'moderate' visual impact at Newlyn Reservoir is understated. Impacts are at least 'high'.

- On balance, visual impacts on Newlyn Reservoir are not so significant as to be unacceptable.

(iv) Hepburn Lagoon

Hepburn Lagoon sits within the volcanic cones landscape in Hepburn, to the north of Newlyn Reservoir and to the west of Allendale. The Proposed Route passes to the south west of the Lagoon and then turns east to cross the Midland Highway.

Evidence and submissions

Many submitters spoke to the IAC about the importance of Hepburn Lagoon to the local community, describing it as a particularly picturesque feature in the landscape with significant aesthetic and cultural significance.

The LVIA did not assess Hepburn Lagoon due to "*safety concerns and limitations on access*". Hepburn Council submitted Hepburn Lagoon is publicly accessible (and was accessed by Mr Papworth and Mr Goss without difficulty), and described the absence of an assessment of the Lagoon as "*extraordinary*". It submitted Mr Goss' photomontage and wire frame images (extracted below):

> … show the high visual impact of the Project as it approaches from the south and passes between Hepburn Lagoon and the nearby volcanic cones, interfering with views across the lagoon and the volcanic cones in the landscape, before proceeding west.

Figure 15 Photomontages – Hepburn Lagoon viewpoint

Source: D243 KOP3 Crop A

Source: D243 KOP3 Crop B

Discussion

The land to the north of Hepburn Lagoon is identified in Hepburn Council's Environmental and Landscape Values Plan as a significant landscape, but not the land to the south traversed by the Project. Nor does the Environmental and Landscape Values Plan identify views across the Lagoon to the south (toward the Project) as significant.

The IAC understands that public access to the Lagoon is available, but from the material before the IAC it appears that public visitation to the shores of the Lagoon is not frequent and viewer numbers are understood to be low. Mr Goss' photomontages demonstrate views from the public road that runs to the north of the Lagoon. The road is more distant from the northern shores of the Lagoon from which the Project would be seen, but viewer numbers will be higher from the public road.

The Proposed Route avoids the significant landscape to the north of the Lagoon, and does not interrupt any significant view corridors identified in the planning scheme other than the Midland Highway. Viewer numbers from static viewpoints along the Lagoon's northern shoreline looking south and south west toward the Project are understood to be low. The Project will not be a dominant feature in those views due to the distance to the Project from those viewpoints.

Mr Goss' photomontages demonstrate that at this distance, the surrounding volcanic cones are significantly more prominent features in the landscape than the Project towers. The photomontages also demonstrate that the Lagoon and its place in the landscape, including its relationship to the surrounding volcanic cones, can still be seen and understood.

Based on the material before it, the IAC considers the visual impact on Hepburn Lagoon is likely to be low to moderate. It considers this to be acceptable.

Finding

The IAC finds:

- Visual impacts on Hepburn Lagoon are likely to be low to moderate, and are considered acceptable.

(v) Mount Beckworth Scenic Reserve

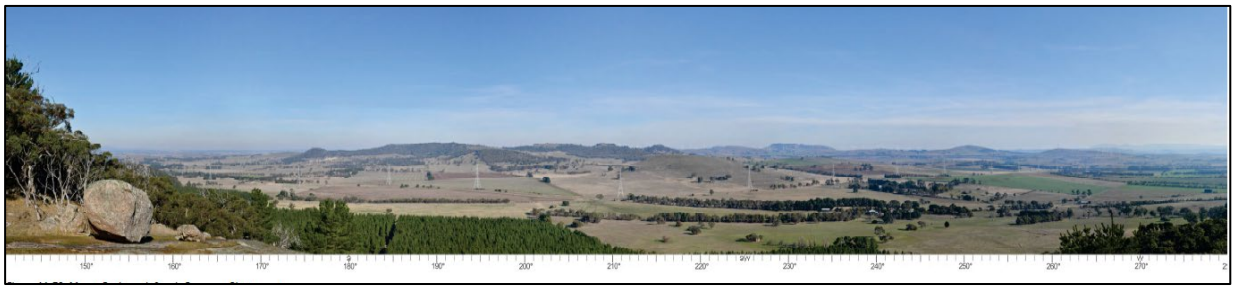
Mount Beckworth is a heavily wooded mount with an iconic 'lollypop tree' on the summit. It is one of the higher landforms in the area and can be seen from a considerable distance from many directions. The Mount Beckworth Scenic Reserve allows camping, bushwalking, and bird-watching activities.

Evidence and submissions

Many submitters spoke to the importance of Mount Beckworth for the local community. It is a local landmark, and several submitters see Mount Beckworth from their properties and regularly access the reserve for bushwalking, picnics and adventures with their children.

The LVIA included a photomontage from a location near the summit, looking south west toward the Project which would sit in the shallow valley below the Mount.

Figure 16 Photomontage - Mount Beckworth Scenic Reserve viewpoint



Source: LVIA Fig 11-73

The LVIA assessed the impact on Mount Beckworth as 'low to moderate'. Views of the Project will be screened from most publicly accessible areas within the Reserve and the summit, and:

> Towers will be low in view and below a horizon established by Mount Bolton to the southeast and rolling hills, visible in a modified farming and forestry landscape comprising roads, turbines in the Waubra Wind Farm, and a landscape subject to short-term seasonal change.

Discussion

The IAC considers the LVIA's assessment of low to moderate impact on Mount Beckworth is accurate. Nothing was presented to the IAC to demonstrate that the Project would be more visible from more locations within the scenic reserve, or would be more prominent in views from the summit than as demonstrated in the photomontage. Views toward Mount Beckworth from the south will be changed by the introduction of the Project into the landscape, however the impact of that change will reduce with distance from the Project. While the IAC recognises the importance of Mount Beckworth to the local community, it considers impacts on Mount Beckworth and the Scenic Reserve will be acceptable.

Finding

The IAC finds:

- Impacts on Mount Beckworth and the Scenic Reserve will be acceptable.

(vi) Bald Hill Activation Area

Bald Hill is a 120 hectare council reserve in Darley. The Bald Hill Activation Plan sets out a vision for the area as a 'Destination Regional Park' providing organised and active recreation uses attracting visitors from the local area, Melbourne, regional Victoria and interstate. Proposed activities include mountain biking, trail walking and running and outdoor adventure uses that are not currently accessible West of Melbourne. The Bald Hill Activation Plan states:

> Activating Bald Hill will greatly encourage resident participation in recreation and drive economic growth to Bacchus Marsh through destination land uses such as a Gravity Mountain Bike Park and 1001 Steps concept.

Evidence and submissions

The LVIA assessed the visual impact on Bald Hill from three viewpoints:

- Viewpoint PU 3A[14] is located along the northern edge of Bald Hill near the proposed entrance from Swans Road and a proposed trail. This is the closest viewpoint to the Project, and is located around 1.5 kilometres from the Proposed Route.
- Viewpoint PU 3B shows the view looking north from the proposed All Abilities Sculpture Trail.
- Viewpoint PU 3C shows the view from the terminal of the 1000 Steps trail to the west of Darley.

The LVIA assessed the impact from Viewpoint PU 3A as 'high'. It concluded that at a distance of around 1.5 kilometres, the Project will be "*highly visible and will dominate the landscape*". No photomontage was prepared from Viewpoint PU 3A. The other viewpoints are more distant and are screened by existing vegetation, and impacts were assessed as 'negligible to low'.

The LVIA stated that mitigation through landscape screening or the design of nodes along the trails around Viewpoint PU 3A may assist in mitigating the impacts of towers while retaining longer views in which the Project infrastructure would be a background element. It stated:

> While such measures will assist in reducing the impacts of the Project, it is recognised that they will also alter the northerly panoramic views available from Bald Hill Activation Area.

Moorabool Council submitted the LVIA had not taken projected visitor numbers at Bald Hill (or other areas in Moorabool) into account in the LVIA, and the assessment of the impacts on the Bald Hill Activation Area was inadequate. It submitted:

> The only tool in the toolkit for mitigation is the "blunt instrument" of landscaping or reconfiguration, but even that instrument does nothing for Darley, Bald Hill Activation Area or Merrimu Reservoir and War Memorial. Further, there is no roadside landscape EPR and so no enforceable manner in which to mitigate those public realm views.

The issue of visitor numbers was explored extensively in Moorabool Council's cross examination of Mr Burge. In response to a question about how he formed a view on visitor numbers at Bald Hill and other locations in Moorabool (Bolwarrah Weir and Merrimu Reservoir), Mr Burge confirmed:

[14] 'PU' refers to the Peri-Urban Landscape Character Unit in which the Bald Hills Activation Area sits.

- he had not had regard to the projected visitor numbers in the Bald Hill Activation Plan
- he based his assessment on the use and what viewers would be doing in those areas, and where people may congregate, rather than viewer numbers.

Moorabool Council put it to Mr Burge that the Bald Hill Activation Plan indicated a projected 347,000 visitors annually when all stages are complete, and asked him whether that changed his view of the visual impacts on the Bald Hill Activation Area. He confirmed it did not, as those numbers are spread across a broad range of activities, across the whole area. He indicated some locations and proposed activities within the Bald Hill Activation Area (such as the Sculpture Trail, the Thousand Steps Walk and the Mountain Bike Park) are at lower elevations that are screened by existing vegetation, and will experience negligible to low visual impacts.

The Proponent submitted:

> Overall, Bald Hill Activation Area is a large area of about 120ha, intended for a range of outdoor activities. Given topography and landscaping, the Project will for the most part, have low to negligible visual impacts. Moorabool Council's submission that the impacts are "unmitigable" and that the area received "inadequate consideration" is an overreach and quite inconsistent with uncontradicted information in the LVIA.

Discussion

The IAC is satisfied that the LVIA's assessment of visual impact to the Bald Hill Activation Area is appropriate and accurate. The LVIA and Mr Burge's answers in cross examination confirm that Bald Hill was considered in some detail, having regard to the nature and location of the proposed activities in the Activation Plan. The LVIA appropriately identified the northern slopes as having the potential for high visual impact, as this is the part of Bald Hill that is closest to the Project with views to the north that take in the Project. Other locations will be less impacted as they are at lower elevations and/or views toward the Project are screened by existing vegetation.

The LVIA recommends landscape screening for the area around Viewpoint PU 3A, which is reflected in EPR LV1. Landscape screening will impact on the panoramic views to the north from the northern elevated parts of the Activation Area. It is therefore appropriate that the land manager (presumably Moorabool Council) be consulted on appropriate mitigations, including landscape screening. This is already provided for in LV1.

The IAC considers that the visual impacts on the Bald Hill Activation Area as a whole are acceptable. That said, they add to the range of impacts that would be experienced in the Darley area.

Finding

The IAC finds:

- While the visual impacts on the Bald Hill Activation Area as a whole are acceptable, they add to the range of impacts that would be experienced in the Darley area.

(vii) Macpherson Park

MacPherson Park is Melton's main recreational reserve for clubs and teams from the local and broader region. At 98 hectares, it is the largest and most significant reserve in

Melton. It has two vehicle access points along Coburns Road, with the northern entry being the main access point. The Park provides facilities for a number of local sporting clubs and associations which were detailed in Melton Council's main submission (D363). It includes an Equestrian Park in the north western part of the Park.

The Proposed Route runs along the northern boundary of MacPherson Park and clips the Equestrian Park and the main (northern) entry point in Coburns Road. This section of the Project is proposed to be configured as a single circuit, with a double row of lower towers of around 38 to 40 metres, to reduce impacts on Melton Aerodrome which is located to the north of the Park.

A masterplan was prepared for the Park in 2010 and updated in 2017. Further changes are likely because the proposed relocation of the main entry to the southern Coburns Road access point would require native vegetation clearance.

Evidence and submissions

Melton Council submitted MacPherson Park is a high use open space asset for active sport and recreation that also offers passive recreation. The Park provides linkages (or potential linkages) into Melton's open space and trails network and is a protected environmental asset within the Green Wedge.

Relying on Mr Goss' evidence, Melton Council submitted the Project will have unacceptable landscape and visual impact to MacPherson Park. It was particularly concerned about the visual impact of the section of Project crossing over the entrance to the Park, and requested Mr Goss to prepare a photomontage at this location. it submitted that the entrance "*whilst transient gives an overall impression and would form part of a user's visual memory*".

Figure 17 Photomontage – Macpherson Park entrance key observation point

Source: KOP A02 Crop A in Mr Goss' evidence (D202(b))

Melton Council disagreed with the Proponent's suggestion that planting along the easement to a height of 4 metres will provide an effective screen.

Mr Goss' evidence was:[15]

> Conclusion on Location (Route):
>
> The route's location through the … MacPherson Park area is demonstrably a critical failure of the route choice, as the Vac II objective requires activities not to attract attention (Low MOC11). The resulting Very High MOC from aviation requirements and proximity renders this location Fundamentally Unacceptable.

Mr Goss considered that undergrounding the segment of the Project around MacPherson Park would be the most effective way to mitigate its visual impacts. He also referred to design alternatives such as monopoles, relocation or increasing the setbacks. The IAC explored this with Mr Goss who responded:

- monopoles are closer to more traditional utility infrastructure in form and shape and the way they are perceived in scale
- the lattice form of the towers is visually cluttering and has an industrial aspect
- judicious use of a monopole could be a solution, especially if they could be lower in height
- monopoles may be easier to screen with landscaping.

Melton Council submitted Mr Burge did not appropriately consider the user's enjoyment of the Park, as he considered the primary purpose of the Park for active recreation will not be impacted by the Project. Mr Goss' evaluation of the visual impacts of the Project included a criterion that he referred to as 'People's Principles', which refers to a collection of ideas or beliefs held by those impacted by the proposal which comprise of Aesthetic, Economic, Education, Heritage, Home, Health & Recreation and Social. He considered the 'People's Principles' meant that the visual impact on Park users would be higher than Mr Burge had assessed.

Relying on Mr Burge's evidence, the Proponent submitted MacPherson Park is an active recreation facility, the primary purpose of which is to watch and participate in active sports. It submitted:

> Whilst an attractive visual setting for a sports facility is a positive, it is not essential.

It submitted existing vegetation along the edges of the Park will partially screen views of the towers, and the growth of trees over time will achieve similar partial screening to the more established areas of the Park. The Proponent submitted that for an active recreation facility, these outcomes are acceptable.

Discussion

The IAC accepts that:

- MacPherson Park caters for a wide and diverse range of users

[15] Mr Goss' evidence was presented over seven different documents and used highly technical language and terminology that is not commonly used in LVIAs. His evidence contained a number of errors that had to be corrected, was not presented in a clear or cohesive way, and was difficult to follow. Despite raising no concerns about the methodology adopted in the LVIA at the Joint Expert Meeting (D191), Mr Goss undertook his own assessment of landscape and visual impacts in Melton applying his own methodology, making direct comparisons with the LVIA and the evidence of Mr Burge and Mr Schutt difficult. It became clear during cross examination that Mr Goss (or others in his office) had used Generative Artificial Intelligence to write substantial parts of his evidence, including parts that rely on professional judgement. The IAC found Mr Goss to not be a credible witness, and his evidence was of little assistance to the IAC.

- the Park is well used by many segments of the local community for organised sports, fitness activities, and informal gatherings
- the double row of single circuit towers creates visual clutter along the whole of the northern boundary of the Park
- close views to the towers will not be able to be screened by landscaping.

Mr Goss' conclusion that the Project would have an unacceptable visual impact on MacPherson Park was in part based on an assumption that the Project towers and lines in the area around the Park would have to be painted and marked for aviation safety reasons (as shown in his photomontage extracted in Figure 21). There was no evidence that the towers would require painting (although some catenary would require marking, as discussed in Chapter 11). Mr Goss' photomontage is therefore of limited assistance to the IAC in understanding the likely visual impact of the Project on MacPherson Park users.

With that qualification, the IAC accepts that the towers and lines at the entrance to MacPherson Park and the approaches to the entrance along Coburns Road will be visually dominant. However these are not places where visitors to the Park will linger. While viewer numbers at these locations might be high, the duration of their exposure to views of the Project around the entrance will be limited.

For viewers located further into the Park, the Project will be less dominant but will still be a significant visual presence in views from the Park to the north. Views of the lower sections of the towers will be filtered through existing vegetation, but the towers will be visible above the vegetation from a number of locations within the Park.

In terms of the impacts this will have on Park users, the IAC prefers the analysis of Mr Burge on this point. While the IAC accepts that the Park has a passive recreation component, most people attending the Park are there to either play or observe active recreation activities. These are not activities that rely on (or are even significantly impacted by) a pleasant infrastructure-free outlook. The IAC does not agree with Mr Goss and Melton Council that park users are particularly sensitive to visual impacts.

The IAC considers visual impacts on MacPherson Park will be acceptable.

Finding

The IAC finds:

- Visual impacts on MacPherson Park will be acceptable.

(viii) Kororoit Creek Valley

VC278, gazetted in mid December 2025 part way through the Hearing, applied the SLO4 to the area either side of Kororoit Creek. Two towers are proposed to be located within the SLO4.

The 'Statement of nature and key element of landscape' in the SLO4 highlights the following landscape values and features:

- the creek is a distinctive feature of the expansive basalt plain, meandering through the open rural landscape in a shallow depression
- low volcanic hills are visible from the waterway.

The landscape character objectives include to:

- enhance the role of the waterway as an integrated and continuous landscape corridor, protecting the environmental, cultural and landscape values of the waterway system
- retain indigenous riparian vegetation and canopy trees or existing grasslands as the dominant landscape feature
- ensure the visual impact of buildings and works is minimised when viewed from the waterway corridor.

Decision guidelines require consideration of whether new buildings and works (among other things):

- are sensitively integrated with the natural landscape setting of the waterway corridor
- are of suitable height and bulk and are set back from the waterway corridor
- create an adverse visual impact from prominent locations such as ridgelines, hill faces, escarpments and landscape features and within waterway corridor and the vegetation canopy along the waterway corridor.

As discussed in Chapter 4.7, the SLO4 also protects a number of values relating to biodiversity and native vegetation in the riparian corridor.

Evidence and submissions

The SLO4 (being recently introduced) was not considered in the LVIA.

Melton Council submitted the scale and form of the proposed 80 metres towers are not capable of being sensitively integrated within the natural landscape due to their height and bulk. The towers will be highly visible and incongruous with a natural landscape. It submitted these issues are compounded in the context of the surroundings:

> Kororoit Creek is located immediately west of Mount Kororoit, which has its own SLO. That close proximity means that despite any attempts to "sensitively" micro-site the towers, the viewlines across the flat natural landscape between the two SLOs will be disrupted.

Melton Council submitted the Project should be undergrounded in the vicinity of Mount Kororoit and Kororoit Creek. Alternatively, the towers should be relocated outside the SLO4 area.

The Proponent explained that the route through this part of Melton passes north of Mt Kororoit, between Mt Kororoit and Holden Road, at the request of Earth Resources to avoid a prime hard rock quarrying resource. The route cannot be easily shifted north to avoid the SLO4.

The Proponent requested Mr Burge to carry out a visual assessment of this area in light of the introduction of the SLO4. Mr Burge's assessment indicated:

- the landscape values at the point where the Project crosses the creek are 'modest'
- there are limited accessible viewing points from this part of the creek
- there is very little visual relationship between the creek and the public realm
- visitation at this part of the creek is low.

He concluded the impacts on Kororoit Creek and the values identified under the SLO4 are modest.

The Proponent acknowledged that the Project "*does not perform favourably*" against all the decision guidelines in the SLO4. It will be tall infrastructure that will not sensitively integrate with the landscape. However the part of Kororoit Creek intersected by the Project is not a prominent location, is not publicly accessible and there are no meaningful views from parks and reserves along the waterway to the Project. It submitted:

> In light of this, the Proponent submits that this part of the Project remains acceptable notwithstanding the new control applied.

Discussion

In Chapter 4.7, the IAC recommends EPR BD10 be amended to require investigation of a 'Minimised risk clearance' approach and/or taller towers to minimise impacts on the Kororoit Creek riparian zone, to allow the retention of canopy trees in the riparian corridor. This would require consideration of possible impacts on Melbourne Airport's protected airspace.

If feasible, retaining the canopy trees will assist in preserving the line of riparian vegetation that makes the creek a distinctive feature of the landscape. While the towers will also be a distinctive (and incongruous) element in the landscape, the creek line will continue to be identifiable in longer range views along the creek corridor and across the landscape.

There is no doubt that the Project will be a dominant element in the landscape of the Kororoit Creek Valley. However the IAC notes Mr Burge's advice that the landscape values in this part of the creek are 'modest', public access and visitation is limited, and a visual relationship between the public realm and this part of the creek corridor is limited.

On balance, the IAC does not consider that the visual impacts of the Project in this location would be unacceptable. This is the case even if a 'minimised risk clearance' approach turns out not to be feasible, and the canopy riparian vegetation is not able to be retained.

Finding

The IAC finds:

- Impacts on the landscape values sought to be protected under the Melton SLO4 are acceptable.

(ix) Other locations

Many other examples were brought to the IAC's attention of particular locations or landscape values or features for which submitters considered the Project would have an unacceptable visual impact. These included the Bullarook Streamside Reserve, where the transmission lines are proposed to cross directly overhead of Kerrins Bridge (discussed further in Chapter 15.3). The IAC has considered all of these examples. The same principles apply as those outlined elsewhere in this Chapter. The IAC is satisfied that none of the examples brought to its attention demonstrated landscape values that are so important that the Project's visual impacts would be unacceptable at any of these locations.

6.6 Environmental Management Framework

The Councils sought various changes to the landscape and visual EPRs, including:

- an amendment to LV1 (which relates to the public domain) to require a process to be developed for determining alternate mitigation measures (if any) responding to the affected place values, where landscape screening and/or reconfiguration cannot be achieved without detracting from sensitive viewpoints and uses
- increasing the maintenance period for landscape screening from 2 to 5 years
- consultation with the Councils on suitable plant species for private domain landscape screening.

The IAC does not consider the first change to EPR LV1 to be warranted. EPR LV1 already provides for alternative measures to be identified.

The IAC agrees with the Council that the maintenance period for new landscaping on public land should be five years. This should be sufficient time to allow the landscaping to establish in areas of regular public use where young vegetation is susceptible to trampling or damage. Landscape maintenance periods of 2 years on private land are relatively standard for major projects, and the IAC does not consider the maintenance period in LV2 should be extended to 5 years.

It is not appropriate for Councils to specify species for landscape screening on private properties, and if landholders want assistance in this regard they can seek it from the Councils on a case by case basis.

6.7 Overall conclusions on landscape and visual effects

Broadly speaking, while landscape and visual impacts have not been avoided, the Project meets the evaluation objective of minimising visual impact, primarily through its double circuit design and route selection.

Some impacts of the Project can be mitigated through the measures outlined in the EPRs, including landscape screening. Facilities in public places could be redesigned or reorientated away from views toward the Project. However for some individuals, screening will not be effective and the residual landscape and visual impacts of the Project are likely to be very significant.

In some parts of the area surrounding the Proposed Route, the IAC considers that the Project's visual impacts will not meet policy objectives that seek to protect and preserve significant landscape values identified in the planning schemes. Some impacts at an individual level could be considered unacceptable. Visual impacts at Darley on both the public and private realms could, in isolation, be considered unacceptable.

The Project's significant (and in some cases potentially unacceptable) visual impacts need to be balanced against the benefits that the Project will bring to the Victorian community as part of an integrated assessment. The IAC's integrated assessment is provided at Chapter 16.

7 Land use and planning

7.1 Introduction

(i) Key information

The evaluation objective is:

> 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.

Land use and planning effects are assessed in:

- EES Chapter 12 Land Use and Planning
- EES Land Use and Planning Impact Assessment (LUPIA)
- Attachment III Draft PSA.

The exhibited EMF includes the following EPRs:

- LU1 Develop and implement a plan to minimise land use impacts during construction
- LU2 Minimise land use impacts through design.

Table 12 lists the experts providing evidence on land use planning.

Table 12 Evidence on land use and planning

Party	Expert	Firm	Expertise	Document number
Proponent	Rob Milner	Milner Planning Advisory	Planning	D107
Proponent	Richard Bolt	Richard Bolt Consulting Pty Ltd	Energy Policy	D109

The Proponent provided the following Technical Notes:

- TN011 – Operation of EPRs – Directly affected Landholders (D284)
- TN013 – Hard rock investigation area near Mt Kororoit (D322).

Other key documents are:

- Independent Peer Review - Land Use and Planning (D58).

The IAC has had regard to relevant policy and guidelines, including:

- PE Act
- Municipal planning schemes

(ii) What did the EES say?

The LUPIA assessed the Project against relevant planning policies contained in the six planning schemes that apply to the Project, while noting that clause 71.02-3 (Integrated decision making) provides that:

> The Planning Policy Framework operates together with the remainder of the scheme to deliver integrated decision making. Planning and responsible authorities should endeavour

> to integrate the range of planning policies relevant to the issues to be determined and balance conflicting objectives in favour of net community benefit and sustainable development for the benefit of present and future generations. However, in bushfire affected areas, planning and responsible authorities must prioritise the protection of human life over all other policy considerations.

The LUPIA included an assessment of relevant legislation, policies, strategies and plans, including the Planning Policy Framework. A similar analysis was provided in Attachment III.

The LUPIA highlighted the policy support for renewable energy and infrastructure in clause 19.01 (Energy) and the Project's alignment with clause 17 (Economic Development). The assessment of other relevant policies included the following key findings:

- 93 percent of the Project Area is within a 'rural zone' including the Farming Zone, the RCZ, RLZ and Green Wedge Zone (GWZ).
- The Project largely avoids public land, including National and State parks.
- The Project avoids urban and urban growth areas, except for the Merrimu Precinct where route options through the Bacchus Marsh / Darley area are constrained.
- Where the Proposed Route is located within the GWZ, it is consistent with green wedge policies.
- The Proposed Route is predominantly through modified environments used for agriculture and includes a 60-kilometre section east of the Bulgana terminal station that is collocated with the existing 220kv transmission line.
- Impacts on native vegetation are proportionally reasonable given the nature and scale of the Project.
- Visual impacts would vary from negligible to high depending on the location, with impacts on the private domain being more significant from nearby dwellings in farming areas immediately adjacent to the Project, and dwellings in the elevated areas in Darley.
- The siting of the transmission line and other infrastructure is consistent with bushfire planning policies.
- The Project's siting and design have sought to minimise the loss of productive agricultural land and avoid extractive industry areas.
- The EMF will appropriately protect and manage heritage values.
- The Project would not have a significant impact on the existing or planned transport network, including aviation infrastructure.

Many of these findings relied on the relevant EES Technical Reports that are discussed elsewhere in this Report.

The LUPIA recommended two land use and planning EPRs intended to minimise impacts during construction (EPR LU1) and through design (EPR LU2). It noted that other EPRs would assist in addressing a range of land use and planning impacts.

The LUPIA concluded that residual impacts would be minor to negligible, however there would be some unavoidable impacts. It found the Project would have a significant net community benefit based on its contribution to Victoria's transition to renewable energy.

Independent peer review

The Independent Peer Review supported the LUPIA and was satisfied it appropriately assessed the Scoping Requirements.

7.2 Land use and planning impacts

(i) Key issue

The key issue is:

- whether land use and planning impacts have been appropriately avoided and minimised, and are acceptable.

Impacts on agricultural land use are discussed in Chapter 10.

(ii) Evidence and submissions

The Proponent outlined the principles that were applied in determining the project alignment and how it was designed to avoid or minimise land use impacts.

It submitted the Project would provide a net community benefit by providing State significant infrastructure that was designed to avoid or minimise negative impacts and the application of the EMF that would mitigate many residual impacts.

Following its consideration of submissions, the Proponent recommended changes to EPR LU1 including the need to consider the following matters when preparing the construction plan (D652):

- the Agriculture and Forestry Business Mitigation and Support Strategy (EPR AF1) and Support Strategy for Directly Affected Businesses (EPR EC1)
- the timing of farming activities
- the timing of community and sporting events at Macpherson Park.

Mr Milner undertook the independent peer review of the LUPIA and provided evidence (D107) that assessed the Project's land use and planning impacts.

He noted recent amendments to the PE Act including the new planning framework objective:

> to provide for explicit consideration of the policies and obligations of the State relating to climate change, including but not limited to greenhouse gas emissions reduction targets and the need to increase resilience to climate change, when decisions are made about the use and development of land[16]

He also noted recent statewide amendments to the relevant planning schemes (Amendments VC283 - Plan for Victoria and VC268 - Victorian Transmission Plan) that had been approved following the preparation of the EES. He considered these amendments provided additional policy support for the Project.

Mr Milner assessed the merits of the Project against the Planning Policy Framework themes and summarised his view of the expected community benefits in Figure 22.

[16] P and E Act, section 4(2)(da)

Mr Milner concluded the Project is strategically justified and "*urgently required*" in the context of climate change and renewable energy policies. He was satisfied the Project would have a net benefit for the Victorian community, while acknowledging that some people would be negatively impacted despite the compensation and other support that would be available. He expected that many in the community would adapt to the Project over time, particularly with generational change.

Figure 18 Net community benefit assessment

	Net Community Benefit							
	Positive		Neutral	Negative				
	Major	Minor		Major	Minor			
Policy themes	**National**		**State**	**Regional**		**Local**		
Energy								
Settlement								
Biodiversity								
Water bodies & wetlands								
Gound water								
Landscapes								
Climate change								
Bushfire								
Land use compatibility								
Agriculture and forestry								
Earth & energy resources								
Building design and design for rural areas								
Aboriginal heritage								
Historical heritage								
Diversified economy								
Tourism								
Land use and transport integration								
Airfields								

Source: D107, paragraph 15

Mr Bolt provided an assessment of how the Project will contribute to the achievement of climate change and energy commitments in national and state law and policy. See Chapter 3.2.

The Councils focussed on land use and planning impacts related to specific land use themes that are discussed elsewhere in Part B of this Report, including biodiversity, agriculture, tourism, landscape, transport and heritage. Some argued that the Project's individual and cumulative impacts had not been adequately assessed and that the Project's disbenefits had been understated. This supported their contention that undergrounding (either partial or full) was necessary for the Project to achieve a net

community benefit. They sought various changes to EPRs LU1 and LU2 that were adopted by the Proponent in its Day 3 version.

Submitters raised concerns related to:

- a lack of strategic planning support
- inadequate consideration of amenity and other impacts
- inconsistency with zone and overlay provisions
- the adequacy of the EMF and other mitigations
- issues with the draft PSA and Incorporated Document.

VPP clause 66.02 makes Ausnet (as the relevant electricity transmission authority) a determining referral authority for planning permit applications for buildings and works within 60 metres of a major electricity transmission line or easement. Submitters believed this would significantly increase the area of land alienated by the Project and the Proponent's ability to recommend refusal and/or conditions on permit applications would exacerbate many impacts.

The Proponent advised that its principal interests in the referral applications were in protecting the easement and avoiding development outside the easement that could impact on the transmission line. It noted any decision made by Ausnet is reviewable by VCAT.

(iii) Discussion

Strategic context

The IAC's assessment of land use and planning impacts is largely based on its findings in relation to the specific themes discussed in Part B of this Report. Many of these themes have direct land use implications, particularly those that will have economic, social and amenity impacts.

The IAC agrees with the overarching EES conclusion and the evidence of Mr Milner and Mr Bolt that there is strong legislative and policy support for renewable energy and the Project, although this support needs to be balanced against competing planning objectives. The IAC provides its net community benefit assessment in Chapter 16.

The IAC is satisfied the Project has been sited having regard to land use and planning impacts and has sought to avoid existing and future urban areas and areas of significant biodiversity values. Land uses in some areas are more likely to be impacted than others, including areas of productive agricultural land that are discussed in Chapter 10 and areas of high landscape value discussed in Chapter 6. However, some areas of the Proposed Route, such as the co-location with the existing 220kv transmission infrastructure east of Bulgana, will have negligible land use impacts.

Specific areas and sites that are likely to experience significant cumulative impacts are discussed in Chapter 15.

Zones and overlays

Many submissions argued that the Project was inconsistent with applicable zones and overlays. As the EES noted, over 90 percent of the route is within the 'rural' suite of zones, predominantly the Farming Zone. Sections of the route are within the RCZ, particularly

within the western area where it is co-located with the existing 220kv transmission line, but also in the Darley area that also includes an area of RLZ. The route also traverses a large area of GWZ in Melton.

While none of these zones would preclude the Project, it is notable that a purpose of the Farming Zone is to encourage the retention of agricultural land and the purposes of the RCZ, RLZ and GWZ include protecting landscape and other environmental values. The Proposed Route traverses other zones including the Public Use Zone and Special Use Zone, which also do not preclude the Project.

The Proposed Route traverses extensive areas subject to the ESO, including the ESO1 in Pyrenees, ESO1 and ESO3 in Hepburn and ESO1 in Moorabool. It also crosses various ESOs applied to waterways. The Proposed Route traverses areas north of Darley subject to the DDO2 and DDO14 in Moorabool (as noted in Chapter 6). Other relevant overlays include the Heritage Overlay (discussed in Chapter 5), SLO (discussed in Chapters 4 and 6) and various overlays associated with Melbourne Airport. Although none of these overlays would preclude the Project, they seek to identify and protect the environmental, landscape and other values within the area surrounding the Proposed Route. Those values and the Project's impacts on them are discussed in the relevant chapters in Part B.

The Proposed Route crosses the northern most point of the Merrimu Precinct as shown in the draft Merrimu Precinct Structure Plan (PSP)[17] as well as the proposed Bacchus Marsh Eastern Link Road and other road infrastructure. This area of the Merrimu Precinct is also subject to various quarry buffers and the transmission line easement would be in proximity to a narrow residential interface. The IAC acknowledges the various constraints that affect the Proposed Route through this area and notes that the PSP will respond to the Project through the PSP approval process.

Extractive industry

The LUPIA outlined the consultation and investigations undertaken in relation to extractive industries and noted the Project traverses the boundary of seven Extractive Industry Investigation Areas. TN13 described how the Project avoids hard rock investigation areas in the Mt Kororoit area. There were no submissions from Resources Victoria or licence holders and the IAC accepts that any potential impacts on extractive industry would be negligible and acceptable.

VPP clause 66.02-4 planning permit referrals

The referral arrangements in clause 66.02-4 apply to all transmission lines in Victoria, not just this Project. As the Proponent noted, this referral requirement has been in place for many years and any decision by the referral authority (including Ausnet) can be reviewed by VCAT.

The Project primarily traverses rural land consisting of large lots. The IAC is satisfied that a requirement to refer permit applications in the area within 60 metres of the easement,

[17] Merrimu Precinct, Precinct Structure Plan, Draft for public consultation, March 2026

and any decision that Ausnet might make in relation to proposals in that area, would not significantly impact the use of the land.

Environmental Management Framework

The Proponent proposed various changes to EPR LU1 in response to Council submissions that were included in the Day 3 version of the EMF. The changes relate to scheduling construction activities having regard to farming activities and the use of MacPherson Park. The IAC supports these changes.

(iv) Findings

The IAC finds:

- The LUPIA is adequate for the purposes of the EES.
- The Project has been sited to avoid and minimise land use and planning impacts to the extent practicable.
- The land use and planning EPRs are appropriate.

7.3 Overall conclusions on land use and planning effects

Subject to applying its recommendations, the IAC is satisfied the Project is generally consistent with relevant policy and legislation and the draft evaluation objective relating to land use planning. The significance and acceptability of impacts on specific land uses are discussed elsewhere in Part B of this Report. Cumulative impacts on specific places are discussed in Chapter 15. The integrated assessment of the Project's cumulative impacts, and the assessment of whether the Project delivers a net community benefit, is discussed in Chapter 16.

8 Bushfire

8.1 Introduction

(i) Key information

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects for community … health and safety with regard to … fire risk management …

Bushfire effects are assessed in:

- EES Chapter 13 Bushfire
- EES Technical Report K Bushfire Impact Assessment.

The exhibited EMF includes the following EPRs (each of these plans must include bushfire protocols and mitigations):

- EM2 – Construction Environmental Management Plan (CEMP)
- EM3 – Property Access and Management Plan (PAMP)
- EM6 – Construction Emergency Management Plan.

The Incorporated Document includes the following requirements:

- a Construction Bushfire Management Plan (clause 4.11.1)
- for the Ballan and Lexton workforce accommodation and laydown areas:
  - a Temporary Workforce Accommodation Plan that demonstrates (among other things) that accommodation buildings are appropriately located having regard to fire risk (clause 4.13.2)
  - an Emergency Management Plan (clause 4.13.4)
  - an Operations Management Plan (clause 4.13.6).

Table 13 lists the expert evidence on bushfire.

Table 13 Evidence on bushfire

Party	Expert	Firm	Expertise	Document number
Proponent	Mark Potter and Graeme Taylor	Fire Risk Consultants	Bushfire and fire risk	D93
Proponent	Rob Milner	Milner Planning Advisory	Planning	D107
Moorabool Shire Council	Michael Buxton and Alan March		Bushfire and planning	D138 (main evidence)
Moorabool Shire Council	Michael Buxton and Alan March		Bushfire and planning	D188 (supplementary evidence)
Joint Expert Statement - Bushfire				D192

The Proponent provided the following Technical Notes:

- TN02 – Vegetation Risk Clearance Footprint, Partial Clearance and Darley Vegetation Removal
- TN06 – Tower Design Standards and Climate Change.

Other key documents are:

- independent peer review, bushfire (D54)
- *Fire risk potential from the Western Renewables Link*, Penman and Cirulis, August 2025 (the Penman Report)[18] (D260)
- *Electricity Transmission Lines: Bushfire Management and Community Safety*, Energy Safe Victoria and others (ESV Bushfire Guidelines) (D268)
- CFA Standard Operating Procedure 11.04 Working Near Electrical Structures and Conductors (CFA SOP) (D422)
- frequently asked questions from the CFA website on fighting fires around transmission lines (D488)
- guidance material from the CFA website on fighting fires around transmission lines (D497)
- Safety performance reports on Victorian electricity networks from 2020 to 2023 prepared by Energy Safe Victoria (ESV) (D502 to D505)
- Fire Risk Consultants' review of TN02 (D659)
- various videos of fire events and firefighting operations including aerial operations in the region provided by various submitters and Moorabool Council.

The IAC has had regard to relevant policy and guidelines, including:

- VPP clause 13.02-1S (Bushfire planning)
- VPP clause 71.02-3 (Integrated decision making)
- the *Electricity Safety Act 1998* (Vic)
- the ESV Bushfire Guidelines
- the CFA SOP.

(ii) What did the EES say?

Project design has minimised bushfire risk by:

- avoiding high risk bushfire areas in the Bushfire Management Overlay (BMO)
- locating towers outside public road reserves, reducing the chance of collisions by vehicles in an emergency
- locating towers at sufficient distances from most fire access routes and fire control lines to avoid the chance of tower collapse obstructing these routes
- locating the workforce accommodation and laydown areas (where large numbers of people will congregate) outside the BMO.

The EES concludes that while the level of landscape bushfire risk will remain high, it will not be materially increased by the Project provided various mitigation measures are

[18] The Charleson Group engaged Professor Penman to provide the report, but the Charleson Group did not file the Penman Report with the IAC. The Penman report was referred to in Mr Perkins' evidence filed on behalf of the Charleson Group (D117). The Proponent requested a copy from the Charleson Group's legal representative after reviewing the Perkins evidence and provided a copy to the IAC.

implemented. Fires in the landscape are a more foreseeable threat to community safety than the Project. Normal emergency and evacuation protocols should be followed to ensure communities are not at risk of fire, which will also effectively mitigate the small additional risk posed by the Project.

Independent peer review

The independent peer review determined that the methodology in Technical Report K was reasonable and met the Scoping Requirements. It considered:

- the assumptions and limitations in the Report are appropriate
- the recommendations for a Construction Bushfire Management Plan, Emergency Management Plans for the workers accommodation and laydown areas, and the CEMP "*provide an appropriate structure to mitigate bushfire risks*".

The peer review supported the conclusions in Technical Report K, describing it as a "*comprehensive evaluation of existing conditions, fire hazards, and necessary management strategies*".

8.2 Methodology

(i) Key issues

The key issues are whether the Bushfire Impact Assessment appropriately:

- assessed bushfire risk
- considered consequence of a bushfire event (as well as likelihood)
- balanced the prioritisation of human life.

(ii) Evidence and submissions

Submitters

Many submitters, including long term volunteer firefighters, highlighted the existing high risk and history of bushfires in the area, the terrifying nature of bushfires, and the devastating effects bushfires have on lives, homes and livelihoods. Many pointed to the fact that Victoria is one of the highest bushfire risk areas in the world. They were concerned that the Bushfire Impact Assessment and the evidence of Mr Potter and Mr Taylor understated the level of bushfire risk posed by the Project.

Submitters were particularly concerned about the proposition that because the Proposed Route traverses land that is already subject to high bushfire risk, the increase in risk posed by the Project should not be regarded as significant, and would be managed by landowners and communities applying their own bushfire plans and evacuating on extreme fire danger days.

KDPA submitted that even if fire is a low likelihood event, that event would have very high consequences on the community. KDPA submitted:

> The community has no tolerance of increased fire risk. The Terms of Reference make it clear increased fire risk is to be avoided. KDPA supports the concerns raised by numerous volunteer firefighters … in relation to firefighting impacts, the lack of modelling and also in relation to the inadequate risk assessment that has been undertaken by AusNet.

They and many others considered that to meet the requirement in the evaluation objective to 'avoid, or minimise where avoidance is not possible' bushfire risk, the Project should be undergrounded.

Experts

Professors Buxton and March considered the methodology in the Bushfire Impact Assessment was flawed. It did not undertake a full risk assessment by placing too much emphasis on the low likelihood of the Project causing ignitions and failing to appropriately consider consequence. A proper risk assessment recognises that even extremely rare likelihood events can be high risk if the consequences are catastrophic, as is the case with bushfire. A matrix approach should have been adopted that appropriately reflects the risk arising from low likelihood but high consequence events.

They considered the Bushfire Impact Assessment did not have appropriate regard to the vulnerability (or resilience) of existing and future settlements, with:

- no assessment of the demographics or locational characteristics of potentially impacted communities
- no assessment of the potential impacts on scattered rural housing and rural residential properties
- risk to residential development on the fringes of towns, townships and urban areas potentially affected by bushfire being understated
- the potentially increased risk from future development of the extensive number of existing rural lots across the area surrounding the Proposed Route and further residential growth on the fringes of townships and the Melbourne metropolitan area "*ignored*"
- the risks associated with "*malicious fires*" in the workforce accommodation and laydown areas underestimated.

Mr Milner considered the bushfire impacts of the Project are acceptable from a planning perspective, on the basis of the finding in the Bushfire Impact Assessment that the Project presents no material increase in bushfire risk, and having regard to the benefits of the Project.

Professors Buxton and March disagreed. VPP clauses 13.02 and 71.02-3 require prioritising human life above all other policy considerations. In their view, neither the Bushfire Impact Assessment nor the draft Amendment prioritised the protection of human life. They considered it was not appropriate to 'justify' a net community benefit (as they considered Mr Milner had done) by emphasising the contribution of potential renewable energy generation to climate change mitigation at what they considered to be the expense of prioritising the protection of human life.

The bushfire experts attended a joint expert meeting before the Hearing. The Joint Expert Statement contains Mr Potter and Mr Taylor's response to various points raised by Professors Buxton and March. Mr Potter and Mr Taylor confirmed their position in the peer review that the EES's assessment of risk:

- considered the risk in both the construction and operations phases
- included history of ignition from transmission lines
- analysed likely bushfire behaviour
- included "*strong and robust*" mitigation measures to manage the risk.

They agreed that the policy framework in clauses 13.02 and 71.02 requires prioritisation of the protection of human life, but considered this has been effectively assessed in the Bushfire Impact Assessment.

Agencies

CFA spoke to its original submission (S159) at the Hearing, and answered a number of questions from the IAC. It also provided a written response to questions it took on notice (D421), and a copy of the CFA SOP (D422). CFA raised no concerns about the methodology of the Bushfire Impact Assessment, and confirmed its conclusion in its original submission that there is sufficient information before the IAC to determine bushfire risk and bushfire protection measures.

DEECA submitted:

> DEECA accepts the Proponent's position that the Project Area is now, and will remain, bushfire prone, and that the Project will only make a small change to the risk of bushfire.

Proponent

The Proponent submitted that the EES "*clearly proceeds on the basis that bushfire can have catastrophic impacts*". Neither the Scoping Requirements nor the Ministerial Guidelines for the Assessment of Environmental Effects require an EES to adopt a matrix based risk assessment approach. Any bushfire carries with it the possibility that the consequences could be catastrophic. However, not every bushfire will have catastrophic results. Probability is a relevant (and weighty) factor in any risk assessment. It submitted:

> A range of other matters need to also be considered. The expert evidence relied upon by the Proponent (and the content of the EES) sets out a detailed analysis as to why, even in the highly unlikely event that an ignition caused by the operation or construction of the WRL Project were to start a fire, it is highly unlikely that such a fire would have 'catastrophic' consequences. This evidence was not subject to any meaningful challenge in cross-examination.

The Proponent submitted that the Penman Report (prepared on behalf of the Charleson Group) effectively confirmed the conclusion in Technical Report K that the Project poses a very low fire risk. Professor Penman used a complex fire simulation model to determine the change in fire risk as a result of the Project, and concluded that in the part of the surrounding area he assessed (which was mainly open agricultural land in the Mount Beckworth and Mount Bolton area), the risks to both houses and agriculture were numerically very small, likely due to "*the infrequent occurrence of extreme fire weather, low forest cover and relatively flat topography*". He assessed the increase in risk as 0.02 (presumably this is a percentage increase, although this is not overly clear from the Penman Report).

(iii) Discussion

The Bushfire Impact Assessment assessed the landscape fire risk based on a detailed analysis of the existing conditions within 50 kilometres of the Proposed Route in accordance with guidance commonly applied in bushfire risk assessments, including the *Technical guide to planning permit applications within Bushfire Management Overlay areas* (DELWP, 2017). The assessment:

- characterised bushfire hazards considering landscape type, vegetation, topography and fire weather conditions within the study area
- included a detailed analysis of fire history in the study area
- identified values at risk within a 20 kilometre radius of the Project using the Victorian Fire Risk Register
- considered bushfire risk scenarios, supported by Phoenix Rapidfire bushfire behaviour modelling at key forested locations in the area surrounding the Proposed Route
- considered current bushfire management arrangements within the study area including the roles and responsibilities of key agencies and regional and local government bushfire management planning
- comprehensively analysed the ignition risks posed by the Project, and its impacts on fire suppression operations and access and egress during an emergency.

For a large scale project that covers such a broad area, this is a practical and appropriate approach to classifying the bushfire risk that currently exists in the Project Area and surrounds, and assessing how the Project will impact existing risk levels. The IAC does not consider the assessment required a detailed demographic analysis of the many communities and settlements throughout the Project Area, or an analysis of potential future settlement patterns. While the risk may increase with future population growth in the area, future population growth is difficult to predict and, in any event, the approach to mitigation would not likely change.

Consideration of consequence

In any risk assessment, likelihood and consequence are equally relevant and important factors. The IAC is satisfied that Technical Report K had appropriate regard to the potentially catastrophic consequences of a significant fire event, notwithstanding it did not refer to a risk matrix in the way recommended by Professors Buxton and March.

The incremental increase in risk

The IAC understands submitter concerns about the proposition that because the Proposed Route traverses land that is already subject to high bushfire risk, the increase in risk posed by the Project should not be regarded as significant. However the size of an incremental increase in risk is a relevant factor in assessing a project's bushfire impact. The Bushfire Impact Assessment concluded that the incremental increase in risk as a result of the Project is very small. This was consistent with the (albeit more limited) assessment undertaken by Professor Penman.

The policy balance

VPP clause 13.02 is primarily directed towards ensuring that bushfire risk is carefully considered before decisions are made that would allow population increases in areas of high bushfire risk. That said, all planning decisions should consider whether the risk to life and property is acceptable.

Professors Buxton and March did not clearly articulate why, in their view, the Bushfire Impact Assessment or the draft Amendment had failed to prioritise the protection of human life. To the extent that they considered *any* increase in fire risk amounts to a

failure to prioritise human life, the IAC does not consider this is the correct approach. Rather, the increase in bushfire risk (and the size of that increase) is a relevant consideration in the integrated assessment process, and needs to be balanced against the benefits of the proposal to the community in an integrated assessment of net community benefit. It agrees with Mr Milner's approach in this regard.

(iv) Findings

The IAC finds:

- The methodology of the Bushfire Impact Assessment was appropriate to assess the bushfire risks and impacts of the Project.
- The Bushfire Impact Assessment appropriately considered consequence in its assessment of bushfire risk.
- The Bushfire Impact Assessment responded appropriately to the requirement in the policy framework to prioritise human life.

8.3 Ignition risks

(i) Key issue

The key issue is:

- whether the Project presents an unacceptable ignition risk.

Chapter 8.4 addresses ignition risks from Project infrastructure failure. Chapter 8.5 addresses ignition risks from flashover.

(ii) What did the EES say?

During the construction phase, key potential impacts include ignition risks from hot works,[19] vehicles being present in areas where dry grass contacts the hot parts of vehicles (such as exhausts), or fires being deliberately lit. These risks will be managed by the CEMP, the PAMP and the Construction Bushfire Management Plan.

During the operations phase, ignition risks include hot works during maintenance activities, tower collapse, fallen conductors, lightning strikes and flashover.[20] The key measure to mitigate these risks is AusNet's Electricity Safety Management Scheme (ESMS) approved by ESV under the Electricity Safety Act. This includes a network wide Bushfire Mitigation Plan which outlines how AusNet manages bushfire risks across the entire Victorian transmission network.

[19] Hot works are activities that create sparks or generate hot particles, such as welding.

[20] Flashover occurs where electricity is conducted from a conductor to another point, including another conductor, a nearby powerline or the ground. It is also referred to as arcing. Technical Report K states "*flashover creates an extreme electrical safety hazard to any nearby persons*".

(iii) Evidence and submissions

Submitters

Many submitters were concerned about the Project presenting an ignition risk in the high bushfire risk landscapes the Project traverses. The Ballarat Group of Fire Brigades[21] (whose submission was adopted by many community submitters) submitted that while transmission lines in Victoria may not have caused a large scale bushfire, there are documented instances of minor ignition events attributed to the network. The Group submitted there were overseas examples of transmission lines causing major fires, including a very significant wildfire in California where authorities found that interaction between high-voltage transmission infrastructure and an adjacent de-energized line initiated the blaze.

Experts

Professors Buxton and March considered the Bushfire Impact Assessment did not appropriately address the possibility of ignition from transmission infrastructure. The Professors referred to a VAGO report from 2020 (D330(a)) that they incorrectly summarised as indicating that electricity transmission failure had caused an average of seven fires a year (most of which were contained on-site).

Mr Potter and Mr Taylor advised that the Project's primary ignition risks occur during the construction period, consistent with any development activity in areas where a bushfire hazard is present. They were satisfied that the proposed mitigation measures respond appropriately to the increased ignition risk during construction.

In relation to ignition risks in the operational phase, Mr Potter and Mr Taylor acknowledged that transmission line infrastructure has led to past ignitions within vegetated areas. However "*these are rare occurrences and there is limited evidence of ignitions*". Their evidence was:

> In relation to the operation of transmission line infrastructure, there is no history within Australia of 500 kV transmission lines starting fires. They are regarded as having the lowest bushfire risk of all powerline infrastructure.

Mr Potter and Mr Taylor advised that distribution lines present a much higher ignition risk than transmission lines. All transmission infrastructure operators are required to implement bushfire mitigation measures and plans approved by ESV under the Electricity Safety Act, which will help ensure the transmission infrastructure, once operational, does not present an ignition risk.

Councils

Hepburn Council submitted that an ignition caused by transmission infrastructure is reasonably foreseeable on the basis of the information in the Bushfire Impact Assessment. It called for additional bushfire modelling both with and without the Project to understand its impact on future fire ignition, spread and suppression, and submitted:

> Undergrounding of the Project presents an opportunity to entirely eliminate bushfire risk during the 80-year long operational phase of the Project. This is a significant benefit that

[21] A group of CFA branches operating in the area surrounding the Proposed Route (Ascot, Burrumbeet, Cardigan/Windermere, Glendaruel/Mt Beckworth, Invermay, Learmonth, Miners Rest and Waubra)

should be considered by the Committee as part of its assessment of the Project EES, and the undergrounding alternatives being presented by Council and other submitters.

Moorabool Council submitted that the evidence on ignition risk from transmission lines was inconclusive. There are international studies that found there were ignition risks, whereas studies from NSW found there were not. It submitted that the Bushfire Impact Assessment indicated there have been three ignitions from transmission infrastructure resulting in ground fires. While those ignitions did not result in bushfire (due to wet weather conditions, prompt fire suppression activities and time of year), there is no guarantee that a future ignition would not occur in drier and more dangerous conditions.

Agencies

CFA's original submission (S159) indicated that the fire ignition risk for transmission lines relates primarily to the construction period, and raised no concerns about ignition risks during operations. At the Hearing, the IAC asked CFA a number of questions in relation to ignition risks. CFA confirmed:

- While distribution lines present a risk of ignition that has historically resulted in several bushfires in Victoria, it was not aware of any bushfires started by transmission lines.
- Its prime concerns in relation to ignition risks are during the construction and decommissioning phases, when works are being undertaken. Systems are in place to manage ignition sources during the fire danger period. This includes requirements for permits to burn or to undertake hot works on total fire ban days.
- Once the Project was operational, there was no evidence that transmission lines materially increase the fire risk in high bushfire risk areas.

Proponent

The Proponent submitted:

- there is no evidence that a transmission line has ever caused a bushfire in Victoria
- the likelihood of the lines falling or arcing, causing an ignition that leads to a bushfire, is "*very small*"
- the likelihood of a transmission line causing a bushfire is "*far smaller*" than existing bushfire ignition risks (such as lightning strikes or deliberately lit fires).

The Proponent submitted the evidence of Professors Buxton and March with respect to the Project's ignition risk was "*seriously flawed*" in two respects.

First, it proceeded on the mistaken belief that the VAGO 2020 report identified an average of seven fires a year in Victoria were caused by electricity transmission failure. The VAGO report was referring to fires started by distribution lines, not transmission lines. The Professors conceded this in cross examination.

Second, it failed to acknowledge the measures in place that make it "*highly improbable that any ignition would occur, or (if it did) that the ignition would result in a bushfire*". These measures include network protection mechanisms required as part of the Proponent's network wide ESMS, that ensure that in the event of a fault or tower collapse, power is switched off automatically in 80 to 120 milliseconds.

The Proponent concluded:

> On any reasonable view, the probability of a transmission line starting a bushfire has been demonstrated to be very low.

(iv) Discussion

Victoria has a long history of managing fire and transmission lines. There are approximately 6,500 kilometres of high voltage transmissions lines in Victoria, many of which have been there for decades. The Bushfire Impact Assessment refers to only one example of a transmission line in New South Wales causing an ignition. No examples were presented of transmission lines in Victoria (or elsewhere in Australia) starting a bushfire, or significantly impacting bushfire response.

Clause 4.11.1 of the Incorporated Document requires a Construction Bushfire Management Plan to be prepared in consultation with the fire authorities (including CFA) that sets out how ignition risks will be managed during the construction phase. The Plan needs to include the following:

- controls on hot works and other activities that could result in fire ignition such as flammable liquid storage and vehicle
- securing CFA permits for any essential hot works on Total Fire Ban days
- managing vegetation within the easement
- water supply and hoses to be provided at laydown areas and near occupiable buildings, as well as vehicle-based water supply, pumps and hoses at all construction sites during the declared fire danger period
- forecast fire weather conditions to be communicated to the construction and maintenance workforce
- bushfire-related training and competency requirements for construction and maintenance personnel
- bushfire attack level construction standards to be met for occupiable buildings including offices, lunch rooms and accommodation buildings, to CFA's satisfaction.

Many of these requirements apply to maintenance as well as construction. The Bushfire Management Plan should therefore cover both the construction and operational phases. The IAC recommends changes to clause 4.11.1 to this effect.

Bushfire risk is also addressed in the EPRs:

- EM3 requires the PAMP to include fire management protocols and mitigation measures
- EM6 requires the CEMP to include measures to manage bushfire risk including:
  - monitoring fire weather conditions and bushfire emergency warnings
  - evacuation triggers, planned evacuation routes, assembly locations and locations to which construction crews are to evacuate if required
  - what do if an on-site fire ignition occurs, including emergency notifications.

ESV is Victoria's safety regulator for electricity, gas and renewable energy. It monitors and enforces compliance with Victoria's energy safety legislative framework which includes the Electricity Safety Act and associated regulations and relevant Australian

Standards. The Project's bushfire risk during the operational phase will be primarily managed under this regulatory regime.

The Proponent's ESMS regulates how assets are to be managed over their life cycle to ensure the safety of consumers and the public as well as AusNet staff and contractors. The bushfire management measures required under the Incorporated Document will work together with the various requirements and plans in the ESMS. The ESMS and related plans must be submitted to ESV for review at least every five years, ensuring they remain current and reflect changes in the regulations and practices.

Managing vegetation in the easement will be important in managing the Project's bushfire risk throughout its operational phase. Vegetation management plans are approved by ESV as part of the ESMS. However it is important that local fire authorities are also consulted on vegetation management in the easement, so that they are well informed and prepared in the event they are required to manage a fire in or near the easement. The IAC recommends changes to the Incorporated Document to ensure this occurs.

Emergency preparedness and response is a key component of the ESMS. The Proponent has an existing Strategic Plan for Integrated Response and Contingency System to address emergencies. According to the EMF, this system provides for effective and timely response to emergency events including bushfires or high winds that may lead to the failure of transmission infrastructure which could affect the operation of the network and the health and safety of the public.

The IAC considers bushfire ignition risks arising from the Project are very low, and are acceptable. It is satisfied that the measures in the ESMS, combined with those in the Incorporated Document and the EPRs, will ensure that the bushfire ignition risk posed by the Project is appropriately managed, and is acceptable.

(v) Findings and recommendations

The IAC finds:

- Bushfire ignition risks arising from the Project are very low.
- The Incorporated Document and EPRs will operate together with requirements under the Electricity Safety Act to ensure the Project's bushfire ignition risks are acceptable.
- The Bushfire Management Plan required under the Incorporated Document should:
  - apply during the construction and operational phases (not just construction)
  - require fire authorities to be consulted in relation to vegetation management in the easement.

The IAC recommends:

Incorporated Document

Include the following changes:

- Amend clause 4.11 (Bushfire Management) to insert additional requirements in clause 4.11.1 to ensure the Bushfire Management Plan:
  - applies during both the construction and operational phases

- includes a requirement to consult with fire authorities in relation to vegetation management in the easement throughout the operations phase.

These changes are included at Appendix E:1.

8.4 Project infrastructure failure

(i) Key issue

Project infrastructure failure (tower collapse, fallen transmission lines and lightning strikes) could result in fire ignition, electrical safety hazards and access and egress routes being blocked.

The key issue is:

- whether the risks posed by Project infrastructure failure have been appropriately assessed, and are acceptable.

(ii) What did the EES say?

The Bushfire Impact Assessment stated that since 1959, twelve high wind events have led to the collapse of a total of 51 towers, including the South Australian 'black system event' in 2016 and the Anakie event in 2024. Only one event, in NSW in 1981, led to ignition and fire escaping from the site.

The Bushfire Impact Assessment explained that AusNet's Bushfire Management Plan and Asset Management Plan required under the ESMS require:

- infrastructure and equipment to be designed and maintained in conformance with Australian Standards that "*provide structural resilience, including under extreme convective downdraft winds and tornadoes*"
- compliance with lightning performance standards specified in Australian Standards
- strict quality assurance processes for the manufacturing and installation of towers and conductors, including load testing of each structure type to confirm resilience
- regular and rigorous inspection and maintenance processes for maintaining assets as well as detecting and rectifying asset failures and defects.

(iii) Evidence and submissions

Submitters and Councils

Tower collapse was a key concern of many community submitters. They were concerned tower collapse is a higher risk in extreme weather conditions, and that fires can create their own weather conditions (including fire induced winds and very strong downdrafts) that would increase the risk of tower collapse and fallen transmission lines. Hepburn Council submitted tower collapse generally occurs in high wind events, which often coincide with the worst bushfire events.

Experts

Professors Buxton and Marsh were concerned about the resilience of transmission infrastructure designed for 'reasonably foreseeable' extreme wind conditions. They

considered there was "*extensive evidence*" of tower failure in the past, and the risk is increased by the predicted probability of increased numbers of extreme events due to climate change. They provided information in relation to 14 major events between 2006 and 2024 across the National Electricity Market that led to tower failures.[22] They did not provide details of how many (if any) resulted in a fire starting, or escalating into a bushfire.

The Professors were concerned with the assertion in the Bushfire Impact Assessment that the risk is low because the towers will be constructed to a higher standard than towers which have previously failed. The assessment provided no comparative details of construction standards, or modelling of the likely performance of towers during extreme events.

They were also concerned that Technical Report N (the Climate Change Assessment) was not consistent with the precautionary principle in reaching the conclusion that the structural design of the Project does not need adjustment given there is no clear evidence that extreme wind conditions will be materially exacerbated by climate change.

Agencies

CFA acknowledged that towers had collapsed during severe storm events in Victoria and brought transmission lines down, but it was not aware of any tower collapse in Victoria causing a bushfire.

Proponent

The Proponent submitted that the likelihood of towers collapsing is very small. The towers have been designed to withstand severe conditions, taking into account climate change predictions. Responding to submissions that referred to fires creating their own weather, the Proponent submitted:

> Apart from the fact that towers have been designed to withstand severe forces, the magnitude of fire required for this to occur is unlikely to occur in the conditions in the area, but even if such a fire occurred, nobody is going to be anywhere near any fire that causes the collapse – it would be far too late.

The Proponent tabled TN06 which provides more information on tower design standards and the research and methodology that informed the conclusions in both the Bushfire Impact Assessment and the Climate Change Impact Assessment. TN06 attaches a memo from the authors of the Climate Change Impact Assessment that provides more detail in relation to the climate data used to predict future weather events. The memo states:

> As with all climate change projections, there is inherent uncertainty in the extreme wind projections. Some climate models project larger reductions in extreme wind speed than the median and other models project increases in extreme wind speed. The range in projections for the 5th and 95th percentile for a 100 year ARI event in 2100 (for example) is from -6.7% of baseline extreme wind speed to +7.3%.

It also states (IAC's emphasis):

> … the 2021 update of [Australian Standard AS/NZS1170.2:2021 Structural design actions. Part 2. Wind actions], for the first time, includes a climate change multiplier for the design

[22] The evidence is contained in Appendix 2 of the Professors' expert report.

> wind event. The multiplier for non-cyclonic regions in Australia and New Zealand is 1.0, meaning that the design wind speeds are not adjusted for climate change. This includes region A5, in which the WRL Project is proposed to be constructed.
>
> Through the writing and review process for the updated Standard, it has been concluded by Standards Australia that the climate science does not support scaling design wind events for elevated structures for climate change in Australia's and New Zealand's non-cyclonic regions.

As well as the Australian Standards, the memo includes a detailed analysis of several scientific papers on the likely climate change impacts on severe wind events, including an Intergovernmental Panel on Climate Change paper from 2021. It concludes:

> There is no clear evidence that climate change will materially exacerbate the threat posed by extreme wind conditions to WRL electricity transmission infrastructure. Based on the evidence, it is plausible that small increases in extreme winds may occur across the WRL project area. Increases in wind speeds for a specific [average recurrence interval event] that are significantly larger than 10% are highly unlikely.

Relying on this information, the Proponent concluded:

> … The concerns expressed by the Professors about tower collapse and a bushfire would require a convergence of a series of individually, highly unlikely events being:
>
> - the highly unlikely event that a tower would collapse;
> - the highly unlikely event that the collapse would cause an ignition; and
> - the highly unlikely event that the ignition then causes a bushfire.

(iv) Discussion

Tower collapse

Current Australian Standards require towers to be constructed to withstand reasonably foreseeable extreme wind conditions. Reasonably foreseeable conditions are based on future climate change scenarios. These standards effectively require 70 metre towers in central and western Victoria to be constructed to withstand a design wind gust speed of around 200 kilometres per hour.[23]

The Australian Energy Regulator investigated the South Australian 'black system event' and found that the 22 towers that collapsed were a superseded design that was known to be more vulnerable to extreme winds than newer towers. An expert panel investigating the Anakie event reached similar findings in relation to the six towers that collapsed during that event.

The IAC is satisfied that the Bushfire Impact Assessment had appropriate regard to climate change risks in the context of tower collapse. It specifically considered the potential for climate change to generate extreme weather that could result in Project infrastructure failure (both towers and lines). It contains a detailed analysis of the implications of climate change on fire weather conditions in sections 6.6, 6.7 and 8.3. That analysis considered future conditions under climate change projections, and applied climate change scaling factors based on Climate Insights, a proprietary data portal explained in the Climate Change Assessment.

[23] Technical Report K at page 98.

On the basis of the information in Technical Reports K and N and in TN06, the IAC is comfortable that the effects of climate change on extreme wind events has received careful consideration in the EES, and has also been considered by Standards Australia in reviewing AS/NZS1170.2:2021 *Structural design actions Part 2: Wind actions*. The IAC sees no reason to recommend that a higher or alternative wind design standard apply to the WRL towers than that which applies under AS/NZS1170.2:2021.

The risk of vehicle collisions that could result in a tower collapse has been minimised through Project design, by locating towers outside road reserves. Further, Technical Report K indicates that while design standards for towers focus on extreme winds as the main hazard, they have historically provided sufficient strength for the structures to withstand collisions from vehicles or farm machinery.

The use of farm machinery within the easement will need to be carefully managed to ensure collisions do not occur. This is dealt with in the Guides to Landholders referred to in Chapter 10.

Overall, the IAC is satisfied the design requirements for the towers, together with the extensive maintenance and other measures outlined in the ESMS, means there is a very low risk that the towers will collapse.

Further, multiple cascading unlikely events would need to occur for a tower collapse to start a bushfire. The collapse would have to occur, and cause an ignition, and the ignition would have to escape the easement and escalate into a bushfire. The IAC considers this to be a very low risk. It does not consider additional modelling is required to demonstrate this.

Fallen transmission lines

The ESMS includes protection systems that deactivate any earthed transmission line within 50 to 120 milliseconds.[24] This should prevent downed conductors that contact the ground (or vegetation or other structures such as fences) from continuing to act as an electrical safety hazard. Technical Report K acknowledges, however, that the protection systems may not prevent flashover or sparks when contact with the ground (or other feature) initially occurs.

After automatic deactivating, the line may take some time to cool from its operating temperature. The Bushfire Impact Assessment states that the peak operating temperature is around 90 degrees centigrade. This is well below ignition temperature for grass or other fine fuels (which requires temperatures in excess of 300 degrees). On that basis the IAC is satisfied the heat of a fallen conductor is highly unlikely to cause an ignition.

Based on this information the IAC considers that ignition risks from fallen conductors are low. That said, any incident that results in a fallen conductor coming into contact with the ground (or vegetation or fences) will require a rapid response to ensure any sparks or flashovers do not cause an ignition. This will be particularly important in high fire danger conditions.

[24] Technical Report K referred to 50 milliseconds, whereas the Proponent's submission referred to 80 to 120 milliseconds.

The IAC anticipates that rapid response to a tower collapse or fallen conductor would be required under ESMS. However in the unlikely event that this is not explicitly specified in the ESMS, an additional requirement to this effect should be added to the Incorporated Document. The IAC has included a provisional change in its recommended Incorporated Document in Appendix E:1.

Lightning strikes

Lightning strikes can occur anywhere in the landscape. If lightning strikes a tree or the ground, the discharge of electricity would be uncontrolled. While the towers will be a tall feature in the landscape and may attract lightning strikes, they are required to be earthed in accordance with Australian Standards. They therefore present less of a bushfire ignition risk than other (unearthed) features in the landscape such as trees.

The Bushfire Impact Assessment indicates there are no known incidences of lightning strikes on transmission towers causing fires in Victoria. On that basis the IAC is satisfied a lightning strike of the Project infrastructure is highly unlikely to cause an ignition.

(v) Findings and recommendations

The IAC finds:

- The risk of tower collapse has been appropriately assessed.
- The risk of tower collapse is very low. The risk of tower collapse causing an ignition, and that ignition escalating to a bushfire, is even lower.
- The risk of fallen lines is low, but there is a possibility that fallen lines could spark or cause a flashover when they first come into contact with the ground (or vegetation or nearby structures).
- In the event that the ESMS does not already require a rapid response to project infrastructure failures including fallen lines, the Incorporated Document should include a requirement.

The IAC recommends:

Incorporated Document

Include the following change:

- Amend clause 4.11 (Bushfire Management) to insert additional requirements in clause 4.11.1 to ensure the Bushfire Management Plan includes procedures to ensure an ignition resulting from a failure of Project infrastructure is immediately identified and brought under control.

These changes are included at Appendix E:1.

8.5 Flashover

(i) Key issue

The key issue is:

- whether the Project could generate flashovers that could start a fire or endanger firefighting personnel or people escaping a fire.

(ii) What did the EES say?

The EES contained little detail on flashover risk, but indicated it is higher in fire conditions when smoke, water vapour or gases may be present that provide a conductive path between live transmission lines and another object. Technical Report K states:

- under everyday conditions, the height of powerlines and their separations are designed to be entirely safe from flashover
- additional separation is specified in standard operating procedures for fire fighters to avoid exposure to flashover
- compliance with the safe clearances specified in the Electricity Safety (General) Regulations 2019 will prevent flashover.

(iii) Evidence and submissions

The Ballarat Group of Fire Brigades submitted "*the EES's treatment of hazards associated with high voltage transmission lines is inadequate and potentially dangerous*". It submitted that conductors and insulators are continually exposed to environmental contamination including smoke from fires, compromising insulation performance and increasing the risk of arcing or flashovers. The Group submitted that it is impossible to determine when an arc or flashover may occur because of so many variables (including weather conditions, ground clearance from conductors and fluctuating contamination levels of insulators).

The Group explained what can happen when arcing or flashover occurs, including shock waves, explosive noise, flying molten metal, extreme temperatures and electrocution. Flashovers can cause injury or death to anyone in close proximity to the flashover event. The Group submitted that systems above 1,000 volts (like transmission lines) are more likely to produce arcing or flashovers, and "*even small arc flashes can damage equipment, start fires, or injure people nearby*".

As well as flashover risks, the Group raised concerns about electrocution risks arising from stepped voltage. It explained:

> Stepped voltage occurs when someone or something stands on ground or touches an object where electrical energy is spreading out over a wide area. As you move further from the energy source, the energy gradually reduces. If a person is within this stepped voltage field, they may be electrocuted because there is a difference in voltage potential between their feet. This difference can sometimes reach tens of thousands of volts.

The Proponent submitted the dangers of arcing and flashover are already being managed by fire crews in operations around existing transmission and distribution lines, and there should be no reason why flashover risks associated with the Project cannot be equally effectively managed.

(iv) Discussion

The information from the Ballarat Group of Fire Brigades was useful in understanding how flashovers occur and what the consequences may be. However the information was of limited assistance in understanding the probability of transmission lines generating a flashover.

Fire crews have been fighting fires around transmission lines in Victoria for decades, and no examples were presented to the IAC of flashovers occurring, or having caused injury or death, including from the now aging transmission infrastructure in Victoria. On that basis, the IAC assumes the probability of flashovers from transmission infrastructure is very low.

That said, the consequences can be severe. The IAC therefore considers a precautionary approach is required, and people (fire crews and the public) should maintain an appropriate separation from transmission infrastructure in fire conditions unless advised otherwise. The CFA SOP (discussed in detail in the next section) specifies 25 metres as a safe distance and the IAC accepts this as an appropriate separation.

The IAC received no technical information about stepped voltage. No examples were provided by the Ballarat Group of Fire Brigades of firefighters being impacted by stepped voltage in any existing transmission easements in Australia or elsewhere. The IAC assumes this is also a very low probability event.

(v) Findings

The IAC finds:

- In the absence of any evidence or examples of Victorian transmission lines ever having caused a flashover or stepped voltage, the IAC assumes these are very low probability events.
- Notwithstanding, it should be assumed that fire fighters and the public need to maintain a separation of 25 metres from transmission lines in fire conditions to avoid flashover risk unless advised otherwise.

8.6 Impacts on firefighting operations

(i) Key issues

The key issues are the Project's impact on:

- ground based firefighting operations as a result of:
  - the need to maintain safe clearances from the transmission lines
  - restricted visibility of Project infrastructure in fire conditions
- aerial firefighting operations.

(ii) What did the EES say?

The Project intersects public roads that are used for strategic fire control lines and fuel breaks.[25] Fire response crews may safely drive below transmission lines, but working within the easement is subject to restrictions to ensure electrical safety. As a result, there is a 'moderate' residual risk to firefighting operations at these locations.

The Bushfire Impact Assessment states that the CFA SOP requires crews to maintain at least 8 metres clearance from electrically active transmission infrastructure during fire suppression activities, and concludes that (IAC's emphasis):

[25] Public roads that serve as strategic fire control lines and fuel breaks are designated in Municipal Fire Management Plans.

> With the minimum ground clearance of 15m for the Project's 500kV transmission lines, CFA crews would not be restricted from driving under the transmission lines. They should also be able to safely refill appliances from farm dams below the transmission lines, unless the site is shrouded in smoke and flashover is a possibility.

The Project could impact aerial firefighting operations by presenting a collision risk for aerial firefighting appliances, disrupting access to water sources, or presenting an obstacle that prevents aerial appliances from accessing a fire at close range. Risks to aerial operations will be minimised by the Civil Aviation Safety Authority (CASA) informing pilots of the presence of Project infrastructure (EPR AV1). Multiple water sources are located in the area surrounding the Proposed Route, including farm dams that would be an alternative water source if access to other resources (such as Pykes Creek or Merrimu Reservoirs) is not available. Residual risk to aerial firefighting operations was assessed as 'low' to 'very low'.

(iii) Evidence and submissions

Submitters

Many submitters were concerned about constraints on the ability to fight fires within and near the easement due to the dangers presented by the Project infrastructure. Many understood the CFA SOP to impose a strict 'no go zone' within 25 metres of the edges of the easement, and that roads crossed by the Project could not be used in fire conditions.

The Ballarat Group of Fire Brigades submitted that while the CFA SOP provides safe operating guidelines for firefighters, "*to fully understand the network's intricacies or the potential impact of external environmental factors requires competencies in industry based electrical training*". It is unclear whether the Group was questioning whether the 25 metre minimum distance specified in the SOP was safe.

The Group submitted:

- CFA introduced a new training module on electrical safety awareness in November 2023 but it is not a part of the general training curriculum and is not mandatory
- it is not appropriate to defer to the CFA officer in charge of an incident to determine whether it is safe to enter the easement as they are not electrical industry trained professionals.

KDPA submitted the Project would put CFA volunteers at risk and the "*State government is asking too much of our volunteers*".

The Charleson Group submitted that the Project has the potential to complicate firefighting efforts. They quoted from the Penman Report:

> There may be challenges for the CFA crews and local farmers as they work to develop alternate strategies for safely working around the easement in this area and others. These strategies need to extend beyond not working under lines during fires. For example, ensuring that resources are in position on either side of the easement (when needed) is likely to reduce the amount of time the fire is not being suppressed and increase the likelihood of containment.

The Charleson Group submitted that the Bushfire Impact Assessment and the Proponent's bushfire evidence gave little consideration to the practical difficulties and the additional load that will be placed on CFA volunteers to suppress bushfires.

The IAC heard evidence from Mr Henderson-Drife, a member of the Charleson Group and a long standing CFA volunteer, on his experience fighting fires and his concerns around how the Project (which traverses his land) will impede efforts to defend his land and to fight fires in the area more generally. Key points he made were:

- fires move fast and fire crews need to make decisions quickly under a significant amount of stress
- fires need to be fought on the flanks in the limited area available determined by wind direction, not at its front
- CFA will not allow its crews to cross under powerlines in smoke due to the risk of arcing and flashovers, so crews could only fight a fire from one side of the easement
- if the Project is located along the flanks of a fire, fighting it will be almost impossible until it has moved past the easement
- firefighting efforts are most effective if they are continuous – the presence of the Project and the protocols in the CFA SOP mean that continuous firefighting will likely not be possible.

The Charleson Group submitted that the restrictions imposed by the Project place an unfair burden on the community, including farmers and CFA volunteers.

The Toolern Vale Landcare Group raised concerns (shared by many other submitters) about the Project's impacts on aerial firefighting operations. It pointed out that aircraft typically drop the water between 8 and 45 metres above the fire, and would be prevented from doing so in the vicinity of the towers given their 80 metre height. They were concerned that the Project would limit access to water resources, and would increase insurance costs for aerial firefighting operations. The Toolern Vale Landcare Group highlighted the value of aerial firefighting in quickly responding to fires that have broken out, and accessing areas in steep terrain that can't be accessed by ground crews. They were concerned that the Project is "*removing this opportunity for everyone along the lines*".

Several submitters raised concerns around the Project's proximity to Melton Aerodrome and the impacts this would have on the ability of aerial firefighting appliances to use the Aerodrome.

Experts

Mr Potter and Mr Taylor considered that the Bushfire Impact Assessment had comprehensively assessed the impact on ground based firefighting resources, and that the proposed mitigations are appropriate to manage the risks.

Mr Potter and Mr Taylor (both of whom are former CFA members) responded to concerns raised by submitters about the restrictions on firefighting imposed by the CFA SOP. They understood CFA may enact what could be described as a 'no go zone' in areas where specific dangers were present, such as electrical hazards, fuel spills or structural failure, however:

> We are uncertain why a transmission line would be classified as an area where firefighters are to be excluded outside of [the 25 metre zone] mentioned within the SOP.

They acknowledged that the Project may limit the ability for fire crews to directly access areas within the easement. However, they did not consider that this would result in

unacceptable restrictions on the ability to respond to fires on or near the easement, and stated:

> …we are aware that numerous easements have been utilised by firefighters to access the fireground, utilise as a control line or undertake direct attack on a bushfire.

Responding to concerns about fire crew safety working near transmission lines, they considered the SOP and other safety and training information "*would no doubt reflect the lessons from working in the vicinity of this equipment*". They advised that CFA has a suite of training materials and SOPs that outline how to operate safely in a wide variety of situations, including driving vehicles under emergency conditions, minimum training levels and working safely in and around bushfires.

Mr Potter and Mr Taylor gave evidence that a variety of firefighting aircraft operate during the fire danger period in Victoria, including Large Air Tankers, fixed wing bombers and helicopters. Their evidence was that Large Air Tankers and fixed wing bombers will always need to return to a predetermined aerodrome to refill, while helicopters can refill at a suitable water body. Further:

> Due to the high manoeuvrability of rotary wing aircraft, they can manoeuvre between and around obstructions if required. The presence of the Project infrastructure will not affect their ability to manoeuvre as required.

They noted that the Bushfire Impact Assessment identified multiple alternative water sources in the area surrounding the Proposed Route in the event that access to a particular source was blocked for any reason. They accepted the conclusion in the Bushfire Impact Assessment that:

> At no locations along the entire length of the Proposed Route would the presence of the transmission line materially compromise local access by fire response helicopters to potential in-field fire water supplies.

The IAC asked the Ballarat Group of Fire Brigades how reliant aerial firefighters are on Pykes Creek Reservoir, which is a key water resource in their area. The Group said there are plenty of other water sources available in the area, including farm dams which are often used.

Professors Buxton and March noted that the Bushfire Impact Assessment states the Proposed Route intersects municipal fire roads at 33 different locations in Moorabool Shire, two of which are strategic fire access roads (Camerons Road in Darley and Long Forest Road, north-east of Bacchus Marsh). They considered the loss of access on these roads due to tower collapse or downed lines "*would have significant impacts on suppression"* including for settlements as large as Ballan.

Councils

Moorabool Council submitted that aerial firefighting is critical for Moorabool Shire, and access to Merrimu is of regional importance for firefighting in Moorabool and Melton. It referred to the State-wide 'Pre-Determined Dispatch' protocol under which aerial firefighting aircraft are automatically dispatched to all fires on high fire danger days.

A Helitack helicopter is stationed permanently at Bacchus Marsh Aerodrome, and relies on access to water at Merrimu Reservoir. Fixed wing aircraft are also used in the Moorabool Shire that rely on access to water at Merrimu and Pykes Creek Reservoirs. Moorabool Council submitted that in times of drought (when dam levels are low),

Merrimu and Pykes Creek Reservoirs may be the only reliable water sources available in the area.

Moorabool Council was critical that the aviation assessment (Technical Report J) did not include modelling or calculations of the flight paths of fixed wing aircraft into Merrimu Reservoir. It submitted there is no information before the IAC which either proves or disproves whether (and how) the Project will impact access to Merrimu Reservoir for aerial firefighting appliances. If aircraft have to go to another water source, that will potentially add to flight times and may impact adversely on fire response.

It submitted:

> There is no evidence that there has been any consultation with emergency services pilots about the potential impact on flight times or flight paths manoevering around the infrastructure. Given the purpose [of the Pre-Determined Dispatch], time is critical and we say that such barriers should not be put in the way of important water resources for the State's fire emergency response.

Hepburn Council submitted the easement will create a "*large buffer zone in which firefighting is not possible*" due to the risk associated with the use of water near transmission lines. It submitted this would also prevent use of aerial firefighting equipment. It submitted:

> 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 firefighting may be restricted or prevented.

Hepburn Council submitted that the 'life safety benefits' of undergrounding have not been given enough weight within the decision making process.

Melton Council considered that the minimum safe distances under the CFA SOP would mean firefighting around the easement will be very challenging. Smoke presents additional risks of arcs or flashovers, which pose a potentially life-threatening hazard to anyone nearby. It submitted rapid isolation protocols and coordination with emergency services are therefore essential.

Agencies

The IAC asked CFA about how restrictions in the SOP on accessing the easement might impact on firefighting, with crews potentially being required on both sides of the fire because they may not be able to access the easement or cross underneath the transmission lines.

CFA confirmed that firefighting operations have to be tailored to any type of infrastructure present in the area (not just transmission lines). The SOP does not impose a hard prohibition on firefighting within 25 metres of transmission lines – it depends on the circumstances. If there was a fire within the easement, crews would need to fight the fire safely. After a dynamic risk assessment was undertaken, crews may determine that it is safe to enter the easement.

CFA confirmed there could be circumstances where multiple brigades need to respond to a fire due to access restrictions created by the Project infrastructure, but this is a common occurrence. All brigades understand the risks in their areas well, and train and practice to deal with likely incidents that take into account major infrastructure in the area. In a major fire event in the area surrounding the Proposed Route, CFA would be

liaising with AusNet as the infrastructure owners, which could include deactivating the powerlines to allow safe firefighting within the easement if the circumstances required.

The IAC asked CFA whether it had considered how the Project would impact aerial firefighting operations. CFA responded that aerial appliances are familiar with working in and around transmission lines, and they do not present a significant impediment to aerial firefighting operations, although procedures need to be put in place to ensure pilot safety. Merrimu Reservoir and other large reservoirs that provide water to aerial appliances in the area surrounding the Proposed Route are big enough to allow access from other parts of the reservoir that are not affected by the transmission lines.

The IAC asked CFA whether it had considered the potential for the Project to interfere with radio communications. It had made inquiries with its communications division and had no reported incidents of transmission lines ever having interfered with communications.

In its written response to the IAC's questions (D421), CFA stated:

> Should the project receive approval, CFA would incorporate the infrastructure into incident action planning, including the establishment of exclusion zones where necessary. Community warnings and evacuation advice would be informed by fire behaviour and identified risks, including potential infrastructure-related hazards

DEECA submitted that its operational procedures provide the necessary framework to adapt firefighting, fuel management, and land management activities around the proposed infrastructure. It submitted its land and fire management practices are already configured to function effectively in and around similar infrastructure across Victoria, ensuring it can continue to meet its fuel reduction and firefighting obligations once the Project is in place.

Proponent

The Proponent accepted that firefighting operations within the vicinity of any electricity infrastructure (not just transmission lines) is potentially dangerous. However, it would not prevent an effective firefighting response. The Proponent submitted that the transmission line would be a new feature in the firefighting landscape. It would be another constraint to be considered, along with existing constraints including the many distribution lines present in the area surrounding the Proposed Route. Fire crews would need to adapt to the presence of the Project and might need additional training and support, but this does not mean the Project presents an unacceptable risk to firefighting operations.

The Proponent submitted:

> When a bushfire occurs near a transmission line, emergency management procedures, which ensure appropriate expert input, are engaged to ensure that CFA volunteers (or Fire Rescue Victoria or Forest Fire Management Victoria personnel) are supported to be able to fight fires safely around power infrastructure.

Assistance and expert advice is available to CFA volunteers making decisions about whether or how to operate in the vicinity of transmission lines. The incident controller has access to input from others within CFA and from AusNet. The SOP identifies that the incident controller may request de-energisation of a transmission line and specialist

advice about dealing with power infrastructure. AusNet procedures include offering specialised resources (linesmen) to local CFA command centres.

Fire authorities are required to notify an infrastructure owner of a bushfire on or within 5 kilometres of a transmission line easement. The Proponent explained notification triggers heightened monitoring by AusNet and ensures that any safety precautions deemed necessary can be relayed in a timely manner to firefighting crews on the ground or in aerial appliances. It submitted:

> This also allows provision of information relating to clearances to be maintained to live lines; advice regarding the energisation status of a line (i.e. whether a line has been de-energised); and, if appropriate, AusNet safety observers/advisers, who will report directly to the Incident Controller.

Responding to concerns about the 25 metre 'exclusion zone' referred to in the SOP, the Proponent clarified that the 25 metre zone applies from the edge of the transmission lines, not the outer edge of the easement. It submitted the SOP applies to all power infrastructure, including distribution lines. The current version of the SOP requires a risk assessment and the application of appropriate controls in the vicinity of any power infrastructure. It does not place a blanket prohibition on accessing the area within 25 metres of the transmission lines. This was confirmed by CFA.

Responding to concerns about aerial firefighting, the Proponent submitted that no evidence has been put forward to challenge the evidence of Mr Potter and Mr Taylor and the position of CFA that there is no material impact on aerial firefighting operations including access to water sources for firefighting. It submitted:

> The IAC should place no weight on submissions that simply assert that there is, or may be an issue of concern, and yet provide no supporting material to establish that the assertion is well founded.

(iv) Discussion

As previously noted, transmission lines have been present in many parts of the State for decades, including in areas of equal (or higher) fire danger than the area surrounding the Proposed Route. While some adaption was no doubt required, there is no evidence, anecdotal or technical, that suggests that existing transmission lines have materially compromised fire suppression efforts or firefighter safety.

Minimum clearances

The need to maintain safe clearances from the transmission lines may prevent fire crews from:

- entering the easement to fight a fire
- crossing underneath the lines to access a fire on the other side of the easement.

There are inconsistencies between the CFA SOP and Technical Report K in relation to minimum safe clearances.

Table 1 in the SOP specifies minimum safe distances of:

- 25 metres for transmission lines (whether or not the line has fallen)
- 3 metres for distribution lines (or 8 metres if the line has fallen).

The SOP indicates minimum safe distance from fallen lines should increase if the ground is wet.

Technical Report K states that crews need to maintain at least 8 metres clearance from electrically active transmission infrastructure during fire suppression activities. On that basis it concludes that crews will not be prevented from driving underneath the transmission lines to access a fire, because the minimum ground clearance is 15 metres.

Given the SOP recommends a minimum distance of 25 metres from transmission lines, the basis on which Technical Report K forms the view that 8 metres is a safe distance is unclear. The IAC appreciates that in a significant fire event, advice from AusNet would be available to the incident controller about safe clearances. However, the IAC queries how likely or practical it would be for AusNet to advise fire crews in the field that a lesser minimum clearance is safe unless lines had been de-energised.

For these reasons and the reasons set out in Chapter 8.5, the IAC considers a precautionary approach is appropriate and it should be assumed that 25 metres is the minimum safe distance from live transmission lines in fire conditions.

The EES materials do not provide details of the ground clearances at road crossing points. It is therefore not clear which, or how many, roads may not have a ground clearance of 25 metres (plus the additional height required to account for the height of a firefighting appliance).

The Development Plans approved under the Incorporated Document should specify the minimum clearances at all road crossings along the Project alignment. The Proponent should also be required to provide this information to fire authorities. This will allow fire authorities to make an assessment in advance of which roads may require a dynamic risk assessment before crossing underneath the lines. It will also allow pre-planning of alternative routes that don't require crossing under the transmission lines (if required). The IAC recommends changes to the Incorporated Document to this effect.

Smoke impeding visibility of the towers

Smoke can restrict visibility for fire trucks and fire crews in active operations. It may be necessary to maintain distances of more than 25 metres in some conditions, particularly in fields, to avoid collisions with towers and to maintain an understanding of whether minimum safe clearances are being maintained. Crews using local roads should not be at risk of collisions with towers, as towers are not located within road reserves.

Aerial firefighting operations

The IAC is satisfied on the basis of the information before it that aerial firefighting operations will not be unduly impacted by the Project.

Helicopters are highly manoeuvrable and should be able to access the main water resources in the area (including Pykes Creek and Merrimu Reservoirs) notwithstanding the presence of the Project infrastructure, which will only traverse relatively small sections of these large water bodies.

On the evidence of Mr Potter and Mr Taylor, fixed wing aircraft need to return to a predetermined airport to refill. This evidence was not challenged. Project infrastructure may limit how close fixed wing aircraft can get to an active fire to drop water or retardant. However there is no evidence before the IAC that the Project will prevent refilling of fixed wing aircraft.

In response to IAC questions, the operators of Melton Aerodrome confirmed that it has not, to date, been used by aerial firefighting appliances. The main bases used by aerial appliances in the surrounding area are the aerodromes at Ballarat and Bacchus Marsh. Access in and out of these bases will not be affected by Project infrastructure.

Support and training

Additional information and training for local ground crews will be required to ensure they are aware of the Project infrastructure, its location, and the SOP to ensure they are able to safely and successfully adapt to the presence of the Project in the landscape. Local brigades will need to ensure their crews are aware of and apply the SOP to ensure the safety of ground crews operating in the vicinity of the Project infrastructure.

As noted above, it is not clear how many roads may be subject to restrictions because of insufficient ground clearances. Restrictions on crossing the easement may require more than one crew to attend a fire. While this is not uncommon in fire fighting operations, the inability to cross the easement may place constraints on CFA and other firefighting resources. Pre-planning should be undertaken to ensure that sufficient resources are available in the surrounding area.

The IAC recommends a new clause be added to the Incorporated Document to deal with training and resourcing.

Notification of de-energisation

Clause 4.11.2 of the Incorporated Document requires fire authorities to be notified of when the transmission lines are deactivated and activated during the construction phase. Fire crews should also be provided with real time information about when lines are de-energised and re-energised in an incident or emergency. It is likely that this already occurs under the ESMS. However if not, the IAC recommends a new clause be added to the Incorporated Document to this effect.

Updates to the SOP

It is beyond the IAC's remit to recommend changes to the CFA SOP. However it provides the following observations for CFA to consider, including whether updates to the SOP may be required.

Greater clarity could be provided in the SOP in relation to:

- how brigades elsewhere in Victoria manage firefighting around existing transmission lines
- when safe distances need to be observed:
  - do they need to be observed in normal conditions, or only in active fire conditions?
  - how proximate do fire conditions need to be for safe distances to apply?
- in what conditions safe distances should be observed, for example:
  - smoky conditions that limit visibility to a certain distance
  - wind conditions above a certain wind speed
  - the use of certain retardants that may increase conductivity and the risk of flashover
- whether minimum safe distances vary depending on the conditions
- whether minimum safe distances are mandatory, or a guideline

- what is required for a dynamic risk assessment.

Overall findings on the impacts on firefighting operations

On balance, in most locations in the area surrounding Proposed Route the IAC is satisfied that firefighting operations will be able to adapt to the presence of the Project without compromising the safety of the ground crews or pilots involved, or the community more broadly. Provided impacts are carefully managed in accordance with the bushfire management requirements in the Incorporated Document (with the IAC's recommended changes), impacts on firefighting operations will be acceptable. The ESMS provides additional reassurance that safety issues will be appropriately managed in accordance with ESV requirements.

(v) Findings and recommendations

The IAC finds:

- The Development Plans should specify the minimum clearances between the road surface and the transmission lines at all road crossing points.
- The Proponent should consult with fire authorities to ensure:
  - appropriate information, support and training is available to firefighting personnel to ensure they are aware of the Project and any operating procedures that need to be applied to ensure crew safety when operating near the Project
  - fire authorities are aware of minimum heights of the transmission lines at road crossing points
  - firefighting in the area surrounding the Proposed Route is adequately resourced having regard to the constraints placed on firefighting operations by the Project, including access constraints.
- Provided these and the other bushfire management measures required under the Incorporated Document are properly implemented, the Project's impacts on firefighting operations in most locations will be acceptable.

The IAC recommends:

Incorporated Document

Include the following changes:

- Amend clause 4.5 (Development Plans) to require the Development Plans to specify the minimum clearance of the transmission lines above the road surface at all road crossing points along the Project alignment.
- Amend clause 4.11 (Bushfire Management) to add a new clause 4.11.4 requiring consultation and coordination with the relevant fire authorities to ensure:
  - appropriate information, support and training is available to firefighting personnel to enable them to adapt to the presence of the Project in the landscape
  - fire authorities are aware of the minimum heights of the transmission lines (in worst case conditions) at every road crossing point along the Project alignment

  - pre-planning occurs for any additional firefighting resources that may be required in the area surrounding the Proposed Route as a result of constraints placed on firefighting operations by the Project
- Amend clause 4.11 (Bushfire Management) to add a new clause 4.11.5 requiring fire authorities to be notified when the transmission line is de-energised and re-energised in an incident or emergency.

These changes are included at Appendix E:1.

8.7 Access and egress

(i) Key issue

The key issue is:

- impacts on access and egress in a fire emergency.

(ii) What did the EES say?

The Project crosses priority bushfire access and egress routes[26] at four locations. The risk of a transmission infrastructure failure (tower collapse or fallen lines) blocking these routes is assessed as 'low'. Towers will be designed in accordance with Australian Standards to ensure they would not collapse under extreme wind conditions or collisions with vehicles or farm machinery. Transmission lines could come down during an emergency, but would most likely be deactivated automatically and immediately (by network protection systems which apply as part of the ESMS). Notwithstanding, people and fire crews are advised not to cross fallen transmission lines unless advised by AusNet that it is safe to do so.

(iii) Evidence and submissions

Submitters

Many submitters expressed concern that the Project infrastructure would block access and egress in a fire. Many were concerned about tower collapse or fallen lines blocking roads. Others assumed it would not be safe to cross under the transmission lines in fire conditions. They pointed to the poor condition of roads in the area surrounding the Proposed Route, and considered that the Project added an additional unacceptable risk to people's ability to escape a fire.

KDPA raised concerns about access and egress to and from several small towns across the district, including Kingston and Allendale, due to the proposed transmission lines being north of these townships on key roads designated for emergency vehicle access.

Experts

Professors Buxton and March considered that while the Bushfire Impact Assessment undertook some analysis of the Project's impacts on access and egress:

[26] Priority access and egress routes are designated in Municipal Fire Management Plans. They are priority evacuation routes from bushland areas in the Pyrenees Ranges, Wombat Forest, Lerderderg/Darley/Coimadai area and at Long Forest. They also serve as access routes for emergency services entering fire grounds in these same areas.

> … no risk level is determined as a result of shortcomings of the methods used, nor are treatments or residual risks assessed in terms of their acceptability.

They considered the information in Technical Report K provides a "*useful starting point*" for understanding constraints on access and egress routes, but did not go far enough to derive a risk level from which an assessment can be made as to whether the Project's impacts are acceptable. Further, with a few exceptions (including Darley), the analysis of egress is not accompanied by modelling of fire behaviour of high consequence events. "*As a result, it is difficult to assess impacts, risks and treatment*".

The Professors raised concerns about the following statement in the Bushfire Impact Assessment:

> Standard public safety advice for days with predicted highly elevated fire weather conditions is to leave high risk areas before extreme conditions develop and to not simply respond once a fire has ignited. Adherence to this advice would effectively mitigate potential egress (but not fire service access) issues associated with the failure of transmission infrastructure, however it is noted such advice is not necessarily followed.

They considered the Bushfire Impact Assessment erroneously suggests that people will leave on high risk days, as evidence from previous events such as the 2009 Black Saturday fires suggests that this assumption is flawed. Their evidence was "*significant complexity exists in human behaviour that might mean people do not or cannot heed advice to leave*".

Mr Potter and Mr Taylor acknowledged that some areas around Darley, Coimadai and Lerderderg have a single egress option for certain properties. However, their view was that the risk of egress routes being blocked already exists. Country roads are crossed by distribution and private lines in multiple locations, including in the areas mentioned above. They stated:

> Whilst the Project can be considered as adding to the risk, due to the low fire ignition data that is available for transmission lines, the type of construction (steel towers), earthing mechanisms and the height of the line, the added risk of the Project is low.

Mr Potter and Mr Taylor emphasised the importance of having an individual bushfire plan, particularly for those living in high bushfire risk areas where roads are in poor condition. They considered:

> The mix of the fire danger rating system and the community messaging activities should ensure that people who live in high risk areas have a plan and when conditions reach certain thresholds, they leave and leave early.

Councils

Moorabool Council submitted:

> The Proponent's approach with respect to access and egress issues, and broader firefighting issues is to put it back on community and speaks to a need for people to leave early and for firefighting to adapt to the Project. This disregards the impact of selection within the Municipal Strategic Fire Management Sub Plan 2023-2027 (Appendix 3) of optimal routes for strategic firefighting and priority access/egress. It also fails to identify the impact of the Project as an agent of change in increasing bushfire risk.

Agencies

CFA did not have concerns about the Project impacting access and egress. CFA indicated that it had consulted with its two regional branches that operate within the area through which the Proposed Route traverses, and they had not expressed any

concerns about the Project crossing priority access and egress routes. The Ballarat Group of Fire Brigades disputed this, as did KDPA.

CFA advised that road access is often compromised during bushfire events. Warnings about road closures are issued as part of normal community messaging and evacuation warnings. CFA highlighted the importance of pre-planning so that if road access at a priority access and egress route was blocked, alternatives would have been identified in advance.

CFA indicated that if a tower collapsed and blocked road access, CFA would work with the infrastructure owner to have the road cleared as quickly as possible. It did however concede that in some cases, roads can be blocked for a number of days.

Proponent

The Proponent submitted the likelihood of Project infrastructure failing and blocking a road is far smaller than the likelihood of the road being blocked by fallen distribution lines, trees or the fires themselves. It submitted:

- Mr Taylor and Mr Potter's expert opinion was that the likelihood of tower collapse being the cause of an access/egress problem was so small relative to existing risks that the Project made no difference to the level of risk
- there is no expert evidence before the IAC that contradicts this evidence or the opinions of the CFA in this regard.

(iv) Discussion

The Project introduces two potential risks to access and egress in a bushfire:

- roads being blocked by Project infrastructure (collapsed towers or fallen lines)
- road crossing points being unsafe due to the potential for flashover.

As stated in Chapter 8.4, the IAC considers the likelihood of roads being blocked as a result of Project infrastructure failure is very low. Flashover risks are less clear, but on the information before the IAC, the risk of roads being inaccessible due to flashover risk cannot be entirely discounted. For the reasons set out in Chapters 8.5 and 8.6, it should be assumed that road crossings with less than 25 metres ground clearance may not be safe to use in fire conditions.

The IAC considers that the information and analysis in Appendix H of the Bushfire Impact Assessment is sufficient to allow conclusions to be drawn about the level of risk associated with egress in the different townships and settlements along the Project alignment. Appendix H concludes that:

- egress from eight settlements[27] is potentially disrupted by the presence of the Project, but practicable alternative routes are available for all eight settlements
- for two of these settlements (Bolwarrah and Mollongghip), while multiple practicable alternative routes are available, all are intersected by the Project
- while Darley residential areas generally have alternative egress routes, those located along Lerderderg Gorge Road do not.

[27] Barkstead, Blakeville, Bolwarrah, Coimadai, Darley North, Korweinguboora, Long Forest and Mollongghip

Both the Bushfire Impact Assessment and the evidence of Mr Potter and Mr Taylor indicated that in high risk locations where access and egress is limited, such as Lerderderg Gorge Road, individuals should proactively manage their risks and leave early on high fire danger days. Caution should be exercised in applying this approach. As Professors Buxton and March pointed out, experience shows that some people will not (or cannot) leave. The IAC does not regard this as sufficient to address the Project's incremental increase in high bushfire risk areas with limited access and egress.

The IAC considers the Project's bushfire risk would likely be unacceptable in high bushfire risk areas with limited access and egress, unless minimum safe clearances can be achieved at road crossing points on roads:

- that are designated in Municipal Fire Management Plans as priority access and egress routes, strategic fire control lines or fuel breaks
- where no alternative suitable access and egress routes are available.

If minimum safe clearances (25 metres plus the height required to accommodate a firefighting appliance) are not currently provided at any of these road crossing points, the Project should be modified (for example by raising tower heights) to ensure minimum safe clearances are achieved.

(v) Findings and recommendation

The IAC finds:

- The Project should be modified (if required) to ensure a minimum ground clearance of 25 metres (plus the height of a firefighting appliance) can be achieved at road crossing points on roads:
  - that are designated in a Municipal Fire Management Plan as a strategic fire control line, fuel break or priority access and egress route, or
  - where no suitable safe alternative access and egress route is available.
- If a minimum ground clearance of 25 metres cannot be achieved at these road crossing points, the bushfire risk in these areas is likely to be unacceptable.

The IAC recommends:

Incorporated Document

Include the following changes:

- Amend clause 4.11 (Bushfire Management) to add a new clause 4.11.2 to require the Development Plans to provide a minimum road clearance of 25 metres (plus the height of a firefighting appliance) at any road crossing point on a road:
  - that is designated in a Municipal Fire Management Plan as a strategic fire control line, fuel break or priority access and egress route, or
  - where suitable safe alternative access and egress routes are not available.

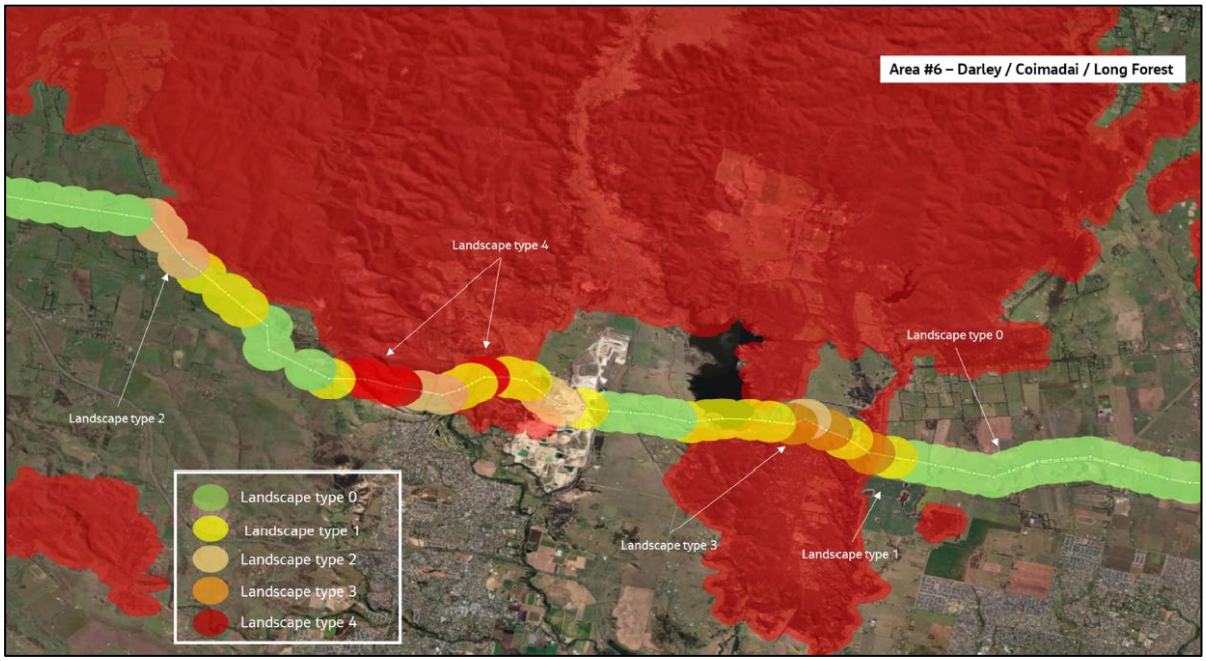
8.8 Specific locations of concern

(i) The Darley, Long Forest and Coimadai area

Evidence and submissions

The Bushfire Impact Assessment indicates that the Darley, Long Forest and Coimadai area is classified as landscape type 4, with extreme bushfire risk. Extensive landscape type 4 areas are located to the north, including the Lerderderg Forest. Refer to Figure 19.

Figure 19 Landscape type classifications in the Darley, Long Forest Coimadai area



Source: Figure C-7 Technical Report K

The Proposed Route crosses a number of roads in the area, some of which are designated priority access egress routes in the Municipal Fire Plan:[28]

- Long Forest Road
- the Diggers Rest-Coimadai Road at two locations
- Swans Road, Lerderderg Gorge Road and Camerons Road in the area north of Darley.

The IAC visited Darley and the area to the north on one of its unaccompanied site visits, and drove along Swans Road, Lerderderg Gorge Road, Camerons Road and Seereys Road (which is an alternative access egress route if Camerons Road were blocked). These roads provide fire crews with access to a fire to the north of Darley. They also provide egress to residents living to the north of the Project who are seeking to escape a fire by travelling to safe areas to the south (noting there are limited safe places to the north).

[28] Long Forest Road is a defined strategic fire access road and Camerons Road is a priority access and egress route. Technical Report K states that Municipal Fire Management Plans use different terminology for fire control lines and fire access roads. It is therefore not clear whether there is a difference.

The crossing points at Swans Road, Lerderderg Gorge Road and Camerons Road are in lightly wooded country to the immediate south and south east of the Lerderderg Forest. The terrain at some of the crossing points (particularly Swans Road) is steep.

The Bushfire Impact Assessment modelled two fire scenarios in this area – a fire coming from the northwest, and a fire coming from the southwest. It concluded that Darley and Coimadai are more highly exposed by a fire burning out of the western side of the Lerderderg Forest. Darley is partly protected from such a fire by the steep and variable topography of the Lerderderg Gorge and the need for a fire to burn down slope (and hence at lower speed) before it can reach the settlement.

The Bushfire Impact Assessment stated the Project could:

- disrupt access to Darley and Long Forest by fire crews, but there are practicable alternative access routes
- disrupt egress from North Darley, Long Forest and Coimadai, but there are practicable alternative routes to safe areas.

For the Darley area:

- a tower collapse could affect access and egress at either Lerderderg Gorge Road or Camerons Road, but not both "*due to design that avoids cascading failures*"
- there is no alternative safe route for those escaping along Lerderderg Gorge Road
- those escaping along Camerons Road would need to divert through bushland, along Seereys and Russells Roads, towards the Bacchus Marsh–Gisborne Road
- travel along Seereys Road "*could be dangerous if the area was under ember attack and spot fires were igniting as people were evacuating. The likelihood of either incident during a fire event is exceedingly low*".

Professors Buxton and March considered the Darley area to be of particular concern. They noted the fire scenario modelling in the Bushfire Impact Assessment shows very high flame heights, with the modelled fire extending to the northern parts of the settlement. They considered the modelling shows the consequences of a fire in this area could be severe:

> Vehicle access is already limited in the north part of Darley. If the combined impacts of a bushfire from the north and downed power lines were to eventuate, access and egress would be significantly compromised. The layout of roads has minimal redundancy, putting people at risk if any single road were to be compromised. While retreat in a southward direction using internal streets [in the urban part of Darley] may be a viable option, the possibility of isolation due to loss of external or internal roads, the possibility for fires burning flammables within the settlement combined with smoke, darkness and loss of communications combined are significant risks.

In response to questions from the IAC, CFA indicated it had specifically considered access and egress on the roads around Darley and the Lerderderg Forest, including Lerderderg Gorge Road and Camerons Road. In a written response (D421), CFA confirmed that the area presents an existing bushfire risk, and that both Camerons Road and Lerderderg Gorge Road are already subject to access and egress constraints, irrespective of the Project. It stated:

> CFA expects the community to act in accordance with the recommendations associated with each Fire Danger Rating under the Australian Fire Danger Rating System (AFDRS) and, where required, to have evacuated prior to a fire impacting the area.

As discussed in Chapter 4, the vegetation in and south of the Lerderderg Forest has high biodiversity value. TN02 outlined a bespoke minimised clearance approach proposed for Darley to allow more native vegetation to be retained in this part of the easement.

Mr Potter and Mr Taylor considered the fire risk associated with the bespoke approach and provided a written response in D659. They concluded:

- the steep terrain in the area means that vegetation is dominated by scattered trees with very little ground fuel, resulting in relatively low fuel loads
- this would reduce bushfire intensity in the Darley area
- there is a "*reasonably short run*" of around 200 metres before a fire from the southwest reaches the transmission lines
- however the landscape is considered low risk, primarily due to the relatively low fuel loads.

They advised that vegetation and fuel load management in the easement is subject to approval and auditing by ESV under the Electricity Safety Act and Regulations, and the Proponent would need to demonstrate that the bespoke approach to the retention of the vegetation in the easement at Darley was acceptable from a bushfire risk perspective. They concluded:

> Based on the information supplied, we are of the view that the vegetation management approach outlined in TN02 is acceptable from a bushfire risk perspective.

Discussion

The view of Mr Potter and Mr Taylor in D659 that the landscape to the north of Darley is low risk does not sit comfortably with the Bushfire Impact Assessment's classification of that area as one of the highest risk landscape types along the Proposed Route. The terrain north of Darley is steep and parts of it are heavily wooded, with high fuel loads.

Fuel loads in the Darley area would be higher if the bespoke clearance approach outlined in TN02 is implemented. The IAC notes that TN02 indicated modelling of fuel density and flame height was conducted to confirm that fire risks associated with the fuel load below the transmission line would be acceptable. However the IAC is not satisfied that the fire risk implications of retaining additional vegetation in the easement in the Darely area have been fully investigated. It recommends that further investigations be undertaken, with an amendment to EPR BD10 to that effect (see Chapter 4.3).

The urban parts of Darley have high population numbers that extend right to the edge of the landscape type 4 extreme bushfire risk areas, as Figure 19 demonstrates. The IAC accepts that if a fire was approaching from the north, multiple egress routes would be available to the south toward safe places in Bacchus Marsh. However no analysis was presented on how quickly this area could be evacuated if a fire was approaching (from any direction).

There are many scattered residential properties north of the Project in this area that rely on Long Forest Road, Swans Road, Lerderderg Gorge Road or Camerons Road for safe egress to the south. Even if minimum safe ground clearances can be achieved at these road crossing points, access and egress routes in this area are limited. Not all these

residents have access to a safe place north of the Project. If those roads were not accessible in a fire, people could be trapped with no safe exit route and no access to a bushfire place of last resort.

It is not clear to the IAC the basis on which the Bushfire Impact Assessment concludes there is an "*exceedingly low*" likelihood that ember attack and spot fires would ignite the bushland around Seereys Road as people were evacuating in the event that Camerons Road was not accessible. The IAC considers ember attack and spot fires in this area are reasonably foreseeable.

Both the Proponent and Mr Potter and Mr Taylor emphasised the need for residents in high bushfire risk locations such as the Darley area to implement personal fire plans, and leave early on extreme fire danger days. The IAC considers that caution should be applied in relying on people leaving early, for the reasons set out in Chapter 8.7.

Due to this combination of factors, the IAC considers both firefighting and evacuations in the Darley area are likely to be challenging. It considers that the Project's small increase in the already very high bushfire risk in the Darley area is unlikely to be acceptable.

Findings

The IAC finds:

- Darley is in one of the highest bushfire risk areas along the Project alignment, with a high population present.
- The limited access and egress options to the north of Darley, combined with terrain and high fuel loads, means that firefighting (and potentially some evacuations) in this area would likely be challenging.
- The Project's small incremental increase to the existing very high bushfire risk in the north Darley area is unlikely to be acceptable.

(ii) The Glendaruel area

Evidence and submissions

Mount Beckworth and Mount Bolton are wooded areas classified as landscape type 4 with extreme bushfire risk. The area in between includes open farmland in lower risk landscapes, as shown in Figure 20.

Figure 20 Landscape type classifications in the Glendaruel area

Source: Figure C-4 Technical Report K

The Charleson Group raised concerns about the impact of the Project on the ability to fight a fire coming from Mount Beckworth or Mount Bolton. They engaged Professor Penman,[29] who described the scenario of concern in his report as follows:

> There is a particular scenario of concern for residents. The scenario is a fire starting in the wooded vegetation of either Mount Bolton or Mount Beckworth under a hot dry north-westerly wind. As the fire develops, suppression crews may be able to deal with the flanks of the fire as it comes out of the forest. The embers from the vegetation result in large numbers of spot fires in the grasslands which are challenging to manage. One or more of these spot fires escapes and on the wind change to the south-west the fire is pushed towards the easement. Smoke will affect visibility and therefore the safety of the suppression crews around the easement. The scenario then has crews on one side of the fire requiring an hour to move around the lines and address the fire again.

Mr Henderson-Drife, a CFA volunteer whose farm is located between Mount Beckworth and Mount Bolton, gave further oral evidence about how difficult it would be to fight a fire in this area.

The IAC asked CFA whether it had particular concerns in relation to firefighting and access and egress in the area between Mount Bolton and Mount Beckworth. CFA confirmed that the area between Mount Bolton and Mount Beckworth is a concern with or without the Project. Ignitions in that area (from whatever source) can be difficult to quickly contain. CFA did not consider that the Project would materially increase the risk. In its written response to the IAC's questions (D421), CFA stated:

> The project area is located outside the Mt Bolton and Mt Beckworth sites. Access and egress for both locations include north–south exit routes, providing alternative egress options should passage be restricted in one direction.

[29] See footnote 17. Professor Penman was not called to present his evidence at the Hearing, and his evidence was not tested through cross examination or questions. This goes to the weight the IAC has afforded his written evidence.

> CFA again emphasises the importance of the community adhering to Australian Fire Danger Rating System warnings and taking early action to evacuate, rather than waiting until conditions deteriorate to a point where access or egress may be compromised by fire activity.

The Proponent responded that the scenario highlighted in the Penman Report is a worst case scenario, and "*requires several factors to align*":

- the ignition needs to occur on a bad fire weather day in conditions that support fire spread
- crews from the local CFA, farmers and all available resources fail at containing the fire
- the spread of the fire would have to impact the adjacent grassland area within approximately one hour of the wind change
- the wind change would have to occur when crews are all on the leeward side of the powerlines with no crews on the windward side.

The Proponent submitted local CFA brigades are very good at working in paddocks and containing spot fires, and it could be expected that the local brigades should be effective in containing spot fires here unless the fire is coming from Mount Beckworth and is within the easement. It submitted the area is a high bushfire risk area already, CFA confirmed the Project would not materially increase the risk, and CFA had confirmed there were alternative access and egress options for both Mt Bolton and Mt Beckworth. It submitted:

> Professor Penman's conclusion, which is supported by CFA's submissions, Technical Report K and the evidence of Mr Potter and Mr Taylor, is directly relevant to the submitter's concerns. The annual probability of a fire coming from Mount Beckworth is objectively low. Such a fire could occur now, and it could occur with the Project. The likelihood is 'low' now, and it will remain at a negligibly different 'low' with the Project.

Discussion

On balance, the IAC does not consider the Project's small incremental increase in the already high bushfire risk in this area is unacceptable. It may be more difficult to fight a fire in the easement, however as noted in previous sections in this chapter, fires are most effectively fought on the flanks. The chance of a fire flank extending for a significant distance within the easement is small. There is a significant distance between the Project and the landscape type 4 areas of Mount Bolton and Mount Beckworth. Even if firefighting is restricted for a time by the easement, there will be locations from which a fire moving through this landscape can be directly supressed.

The terrain in the area is less steep than the Darley, Long Forest and Coimadai area, with lower fuel loads and less concentration of surrounding extreme bushfire risk landscape types. There is greater access to areas of lower bushfire risk, and CFA confirmed there are multiple access and egress routes in this area. Crews could access the area from either the north or the south if it was not safe for crews to cross the easement due to flashover risk.

Findings

The IAC finds:

- On balance, the IAC considers that the small incremental increase in the bushfire risk in the Glendaruel area, between Mount Bolton and Mount Beckworth, is acceptable.

8.9 Overall conclusions on bushfire effects

Subject to applying its recommendations, the IAC is satisfied the Project is generally consistent with relevant policy and legislation and the draft evaluation objective relevant to bushfire impacts. This is assuming that minimum safe clearances of 25 metres (plus the additional height required to accommodate a firefighting appliance) can be achieved at road crossing points on key roads, namely those:

- that are designated in a Municipal Fire Management Plan as a strategic fire control line, fuel break or priority access and egress route, or
- where no suitable safe alternative access and egress route is available.

The exception is the Darley area. A combination of very high bushfire risk, limited access and egress routes, terrain and fuel load make firefighting (and potentially evacuations) in this area challenging. The area has a significant population, and while the Project has sought to minimise adverse effects for community health and safety with regard to fire risk management, the IAC does not consider that the evaluation objective can be met in the Darley area. The IAC considers the small incremental increase in the bushfire risk in this area is unlikely to be acceptable.

These impacts need to be considered in the context of the Project's cumulative impacts in the Darley area (discussed in Chapter 15.1) and the assessment of whether the Project delivers a net community benefit (discussed in Chapter 16).

The IAC has considered the combined Councils' submission (in D595 and D596) calling for a new EPR15 requiring development and implementation of an Emergency Response and Resilience Strategy. Given the IAC's findings that (with the exception of the Darley area) the Project's bushfire impacts are acceptable, the IAC does not consider that such an EPR is justified.

9 Economic

9.1 Introduction

(i) Key information

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects on land use, … businesses including farming and tourism… and to affected and neighbouring landowners during construction and operation of the project.

Economic effects are assessed in:

- EES Chapter 14 Economic
- EES Technical Report G Economic Impacts Assessment (EIA).

The exhibited EMF includes the following EPRs:

- EC1 Develop and implement a Business Mitigation and Support Strategy for directly affected businesses
- EC2 Develop and implement initiatives for procurement of goods and services from local communities and social enterprises
- EC3 Develop and implement a Business Mitigation and Support Strategy for eligible businesses within 2 kilometres.

Table 14 lists the experts providing evidence on economic effects.

Table 14 Evidence on economic effects

Party	Expert	Firm	Expertise	Document number
Proponent	Craig Fenton	PWC	Economic impact	D90
Hepburn Shire Council	Karl Flowers	Decisive Consulting Pty Ltd	Tourism	D137
Ballarat Council	Gavin Beever	Cumbre Consultants	Agriculture	D115
Hepburn Council	Gavin Beever	Cumbre Consultants	Agriculture	D136
The Charleson Group	Andrew Perkins	Hall and Chadwick	Agriculture and economics	D117
Joint Expert Statement - Economics				D190

The Proponent provided the following Technical Notes:

- TN01 – Community Benefits (D127)
- TN03 – Compulsory acquisition of easements and compensation (D204)
- TN04 – Voluntary payments to landholders (D205)
- TN010 – Option to purchase (D280)

- TN015 – Solatium for compulsory acquisition of easements (D422).

Other key documents are:

- Program Change Advice - Economics (D060i).

The IAC has had regard to relevant policy and guidelines, including:

- PE Act
- Municipal planning schemes
- Daylesford Macedon Tourism Destination Management Plan 2024-2029
- Various local and regional tourism strategies and initiatives, including:
  - the Daylesford Macedon Tourism Destination Management Plan 2024-2029
  - Bald Hill Activation Plan 2019
  - Buried Rivers of Gold.

(ii) What did the EES say?

The EIA assessed the Project's potential economic impacts based on:

- economy-wide analysis using computable general equilibrium (CGE) modelling to assess the Project's direct and flow on macroeconomic impacts
- a qualitative assessment of the potential impacts of the Project on businesses operating within the study area, undertaken at an industry-level.

The economy wide assessment concluded that by 2050:

- The Project would increase national Gross Domestic Product by $4.5 billion in net present value and Gross Regional Product in the study area by $0.9 billion.
- Investment in the study area would increase Victorian investment by $2.0 billion. This would be partially offset by cheaper electricity generation replacing more expensive generation elsewhere, resulting in a national increase in private investment of $1.0 billion.
- Private and government consumption of goods and services would increase by $3.7 billion and $1.4 billion respectively, due to cost savings in the energy sector being passed on to consumers.
- Living standards (or consumer welfare) would increase by net $4.7 billion because of more efficient electricity generation and transmission.

Overall, the Project would provide a net welfare benefit.

The business impact assessment concluded:

- There would be a largely neutral effect for most industries in the study area during Project construction, operation and decommissioning.
- There would be potentially modest and highly localised negative impacts to businesses within two kilometres of the Project. These impacts would be within the Accommodation and Food Services and Arts and Recreation Services industries during construction and operation, where local businesses may be negatively impacted if visitation in the area is reduced.
- There would be potentially positive impacts for businesses in the study area, including increased investment in services and materials to facilitate the construction of the Project. This would be largely dependent on the procurement strategy adopted by the Proponent and the extent to which local businesses are utilised in Project construction.

The EIA acknowledged that Project construction would potentially have negative impacts associated with disruptions to agricultural and commercial land and to residential landholders and businesses. Project operation would have potentially negative impacts associated with decreased land values where land is permanently restricted within the easement and from new renewable energy generation infrastructure in the area facilitated by the Project. These impacts would be offset, at least partially, by compensation payments and the recommended EPRs that require business mitigation and support strategies for directly affected businesses and businesses within two kilometres.

The EIA recommended three EPRs to address economic impacts that require:

- a Business Mitigation and Support Strategy for directly affected businesses (EC1)
- initiatives for procurement of goods and services from local communities and social enterprises (EC2)
- a Business Mitigation and Support Strategy for eligible businesses within two kilometres of the Project (EC3).

Other EPRs would assist in addressing economic issues, including those related to agriculture, communication, decommissioning, social and traffic impacts.

9.2 Methodology

(i) Key issues

The key issues are whether:

- the EIA was adequate for the purposes of the EES
- the EIA should have included a cost benefit analysis (CBA) or triple bottom line assessment
- economic impacts have been appropriately avoided and minimised, and are acceptable.

(ii) Evidence and submissions

Submitters

Submitters raised issues related to:

- the adequacy and relevance of the EIA, including a failure to fully assess local economic impacts
- whether the use of CGE analysis was appropriate
- the currency and accuracy of EIA inputs
- the appropriateness and effectiveness of the EPRs
- the economic impacts on agriculture and forestry (discussed in Chapter 10), aviation businesses associated with Melton Aerodrome (discussed in Chapter 11) and tourism (discussed later in this chapter)
- impacts on property values, insurance premiums and financing (discussed in Chapter 9.4).

Experts

Mr Fenton outlined the process for undertaking the EIS and advised that whole of economy modelling using CGE or similar modelling was a standard approach for assessing major infrastructure projects and had been used in other impact assessment processes.

He noted the EIS did not include a cost benefit analysis (CBA) and did not seek to apply a monetarised value to a range of environmental impacts. He noted that CBA is more typically used for investment decisions that involve option comparisons and that monetising some effects would be difficult. He believed the EIA, including the whole of economy modelling and supporting business impact analysis, should be assessed collectively by the IAC along with other impact assessments in the EES.

He noted that updating the EIA inputs to accommodate more current information, including the program change advice, would not materially change the Project's economic impacts, the cumulative impact analysis or require any revisions or additions to the economic EPRs.

Mr Fenton was satisfied the EIA adequately assessed business impacts, including tourism, agricultural and aviation impacts, noting that:

- the tourism assessment focussed on businesses within two kilometres of the Project on the basis that this zone was where potentially significant visual impact could occur
- the agricultural assessment relied on the findings of Technical Report H (Agriculture and Forestry Impact Assessment) that residual impacts would be minor at the State and regional levels and that more significant impacts at the local level would be offset by compensation
- the aviation assessment relied on the findings of Technical Report J (Aviation Impact Assessment) and the conclusion that residual impacts on Melton Aerodrome would be minor.

Mr Fenton indicated the EIA relied on the assumption that any economic loss incurred by a landholder hosting an easement for the Project would be offset by compensation.

Councils

Pyrenees Council submitted the Project would have negative impacts on primary production, tourism and property values. It acknowledged broader State and national economic benefits but submitted any local benefits would be limited.

Ballarat Council submitted the EIA contains omissions and errors but did not detail them. It questioned the adequacy of the financial compensation available to landholders and encouraged the Proponent to provide compensation above the minimum requirements of the LAC Act.

Hepburn Council submitted that the EIA should have included a CBA and a focus on tourism and agricultural impacts.

Moorabool Council submitted the EIA failed to adequately assess business impacts because of its reliance on the assessments in other Technical Reports and by limiting its assessment to properties within two kilometres of the Project. It submitted the EIA's

authors failed to directly consult with local stakeholders in order to quantify impacts, instead relying on consultation undertaken by the Proponent and other technical experts. It submitted the EIA did not consider impacts to property insurance and the potential tax implications of compulsory acquisition of easements.

Melton Council submitted that the EES failed to properly assess and detail economic impacts on community groups, landowners, and businesses. It submitted the Project should be assessed through a triple-bottom line process of actual costs and impacts.

Proponent

The Proponent relied on Mr Fenton's evidence and submitted the methodology of the EIA was appropriate and fit for purpose.

(iii) Discussion

The EIA was informed by the CGE analysis and the qualitative assessment of potential impacts on businesses within the study area.

The IAC is satisfied the CGE analysis provides an appropriate assessment of macroeconomic impacts and is suitable for the purposes of the EES. CGE has been used for similar purposes for other major projects and there was no evidence or submissions that established it was an inappropriate or inaccurate tool for assessing the impacts of this project. The IAC also notes Mr Fenton's evidence that the analysis relied on information available at a point in time and its key finding or recommendations would not change if the inputs were updated.

The IAC accepts the broad findings of the CGE analysis including expected increases in Gross Domestic Product, Gross Regional Product and consumer welfare. In this context, the Project would have positive impacts at the State and regional levels.

The EIA was also informed by the assessment of potential impacts on businesses within the study area. This assessment was challenged in submissions and evidence, particularly in relation to tourism and agriculture. There were concerns it did not include a sufficiently detailed analysis of local and property specific impacts and consequently should not be relied upon to inform an overarching assessment of economic impacts. These issues are discussed in Chapters 9.3 and 10.

IAC does not agree with submissions that the EIA should have included or be based on a broader Cost Benefit Analysis or triple bottom line analysis and agrees with Mr Fenton's evidence that CGE analysis is suitable for the purposes of the EES.

Subject to its findings about local impacts, the IAC is satisfied the EIA is fit for purpose and that the Project would provide macroeconomic benefits.

(iv) Findings

The IAC finds:

- The Economic Impact Assessment was appropriate for the purposes of the EES.
- The Project would have State and regional macroeconomic benefits.
- It was not necessary for the EIA to include a CBA or triple bottom line assessment of the Project.

9.3 Tourism

(i) Key issues

The key issues are whether:

- the EIA focus on impacts within two kilometres of the Project is appropriate
- the Project will have broader regional impacts on tourism
- tourism impacts have been appropriately avoided and minimised, and are acceptable.

(ii) What did the EES say?

The EIA assessed potential tourism impacts based on ANSZIC industry codes and was primarily focused on the area within two kilometres of the Project. The EIA noted that tourism occurs across a range of ANSZIC industry codes and included additional tourism specific information based on statistical areas. The two kilometre zone was adopted as the area within which potentially significant visual impacts might occur, based on the findings of the LVIA. The EIA relied on the Proponent's identification of relevant businesses within the two kilometre zone.

The EIA noted that tourism businesses that are reliant on visual amenity might be impacted, but these are likely to be highly localised. The impacts to landholders hosting the Project infrastructure would be greater than impacts on adjacent landholders and it is unlikely that impacts would extend to the broader region. Any impacts on directly affected properties would be compensated under the LAC Act or Option for Easement process and would be eligible for the business and support strategy under EPR EC1. Properties not directly affected but within two kilometres of the Project would be eligible for the recommended business and support strategy under EPR EC3. The EIA concluded that the industry level effect on tourism would be neutral.

(iii) Evidence and submissions

Submitters

Submissions about tourism impacts were received from Destination Central Victoria (S271), community groups and various tourism businesses.

Destination Central Victoria submitted the Project's tourism impact would be far greater than anticipated in the EIA and would decrease the region's appeal, impacting on visitation, spending and employment.

Community groups and individual submitters echoed the concerns raised by the Councils, particularly in relation to broader local and regional impacts as well as impacts on individual businesses. Submissions were received from tourism operators who were concerned about impacts on their businesses and the broader tourism sector.

Experts

Mr Fenton explained the process adopted in the EIA for assessing tourism impacts, including the basis for the two kilometre impact zone and the identification of tourism

related businesses. He was satisfied the impact assessment was appropriate, including the two kilometre zone.

Mr Fenton prepared a Joint Expert Statement (D190) with Mr Flowers who was called by Hepburn Council in relation to tourism impacts in Hepburn. They agreed that the Project would impact on tourism but disagreed about the adequacy of the EIA, the scale of the impacts and the appropriateness of the EPRs. Mr Fenton noted there was no evidentiary basis for Mr Flowers' assessment of impacts.

Mr Flowers noted the economic importance of tourism in Hepburn and potential negative impacts of the Project. He provided an assessment of the extent of those impacts, including a projected reduction in visitor spending by 5 to 9 percent per annum, but advised this assessment was based on his judgement rather than any empirical research. Hepburn Council did not rely on Mr Flowers' findings in relation to the quantum of impacts (D381).

Mr Flowers recommended that the Proponent:

- provide additional compensation to affected businesses
- set up a fund to promote visitation to the municipality ($2 million per annum for the first five years, decreasing to $1 million per annum for the following 15 years)
- set aside a $20 million fund for Hepburn Council to invest in tourism.

Councils

The Councils raised concerns about tourism impacts and cited various tourism related planning scheme provisions, policy and strategy documents and infrastructure and program investments. They highlighted the importance of the region's landscape and scenic values in attracting tourists and supporting regional economies. They raised concerns about tourism impacts beyond the two kilometre zone, including broader regional impacts. They submitted that impacts would be minimised by undergrounding the Project. Hepburn noted the reliance on tourism within its municipality and submitted the impacts on local employment and income would be significant.

Proponent

The Proponent acknowledged the Project has the potential to impact on specific tourism businesses in proximity to the Project, but argued there is no credible evidence that there would be significant tourism impacts at local, regional or state levels. It noted that transmission lines have been a feature of the Victorian landscape for many years and impacts could be mitigated through the EMF and compensation arrangements.

The Proponent included an additional EPR EC4 in its day 3 EMF that requires the preparation of a Tourism Mitigation and Support Strategy to be developed with industry stakeholders. The purpose of the strategy is to implement "*reasonable and practicable measures with the aim of promoting tourism*". The Councils proposed various additions to the EPR so that it would provide more detail about the matters it would address.

(iv) Discussion

The IAC acknowledges the significant economic and social roles tourism plays in the region and the strong policy support for tourism investment and promotion. It agrees

that some tourism businesses will be impacted by the Project, particularly those that rely on their immediate landscape setting and visual amenity.

In this context, the IAC is satisfied the EIA's focus on the area within two kilometres of the Project is an acceptable approach to assessing impacts and framing mitigations. It agrees with the LVIA finding that this is the distance within which Project has the potential to be highly visible and dominate the landscape. While there might be impacts beyond that area, they would not be as significant and would be difficult to quantify or mitigate. The Councils submitted that the impact area should be extended to 10 kilometres but did not provide any compelling evidence in support of this.

In forming its views about the area of impact, the IAC was assisted by its inspections of the general area surrounding the Proposed Route and specific tourism related properties. It notes the finding in the LVIA that visual impact is minimal beyond 9.2 kilometres.

The impacts on businesses within two kilometres of the Project would vary depending on the nature of the business and its setting. The IAC accepts that some businesses, such as the Quirindi Stables (S140 and 141), would be significantly impacted, some less so and some not at all.

These impacts and their acceptability need to be assessed in the context of the EPRs that seek to mitigate impacts and the provisions for impacts to be compensated. The EES acknowledged the need for these impacts to be mitigated and recommended that business mitigation and support strategies be available for directly affected businesses and those within two kilometres of the Project. Theses EPRs were the subject of extensive submissions that are discussed later in this chapter.

In terms of broader regional impacts, the IAC has not been persuaded by submissions or evidence that the Project would be a determinative factor in whether tourists visit the region or that it would have significant or unacceptable impacts on broader tourist visitation or expenditure. Many rural, regional and urban areas of Victoria host similar transmission infrastructure and the IAC was not presented with evidence about how rural or regional tourism elsewhere in the State might have been impacted by transmission infrastructure.

The IAC agrees with the Proponent that the Project's tourism impacts will largely be confined to businesses in proximity to the Project that would experience diminished visual or landscape amenity. To the extent that there might be broader impacts, the IAC supports the Proponent's proposed EPR EC4 and further consultation with tourism stakeholders. The IAC does not support Mr Flowers specific funding recommendations and believes that funding issues need to be further explored through the EPR.

Submissions raised concerns about the Project's scenic and landscape impacts on public tourism assets and projects, with some citing the Bald Hills Activation Project. These impacts are discussed in Chapter 6.5.

(v) Findings

The IAC finds:

- There is strong State, regional and local policy support for supporting tourism.

- Impacts on tourism business will mainly be confined to those that experience direct landscape, visual and amenity impacts.
- Significant impacts will likely be confined to the area within two kilometres of the Project.
- Impacts outside that area are not expected to be as significant or unacceptable, but warrant further mitigation through the proposed Tourism Mitigation and Support Strategy.

9.4 Other economic effects

(i) Key issue

The key issue is:

- whether other financial impacts, including property values, financing and insurance have been appropriately avoided and minimised, and are acceptable.

(ii) What did the EES say?

The EES noted the Project's potential to negatively impact land values of directly affected properties and neighbouring properties, including concerns that decreased farm values might limit borrowing capacity. It acknowledged concerns about the willingness of insurance companies to provide coverage if concerned about increased fire risk.

The EES noted the compensation under the LAC Act and Option for Easement processes would compensate landowners within the easement for any decrease in property value.

(iii) Evidence and submissions

Submitters

Submitters were concerned about anticipated impacts on property values, and the availability of finance and insurance. Some provided anecdotal advice that property values might fall by up to 20 to 50 percent, finance against property values would be reduced and insurance would either be unavailable or prohibitively expensive. Some submitters raised concerns about the taxation treatment of compensation.

Experts

Mr Fenton agreed that any decrease in the value of directly affected properties would be compensated under the LAC Act. He advised that the EIA had involved a desktop literature review of impacts on property values near transmission infrastructure. The review found that measuring land value impacts was complex and the impacts vary. Some studies found that values declined while others found that in some instances there was little or no impact.

The agricultural experts noted that land values within the easement would likely be reduced but agreed this would be compensated. Impacts on land outside the easement would be more difficult to assess.

Mr Fenton noted the EIA acknowledged concerns about access to insurance but did not seek to quantify any impacts given the uncertainties about the possible scale and likelihood of any cost or availability issues.

Mr Perkins gave evidence that reductions in land value and profitability would impact borrowing capacity, limiting the capacity of the business to grow in terms of land area and purchasing equipment. He acknowledged these impacts could be mitigated through compensation.

Mr Beever (D115 and D136) noted the EES had not been informed by any study into the potential decline in land values and the implications of this for leveraging finance.

Proponent

The Proponent noted the distinction between potential impacts on the value of directly affected properties (for which the Project would require an easement) and those not directly affected. Directly affected properties would receive compensation through an Option for Easement agreement or under the LAC Act. The Proponent noted that there had been no evidence presented to the IAC that the value of properties not directly affected by the Project would be impacted. It also questioned the extent to which the IAC should consider possible impacts on property values and referred to VCAT decisions and the Delburn Wind Farm Panel Report[30] about the 'planning' relevance of impacts on property values.

(iv) Discussion

The IAC notes the Proponent's submissions about the extent to which it should consider impacts on property values, including the findings of various VCAT and Panel reports. However, the IAC is satisfied it has a broad remit (including the consideration of impacts on property values) consistent with its appointment under the EE Act and its Terms of Reference. It notes that the Scoping Requirements identify a wide range of possible economic impacts, without limiting the range of those impacts to be considered.

The IAC agrees with the Proponent that impacts on the value of directly affected properties would be compensated through the LAC Act or Option for Easement processes. For this reason, it does not believe there would be any significant economic impacts arising from potential reductions in the value of these properties. The IAC also notes the financial assistance that would be available to directly affected landholders under the other compensation initiatives such as the REZ Community Benefits Plan described in Chapter 2.4.

Many submitters raised concerns about impacts on the value of residential properties and businesses that are not directly affected by the Project, but would experience visual and amenity impacts. This was particularly the case in the Darley area, where many properties and dwellings have views across the landscape. For some, visual impacts will not be able to be effectively mitigated with screening, or screening would result in the loss of the view (which no doubt contributes to the value of the property).

[30] Latrobe City, Baw Baw Shire and South Gippsland Shire Planning Permit Applications Delburn Wind Farm Panel Report, 7 February 2022

For residential properties, the Near Neighbour Benefit Program proposes one-off payments of $20,000 or $40,000 for dwellings within one kilometre of the easement, depending on distance from the Project. It is not clear these payments would cover the reduction in property value for all properties. Further, the Project will be visually dominant at 2 kilometres (if unscreened), and the Near Neighbour Benefit Program only applies to dwellings within one kilometre.

EPR EC3 would partly mitigate business impacts for indirectly affected businesses within 2 kilometres of the Project. However it is likely that there will be residual impacts for some businesses.

Submitters raised concerns about reductions in the value of agricultural land and the impact this would have on the ability to secure finance for reinvestment in the business. Reductions in the value of directly affected agricultural land will be compensated under the LAC Act and Option for Easement processes. Reductions would be less likely on agricultural properties not directly affected, because the Project would have little if any impact on agricultural productivity and the agricultural value of the land.

The IAC was not presented with any definitive evidence demonstrating the likely amount of any reductions in property values or impacts on businesses. It agrees with Mr Fenton that this is a complex issue and impacts could vary depending on a range of factors. Consequently, it is difficult to quantify the significance and acceptability of these economic impacts. This needs to be considered within the broader assessment of net community benefit.

Concerns about possible impacts on the availability and cost of insurance were typically raised in the context of increased bushfire risk associated with the towers. As discussed in Chapter 8.3, the IAC is satisfied that the risk of the Project generating bushfires, particularly during operation, is very low. While the Project might increase the challenges of firefighting in some areas, the IAC does not believe any additional risks resulting from the Project would be significant or incapable of being effectively managed, with the possible exception of the Darley area. Although the availability and cost of insurance are ultimately matters for insurers, the IAC does not believe the Project would result in any significant increase in risk or provide a basis for limiting the availability or increasing the cost of insurance.

Concerns about the possible taxation treatment of compensation payments are beyond the scope of the IAC's considerations.

(v) Findings

The IAC finds:

- Impacts on the value of directly affected properties would be compensated under the LAC Act or Option for Easement processes.
- Some indirectly affected properties are likely to experience reduced property values. It is not possible to determine the likely amount of reductions in property values, and it is therefore difficult to assess the significance and acceptability of these impacts.
- It is not possible to assess impacts on the cost and availability of insurance, but the IAC does not expect impacts will be significant.

- The taxation implications of compensation payments are not within the scope of the IAC's considerations.

9.5 Environmental Management Framework

(i) Key issue

The key issue is whether the Environmental Performance Requirements adequately address economic impacts.

(ii) Evidence and submissions

The three economic EPRs were the subject of submissions and evidence, including general concerns about how successful they might be in mitigating impacts and whether the matters they were intended to address should be broader.

Changes to the economic EPRs proposed by the Councils were identified in D596 and D643. They included:

- requirements for further consultation with Councils
- more specificity in some requirements, including additional support to affected businesses and organisations
- extending the application of EPR EC3 from within two kilometres of the Project to within 10 kilometres
- a new EPR EC4 Develop and Implement a Visitor Economy and Mitigation Support Strategy.

The Proponent proposed various changes to these EPRs in response to evidence and submissions that were included in the Day 3 version of the EMF.

(iii) Discussion

The IAC generally supports the Proponent's responses described in its submissions and in its response to drafting changes proposed by submitters (D654), and has included them in its recommended EMF at Appendix E:2. Key issues that remain unresolved are discussed below.

Ballarat Council sought a reference in EPR EC1 that the Proponent is "*encouraged to provide payments for the leasing or acquisition of land that exceed the minimum requirements provided for under the Land Acquisition and Compensation Act 1986*". While the IAC acknowledges the intent of the proposal, there are processes in place to negotiate compensation arrangements and it is not clear how including this reference would be of assistance.

The Councils sought an additional requirement in EPR EC2 that they be consulted during the development of local procurement initiatives. The IAC is satisfied that direct consultation with affected businesses would achieve the intent of the EPR without the need to consult with Councils.

The Councils submitted that EPR EC3 should apply to land within 10 rather than two kilometres of the Project. As discussed earlier in relation to tourism, the IAC is satisfied

that the two kilometre catchment is appropriate, given the likelihood that more significant landscape and visual impacts would occur within that area.

The Councils submitted EPR EC3 should include an additional requirement relating to businesses that choose not to engage with the Project, including an additional mitigation payment scheme, and that it be extended to include "*organisations*" in addition to businesses. The IAC does not believe that an EPR requiring consultation with business that choose not to consult would be workable and does not support this proposal. In relation to extending the EPR to "*organisations*", the IAC is not satisfied that the justification for this, or its implications, have been adequately demonstrated.

The IAC considers EPR EC3 should be amended to clarify that the Business Mitigation and Support Strategy must address 'operational' as well as 'amenity' impacts. This is included in the IAC's recommended EMF. Chapter 11 also includes a recommendation that the EPR apply to businesses that operate out of Melton Aerodrome.

The Councils proposed a new EPR to develop and implement a Visitor Economy and Support Strategy. The IAC is not satisfied this is necessary because of its finding in Chapter 9.3 that impacts on businesses, including tourism business, would not be as significant as anticipated by the Councils.

(iv) Finding and recommendation

The IAC finds:

- The IAC's recommended Environmental Management Framework provides an appropriate framework for mitigating economic impacts.

The IAC recommends:

Environmental Management Framework

Include the following change:

- Amend EPR EC3 to clarify that the Business Mitigation and Support Strategy must address operational as well as amenity impacts.

9.6 Overall conclusions on economic effects

Subject to applying its recommendation, the IAC is satisfied the Project is consistent with relevant policy and legislation and the evaluation objective relating to economic impacts. The IAC expects the Project would cause uncompensated impacts on the value of some residential properties but the overarching economic effects of the Project for the community would be positive. Negative impacts on property values need to be assessed in the context of broader economic benefits and policy in support of renewable energy, as part of an integrated assessment. The IAC's integrated assessment is in Chapter 16.

10 Agriculture and forestry

10.1 Introduction

(i) Key information

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects on land use, social fabric of the community, businesses including farming and tourism… during construction and operation of the project.

Agriculture and forestry effects are assessed in:

- EES Chapter 15 Agriculture and Forestry
- EES Technical Report H Agriculture and Forestry Impact Assessment (AFIA).

The exhibited EMF includes the following EPR:

- AF1 Develop and implement an Agriculture and Forestry Business Mitigation and Support Strategy.

Other relevant EPRs include:

- EM3 Develop and Implement a PAMP
- EM4 Maintain a record of Specific Property Access Requirements (SPAR) and implement during construction and operation
- EM8 Develop and implement a Biosecurity Management Plan.

Table 15 lists the experts providing evidence on agricultural impacts.

Table 15 Evidence on agriculture and forestry

Party	Expert	Firm	Expertise	Document number
Proponent	Shane Annett	RMCG	Agriculture	D89
Proponent	Rob Milner	Milner Planning Advisory	Planning	D107
Proponent	Ian Jennings	Chiron	Aviation	D91
Ballarat Council	Gavin Beever	Cumbre Consultants	Agriculture	D115
Hepburn Council	Gavin Beever	Cumbre Consultants	Agriculture	D136
The Charleson Group	Andrew Perkins	Hall and Chadwick	Agriculture and economics	D117
Joint expert statement – Agriculture				D236

The Proponent provided the following Technical Notes:

- TN03 – Compulsory Acquisition of Easements and Compensation (D204)
- TN04 – Voluntary payments to landholders (D205)

- TN17 – Easement safety assessments and permits to work (D519).

Other key documents are:

- EES Peer Review – Agriculture and Forestry (D51).

The IAC has had regard to relevant policy and guidelines, including:

- PE Act
- Municipal planning schemes including local rural land use strategies.

(ii) What did the EES say?

The AFIA assessed construction, operation, decommissioning and cumulative impacts, and recommended various EPRs to mitigate those impacts.

Key findings included:

- The Project directly affects 229 agricultural and forestry properties that have a cumulative area of 33,612 hectares. This equates to approximately 6 percent of the agricultural land in the region and 0.3 percent of the agricultural land in Victoria.
- During construction, 2,228 hectares of land within these properties would be directly affected (excluded from agriculture or forestry), which equates to approximately 0.4 percent of the area used for agriculture in the region.
- Thirty six hectares of agricultural land would be occupied by temporary lay down areas and workers' accommodation.
- During operation, 239 hectares would be taken out of production, including:
  - 72 hectares for the terminal stations, including 63 hectares for the Bulgana terminal station
  - 35 hectares for the placement of towers
  - 132 hectares for access tracks.

The AFIA found the most significant impacts during construction would include the following:

- There will be a loss of agricultural production from restrictions on grazing and cropping and loss of just over five percent[31] of the gross value of potato production, some of which is likely to be mitigated.
- There will be restrictions on irrigation of prime horticultural land, and isolation or redundancy of areas where paddocks are split by construction activity and transmission structures.
- The overall loss of land for grazing, fodder, crops, and trees would result in financial losses estimated at:
  - $536,000 per annum for grazing enterprises
  - $1,216,000 per annum for cropping enterprises
  - $4,575,000 per annum for horticulture enterprises
  - $461,915 of forest products for the life of the Project.
- Changes to normal farming or forestry activities will be needed to accommodate project activities.

[31] There are inconsistent references in the AFIA to the percentage loss. Mr Annett clarified the loss was assessed as 5.3 percent.

- There will be disruption of livestock due to project activities.

The most significant impacts during operation would include the following:

- There will be restrictions within the easement on farm design, or on the development or use of farm infrastructure, machinery and aerial services. These restrictions may result in ongoing financial losses, opportunity costs, or increased production costs (involving time or cash costs).
- There will be restrictions on irrigation of prime horticultural land that cannot be mitigated, and isolation or redundancy of areas where paddocks are split by the easement or tower structures.
- There will be restrictions forestry production losses due to ongoing restrictions from planting trees in the easement.

The AFIA assessed the residual impacts as minor:

- Regional impacts during construction would be minor, although the degree of localised disturbance would vary considerably between individual locations and properties and some were likely to experience more significant impacts.
- Regional impacts during operation would be minor to negligible, although some land would be permanently removed from agricultural production for the life of the Project.
- Impacts during decommissioning would be similar to the construction phase but would likely require less ground disturbance.
- Overall, no regionally significant cumulative impacts on agriculture or forestry were anticipated.

The AFIA did not attempt to quantify decommissioning impacts because of the extensive unknowns. It assessed the potential cumulative impacts associated with ten relevant projects and concluded there would be no significant cumulative effects.

The AFIA noted the financial compensation that would be available under the LAC Act to directly affected landowners and that effective implementation of the EPRs would be critical in addressing residual impacts.

Independent peer review

Drafts of the AFIA were peer reviewed by:

- EMM Consulting, Thomas Elder Consulting and Minesoils engaged by the Department of Transport and Planning (the DTP review)
- Ag-Challenge Consulting (engaged by the Proponent).

The DTP review commented on various methodological matters and found that the AFIA should have considered project alternatives, including undergrounding. Mr Annett responded to those matters in his evidence. The Ag-Challenge Consulting review generally supported the methodology and key findings in the AFIA.

10.2 Methodology

(i) Key issues

The key issues are whether:

- the AFIA adequately assessed the Project's agricultural and forestry impacts

- agriculture and forestry impacts are acceptable.

(ii) What did the EES say?

The AFIA included the following key elements:

- existing conditions analysis
- risk screening
- stakeholder, landholder and community engagement including consultation with some affected landowners
- impact assessment
- the preparation of farming case studies to better understand the Project's impacts
- quantification of economic impact
- recommended EPRs.

(iii) Evidence and submissions

Submitters

Submitters raised issues about the adequacy of the agriculture elements of the AFIA and argued it should not be relied upon. Concerns included:

- economic impacts had been understated
- the AFIA was focussed on local and regional impacts and did not adequately consider impacts on individual farms
- consultation with landholders was inadequate, noting only 14 of the 229 landowners were directly interviewed
- not all of the recommendations in the DTP review were adopted
- the AFIA relied on deferring the preparation of various plans and strategies required under EPRs until the future.

Many of these submitters argued there was insufficient information to assess the Project's agricultural impacts.

Experts

Mr Annett explained the basis for assessing economic impacts and the various factors intended to ensure impacts were not underestimated. He was satisfied the magnitude and duration of economic impacts would be less than expected in the AFIA.

Mr Annett explained that assessing the impact on individual properties was beyond the scope of AFIA, although some property level impacts were assessed using aerial imagery and other spatial data. He agreed that impacts on individual properties would vary, with some likely to experience more significant impacts. He understood impacts on directly affected landholders would be compensated under the LAC Act.

Mr Annett explained the consultation undertaken as part of the AFIA, including the range of consultation strategies intended to provide a full understanding of the Project's potential impacts. He explained the intention had been to consult with 10 percent of the 229 landowners, but only 14 of the 53 invitees had agreed to participate (6 percent). Despite this he was satisfied the interviews and other consultation processes had resulted in a comprehensive understanding of potential impacts.

Mr Annett explained why various EPRs require plans or strategies to be prepared in the future and were not prepared as part of the EES. He noted that further information would be required, particularly in relation to individual properties and construction processes before some plans could be prepared.

He advised the DTP peer review had been considered and resulted in various changes to the AFIA that are documented in the AFIA. He noted DEECA's submission (S471) that input from Agriculture Victoria into technical reports and peer reviews had resulted in amendments to the documents that were satisfactory.

The evidence of Mr Beever and Mr Perkins was largely focused on how specific impacts had been assessed in the AFIA and how they might impact on local productivity and individual properties. These issues are reflected in the Joint Expert Statement and discussed later in this chapter. Mr Perkins advised he had not had regard to the EMF and the proposed mitigations when preparing his evidence and only became aware of it during the expert meeting.

Mr Beever was satisfied the AFIA was based on thorough research, used sound processes and had involved appropriate expertise. However, he noted various impacts that he believed the AFIA had not fully addressed, including impacts to individual properties. He emphasised that implementing the EPRs would be critical to addressing potential impacts. Mr Perkins raised similar issues and expressed concerns about the effectiveness of the EPRs to mitigate various impacts.

Proponent

The Proponent submitted the EES had adequately assessed potential agriculture impacts and relied on Mr Annett's evidence and other material it provided to demonstrate the Project would have limited and acceptable impacts on agriculture. It noted Agriculture Victoria's submission[32] that the proposed route would minimise agricultural impacts to the extent practicable.

It submitted it was unlikely there would be any material impacts on agriculture other than on the directly affected properties and acknowledged that while some directly affected landowners would experience significant impacts, many would not.

It highlighted the compensation that would be payable to directly affected landowners under the LAC Act and the other compensation and payments that would be available (summarised in Chapter 2.4).

(iv) Discussion

The IAC's review of the AFIA and its assessment of impacts has focused on agriculture rather than forestry because the Project would only involve the removal of 26 hectares of commercial plantation forestry, which represents less than one percent of regional production. The IAC agrees with the AFIA that impacts on forestry would not be significant and would be compensated under the LAC Act.

[32] DEECA's submission included a submission on behalf of Agriculture Victoria

The IAC is satisfied the AFIA's assessment of agriculture impacts was suitable for the purposes of the EES and that its methodology was sound. It agrees that regional impacts are likely to be minor, although it acknowledges concerns about the impacts in some local areas and particularly on individual properties. It was unchallenged that impacts on some properties would be significant, although there was disagreement about the nature and extent of impacts and the adequacy of compensation and mitigations. These impacts are discussed later in this chapter.

The IAC acknowledges submissions that the AFIA would have been assisted by more direct consultation with landowners, particularly directly affected landowners. This might have led to a more detailed understanding of the nature and extent of impacts and better informed the drafting of EPRs and quantification of economic impacts.

Nevertheless, the IAC notes Mr Annett's view that the various consultation strategies and investigations undertaken as part of the AFIA were adequate to identify the range of potential impacts. This was largely confirmed during the EES Hearing process, given that evidence and submissions did not identify any significant additional impacts that had not been identified in the AFIA. The IAC also notes that many directly affected landowners chose not to engage with the Proponent and that this would have limited the scope for consultation.

The IAC has read the peer reviews and notes the submissions about the extent to which the findings and recommendations in the DTP review were addressed in the AFIA. Mr Annett explained that the AFIA had been revised in response to relevant elements of the DTP review but noted some of the recommended revisions were unnecessary. The DTP review was critical the AFIA did not assess alternatives, including undergrounding, but Mr Annett explained this was beyond the scope of the assessment.

It is not clear to the IAC how an assessment of alternatives, including undergrounding, would have better informed the AFIA given its purpose was to assess the exhibited Project. In any event, the Hearing process elicited submissions and evidence about how undergrounding might mitigate agricultural impacts.

Many submissions were critical of deferring the preparation of plans and strategies until later in the Project approval process. Mr Annett acknowledged that some plans require detailed information that is not currently available, including property specific information.

It is common for major projects that require an EES to proceed on the basis that some detailed plans will be prepared as part of the Project's implementation and need not be prepared as part of the exhibited EES. However, it is important that any required plans and what they must address are clearly identified at the EES stage. For this project, the Incorporated Document and EMF provide that mechanism and their requirements for further plans have been the subject of extensive submissions and evidence. Where appropriate the IAC has reviewed those requirements and recommended changes.

(v) Findings

The IAC finds:

- The Agriculture and Forestry Impact Assessment is adequate for the purposes of the EES.
- Regional impacts on agriculture would be minor, although some local and property specific impacts would be significant.
- Impacts on forestry would be negligible and are acceptable.

10.3 Policy framework

(i) Key issue

The key issue is:

- whether the Project is consistent with the policies that seek to protect productive agriculture land.

(ii) What did the EES say?

The AFIA outlined the relevant Commonwealth and State legislation, strategies and policies and regional and local government policies and strategies. It discussed the relevance of these documents and noted that much of the agricultural land traversed by the Project is identified in State and local polices as having significant economic and social value.

The LUPIA assessed the Project against VPP clause 14.01-1S that seeks to protect productive agricultural land from inappropriate development, including land that is strategically important in the local or regional context. It concluded the Project would have a minor effect on agriculture and the impact is avoided and minimised to the extent feasible. It noted local planning policies related to agriculture but did not specifically assess the Project against them.

(iii) Evidence and submissions

Submitters

Submitters noted the broad policy support for agriculture, with some submitting the Project's impacts on agriculture had not adequately addressed the objectives of the PE Act, VPP clause 14.01 (Agriculture) and local agriculture policies and strategies.

The VFF's submission (S459) highlighted the strategic importance of the agricultural land in the region and considered the EES had failed to adequately consider relevant State government policies and frameworks, including the Central Highlands Regional Growth Plan 2016. It submitted the Project was inconsistent with the purposes and decision guidelines of the Farming Zone.

Experts

Mr Milner acknowledged agricultural policies in the VPP but was satisfied the loss of agricultural land was acceptable within his broader net community benefit assessment.

Councils

The Councils highlighted extensive planning scheme support for protecting productive agricultural land at the State, regional and local levels, and referred to various municipal strategies, including the:

- Ballarat Rural Land Use Strategy 2010
- Moorabool Rural Land Use Strategy 2024
- Western Plains North Green Wedge Management Plan 2014
- Rural Hepburn Agricultural Land Study and Rural Settlement Strategy (draft) 2024.

These strategies noted the agricultural productivity of the region, its role as a food bowl and its contribution to food security.

Agencies

Agriculture Victoria noted that the Project intersects a region of significant agricultural production that is strategically important for food security, regional employment, and export markets. It concluded that the EPRs would appropriately avoid or minimise potential adverse impacts on agriculture. Agriculture Victoria was a member of the Technical Reference Group (TRG) that reviewed the EES as it was being prepared.

Proponent

The Proponent acknowledged the policy support for agriculture and the productive capacity of the region, particularly the intensive agricultural areas to the north and east of Ballarat associated with more fertile soils (including ferrosol soils) and higher rainfall. It submitted that the Project was consistent with agricultural policies because residual impacts on productive capacity would not be significant, although it acknowledged there would be impacts on directly affected properties.

The Proponent noted that transmission infrastructure is a common feature of rural and peri-urban areas and submitted the VPP actively encourages the location of energy supply infrastructure in rural and peri-urban areas, citing VPP clauses 11.03-3S, 19.01-1S and 19.01-2S.

(iv) Discussion

There is strong policy support for protecting productive agricultural land, particularly agricultural land that is strategically important in the local or regional context. This is clear in VPP clause 14.01 and reinforced in rural land use strategies and local planning policies in the Ballarat, Melton, Moorabool, Hepburn and Pyrenees Planning Schemes.

The relevance of these policies was largely uncontested in submissions and evidence, with the main points of difference relating to the nature and significance of potential impacts. The Proponent's position was that impacts would largely be avoided, minimised or mitigated, and that many residual impacts would be compensated. For these reasons the Proponent asserted the Project was consistent with the policy framework.

Submitters believed there would be significant residual impacts on agriculture because of the nature of the Project, the sensitivity of agriculture, particularly horticulture, to the types of disturbances the Project would bring and the limitations of the EPRs and other

mitigations. These concerns were particularly focussed on operational constraints within the transmission line easement, and access and biosecurity issues.

The IAC agrees with submitters that the loss of agricultural land, particularly more productive, higher quality land used for horticulture, would be a negative outcome of the Project. During construction, 2,228 hectares would be temporarily impacted, including 632 hectares used for horticulture. During operation, 239 hectares would be removed from production, including 48 hectares used for horticulture. There would also be efficiency and productivity impacts associated with various operational restrictions and the potential for offsite impacts on adjacent properties, particularly during construction. While the Proponent submitted that these impacts would be compensated, this would not overcome the loss of this land from the State's agricultural base.

While it is arguable these losses would not be significant in the State or regional contexts, they would be significant in the local context. For this reason, the IAC finds that the Project does not achieve the overarching planning objective of preserving productive farmland, including strategies to:

> Protect productive farmland that is of strategic significance in the local or regional context.
>
> …
>
> Protect strategically important agricultural and primary production land from incompatible uses.[33]

Despite this, the IAC agrees with Mr Milner that the extent to which the Project is consistent with agriculture and other polices needs to be factored into a broader net community benefit assessment that balances competing policies. This is provided in Chapter 16.

(v) Findings

The IAC finds:

- The Project's construction and operation would remove some agricultural land from productivity, including highly productive land used for horticulture.
- The Project is inconsistent with policies that seek to preserve agricultural land, but this needs to be balanced against policies that support renewable energy in an integrated assessment of whether the Project delivers a net community benefit.

10.4 Route selection

(i) Key issue

The key issue is:

- whether the development of the Project route has had adequate regard to avoiding or minimising impacts on agricultural land.

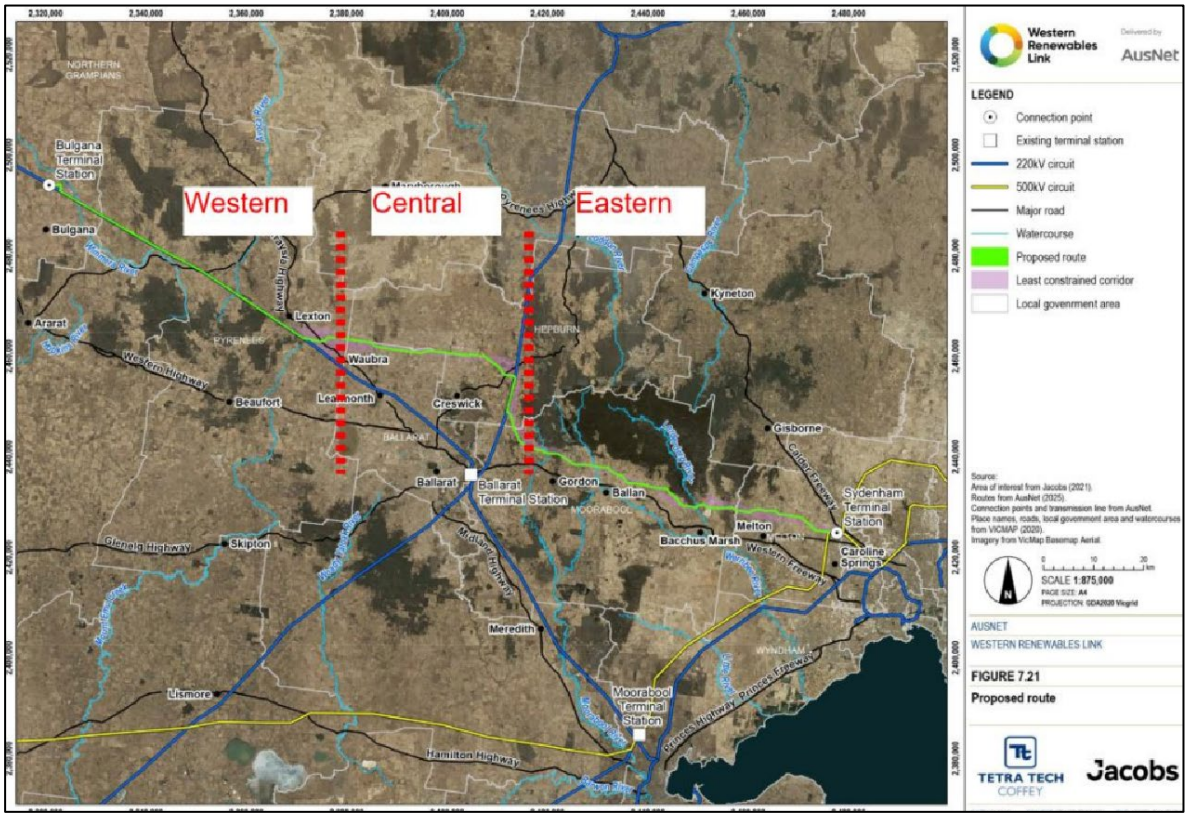
[33] Victoria Planning Provisions, Clause 14.01S

(ii) What did the EES say?

EES chapter 5 and Attachment I describe the process for determining the Project's area of interest and the subsequent development of route corridors and the proposed route. Alternatives were assessed against a range of factors, including agricultural land uses. Potato and horticultural areas and other areas of higher capability were mapped as part of the constraints assessment.

The assessment of alternatives in the EES divided the area of interest into eastern, central and western sections (refer to Figure 21). Alternatives assessed in the central section included northern and southern corridors that both traversed potato growing and horticultural areas. The length of the southern corridor through agricultural land was shorter but was constrained by traversing the Creswick Plantation, Creswick Regional Park and Glen Park State Forest and by the greater potential for biodiversity impacts. For these reasons the northern corridor was preferred.

Figure 21 Route sections annotated in red



Source: D203, page 150

The assessment of alternatives in the eastern section included northern and southern corridors that also both traversed potato growing and horticultural areas and were of similar length. The northern corridor was preferred because it was less constrained by other factors.

The western section of the area of interest did not include an assessment of alternatives, because co-location with the existing Horsham-Ballarat 220kv transmission line was largely unencumbered and assessed as minimising impacts.

Route assessments within the preferred corridor were then undertaken based on various criteria. Criteria related to agriculture included:

- aligning the route at the back/rear of properties to reduce impacts on land use, including agriculture and land access
- adopting property boundaries where practicable to reduce diagonal cuts of paddocks and reduce land use impacts
- minimising impacts on irrigated paddocks and irrigator operation
- avoiding windbreak plantings and shelter belts or using design modifications to reduce impacts where unavoidable
- maintaining straight lines and avoiding acute angles of more than 45 degrees.

The resultant 2021 route was further refined in response to stakeholder consultation and further investigations, including the consideration of agricultural impacts where relevant. This process culminated in the preferred route proposed in the EES.

(iii) Evidence and submissions

Submitters

Many submitters sought alternative alignments or undergrounding to avoid or minimise impacts on agricultural land, including specific areas and properties. Some were critical of a perceived lack of flexibility in the route development and assessment processes and a reluctance on the part of the Proponent to consider alternatives.

Some submitters sought a more fundamental realignment of the route, including options to the south of Ballarat, Option B3 and co-location with other infrastructure, including the Western Highway. As stated in Chapter 3.1, options outside the area of interest are beyond the scope of the IAC's consideration.

Councils

The Councils raised concerns about the Project traversing agricultural land, particularly higher quality agricultural land in the Ballarat and Hepburn municipalities. These concerns were generally in the context of submitting that the route should be partially or fully underground. They submitted that the lack of comprehensive assessment of alternatives in the EES was a deficiency and it was not reasonable to expect Councils or other submitters to investigate alternative routes in detail.

Agencies

DEECA noted the Project would have impacts on biodiversity and agriculture but was satisfied the Proposed Route avoids and minimises these impacts to the extent practicable, particularly through its alignment and design.

Proponent

The Proponent outlined the route selection process and the associated assessment of agricultural impacts with reference to the relevant parts of the EES, Mr Napier's presentation (D194) and Mr Annett's evidence. It acknowledged the Proposed Route traverses high quality agricultural land but submitted there is no route within the area of interest that avoids agricultural land and areas of native vegetation. It advised that the

avoidance of native vegetation had been prioritised when balancing competing considerations.

The Proponent noted that although submitters, including Councils, were critical of the Proposed Route and its agricultural impacts, they had not proposed any feasible alternative routes within the area of interest. Where submitters had proposed detailed local or property specific changes, these had been considered and various changes made to the route.

The Proponent submitted that the IAC is not required to make recommendations about the "*best*" route for the Project. Instead, it is required to consider whether the environmental impacts of the Proposed Route are acceptable. The Proponent concluded it had made all practicable efforts to avoid productive agricultural land, while having regard to a broader range of factors, particularly native vegetation and biodiversity impacts.

Mr Annett agreed it was not possible to avoid areas of high agricultural productivity within the area of interest.

(iv) Discussion

The IAC's primary role is to assess the acceptability of the Project's impacts based on the Proposed Route, not to determine what might be the 'best' route. For these reasons and the reasons in Chapter 3.1, the IAC makes no comment on corridors or routes outside the area of interest that were proposed in submissions as a means of reducing agricultural impacts.

The IAC accepts that the route alignment process adequately considered agricultural impacts, particularly in the more contentious central and eastern sections of the area of interest. The route selection process had regard to impacts on agriculture in combination with a range of other relevant factors. These included the protection of native vegetation and biodiversity values in the central section, and the IAC is satisfied it was acceptable for the route selection process to have prioritised those values.

The IAC notes the Proponent's submissions about the extent of high-quality agricultural land within the area of interest and accepts that it was not possible to avoid it.

The IAC acknowledges submissions that there was scope to better refine the route in response to stakeholder consultation during the Project's development. The Proponent advised it had been responsive to requested changes where feasible but could not accommodate all changes that had been sought. No doubt this process has also been impacted by the reluctance of some landowners to engage with the Proponent.

Issues associated with micro-siting and refining the Proposed Route through affected properties are discussed in the following section and in Chapter 15.5.

(v) Finding

The IAC finds:

- The development of the Proposed Route has had adequate regard to avoiding or minimising impacts on agricultural land.

10.5 Impacts on farm operations

(i) Key issue

The key issue is:

- the potential for the Project to impact of various farm operations.

(ii) What did the EES say?

The AFIA described the agricultural issues that would arise during construction, and assessed key impacts in terms of:

- production and income losses
- disruption of normal farm activities
- isolation and redundancy of productive land
- soil management
- biosecurity
- disruption to livestock
- soil and water contamination.

The key issues arising during operation and their impacts were assessed in terms of:

- agricultural economic losses
- biosecurity
- isolation and redundancy of productive land
- disruption to farm operations.

The AFIA included three case studies that were based on real farms (outside the study area) and a hypothetical overhead transmission line project. The case studies included:

- sheep farming (grazing) – sheep, growing pasture and sheep to produce prime lambs and wool
- mixed farming – irrigated horticulture (potatoes) plus cereal crops and grazing of prime lambs
- horticulture and cropping – growing irrigated potatoes, garlic and cereal crops, and some dryland crops.

The AFIA provided mitigations based on the impact assessment, consultation and case studies, noting that some impacts had been mitigated through project design and others would be compensated through the LAC Act or Option for Easement processes.

The AFIA highlighted the relevance and importance of EPRs related to:

- the timing and scheduling of construction
- business mitigation and support strategies
- property access
- communications
- biosecurity
- soil and air management plans.

The Proponent prepared various landholder guides that were exhibited in conjunction with the EES, including:

- Easement safety and permitted activities, October 2024 (D285)
- Option for Easement process, compensation and benefits, July 2025 (D662)

- Land access for field surveys and investigations, August 2024.

(iii) Evidence and submissions

Proponent

The Proponent submitted that most potential impacts on agriculture can be avoided, minimised or mitigated. It relied on the EES and Mr Annett's evidence in relation to specific impacts raised in submissions and other evidence. It proposed various additions and refinements to EPRs in response to Mr Annett's evidence and the Joint Expert Statement on Agriculture and Forestry. It submitted that any financial losses associated with residual impacts would be compensated under the LAC Act, including a solatium provision as described in Chapter 2.4.

Experts

The Joint Expert Statement records that the experts agreed impacts would differ from farm to farm and that for some farms the impact would be more significant than the overall EES rating of minor. They also agreed it was critical that compensation addresses matters that are not capable of mitigation and that it be negotiated with individual landowners. They noted the key role of the EPRs in identifying and mitigating impacts and highlighted the need to invest adequate resources in their implementation, including consultation with stakeholders.

Agencies

Agriculture Victoria (S471) submitted that while some farming systems can successfully operate alongside transmission infrastructure, others might experience significant constraints related to interruptions to irrigation layouts, aerial spraying and infrastructure placement. It noted the EES considered biosecurity risks, infrastructure placement and social licence and engagement, and was satisfied the assessment of these constraints and potential impacts was appropriate. It supported the relevant EPRs but recommended that EM8 (Biosecurity Management Plan) be prepared in consultation with DEECA (Agriculture Victoria). This relates to the Project-wide Biosecurity Management Plan, not farm-specific plans, and was agreed to by the Proponent.

Submitters raised specific issues and impacts that are summarised below.

Safety assessments and permits to work

Submitters raised concerns about the time and costs associated with safety assessments and permit to work processes outlined in the Landholder Guide - Easement safety and permitted activities. They raised associated issues about the height of machinery (discussed below) and types of activities acceptable within the easement, including the use of spotters.

The Joint Expert Statement records that the experts agreed greater clarity was required relating to Ausnet and Worksafe Victoria requirements for working under transmission lines, particularly in relation to the heights of no-go zones and the requirements related to spotters.

Mr Annett noted there would be opportunities for landholders to raise concerns with the Proponent about the safety assessment and permit to work process during consultation and the preparation of plans under the EPRs.

The Proponent provided supplementary material in TN17 that outlined the safety assessment and permit to work process and the legislative and regulatory context, including the requirements under the Electricity Safety Act and guidance from Worksafe Victoria and ESV (including the No Go Zone).

It advised that safety assessments and permits to work would be provided free of charge at the request of landholders. An initial review of an application would be undertaken within five business days and a complete assessment, including a Permit to Work if required, would typically take ten days. It noted this timeline could be longer if a site visit was necessary and that the process could be coordinated though a Land Liaison Officer. It explained how the height restrictions that apply to farm machinery had been derived and situations where a spotter might be required. It noted that spotters would not typically be required for machinery that does not require a Permit to Work.

The Proponent acknowledged the complexity of the regulatory system and the potential confusion relating to the use of machinery within the easement. It undertook to update the WRL guidance on its website to ensure that obligations and recommendations are more clearly communicated.

Machinery heights

The Proponent outlined the height restrictions applying to farm machinery within the easement:

- machinery up to five metres in height could operate without restriction or a safety assessment
- machinery over five metres and up to 8.6 metres in height may be allowed to operate subject to a safety assessment
- machinery cannot exceed 8.6 metres in height.

Submitters raised concerns about the heights of various farm machinery and whether it could operate within the easement. Examples of this machinery, including harvesters, augers, tip trucks and sprayers, were made available during the accompanied inspections of various farms.

The concerns included whether existing machinery could be used, whether spotters would be required, and whether the Project would limit the future use of taller, more efficient or productive machinery.

The Proponent submitted that there were few, if any, realistic scenarios where farm machinery would exceed the 8.6 metre height limit. Mr Annett was satisfied that spotters would not typically be required.

Property access and biosecurity

Submitters raised concerns about property access and the potential for biosecurity breaches prior to and during construction and operation. They noted the serious ramifications of biosecurity breaches and were concerned about contractors accessing their properties and failing to comply with access and biosecurity requirements under

the EPRs. Other concerns related to the preparation and approval of the Biosecurity Management Plan required under EPR EM8.

In the Joint Expert Statement, the experts agreed that potential biodiversity impacts were a major concern and that controlling access is a key means of managing risk. They noted various matters that should be addressed in the Biosecurity Management Plans.

Mr Perkins noted that biosecurity issues could arise as vehicles move directly from property to property in addition to movements along public roads. Mr Beever agreed with the Proponent's proposition that there is an existing biosecurity risk associated with farm equipment moving from farm to farm and the Project would add to an existing risk rather than create a new risk.

The Proponent explained the requirements to develop an overarching PAMP (EM3) and SPARs (EM4). These would include relevant elements of a project-wide Biosecurity Management Plan (EM8) including processes for biosecurity breach detection, compliance, reporting and response. EPR EM7 requires a complaints management system. EPR EM9 requires auditing and reporting on environmental compliance by an Independent Environmental Auditor, including reporting on the Biosecurity Management Plan. These requirements are enforceable under the PE Act as the Incorporated Document requires the EMF and EPRs to be implemented.

The Proponent noted that access to the Project during operation would typically be limited to once a year via the air and once every five years via on the ground inspections using designated access tracks. It concluded the biosecurity risks associated with the Project's operation would be less than those related to day-to-day farming activities that involve the movement of equipment and people.

The Proponent agreed to various revisions and additions to EPRs to address various biosecurity findings and recommendations in the Joint Expert Statement. It also agreed to consult with Agriculture Victoria during the preparation of the project-wide Biosecurity Management Plan under EPR EM8.

Soil compaction

Submitters raised concerns about potential soil compaction, particularly associated with heavy vehicle movements during construction. They highlighted the vulnerability of soils to compaction impacts in various areas, the implications for agricultural productivity (particularly horticulture) and the difficulties in remediating compacted soil.

In the Joint Expert Statement, the experts agreed about the Project's potential for soil compaction impacts, their significance and the need to prioritise its avoidance.

The Proponent acknowledged this issue and proposed a change to EPR GSL2 that would require the Sediment and Erosion Control Management Plan to include measures to avoid and minimise soil compaction.

Relocating livestock during construction

Submitters highlighted the potential impacts on livestock during construction and the likely need for relocation, depending on the nature, duration and scheduling of construction activities and various seasonal factors. They raised concerns about the

potential cost and availability of land for agistment and the implications of alternative land not being available.

In the Joint Expert Statement, the experts agreed that moving livestock during construction could be critical and would be impacted by factors such as the availability and cost of using alternative land, including on-farm land or off-farm agistment.

The Proponent proposed that the PAMP (EPR EM3) include a new requirement to address "*arrangements for moving livestock away from construction activities and agistment where necessary*".

Aerial services

Submitters raised concerns about the restrictions on manned aircraft and drones operating within and adjacent to the easement and how this might affect spraying of fertilisers and chemicals.

In the Joint Expert Statement, the experts acknowledged that restrictions on manned aircraft would affect some broadacre and horticultural properties and could result in ongoing financial losses, opportunity costs or increased production costs. They noted that alternatives, such as drones, might be available subject to a safety assessment, but would likely be more expensive.

Mr Perkins noted that any delayed herbicide, insecticide or fungicide spraying during construction could have significant implications for crop health and yield. Mr Beever considered drones are not as effective as manned aircraft for spraying and are "*twice*" as expensive.

The Proponent explained that aerial spraying would not be allowed within 45 metres of the transmission line conductors, consistent with civil aviation regulations. Drones may be allowed to operate within the easement (and under the conductors) subject to a safety assessment and permit. It advised that restrictions on aerial spraying that impacted land directly affected by the Project would be compensable and impacts on land not directly affected by the Project could be mitigated through the Agriculture and Forestry Business Mitigation and Support Strategy (EPR AF1).

Mr Jennings explained the regulations related to low flying, including agricultural spraying, and was satisfied that although the Project might require changes to flightpaths it would not preclude aerial applications.

Irrigation

Submitters raised concerns about limitations on the use of some irrigation equipment within the easement, the need to reconfigure irrigation equipment and the severance of land.

The Joint Expert Statement recorded the experts' agreement that irrigation impacts would vary from property to property and could be reduced (or in some cases avoided) by the proposed mitigations. They agreed there might be situations where some land might be withdrawn from irrigated agriculture and converted to a lower value use, such as grazing.

The Proponent confirmed that irrigators with the potential to spray water onto the transmission line (such as gun irrigators) would not be permitted because of safety risks. Any need to change irrigation equipment because of the acquisition of the easement would be compensable. The Agriculture and Forestry Business Mitigation and Support Strategy (EPR AF1) would seek to avoid impacts and if avoidance was not possible, re-design and replace irrigation systems.

It concluded that alternative methods of irrigation would be available and would be able to be used in all but the most exceptional of circumstances.

Stubble burning

Submitters raised concerns about the restrictions and practical challenges associated with getting permits from the Proponent for stubble burning, particularly where a permit was also required from CFA. Submission S468 provided a site-specific example of where the Proponent's and the CFA's conditions might be inconsistent and unreasonably constrain stubble burning.

The Joint Expert Statement noted that stubble burning might be subject to restrictions through the permit process and highlighted that the safety assessment and permit processes needed to be timely and tailored to individual properties.

The Proponent advised that controlled burns are not prohibited in the easement but require a safety assessment before a permit would be issued. As part of the safety assessment process, the workability of any requirements or recommendations can be considered and refinements put in place if necessary. It noted that controlled burning occurs throughout the transmission network.

Route refinement and micro-siting

Submitters provided examples of where the Project route should be altered to avoid or better mitigate impacts within directly affected properties. These included sections of the route that bisect properties or paddocks or don't follow property boundaries or fencelines. Some suggested there was scope to reduce severance, particularly over the operational life of the Project.

(iv) Discussion

The following assessment of the Project's agriculture impacts has regard to the mitigation measures in the EMF and the significance and acceptability of any residual impacts. The IAC acknowledges that many impacts would be subject to compensation arrangements under the LAC Act and Options for Easements, while other financial mitigations, such as the REZ Community Benefits Plan, could provide capital to fund farm expansion, new equipment or debt reduction.

In this context the IAC's task is to determine the significance of any residual impacts and whether those impacts are acceptable.

Safety assessments and permits to work

The safety assessments and permit to work processes are necessary consequences of the Project, consistent with the legislative and regulatory framework. The IAC accepts that participating in these processes would require resources from landowners but is

satisfied that impacts would be reduced by the short timeframes for processing applications and undertaking the assessments on a no fee basis. As the Proponent noted, many activities and farm machinery will only require a single assessment and an ongoing permit, limiting the demands on farmers.

The IAC agrees with the Proponent that the various requirements and obligations described in TN17 are complex and potentially confusing. While the Landholder Guide - Easement Safety and Permitted Activities provides a useful overview, it does not include levels of detail or guidance that are likely to be useful to many landholders. The IAC supports the Proponent's commitment to updating this material and making it available to landowners and on the Project website and has a recommendation to that effect. In this context, the IAC also recommends that EPR AF1 include a requirement to better define these processes in the Agriculture and Forestry Business Mitigation and Support Strategy.

Machinery heights

The farm machinery the IAC was shown was typically under 8.6 metres in height, although there were some exceptions including augers, elevated tipper truck trays and boom sprayers operating on uneven ground. Some of this machinery such as tipper trucks would not need to be operated within the easement.

The IAC is satisfied that most farm machinery used on affected farms would be below the maximum 8.6 metre height and would be able to be used within the easement, subject to a safety assessment where it is above five metres in height. If it can be demonstrated that the Project has made existing farming machinery redundant because of its height, the IAC understands this would be the subject of compensation.

The IAC accepts that some farm machinery has become larger and more efficient over time and that the Project might preclude the use of taller machinery in the future. The IAC was not presented with any definitive material about this issue and can only note that farming within the easement will be able to continue and that from its observations, most machinery currently used is significantly lower than the 8.6 metre limit.

Property access and biosecurity

The IAC supports the approach to biosecurity management in the EMF, including the preparation of an overarching Biosecurity Management Plan with input from Agriculture Victoria (EPR EM8) and the inclusion of property specific biosecurity requirements as part of the PAMP (EPR EM3) and SPARs (EPR EM4).

The IAC acknowledges the concerns about biosecurity risks and agrees that they would be greatest during construction, with the movement of vehicles, material and workers. Risks during operation are likely to be significantly less given on-ground inspections might only occur once every five years.

Submitters also raised concerns about potential biosecurity issues associated with preparatory buildings and works permitted under the Incorporated Document before EPRs such as the requirement for a Biosecurity Management Plan are in place. The IAC acknowledges this concern and recommends that the Incorporated Document require that any preparatory buildings and works have regard to potential biosecurity risks.

This change, together with the IAC's recommended EPRs, would provide an appropriate framework for managing submitters concerns, including requirements relating to biosecurity breach detection, compliance, reporting and response. EPR AF1 also provides for the appointment of consultants to advise landholders on property specific biosecurity risks.

While there is no guarantee that biosecurity issues would not arise, the IAC is satisfied appropriate management processes are in place and any risks have been acceptably minimised.

Soil compaction

The IAC agrees that soil compaction is a potentially significant impact and supports the additional requirement in the Sediment and Erosion Control Management Plan proposed by the Proponent. This is discussed further in Chapter 14.3.

Relocating livestock during construction

The IAC accepts submissions and evidence that Project construction could impact on livestock and that it might be necessary to relocate or sell some livestock. How this might be implemented would depend on the timing of construction and the availability of alternative on-farm or off-farm land. However, the IAC agrees that this should be provided for in the PAMP and supports the additional requirement recommended by the Proponent in EPR EM3.

Aerial services

The IAC accepts that the restriction on aerial spraying within 45 metres of the conductors could impact some directly affected properties and potentially some adjoining properties. However, it would not preclude spraying outside that area and it is not expected that any impacts would be significant. As Mr Jennings explained, aerial spraying around the Project would continue with minor adjustments and subject to CASA regulations, and that agricultural pilots were experienced in assessing appropriate flight paths and efficient spraying applications.

Drones may well provide a feasible alternative to aerial spraying. Indications were that drones would be permitted to fly under the transmission lines subject to a safety assessment and permit, although some farmers indicated that the transmission lines may interfere with signals that control the drones. The IAC did not receive sufficient information to make a definitive finding on this issue.

The Proponent noted that any impacts on directly affected properties would be subject to compensation, while impacts on properties not directly affected might be mitigated through the Agriculture and Forestry Business Mitigation and Support Strategy (EPR AF1).

Irrigation

The IAC accepts that irrigation restrictions and the need to redesign irrigation infrastructure would be a significant impact for some farms. This was clear from evidence, submissions and inspections of various farms.

As the Proponent advised, some impacts would be compensable and the EMF includes various requirements including the requirement under the Agriculture and Forestry Business Mitigation and Support Strategy (EPR AF1) that the Project:

> Avoid irrigation systems or if not practicable re-design the system and replace it to enable irrigation of the affected paddock.

It also provides for the appointment of consultants to advise landholders on the redesign of irrigations systems.

The IAC agrees that managing these impacts would be challenging but is satisfied the EMF and compensation arrangements provide suitable mechanisms to acceptably mitigate the impacts.

Stubble burning

The IAC notes that stubble burning can occur subject to a safety assessment and permit and was not presented with evidence indicating the Project would introduce any significant constraints on stubble burning continuing.

The IAC acknowledges concerns about the potential for inconsistent requirements between permits issued by Ausnet and Fire Permits Victoria. However, it notes the Proponent's advice that the safety assessment process can consider the workability of any requirements, including any Fire Permits Victoria permit that is required.

While it is conceivable that there may be some situations where the safety assessment restricts stubble burning, this is likely to be the exception rather than the norm. The IAC is satisfied that any restrictions are unlikely to be significant or create an unacceptable impact.

Route refinement and micro-siting

The IAC received submissions from landowners that agricultural outcomes would be improved for their properties if the alignment and/or tower sites were repositioned. Some submitters explained their concerns during accompanied inspections of their properties.

The IAC acknowledges the Proposed Route and tower siting have been progressively refined, but considers there may be scope for further property specific refinements through discussions between the Proponent and landowners, including those that have not engaged with the Project or have withdrawn from engaging with the Project. This is discussed further in Chapter 15.5.

(v) Findings and recommendations

The IAC finds:

- Potential impacts will vary from farm to farm but are likely to be more significant on horticultural and cropping farms than grazing farms.
- Most impacts will be compensated under the LAC Act and Option for Easement processes.
- The EMF provides a suitable framework for avoiding and mitigating impacts, but its successful implementation will require effective consultation between the Proponent and landholders.

- There should be further consideration of refining the Proposed Route within affected properties, as discussed in Chapter 15.5.

The IAC recommends:

Incorporated Document

Include the following change/s:

- Amend clause 4.12 (Preparatory Buildings and Works) to require that preparatory buildings and works have regard to existing biosecurity arrangements that are in place for specific properties and any biosecurity issues raised by the landowner.

These changes are included at Appendix E:1.

Environmental Management Framework

Include the following change:

- Amend EPR AF1 to include a requirement to define the safety assessment and permit to work processes in the Agriculture and Forestry Business Mitigation and Support Strategy.

These changes are included at Appendix E:2.

Other recommendations

The IAC recommends:

- The Proponent should revise and update the guidance related to safety assessments and permits to work to better reflect the material provided in Technical Note 17 (D519) and to proactively assist landowners in understanding and effectively managing those processes. This material should be published on the Project website and be made available to directly affected landowners.

10.6 Environmental Management Framework

(i) Key issue

The key issue is whether the Environmental Performance Requirements adequately address agriculture and forestry impacts.

(ii) What did the EES say?

The AFIA recommended one specific agriculture and forestry EPR that required the preparation of an Agriculture and Forestry Business Mitigation and Support Strategy (EPR AF1). It noted that other EPRs would assist in addressing agriculture and forestry issues, including those related to the:

- CEMP
- PAMP
- Specific property access and management plans
- Biosecurity Management Plan
- Communications and Stakeholder Engagement Management Plan
- Decommissioning Management Plan
- Sediment and Erosion Control Management Plan.

(iii) Evidence and submissions

As already noted, the Proponent proposed various changes to the EPRs in response to evidence and submissions that were included in the Day 3 version of the EMF.

The Councils proposed minor changes to EPR AF1 (D596), with Ballarat Council (D643) seeking additional changes that included:

- confirming that impacts must be assessed on a farm-by-farm basis
- specifying various matters the strategy must address as part of farm-by-farm assessments
- specifying the matters to be documented in property specific records
- offering independent support for directly affected landowners
- providing greater flexibility in the timing of various actions.

Other submitters raised definitional issues in the Incorporated Document and EMF and sought various changes, relating to:

- limiting actions to those that are "*reasonably practicable*"
- preparing various plans
- constructing access tracks.

(iv) Discussion

The IAC supports the changes to the EMF agreed by the Proponent following its consideration of submissions and evidence and has included them in its recommended EMF at Appendix E:2. These include changes to EPR AF1 and other EPRs that require agriculture related plans (EM2, EM3, EM4 and EM5).

The IAC recommends further changes to EM8 (Biosecurity Management Plan) so that it applies to the operational phase as well as construction, and to provide for property specific plans where appropriate. These changes augment the requirements for the PAMP under EM3 and are consistent with issues raised in many submissions.

The IAC also recommends a change to the Incorporated Document to require that preparatory buildings and works have regard to biosecurity issues.

The IAC discusses the role of an independent facilitator in Chapter 13.5.

The IAC is satisfied that the further changes to EPR AF1 sought by Councils and other submitters are generally addressed through other EPRs and requirements in the recommended EMF or do not warrant being specifically referenced.

Broader drafting issues, such as references to limiting actions to what is "*reasonably practicable*" are discussed in Chapter 18.

(v) Finding and recommendation

The IAC finds:

- The recommended Environmental Management Framework provides an appropriate framework for mitigating impacts on agriculture operations.

The IAC recommends:

Environmental Management Framework

Include the following change:

- Amend EPR EM8 to require that the Biosecurity Management Plan applies to the operational phase and makes provision for property specific plans where appropriate.

10.7 Overall conclusions on agriculture and forestry effects

The IAC considers the Project would negatively impact on agriculture through the loss of high quality agricultural land. While the amount of land proposed to be taken out of agricultural production is relatively modest in the State and regional contexts, this is inconsistent with State planning policy relating to the protection of agricultural land. The implications of this need to be considered in the broader policy context including renewable energy policy as part of an integrated assessment (see Chapter 16). The IAC is satisfied any impacts on agriculture and forestry at a regional level would not be significant and are acceptable.

11 Aviation

11.1 Introduction

(i) Key information

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects on … businesses and … aviation safety … during construction and operation of the project.

Aviation effects are assessed in:

- EES Chapter 16 Aviation
- EES Technical Report J Aviation Impact Assessment (AIA).

The exhibited EMF includes the following EPRs:

- AV1 Provide notification to Airservices Australia
- AV2 Mark transmission line towers and associated catenary around Melton Uncertified Aerodrome.

Table 16 lists the experts providing evidence on Aviation.

Table 16 Evidence on aviation

Party	Expert	Firm	Expertise	Document number
Proponent	Ian Jennings	Chiron	Aviation	D91
Proponent	Peter White	Aviation Safeguarding Australia	Aviation	D96
Melton City Council	Bryan Fitzgerald	Airport Surveys Pty Ltd	Aviation	D112
Melton Air Services Investments Pty Ltd	Daniel O'Donnell	Aviation Safety and Aerodrome Operations	Aviation	D148
Melton Air Services Investments Pty Ltd	Julian Fraser	Various industry roles	Aviation safety	D193
Joint expert statement - Aviation				D233

Other key documents are:

- Independent Peer Review – Aviation (D52).

The IAC has had regard to relevant policy and guidelines, including:

- Melton Planning Scheme
- various Civil Aviation Authority and CASA regulatory and guidance documents.

(ii) What did the EES say?

The AIA identified the key Project activities that could impact on existing aviation including:

- pre-construction aerial surveys of the transmission line route
- the use of cranes and/or helicopters associated with tower construction
- the use of helicopters for conductor and earth wire stringing during construction
- the presence of transmission towers and overhead conductors during operation
- the use of aircraft for inspections and maintenance during operation
- the use of cranes and/or helicopters for tower deconstruction during decommissioning.

The key aviation-related values that might be affected included:

- operations at certified aerodromes and uncertified aerodromes
- air navigation and air traffic management services
- transiting air routes and authorised low flying activities (including aerial agricultural applications)
- firefighting, medical and emergency flights, flight training, sports aviation, private flights and tourism, military activities and other approved flights.

The key findings included:

- certified aerodromes:
  - there would be no impact on protected airspace at Stawell or Ararat aerodromes
  - there would be no impact at Ballarat aerodrome subject to Project activities being below the protected airspace of runway (RWY) 18
  - there would be no residual construction and decommissioning impacts at Melbourne Airport, subject to the recommended mitigations, management measures and EPRs. Operational impacts would be avoided by reducing the height of towers to avoid Melbourne Airport's protected airspace.
- uncertified aerodromes:
  - there would be no impacts to safe operations from Project activities during construction, operations or decommissioning at aerodromes at Glenlofty, Beaufort, Myrniong, Rowsley/Brooks Landing,[34] Greystones or Bacchus Marsh, or helipads at Ballarat Hospital, Bacchus Health or Rowsley
  - there would be impacts on Melton Aerodrome that are discussed later in this chapter.
- There would be no impacts on air navigation and air traffic management services or transiting air routes.
- There would be minor residual impacts on authorised low flying during construction, operation and decommissioning of the Project. Operational impacts could affect aerial agricultural applications, firefighting and medical and emergency flights in circumstances that necessitate these flights near Project infrastructure. However, any impacts were assessed as minor.

The AIA recommended two EPRs:

[34] Mr Jennings advised that Rowsley/Brooks Landing has been deleted from aeronautical charts (D91).

- AV1 – provide notification of the Project's details to Airservices Australia so that pilots are aware of potential hazards to aircraft operations
- AV2 – mark the transmission towers and catenary around Melton Aerodrome.

Independent Peer Review

The Independent Peer Review supported the findings of the AIA.

11.2 Adequacy of the Aviation Impact Assessment

(i) Key issues

The key issues are whether:

- the Aviation Impact Assessment adequately assessed the Project's aviation impacts
- aviation impacts have been appropriately avoided and minimised, and are acceptable.

(ii) Evidence and submissions

The Proponent relied on the EES and evidence of Mr Jennings and Mr White and submitted that the only aerodrome the Project would impact was Melton Aerodrome.

Mr Jennings outlined the relevant airspace designations and flight rules, noting the Project is within Class G uncontrolled airspace from Bulgana Terminal Station to tower F3002DL (seven kilometres west of the Sydenham Terminal Station), beyond which the Project is within the Melbourne Airport Class C controlled airspace which extends from the surface to 1500ft. Tower heights in this area have been designed to be below the Obstacle Limitation Surface (OLS) and Procedures for Aircraft Navigation Services – Aircraft Operations (PANS-OPS) airspace to avoid impacts.

Mr Jennings noted that in Class G airspace the pilot in command is responsible for ensuring separation from other aircraft and maintaining the regulated height above any obstacles and the ground. Pilots are also responsible for ensuring adequate flight planning is undertaken for every flight. The majority of aircraft flights in the area surrounding the Proposed Route would be conducted at altitudes above the height of the towers in accordance with the requirements of both visual and instrument flight rule procedures - 500ft for Visual Flight Rules and 1000ft for Instrument Flight Rules.

Aircraft authorised for low flying (flights less than 500ft above the terrain and obstacles), include aerial agricultural applications, aerial firefighting, Air Ambulance and Police operations, survey (power line inspection) and search and rescue. Such flights are subject to the Visual Flight Rules and conducted by suitably trained and endorsed pilots in Visual Meteorological Conditions.

Submissions raised concerns about general impacts on aviation safety, including firefighting and agricultural applications that are discussed in Chapters 8 and 10. Ballarat Council submitted that if the Project is not undergrounded, all towers should be fitted with obstacle lighting.

There were no submissions from owners or operators of aerodromes assessed in the AIA, apart from Melton Aerodrome as discussed later in this chapter.

(iii) Discussion

The IAC is satisfied the AIA has adequately assessed the Project's impacts on aviation and accepts its conclusion that impacts on certified and uncertified aerodromes would be avoided (with the exception of Melton Aerodrome) subject to implementing EPR AV1 and implementing the proposed tower heights in proximity to Melbourne Airport.

There would likely be circumstances where the Project could impact on low flying, including agriculture, bushfire and emergency services related flights, but these low flying activities would be subject to CASA requirements. This is not an uncommon situation and the IAC is satisfied that impacts on low flying would not be significant and any increased risk would be acceptable. Specific aviation issues related to agriculture and bushfire are discussed in Chapters 8 and 10.

Ballarat Council's submission that all towers should have obstacle lighting was not supported by evidence and the IAC is satisfied with the EES assessment and the evidence of Mr Jennings about this issue.

(iv) Findings

The IAC finds:

- The Aviation Impact Assessment is adequate for the purposes of the EES.
- Impacts on certified and uncertified aerodromes would be avoided (excluding Melton Aerodrome).
- Impacts on low flying would not be significant and are acceptable.

11.3 Melton Aerodrome

(i) Key issues

The key issues are whether:

- the Project is consistent with policy support for protecting aerodromes
- aviation impacts have been appropriately avoided and minimised, and are acceptable.

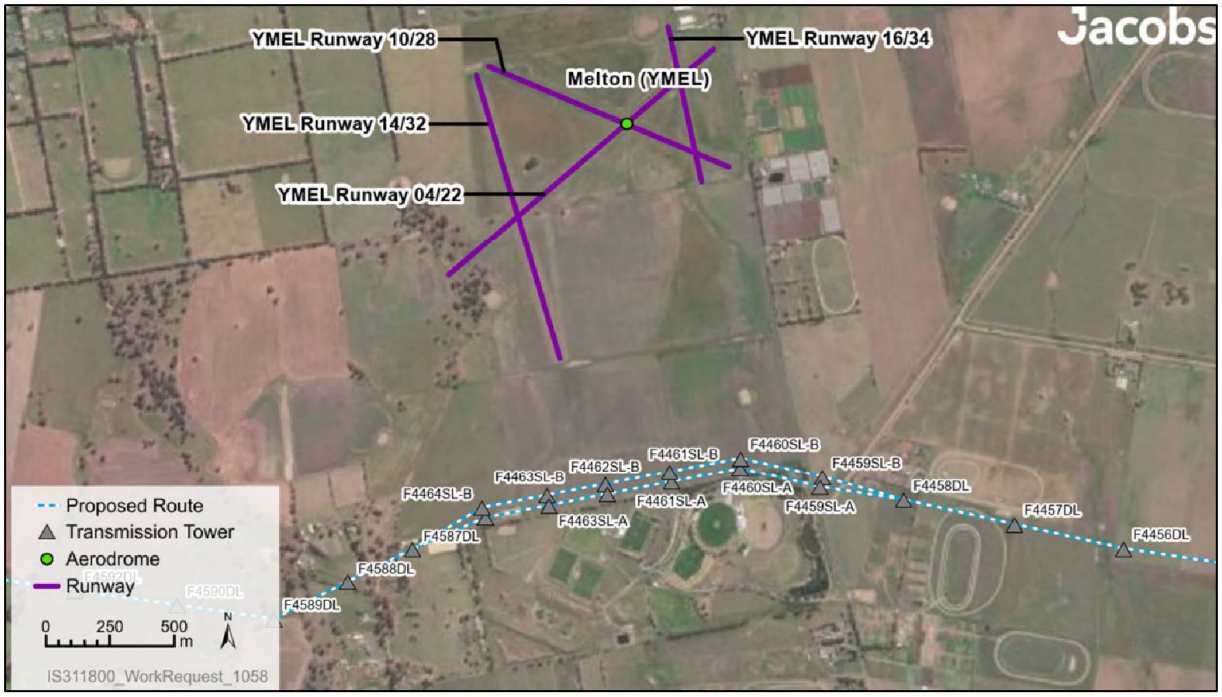
(ii) What did the EES say?

The EES provided an overview of the Melton Aerodrome, noting that was a privately owned uncertified aerodrome with four grass runways. It is owned and operated by Melton Air Services Investments Pty Ltd (Melton Air Services) that conducts flying training, charter and maintenance operations. It is subject to obstacle constraints associated with infrastructure at MacPherson Park to the south and rising terrain to the north. There are various restrictions on the use of specific runways, including the direction of take-offs and landings, and circuits and general requirements such as avoiding overflying Toolern Vale township. The aerodrome requires right hand circuits for RWY04 and RWY10 rather than legislated left-hand circuits because of hazard constraints.

The Proposed Route is to the south of the aerodrome as shown in Figure 22 and was the preferred alternative following an assessment of options to the north of Melton. The

options were described and assessed in EES Attachment I and responded to existing land uses including the Melton Aerodrome.

Figure 22 Transmission towers in proximity to Melton Aerodrome



SOURCE: EES Technical Report J Aviation

The EES noted that the nominal 85 metre high double circuit towers used for the Project would have significant impacts on the operation of the aerodrome. Consequently, the towers in this area include lower single circuit towers ranging from 33.76 to 39.62 metres in height (between towers F4459SL-A and F4464SL-B). The height of the connecting double circuit towers either side (F4458DL to the east and F4588DL to F4595DL to the west) were also reduced from the standard tower heights, ranging from 60.9 to 69.9 metres tall. The location of these towers are shown in Figure 22.

The AIA noted that pilots are required to familiarise themselves with limitations, such as transmission towers, prior to using the aerodrome and to seek permission and information on hazards from the aerodrome operator.

It assessed unmitigated impacts during construction and decommissioning of the Project ranging from moderate to major. Subject to early consultation and coordination, residual impacts would be moderate, but would require careful management.

The AIA assessed the impacts of the Project's operation on the four runways, and found that:

- Landings on RWY04 and RWY34 can continue, however pilots will need to be aware of the tall obstruction crossing the extended runway centrelines. Landings on RWY32 will require a steeper approach and touch down point north of the runway threshold.
- Departures on RWY22 will need to be planned to ensure the climb after take-off is sufficient to avoid the tall obstruction crossing the extended runway centreline 2,000m from the end of the runway. Departures are not permitted on RWY16/34. Departures on RWY14 will need to be planned to ensure climb after take-off is sufficient to avoid the tall structures crossing the extended centreline 520m from the end of the runway. Operations on runway 14/32 will require the Pilot in Command to decide if there is

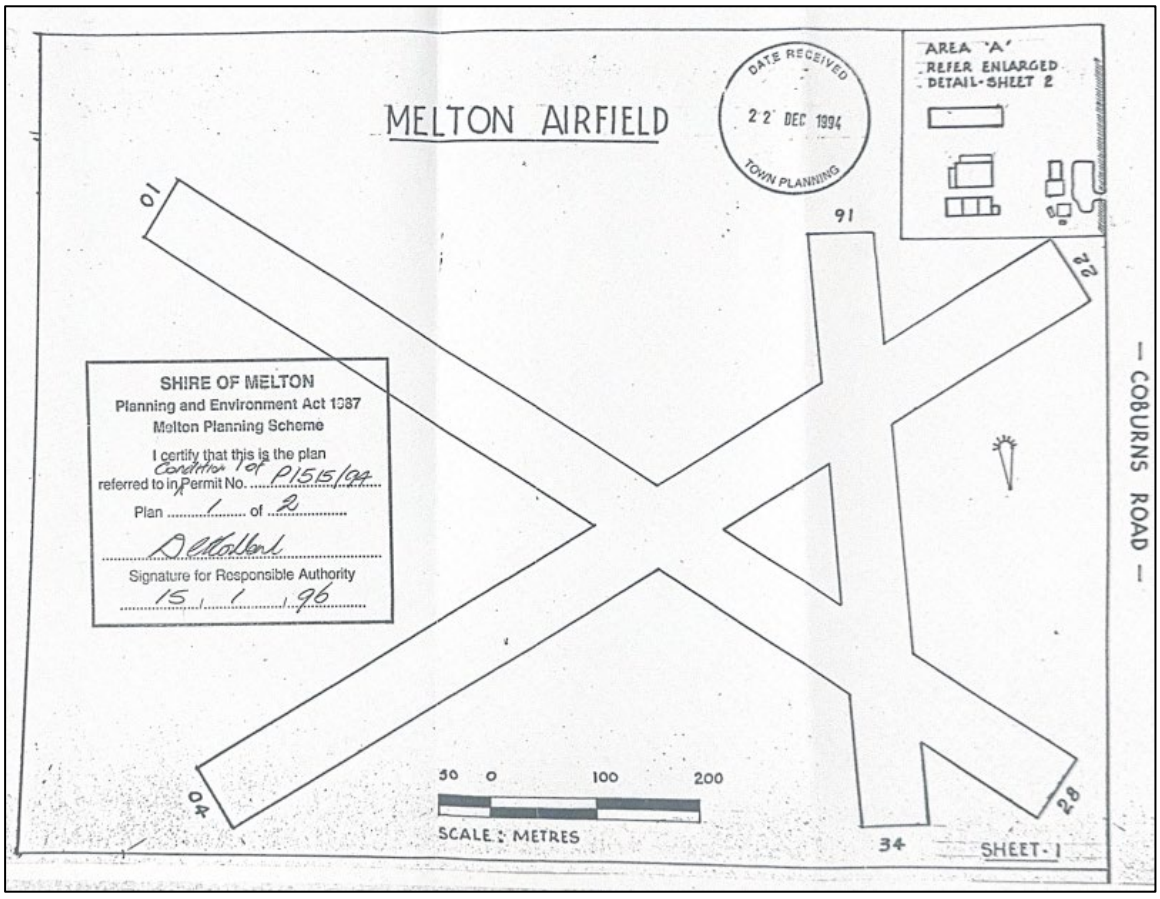
> sufficient runway available, in the prevailing conditions, to facilitate the take-off or landing and be able to avoid the known obstacles (CASR 91.410) at each end of the runway.[35]

It concluded that the Project would add additional obstacles, but the aerodrome could still operate as normal with moderate pilot adjustments for the use of some runways. It recommended that the relevant transmission towers and catenary be marked with standard obstacle markings required through EPR AV2. This would reduce residual impacts from moderate to minor.

(iii) Melton Aerodrome approvals

Melton Aerodrome is the subject of various planning permit approvals for use and development of the site, including runways, hangars and other infrastructure. There are also restrictions on the use of the facility related to the types and weight of aircraft, the number of take-offs and landings, hours of operation and flight paths. The approved runways are indicated in the endorsed plan in planning permit P1515/94 and shown in Figure 23.

Figure 23 Planning permit P1515/94 endorsed plan



Source: D293

During the Hearing Melton Council confirmed that RWY14/32 and an extension to RWY04/22 had been constructed without the required planning approval. RWY14/32 was not in use at the time of the Hearing and is the runway that would be most impacted by

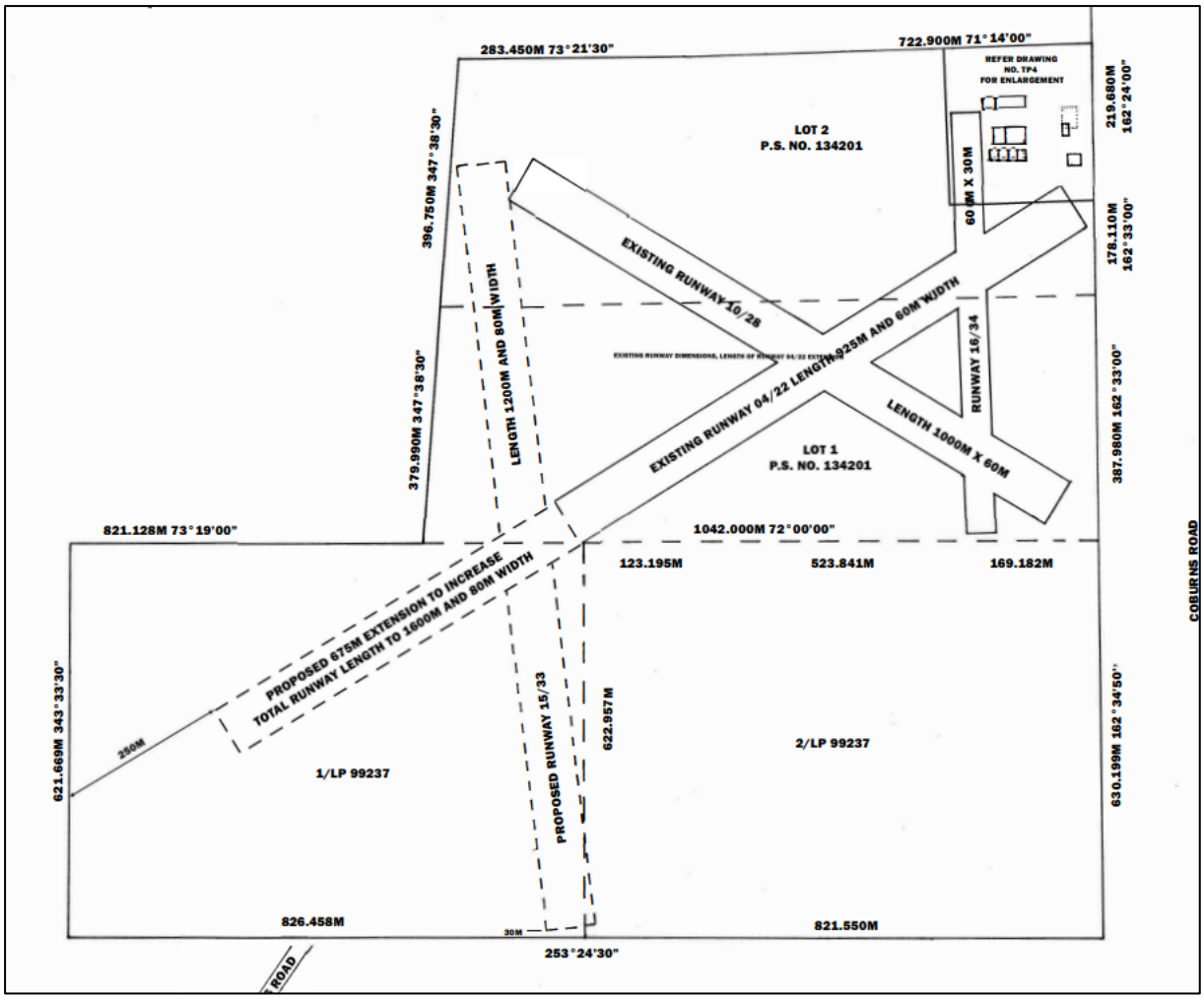
[35] EES Technical Report J Aviation, page 74

the Project. Aerial photographs suggest it was constructed in 2022. RWY04/22 has been extended to the southwest (in the direction of the Project alignment) by approximately 450 metres beyond the approved extent of the runway and has been in use.

Melton Air Services lodged a planning permit application in December 2025 that sought approval for RWY14/32 (redesignated as RWY15/33) with a 1,200 metre length, a 675 metre extension of RWY04/22 to the southwest and various other works. The proposed runway arrangement is shown in Figure 24.

Melton Air Services advised it had applied to CASA for Aerodrome Certification, based on an OLS prepared by Mr Fitzgerald in 2021 and including a draft Aerodrome Manual. The application material was included in D318 and was lodged in November 2025.

Figure 24 Outline of proposed runway works



SOURCE: D674

(iv) Evidence and submissions

The Melton Aerodrome was the subject of over 120 submissions during the exhibition of the EES that expressed concerns about the Project's impacts on its operation, safety and viability. These included submissions from industry groups and aerodrome users. There were extensive submissions and evidence during the Hearing. The IAC has had regard to

all of this material but has not recorded it in detail. Instead it has highlighted the key factors that have informed its assessment.

Melton Air Services

Melton Air Services and Mr Reeve (the director and owner of Melton Air Services) outlined the history of the Aerodrome, its development and usage, and made submissions about the anticipated impacts of the Project on its operations, including the risk of wire strike. They submitted the Project would impact the commercial viability of the aerodrome. Melton Air Services provided an overview of flight training at the aerodrome and other training facilities in Victoria, and a breakdown of the aerodromes' usage (D644). Mr Reeve outlined and criticised the consultation undertaken by the Proponent. They relied on the evidence of Mr O'Donnell and Mr Fraser and concluded that the Project should be undergrounded in the vicinity of the aerodrome.

Melton Council

Melton Council submitted the Project created a land use conflict with the aerodrome and was contrary to clause 18.02-7S (Airports and airfields) of the Melton Planning Scheme that seeks to safeguard the ongoing, safe and efficient operation of airports and airfields. It noted the Project would infringe the OLS prepared by Mr Fitzgerald, potentially constrain its future expansion, impact its commercial viability and increase risks to pilots (particularly student pilots). It submitted that locating the Project as far south as possible away from the aerodrome had created landscape, visual and social impacts for MacPherson Park.

Experts

Mr Fitzgerald explained he had prepared an OLS for the aerodrome in 2021 and described the process and regulatory context. He noted that three towers would infringe the OLS for RWY04, RWY32 and RWY34 and therefore endanger safe aircraft operations, particularly when experiencing difficulties or operating in adverse weather. He noted that the Project might compromise future development or certification. The IAC notes the OLS is based on the unapproved RWY14/32 and extension to RWY04/22, and a future extension to RWY16/34 that has not been approved.

Mr O'Donnell described the operation of the aerodrome and the types of aircraft that use it, outlined various guidance documents and assessed the potential hazard and safety impacts of the Project, including an increased risk of collision.

Mr O'Donnell assessed the Project's compliance with guidance material related to approach and take off area gradients including:

- the recommendation in *Civil Aviation Authority CAAP 92-1 (1) Guidelines for aeroplane landing areas 1992*[36] (CAAP 92-1 (1)) that runways have approach and take-off areas clear of objects above a 5 percent slope for day operations
- the recommendation in *Air Services Australia Aeronautical Information Publication ENR 110.14.3.1* (ENR 110.14.3.1) (D402) that aerodromes used for ab-initio flying training have obstacle-clear approach and take-off slopes of no

[36] CAAP 92-1 (1) was withdrawn in 2021

> more than 3.33 percent to a distance of 1,600 metres from each end of the runway.

He calculated the slope from the southern threshold of RWY14/32 to clear the Project was 5.706 percent (Mr Fitzgerald calculated it as 5.13 percent (D112)). The gradients for all other runways were below 3 percent.

He also referred to *CASA AC91-02 v1.2 - Guidelines for aeroplanes with MTOW not exceeding 5 700kg – suitable places to take off and land* and noted a range of factors that impact on safety, concluding that the Project would create an unnecessary risk to users and should be relocated.

Mr O'Donnell disagreed with various elements of the AIA, including some of the assumptions on which it was based. He concluded:

- impacts during construction would be between "*major and unacceptable*"
- impacts during operation would be "*major*", based on the climb and descent gradients, particularly on RWY14/32, and the requirement for all circuits to fly over the Project
- pilots and the aerodrome operator might determine that the increased risk of operating at the aerodrome is "*unacceptable*".

Mr Fraser provided evidence in relation to wire strike accidents and the potential impacts of the Project, including risks to student or low experience pilots. He referred to various CASA guidance and concluded the Project would create an unacceptable risk to aircraft operations at the aerodrome.

The Joint Expert Statement recorded general agreement about the status of the aerodrome but there was disagreement about the likelihood and significance of impacts.

Proponent submissions and evidence

The Proponent provided extensive submissions about take-off and landing gradients, the OLS, the applicable aerodrome code, various guidance documents and safety and hazard issues.

It relied on the evidence of Mr Jennings and Mr White that the Project's main impact would be associated with the unapproved RWY14/32 although it noted that this runway would comply with CAAP 92-1(1) if it was marginally shorter. It submitted:

> The potential for some curtailment of a runway that does not have any planning approval is not a matter which could be reasonably regarded as a material impact on the Aerodrome. The Aerodrome has operated for a very long time without runway 14/32. It is not reasonable to expect a state significant infrastructure project to accommodate the use of a facility on private land which does not have planning approval, and which may never obtain the necessary planning approval.

The Proponent noted the OLS prepared by Mr Fitgerald reflected the runway configuration and codes provided by Melton Air Services, including unapproved runways. It submitted the OLS had been provided to the Proponent in support of varying the Project design and presented to the IAC to argue the Project infringes the OLS.

In relation to wire strike, the Proponent noted the evidence of Mr Jennings and Mr White that this risk is mostly associated with distribution lines and aerial application aircraft.

Neither expert was aware of a wire strike incident involving a transmission line in Australia.

In relation to increased risk associated with emergency situations, the Proponent noted that the aerodrome was already subject to various risks and hazards and that the issue was "*not whether it is possible that the Project would increase risk, but rather whether any increase in risk is unacceptable*".

The Proponent provided advice in relation to EPR AV2 and the marking of transmission towers and catenary that provides:

> Towers and associated catenary are to be marked with standard obstacle markings as per Australian Standard AS 3891.1:2021 and AS 3891.2 to make them more visible to pilots flying. Towers near the Melton Uncertified Aerodrome (YMEL) are to be marked, including [towers F4458DL to F4595DL inclusive].[37]

It submitted there was ambiguity in the drafting of the EPR because it required an assessment of the Australian Standard to determine which towers should be marked but also specified 21 towers required to be marked. Mr Jennings explained that applying the Australian Standard would only require one tower and the associated catenaries running east and west to be marked and that marking the other towers had been proposed as an additional risk mitigation. The Proponent undertook to further consider this issue following its consideration of evidence and submissions but did not make any further submissions about the EPR or recommend any changes.

(v) Discussion

The IAC agrees there is strong policy support for safeguarding the ongoing, safe and efficient operation of airports and airfields, including Melton Aerodrome, and protecting them from incompatible land use and development. This has been relevant in framing the IAC's consideration of submissions and evidence about the impacts on Melton Aerodrome.

The IAC also notes that the aerodrome is uncertified, does not have an approved OLS and its airspace is not protected. Although Melton Air Services has applied for certification, there were competing views about the likelihood of the application being successful. The IAC has not formed any conclusions about this.

The IAC's assessment of impacts is primarily focussed on the approved runways, excluding the new RWY14/32, extended RWY04/22 and other changes sought in the current permit application. In this context, the IAC is satisfied the Project would not have a significant impact on the operation of the approved runways, noting that submissions and evidence generally agreed that the Project would mainly impact the unapproved RWY14/32.

The IAC acknowledges general concerns about increased safety risks in certain circumstances but notes the responsibility of pilots to inform themselves of hazards and to respond accordingly. The IAC accepts the Project would add some additional risk to pilots operating out of the aerodrome but was not convinced by submissions or evidence

[37] D319, paragraph 415

that this would be significant. The aerodrome's operation is currently constrained by a number of factors and it is not clear the Project would significantly worsen the current situation.

That said, the IAC acknowledges the Project might negatively impact on the usage of the aerodrome by trainee and less experienced pilots concerned about increased hazard and risk. This could impact its commercial viability. The views about this varied in submissions and evidence, with some suggesting there would not be any impacts and others that there could be significant impacts. The IAC would be surprised if the presence of transmission towers did not have some level of negative impact on the aerodrome's usage, but it is not able to quantify this.

During the Hearing the Proponent and Melton Air Services advised the IAC it should have regard to the existing, unapproved runways (RWY14/32 and the extension to RWY04/22) and the additional runway works included in the current permit application. The IAC notes the existing RWY14/32 and extension to RWY04/22 were considered in submissions and evidence, however the additional works sought in the permit application were only revealed during the Hearing and were not subject to any detailed consideration in submissions or evidence. For these reasons, the IAC has considered the impacts of the Project on the existing, unapproved works, but not the further works sought in the permit application. The IAC has not formed any views about the merits of the permit application.

In considering RWY14/32 and the extension to RWY04/22, the IAC has had regard to the various guidance documents referred to in submissions and evidence, including CAAP 92-1(1) and ENR 110.14.3.1.

The IAC notes that CAAP 92-1(1) has been withdrawn but is satisfied it provides useful guidance in the absence of a replacement document. The IAC acknowledges the Project would marginally infringe the five percent take-off and landing slope for RWY14/32 recommended in CAAP 92-1(1) but notes the Proponent's view that compliance could be achieved by a minor reduction in the length of the runway.

The Project would significantly infringe the 3.33 percent slope recommended in ENR 110.14.3.1 relating to ab-initio training. This could potentially impact the use of this runway for pilot training, however the IAC notes that runways that comply with ENR 110.14.3.1 are available and have been used for pilot training for many years. The IAC is satisfied the Project would not have any significant impacts on the operation of RWY04/22.

The IAC agrees the Project could potentially impact on the viability of the aerodrome because of constraints on future expansion and decreased training usage resulting from increased hazard and risk. Although it is not possible for the IAC to quantify these impacts, they would be inconsistent with planning policy to safeguard the ongoing, safe and efficient operation of airports and airfields and protect them from incompatible land use and development.

The EMF does not include any EPRs to mitigate possible financial impacts Melton Air Services might experience. While EPR EC3 provides for a Business Mitigation and Support Strategy for businesses within two kilometres of the Project, it only applies to existing businesses that "*rely on the existing character of the natural landscape to attract customers*". This EPR should be broadened to apply to businesses that operate

out of the Melton Aerodrome and to address impacts on business operation as well as amenity.

In relation to EPR AV2, the IAC notes that additional towers were nominated for marking as a further mitigation measure and supports this. It reads the reference to the Australian Standard as relating to how the towers and catenary would be marked, not which towers would be marked. The EPR then lists the towers that are to be marked, consistent with the EES recommendation. It notes that the EPR heading refers to Melton Aerodrome and does not provide for marking to be provided elsewhere. The IAC does not believe that any changes to the EPR are necessary.

(vi) Findings and recommendation

The IAC finds:

- The Project has the potential to negatively impact on Melton Aerodrome and would therefore be inconsistent with State planning policy at clause 18.02-7S (Airports and airfields) of the Melton Planning Scheme.
- Potential impacts on the aerodrome include constraints on its future development and expansion and reduced usage and commercial viability.

The IAC recommends:

Environmental Management Framework

Include the following change/s

- Amend EPR EC3 so that it applies to businesses that operate out of the Melton Aerodrome.

11.4 Overall conclusions on aviation effects

The IAC considers Melton Aerodrome would likely experience negative impacts from the Project that would not be consistent with State planning policy relating to the protection of airports and airfields. The implications of this need to be considered in the broader policy context including renewable energy policy as part of an integrated assessment.

Apart from the impacts on Melton Aerodrome, the IAC is satisfied the Project is consistent with relevant policy and legislation and the draft evaluation objectives relating to impacts on aviation. The likely aviation effects are not significant and the IAC is satisfied any effects are acceptable.

12 Transport

12.1 Introduction

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects for community amenity, health and safety, with regard to … transport network …

Transport effects are assessed in:

- EES Chapter 20 Transport
- EES Technical Report P Transport Impact Assessment (TIA).

The exhibited EMF includes the following EPRs:

- T1 Develop and implement Traffic Management Plans (TMPs)
- T2 Undertake dilapidation surveys, road condition monitoring and rectification/restoration.

Table 17 lists the experts providing evidence on transport.

Table 17 Evidence on transport

Party	Expert	Firm	Expertise	Document number
Proponent	Christina Emmitt	Jacobs Group	Traffic and transport	D120, 121, 287 and 288

The IAC has had regard to relevant policy and guidelines, including:

- *Road Management Act 2004*
- *Transport Integration Act 2010*
- *Road Safety Act 1986*
- Austroads Guide to Traffic Management.

12.2 Transport impacts

(i) Key issues

The key issues are whether:

- the Transport Impacts Assessment is adequate for the purposes of the EES
- Traffic Management Plans should have been prepared and exhibited with the EES
- the EPRs provide an appropriate framework for managing transport impacts
- transport impacts have been appropriately avoided and minimised, and are acceptable.

(ii) What did the EES say?

The TIA provides an assessment of potential transport impacts based on Project related trips on local, regional and state managed roads. It included an existing condition review that informed the designation of a proposed construction route.

The TIA noted that most of the traffic generated by the Project would relate to the construction phase and involve the transportation of material, equipment and labour.

Operational traffic would consist of maintenance staff travelling to terminal stations and towers and be significantly less than construction traffic.

The key findings of the TIA in relation to construction traffic impacts included:

- The majority of roads would only experience minor traffic performance impacts, noting that:
  - the Western Freeway between Ballan-Daylesford Road and Midland Highway would experience a reduced Level of Service, but still above the minimum acceptable rating
  - the Melton Highway between Plumpton Road and Leakes Road already has poor traffic performance, although the additional Project traffic (1 percent increase in peak hour traffic volumes) would not have a significant impact.
- Heavy vehicle construction traffic would impact unsealed or narrow seal local roads. Local roads proposed to be used by construction traffic require further investigation and upgrading, including the preparation of dilapidation reports.
- Impacts on other road users would potentially increase in some locations, but are likely to be minor because the additional traffic volumes are minimal, existing traffic volumes are low and expected interactions between Project traffic and other road users would not be frequent.
- Conflict points would be managed through TMPs and road safety audits, including time restrictions on heavy vehicles associated with two high risk locations (Albert Street Darley and Fussell Street Ballarat).
- Further load limit investigations would be undertaken as part of dilapidation surveys where necessary, to provide input to TMPs.
- Further approvals would be required from DTP and the National Heavy Vehicle Regulator.

The TIA recommended two EPRs (T1 and T2) and concluded that residual impacts would include minor impacts to:

- traffic delays on the road and freight network due to increased light and heavy vehicle traffic
- road condition, such as damage and degradation to local roads, bridges and culverts, due to increased heavy vehicle construction traffic and Oversize and/or Overmass vehicle movements
- public transport performance and safety and school bus route safety on the proposed construction transport route
- school safety as there may still be a presence of vulnerable users outside of the time restriction mitigation measure
- active transport safety as there may still be a presence of users despite an absence of formal active transport infrastructure
- road safety as there are histories of severe crashes and locations of concern
- the condition of bridges and culverts due to unspecified load limits.

The potential impacts of operational traffic would be negligible compared to the construction stage because of the lower number of trips that would be generated.

The level of decommissioning traffic would be similar to construction traffic levels, although background traffic levels would be expected to increase over the 80-year

Project life. Relative impacts are therefore likely to be less and would be assessed at the time of decommissioning.

Cumulative impacts were assessed as minor.

Overall, the TIA concluded traffic impacts can be effectively managed and residual impacts would be minor or less.

(iii) Evidence and submissions

Submitters

Submitters raised issues related to:

- the adequacy of the TIA and the EMF
- the capacity of the road network and specific infrastructure to support construction traffic
- potential damage to roads and bridges, including Kerrins Bridge
- safety and amenity impacts
- property access.

Some submitters argued the TIA was outdated and inaccurate and needed to be redone and that the TMPs should have been prepared as part of the TIA and exhibited with the EES.

Councils

Northern Grampians Council (S145) raised concerns about the impacts of construction traffic, including road deterioration and safety, dust contamination of drinking water and traffic and contractor behaviour. It submitted the EES was deficient because it did not include baseline condition surveys, take account of seasonal variations in traffic patterns associated with agricultural activity or identify required infrastructure upgrades. It sought recommendations that the Proponent prepare pavement management, structure management, road safety and traffic management plans to the satisfaction of Council.

Northern Grampians Council submitted the Proponent should provide a bank guarantee as security to cover remediation works identified post construction and funding for the cost of engineering services for inspections, reporting, liaison and consultation.

Northern Grampians Council provided a further written submission (D641) in which it supported the changes to the EMF sought by the other Councils and provided further detail about the recommendations it sought.

Pyrenees Council (S217) submitted that construction traffic, particularly heavy and oversized vehicles, would be significant and would impact on congestion, road safety, deterioration of infrastructure and access to farms, tourism sites and essential services. It submitted that infrastructure should be maintained to Council standards, upgrades and maintenance costs should be borne by the Project and there should be proactive engagement with Council.

Ballarat Council (S254) generally supported the TIA and relevant EPRs but submitted:

- the proposed use of Fussell Street as a heavy vehicle route raised safety issues because a school is located on Fussell Street and an alternative route should be considered
- the requirements of EPR TP2 should apply to all Project vehicles, and not be limited to 'heavy vehicles'
- EPR T2(1) should reflect that a documented agreement is needed with Councils for dilapidation surveys and associated works to road assets
- EPR T2 should require an assessment of the reduced life of road assets caused by the Project and a mechanism for the Project to fund associated road repairs.

Moorabool Council (S307) raised issues about road transport impacts and the adequacy of the EES and TIA, including:

- the underestimation of traffic volumes, risks and impacts
- potential impacts on specific roads and in specific areas
- the preparation of TMPs after Project approval
- a lack of specificity in the transport related EPRs
- a lack of consultation with Council.

Hepburn Council (S448) and Melton Council (S260) did not make specific submissions about transport impacts but supported the consolidated set of changes to the Incorporated Document (D595) and EMF (596) sought by other Councils. Further transport related changes to the EMF were sought by Ballarat Council in D643.

Proponent

The Proponent relied on the evidence of Ms Emmitt who prepared the TIA. Ms Emmitt outlined the process for preparing the TIA and responded to issues raised in submissions. She noted the program change advice would not materially change the TIA or require any EPR revisions or additions.

Ms Emmitt was satisfied the baseline traffic volumes and network data used to inform the TIA were appropriate and noted they would be updated prior to construction commencing to provide an up-to-date baseline for developing TMPs and determining any road upgrade requirements.

Ms Emmitt's evidence was that:

- The level of assessment in the TIA was appropriate for this stage of the planning process and was consistent with the Austroads Guide to Traffic Management. The assessment would be supplemented by the further investigations required under EPRs T1 and T2, including the preparation of TMPs.
- The number of vehicles expected to be generated by the Project would not reduce the Level of Service of the road network below acceptable levels, consequently the impact on traffic performance is minor. Localised impacts will be managed through TMPs.
- The preparation of TMPs required under EPR T1 would address many of the concerns raised in relation to road capacity, safety and wildlife movement, including the need to prepare Road Safety Audits and consultation with stakeholders. Amenity impacts, such as dust and potable water contamination would also be addressed through TMPs.

- The preparation of dilapidation surveys required under EPR TP2 will identify any upgrades and rectifications that are required (including bridges and culverts). This would be done prior to construction commencing to record the current road conditions.
- Road condition monitoring required under EPR T2 will be undertaken throughout the construction period to identify damage and any maintenance or rectification that is required.
- Further assessment of infrastructure capacity and necessary upgrades will be conducted following Project approval, including the consideration of updated information that became available since the preparation of the TIA.
- Seasonality impacts, including impacts on agriculture, are not expected to have a significant impact on traffic performance because of the low traffic volumes identified in the data provided. Any impacts would be significantly less during Project operation.
- Plans to address pavement management, structure management and road safety would be addressed through the TMP requirements.
- Post construction assessment is adequately addressed in EPR T2.
- Bank guarantees with road authorities could be addressed as part of TMP content.

Ms Emmitt considered impacts on specific roads and areas (including Kingston Avenue of Honour, Swans Road, Kerrins Bridge and the Learmonth Avenue of Honour) raised in submissions. She noted some roads were approved B Double routes, some would carry very little construction traffic and TMPs would address specific concerns, including the need for upgrade works and the identification of alternative access arrangements where necessary, including the possible avoidance of Kerrins Bridge. She acknowledged the potential safety issues and residual risk with the use of Fussell Street but considered this could be managed through EPR T1 and there was no need to investigate alternatives.

Ms Emmitt's addendum evidence (D288) assessed the additional truck movements required to service the Ballan and Lexton workforce accommodation facilities. She calculated the range of truck movements that would be required for each facility and concluded that the low number of movements and likely movement outside peak times would have little to no impact, and that residual impacts would be minor or less.

Ms Emmitt was comfortable with the Proponent's changes to EPR T2 in relation to the types of construction traffic that would be subject to dilapidation surveys and other investigations.

Agencies

In its original submission DTP on behalf of the Head, Transport for Victoria (S449) sought changes to:

- the Project alignment
- the Incorporated Document
- the EMF.

DTP's hearing submission on behalf of the Head, Transport for Victoria (D406) noted the Proponent's responses to its original submission (D85), Ms Emmitt's evidence and the

Proponent's proposed changes outlined in the Day 1 Incorporated Document and EMF (D208 and D209). It advised its concerns had been addressed in the Day 1 documents.

(iv) Discussion

Adequacy of the Transport Impact Assessment

The IAC is satisfied the TIA is fit for purpose and is consistent with the approach adopted for other major projects. As Ms Emmitt acknowledged, elements of the TIA will likely require review and updating to reflect additional or revised information if the Project is approved. This can be done during the preparation of TMPs and in consultation with stakeholders, including the Councils.

Some submitters believed that the TMPs should have been prepared and exhibited as part of the EES. The IAC agrees with Ms Emmitt that the TIA is adequate to inform the EES and that TMPs provide a level of detail that is unnecessary at this stage of the approval process.

The IAC acknowledges the concerns from Councils about the potential damage to their road infrastructure and their capacity to fund maintenance works. However the IAC is satisfied the EMF framework for managing transport impacts is appropriate and consistent with how the impacts on roads of other major projects are managed.

The IAC accepts the TIA's overarching findings that construction traffic impacts can be suitably mitigated or minimised and that any residual impacts would be minor. Operational impacts would be less given the low volumes of traffic the Project would generate. Decommissioning impacts are likely to be similar to construction impacts, although they would need to be assessed in the context of likely higher background traffic levels at the time.

The TIA assessment of cumulative impacts acknowledged the limitations associated with a lack of detail about some projects, but the IAC is satisfied that any cumulative impacts are likely to be acceptable. There was no evidence presented to the IAC that any possible cumulative impacts would not be capable of effective mitigation.

The IAC accepts Ms Emmitt's evidence that impacts on specific road infrastructure and the capacity and suitability of various roads and bridges would be further reviewed during the preparation of TMPs. The IAC is satisfied with Ms Emmitt's evidence that alternatives routes (such as avoiding Kerrins Bridge) would be available if considered necessary.

Safety issues, including Ballarat Council's concerns about the use of Fussell Street, would be further considered as part of the TMP process and in consultation with Council. If potential safety impacts at this (or any other) specific location were assessed as unacceptable, they could be addressed through the use of alternative routes or managed through heavy vehicle time restrictions.

The specific roads and issues raised by Northern Grampians Council can be addressed through the EPRs and the IAC does not consider the particular roads need to be specified. Many of the conditions and approval requirements sought by Councils can be negotiated and implemented through the EPRs and when more detailed information is available about impacts and mitigations through the EPR processes.

Environmental Performance Requirements

The Proponent proposed changes to EPRs T1 and T2 following its consideration of submissions and Ms Emmitt's evidence. The IAC supports those changes.

The IAC has reviewed the further drafting changes sought by the Councils and other submitters and notes that many of these changes were intended to provide greater specificity in the EPRs about various issues to be addressed and the processes for addressing them.

Ms Emmitt and the Proponent noted that these matters were typically assessed during the preparation of TMPs under EPR T1 and the investigations required under EPR T2 and did not need to be specified. They also noted that issues of concern could be addressed through the proposed consultation and approval processes involving the Councils and other road agencies.

The IAC is satisfied with this approach and agrees that the EPRs provide appropriate flexibility to address submitter concerns, including those outlined by the Councils.

(v) Findings

The IAC finds:

- The Transport Impact Assessment is appropriate for the purposes of the EES.
- It was not necessary to prepare Traffic Management Plans as part of the EES.
- The Traffic Management Plan requirements under EPR T1 and other investigations required under EPR T2 will provide an appropriate framework for addressing detailed issues raised in submissions.
- Transport impacts can be appropriately managed though the EMF and any residual impacts would be minor.

12.3 Overall conclusions on transport effects

The IAC is satisfied the Project is consistent with relevant policy and legislation and the draft evaluation objective relating to transport impacts. The likely transport effects are not significant and the IAC is satisfied any effects are acceptable.

13 Social

13.1 Introduction

(i) Key information

The evaluation objectives are:

> Avoid, or minimise where avoidance is not possible, adverse effects on … social fabric of the community…during construction and operation of the project.
>
> Avoid, or minimise where avoidance is not possible, adverse effects for … health and safety …

Social effects are assessed in:

- EES Chapter 21 Social
- EES Technical Report F Social Impact Assessment (SIA).

The exhibited EMF included the following EPRs:

- SC1 Avoid and minimise potential negative social impacts of the Project construction workforce
- SC2 Develop and implement a Code of Conduct to avoid and minimise potential social impacts of the construction workforce
- SC3 Develop and implement initiatives to maximise employment opportunities for local communities, First Nations people and vulnerable and disadvantaged groups.

The EES also relied on:

- the EPRs designed to mitigate upstream impacts
- general EPRs that include (for example) a Communications and Stakeholder Management Plan (EM5), a Complaints Management System (EM7) and a Residential Mitigation and Support Strategy (EM10).

Table 18 lists the experts providing evidence on social effects.

Table 18 Evidence on social effects

Party	Expert	Firm	Expertise	Document number
Proponent	Glenn Weston	Public Place	Social impacts	D110
Proponent	Dr Jackie Wright	Environmental Risk Sciences Pty Ltd	Health impacts	D108
Moorabool Council	Dr Kate Kerkin	K2 Planning	Social impacts	D164
Moorabool Council	Dr Kate Kerkin	K2 Planning	Social impacts	D187
Melton Council	Robert Panozzo	ASR Research	Recreation infrastructure planning	D170

The Proponent provided the following Technical Notes:

- TN01 – Community Benefits (D127)
- TN07 – Social Procurement (D272)
- TN11 – Operation of EPRs – Directly Affected Landholders (D284).

The IAC has had regard to relevant policy and guidelines, including:

- *Community engagement and benefit sharing in Renewable Energy Development in Victoria*, Clean Energy Council, 2021 (CEC Guidelines)
- draft *Community Engagement and Social Value Guidelines for Renewable Energy and Transmission Projects*, VicGrid, Sep 2025.

(ii) What did the EES say?

Public Place undertook the SIA in Technical Report F. Mr Weston was the key author.

Key aspects of the methodology applied in the SIA included:

- defining a 9.2 kilometre study area, based on the maximum extent of potential visual exposure to the Project assessed in the LVIA
- establishing baseline conditions in the study area using ABS Census data, land use and tenure information, and an inventory of tourism and community facilities
- analysing information from community engagement undertaken by the Proponent, including landholder interviews, community information sessions and survey data (no direct community engagement was undertaken for the purposes of the SIA)
- identifying potential impacts during the construction, operation and decommissioning phases, with a particular focus on workforce dynamics, land use change, amenity, social cohesion and community wellbeing
- assessing potential impacts considering:
  - the magnitude, extent and duration of change
  - the sensitivity of social receptors
- assigning a significance rating to impacts, from 'negligible' to 'severe' (the SIA explains what these ratings mean).

The study area was subdivided into four sections, reflecting distinct social, demographic and land use contexts ranging from sparsely populated agricultural districts in the west (Section 1) to peri-urban and metropolitan-influenced areas in the east (Section 4).

The most significant residual impacts are during the operations phase, and relate to land use and amenity, particularly for directly affected landholders and those within 2 kilometres of the Proposed Route. Impacts are long term and will be experienced over the anticipated 80 year life of the Project.

For directly affected landholders, social impacts are associated with changes to visual amenity, challenges to place attachment and an erosion of valued rural character and identity. Residual social impacts were assessed as:

- moderate in Section 1
- major in Sections 2 and 3
- moderate to major in Section 4 (major in Darley where receptors are particularly sensitive to visual change and bushfire risk).

For surrounding landholders within 2 kilometres of the Project, residual social impacts were assessed as moderate to major, depending on location. While land use would not be directly impacted, long term visual exposure to the Project has the potential to reduce enjoyment of dwellings and valued lifestyles for some residents.

Residual social impacts on the broader community were assessed as minor to moderate during operation, except in the Darley area where impacts are assessed as moderate to major due to the Project's visibility from residential areas, local roads and recreational facilities.

Social impacts will be mitigated by the EPRs relating to:

- workforce management (SC1 and SC2)
- managing upstream impacts
- stakeholder engagement (including EM5 and EM7)
- targeted mitigation and support strategies (including EM10).

The EES concluded that with the implementation of the EPRs, the Project meets the relevant evaluation objectives.

13.2 Social impacts

(i) Key issues

The key issues are:

- whether the methodology of the SIA was appropriate
- whether there should have been direct engagement with the community in preparing the SIA
- impacts on social cohesion
- the relevance of community opposition and social licence
- perceptions of economic injustice
- workforce impacts.

(ii) Evidence and submissions

Many submissions raised significant concerns about the Project negatively impacting the community, the character and amenity of the area and community members' wellbeing and mental health. Submitters felt the communities in the area surrounding the Proposed Route are being asked to bear the burden of a Project for which they will not receive a benefit. Submitters felt the EES fails to capture the true depth of emotion which underpins community opposition to the Project, and fails to acknowledge the profound long term impacts on the community.

Submissions indicated that the loss of scenic values in the surrounding area has broader social consequences, including mental distress, reduced enjoyment of home and community spaces, and diminished pride in place. There is elevated stress and anxiety in the community about the perceived increased fire risk presented by the Project.

The Councils highlighted the strong levels of opposition to the Project within their communities, and the absence of a social licence. They were concerned that the Project has already had a significant detrimental social impact, and that the concerns of the

community expressed through the consultation process to date have been dismissed, with the Proponent having been reluctant to meaningfully engage with and evaluate alternatives including undergrounding.

Mr Weston considered the Project's residual social impacts primarily arise from its land use impacts and visual impacts, although he recognised that other impacts also contribute, including tourism and bushfire impacts. Notwithstanding efforts to route the Project to avoid sensitive land uses, and the EPRs, the Project has negative residual social impacts which range in severity from 'minor' to 'major'.

Key impacts include:

- a sense that the Project undermines an aspirational lifestyle
- for directly affected landowners, a disruption to intergenerational connections to land and property
- challenges to a shared sense of identity among local communities built on an appreciation of the area's scenic qualities and peaceful rural lifestyle.

He considered that over time, the populations of the affected areas would adapt, grow and change, and a new equilibrium would evolve. Nevertheless, if the Project proceeds some may never be comfortable with the Project, and some will experience an "*enduring sense of loss and powerlessness*".

The Proponent submitted that Victoria needs to urgently upgrade its transmission capacity, and the Project provides a social benefit in progressing the transition to renewable energy and making meaningful progress to address climate change. It submitted that "*every reasonable effort*" has been taken to mitigate the social impacts of the Project, including through Project design and route selection, community benefit sharing and providing mental health support services to local communities. It submitted:

> Overall, and when considered in the context of the considerable benefits delivered by the WRL Project, social impacts should be considered to be acceptable.

Methodology

Dr Kerkin was highly critical of the approach in the SIA to assessing social impacts. Her key concerns were:

- a lack of consideration of factors that she considered would normally be taken into account, including social values and connections, community cohesion, workforce development and other matters
- over-reliance on other Technical Reports
- limited stakeholder engagement and site visits.

To demonstrate the implications of over-reliance on other Technical Reports, Dr Kerkin noted the SIA identified moderate to major negative social impacts arising from the Project's visual impacts. These included:

- degraded residential amenity
- diminished enjoyment of homes and lifestyles
- reduced usage and visitation at valued community facilities such as Bald Hill Activation Area, Merrimu Reservoir and Coimadai Memorial Park
- a reduced appeal of equine and lifestyle properties in Moorabool Shire.

Dr Kerkin considered that because the SIA did not independently assess sense of place or the psychological effects of changes to place, it "*systematically understates*" social harm. If visual impacts were found to be greater or more widespread than as assessed in Technical Report D (the LVIA), social impacts would escalate significantly, particularly in Darley and surrounding areas where she considered place attachment is strong.

Dr Kerkin considered a revised social impact assessment should be prepared, reflecting a more comprehensive approach that addressed what she considered were gaps in the SIA including (among others):

- a group based qualitative research method that "*gives participants freedom to shape discussion on a given topic with minimal intervention from researchers*"
- a narrative analysis of the conflict evident between those opposed and those who support the Project
- detailed case study interviews with directly affected landholders and adjacent landowners
- an exploration of the specific impact of the Project on the residents of Darley, including community group consultations, a narrative analysis of local media and focus group interviews with residents and land holders.

She considered the revised assessment should:

- Respond to the now widely recognised social conflicts within communities affected by renewable energy projects including conflict between landowners who agree to have transmission towers located on their land and other land owners.
- Provide evidence of the minimum expectations for creating social value as set out in the State Government of Victoria Draft *Community Engagement and Social Value Guidelines for Renewable Energy and Transmission Projects* 2025.

Direct community engagement

As noted above, no direct community engagement was undertaken for the SIA. Instead, the authors relied on the Technical Reports assessing the upstream impacts (some of which included direct consultation), and the Proponent's consultation on project development.

Dr Kerkin considered that direct, meaningful engagement with affected communities is fundamental to an assessment of social impacts. She considered social impacts are lived and contextual, and cannot be inferred from desktop analysis. Impacts such as place attachment, fear, resentment and community division are experienced and cannot be understood through a secondary analysis of information in Technical Reports. Nor are they a matter of professional judgement.

Dr Kerkin considered direct engagement is necessary to understand:

- how communities value landscapes, views, recreation areas and rural character
- the social meaning attached to land, homes and intergenerational farming properties
- how perceived loss or threat translates into wellbeing, mental health and social cohesion impacts
- how these impacts can be properly mitigated.

Katherine Myers addressed the importance of place identity to farmers in her submissions on behalf of the VFF and KDPA, and in her oral personal submissions. For

farmers and farming communities, land is an intergenerational asset and strong source of identity. Their land, and the surrounding landscape, is inseparable from family history and professional identity. Farmers have a strong sense of responsibility for and stewardship over their land. Land does not just represent their livelihood and financial security – it represents their legacy. The personal dignity of many farmers is tied to their stewardship of their land, leaving it in a better state than they found it, and the deep attachment to their land and enjoyment of place. The Project would not just disrupt their use of land and its value and visual aspect – it would disrupt the personal identity and autonomy of the farmers who are custodians of the land.

Questions were put to Mr Weston in cross examination about the need for direct engagement with the community in undertaking a SIA. He appreciated community views were important, however the primary consideration is gathering the necessary information to make an informed assessment of impacts. He did not consider primary research on community views was fundamentally necessary to understand social impacts, which are a downstream impact from the Project's primary impacts (visual, bushfire and so on).

The Proponent submitted:

> The IAC can be well satisfied that Mr Weston had or was aware of all the information that he needed to make an informed assessment of likely impact. Goals relating to inclusivity and people's participation in the WRL Project are important, but they are typically to be achieved through the Proponent's community engagement process.

Social cohesion

Submissions suggested that the Project had triggered a deterioration in community cohesion, generating division, tension and strain within communities as residents responded differently to the Project and the Proponent's consultation process. Submitters gave examples of the deterioration of relationships between neighbours, between communities and the Proponent, and in some cases within families.

Submission 242, from a group of doctors in Creswick and Clunes, indicated they have seen:

- the breakdown of long-standing friendships between neighbours, some spanning multiple generations
- a rise in community tension, with many residents withdrawing from sporting and social activities they have previously loved
- significant anxiety and fear about property values, fairness and hidden decision-making processes
- feelings of hopelessness and disempowerment.

Dr Wright reviewed the submissions received in response to the exhibition of the EES. She acknowledged that they reveal real and documented community division, including the impacts identified by the group of doctors. She recognised these effects are already occurring, but did not consider they would necessarily be permanent for the community as a whole. With appropriate management, she considered that at a community level, the long term risk to social cohesion would be low.

The IAC asked Mr Weston whether the SIA had considered impacts on social cohesion in the broader community. He explained that the SIA took the approach of

focussing on the impacts on directly impacted landholders and near neighbours, as they would have a more intense experience of the Project. These impacts will be different to those felt by the broader community. Mr Weston accepted that conflict could manifest in the community (for example at the local footy club) where people may be very upset about their personal circumstances. However he expects issues relating to social cohesion would reduce over time, perhaps years.

Community opposition and social licence

Many community submissions highlighted the strong level of community opposition to the Project, submitting that it has no social licence. Moorabool Council submitted that according to the SIA, 76 percent of directly affected landholders in Sections 2 and 3 oppose the Project, and 43 percent in Section 4. Dr Kerkin considered that the lack of any attempt to understand and respond to community opposition to the Project and how this impacts on community wellbeing was a major gap in the SIA.

Economic injustice

As discussed in Chapter 9, many submitters were concerned about the Project's impacts on their property values and insurance costs. They were also concerned about the impacts on local businesses and agricultural operations discussed in Chapters 9 and 10, and the impacts this would have on the prosperity of the local communities.

Submitters highlighted the unfairness and inequity of local communities having to bear the economic burden of the Project when the benefits of the Project will be enjoyed by others (mainly those living in cities). Many residents described their homes and land as representing lifelong investment and security, and devaluation of their properties would have significant impacts on their financial security and the sustainability of their farming operations. They submitted compensation (which is only available to those who are directly impacted) does not address intergenerational loss or the cumulative economic burden placed on local communities.

MacPherson Park

Mr Panozzo's evidence considered the impacts and opportunities of the Project on formal and informal recreation infrastructure in the City of Melton, with a particular focus on MacPherson Park. His evidence was:

- MacPherson Park is Melton's most significant and only regional active open space and will remain critical to meeting future sporting demand generated by Melton's rapidly growing population
- the Project will directly affect the northern section of MacPherson Park, including existing and planned sporting facilities, the equestrian centre, and key access areas
- overhead transmission lines would significantly compromise the Park's functionality, visual quality, user safety, and long-term ability to attract elite sporting clubs or sponsors
- there is a strong planning and community justification to underground the Project along MacPherson Park's northern boundary, and incorporate the undergrounded alignment into a future master plan for a high quality east to

west recreation and cultural trail integrated with existing and planned pathways for the area
- this could be done as part of the Project's community benefit sharing framework.

Melton Council cross examined Mr Weston on the impacts on MacPherson Park, specifically visual impact. Mr Weston considered the social value of the Park is primarily a function of how many people visit and the activities they undertake there. While some users may find the towers ugly or imposing, the main reason they are there is to observe or engage in sporting activities, not to take in views. He did not consider the Project would have a material impact on the social value of the Park.

(iii) Discussion

Methodology

The IAC considers the methodology of the SIA was broadly appropriate for assessing the social impact of a project as part of an environmental impact assessment under the EE Act. The type of social impact assessment recommended by Dr Kerkin goes considerably beyond an assessment of the social impacts of the Project. She recommended an assessment that explores broader philosophical and societal issues, including the aspirations of local communities and councils and the divisions between parts of the community that support renewables and those that do not. That is not the purpose of a social impact assessment undertaken as part of an EES.

The IAC agrees that the Project's social impacts are largely (although not exclusively) a product of its physical and other impacts, such as visual impact, impact on land use and the perceived increased threat of bushfire. It was therefore appropriate for the SIA to have relied on the findings of other Technical Reports. This is standard practice for a SIA undertaken for an EES, and is sufficient to enable an understanding of the Project's social impacts.

The IAC has found that in some cases, the Project's upstream impacts are more significant than as assessed in the Technical Reports. This includes the visual impacts in Darley and bushfire impacts in the Darley, Long Forest and Coimadai area. As a result, the social impacts flowing from those impacts are also likely to be more significant. For example, the IAC considers the extent of 'major' social impact is likely to be more widespread in Darley than the SIA concluded.

That said, the IAC does not consider the rating of impacts should be lifted to 'severe'. The SIA describes 'severe' social impact as an impact that is "*intolerable*". It includes impacts to essential resources where receptors have little or no capacity to cope. While the Project's social impacts could be described as severe for some individuals, the IAC does not consider that the impacts can be described in this way at a community level in any of the areas along the Proposed Route, including Darley.

Direct community engagement

The IAC accepts Dr Kerkin's position that social impacts are contextual, and will be lived by those who will experience the burden of the Project's impacts. Social impacts are heavily tied to emotional reactions and states, including fear, anxiety, frustration and a sense of powerlessness. Place identity is a deeply felt personal and emotional state, and

impacts on place identity cannot be fully captured or understood by an analytical analysis.

The SIA has not been able to independently identify or assess values that are important to individuals, including place identity. The SIA has not been able to fully capture the types of impacts on individuals referred to by Ms Myers or Dr Kerkin, including personal impacts on mental health and wellbeing that were described to the IAC by many submitters (these are explored in more detail in Chapter 13.3).

That said, the Technical Reports considering upstream impacts were not purely data based. They included both quantitative and qualitative analysis. The qualitative analysis was based on the values present in the study areas that were identified and informed by community feedback, including feedback gained through the Proponent's consultation on project development. Some Technical Reports (including the LVIA) were informed by further direct community engagement by the authors.

An EES is designed to assess the impacts of a project on the environment and the community as a whole. It is not the purpose of an EES assessment (or a SIA conducted as part of an EES) to provide a granular understanding of the Project's likely impacts on individuals. For a project of this scale, that would be an impossible task. Nor is it necessary in order to gain an understanding of the Project's significant environmental effects.

That is not to say that impacts on individuals are not important. If individual impacts are sufficiently widespread, they cumulatively become community impacts.

On balance, the IAC is satisfied that it was not necessary for the authors of the SIA to have engaged directly with the community in the way that Dr Kerkin suggests. That level of engagement may be appropriate for a different type of SIA, but it is not necessary for a SIA that seeks to understand and analyse the social impacts of a project on the impacted community as a whole.

Further, some of Dr Kerkin's suggestions were not practical. For example, she suggested consultation methods that "*give participants freedom to shape discussion on a given topic with minimal intervention from researchers*", and inquiries into the social meaning attached to land, homes and intergenerational farming properties. These types of inquiries would be unlikely to add to a focussed understanding of the Project's social impacts on the community as a whole.

Social cohesion

The IAC accepts that to date, the prospect of the Project, the Proponent's consultation on Project development and discussions about compensation have created divisions within the communities impacted by the Project. It was evident from the accounts of various submitters in the Hearing (many of whom were highly distressed) that there has been a significant erosion of social cohesion in some areas, with bitter divisions between those who are seen to be supporting the Project (or not fighting it hard enough), and those who oppose the Project.

Some of the behaviours described by submitters that have contributed to this erosion in social cohesion are concerning. The IAC heard accounts of:

- bullying and aggressive behaviour from landowners toward Proponent staff and from Proponent staff or contractors toward landowners
- some community members being aggressive toward others, blaming them for Project alignments that they had no control over and had not agreed to.

Community divisions are not universal across the whole of the study area in the SIA. The worst erosion of social cohesion appears to be generally centred in Sections 2 and 3 of the study area. It was also evident to the IAC that there have been positive social outcomes, with communities coming together and supporting each other in seeking to understand the Project and its impacts, and to participate effectively in the IAC process.

It is likely that some of the social divisions within the community over the Project have been instigated by an active minority, whose views might not reflect those of the broader community. Despite this, the impacts being felt within the community appear to be significant and widespread, and will be difficult to heal regardless of whether (and in what form) the Project proceeds. That said, there are ways in which the breakdown of social cohesion can be managed and mitigated. These are discussed in more detail in Chapter 13.3 in the context of community wellbeing.

Community opposition and social licence

The level of community opposition to a project can be an indicator that there may be deeper social impacts. However it is only the starting point for an inquiry into a project's social impacts. It is certainly not the end point.

Community opposition to the Project, while strong, is not universal. Ninety one of the 230 directly affected landholders have signed Options for Easements, representing 42 percent of the Proposed Route.

The CEC Guidelines describe social licence as:

> … a "level of acceptance or approval continually granted to an organisation's operations or project by the local community". The concept has been in common use for at least 20 years, and a lack of, or one that diminishes over time, can have significant impacts on key milestones in a project's development, such as permit approvals.

Community opposition is not, in itself, a social impact. Nor is it reasonable for the community to expect that if enough people oppose a project, it will not proceed. A social licence is not a legal requirement for a project to be approved, although establishing a social licence can make the path toward project approvals and delivery easier as is recognised by the CEC Guidelines.

Economic injustice

The economic impacts of the Project are discussed in Chapter 9. These include potential reductions in residential property values.

Reductions in the value of directly affected properties will be compensated under the LAC Act or Option for Easement processes. However the value of some indirectly affected properties is also likely to be impacted, particularly those within 2 kilometres of the Project who will experience high or very high residual visual impacts. This includes many properties in Darley.

No formal compensation is available for near neighbours. This has already generated social impacts, including reduced financial security and increased stress and anxiety.

The main tool for offsetting impacts of a reduction in property values for indirectly affected residential properties is the Proponent's Near Neighbour Benefit Program, which proposes one-off payments to the owners of dwellings within one kilometre of the Project. Payments of this nature are generally consistent with the concept of neighbour benefits described in the CEC Guide:

> Neighbour benefits are usually offered according to proximity to the renewable energy infrastructure. They can include a blanket offer to anyone within a certain radius, or graduated benefits that decrease with the distance from project infrastructure. In the latter model, benefit sharing is based on concentric circles around project infrastructure.

For the reasons set out in Chapter 9.4, it is not possible to quantify the likely reductions in indirectly affected residential property values. It is therefore difficult to assess the significance and acceptability of both the economic impacts and the ongoing consequential social impacts. While the Near Neighbour Benefit Program is a positive step toward addressing the Project's social and economic impacts resulting from a reduction in property value, it is unlikely to fully offset those impacts for all near neighbours. This needs to be considered within the broader assessment of net community benefit.

It is also likely that economic impacts will be felt by local businesses. Those directly affected will be compensated under the LAC Act and Options for Easement processes, but indirectly impacted businesses are not entitled to compensation. While the Business Mitigation and Support Strategy required under EPR EC3 will mitigate impacts on indirectly affected businesses within 2 kilometres of the Project, it is unlikely that economic impacts on all businesses will be fully mitigated, as discussed in Chapter 9. This also needs to be considered within the broader assessment of net community benefit.

MacPherson Park

The main impacts identified in Mr Panozzo's evidence and the submissions of Melton Council as to why the Project would have unacceptable social impacts on the Park are its visual impacts. The IAC concluded in Chapter 6.5 that the visual impacts on MacPherson Park will be acceptable.

The IAC is not persuaded the consequential social impact arising from the Project's visual impact on the Park would be unacceptable. The IAC agrees with Mr Weston that the primary social value of MacPherson Park is as a sports and recreation facility, and this primary function is not overly impacted by views of transmission infrastructure. There are multiple examples of sporting and recreational facilities underneath or in close proximity to transmission lines, and no evidence was presented to the IAC to suggest that the useability of these facilities is materially impacted by views of transmission infrastructure.

Apart from some minor impacts to the equestrian park, the Project will not impact the functionality of MacPherson Park. Sporting activities will be able to continue unimpeded. The IAC was not persuaded on the basis of Mr Panozzos' evidence that the Project would

prevent the Park attracting and hosting high-level sporting competition, clubs or sponsors.

The IAC does not consider the Project will have unacceptable social impacts on MacPherson Park.

(iv) Findings

The IAC finds:

- The methodology of the SIA was broadly appropriate for the purposes of understanding the social impacts of the Project as part of an EES assessment.
- The reliance of the SIA on other Technical Reports was appropriate, but it means that where the IAC has found impacts are likely to be higher than assessed in the other Technical Reports, the consequential social impacts will also increase.
- The prospect of the Project, and the consultation to date, have had significant impacts on social cohesion, but there are ways in which social cohesion can be managed and mitigated going forward.
- Community opposition can be an indicator that there may be deeper social impacts, but it is not, in itself, a social impact of the Project.
- The Project will have economic impacts for indirectly affected individuals or businesses within 2 kilometres of the Project that are unlikely to be fully mitigated by the EPRs or offset by payments under the Near Neighbour Benefit Program. These economic impacts will have a consequential social impact. These impacts are difficult to quantify in terms of significance or acceptability.
- The social impacts on MacPherson Park are acceptable.

13.3 Wellbeing impacts

(i) Key issue

The key issue is:

- whether impacts on wellbeing have been accurately assessed and are acceptable.

(ii) Evidence and submissions

A strong theme in submissions was the psychological toll of the Project on individuals, families and communities. Submitters described prolonged stress, anxiety, sleep disruption and emotional exhaustion associated with uncertainty, loss of control and the anticipation of irreversible change. In some cases, this had led to health crises and hospitalisations.

Many characterised the Project as transforming their homes from places of refuge into sources of distress. They submitted the enduring nature of the infrastructure and the lack of choice for the community will lead to long term and irreparable wellbeing impacts.

Many people submitted that these effects were compounded by what they described as the 'high stakes' involved, the combative nature of the conflict (between the Proponent and the community and within communities), and what they perceived as manipulation and deceit from the Proponent.

Submitters considered that while the SIA acknowledged some of these effects, it understated and minimised them through generic mitigations that they considered would be ineffective. They regarded counselling services or the provision of information as inadequate responses to what they described as structural, long-term harm.

Dr Wright's evidence was that the Project's psychological impacts arise primarily from prolonged stressors, rather than from any single physical risk or hazard presented by the Project. She considered prolonged stressors are far more damaging than short term disruption.

Dr Wright agreed with many of the stressors identified in community submissions, including:

- the prolonged uncertainty and duration of the planning process (ongoing since early 2020) which had created chronic stress, anxiety, and engagement fatigue
- the perceived lack of procedural justice and trust arising from people feeling unheard, powerless, and imposed upon
- the loss of valued rural and natural landscapes, which she considered is strongly linked to wellbeing, identity, and sense of place
- specific fear-based stressors , including bushfire risk, EMF/EMI, noise (including the corona hum that can be produced by transmission lines), aircraft safety, and property access. She considered these issues all create anxiety even where the Technical Reports assess the physical risks as low.

Dr Wright emphasised that stressors such as these compound, and have a cumulative effect on the wellbeing of individuals and the community more broadly. Chronic stress and anxiety can undermine wellbeing even in otherwise resilient communities, especially where people feel they lack control. This is a driver of psychological harm.

Dr Wright considered that based on data from a variety of sources including VicHealth, the impacted communities generally showed good or above average wellbeing scores and high resilience scores relative to the Victorian average. She considered that as a result, most of the impacted communities have a strong underlying capacity to cope with change, which reduces the likelihood of widespread or severe long term psychological harm. However, resilience is not uniform, and does not protect everyone, particularly individuals exposed to sustained or multiple stressors.

Dr Wright emphasised the link between trust and wellbeing. Trust impacts how people perceive risk (even low risk hazards), and whether people are likely to believe reassurances. She considered submissions demonstrated a significant breakdown of trust, which had contributed to the degradation in social cohesion. She considered that without trust, even technically sound mitigations and impact management will be less effective.

Dr Wright emphasised the need for consistent, independent, confidential mental health support over time, including during construction and for two years post-construction. Staff engaging directly with the community should be trained to recognise and respond appropriately to psychological stress.

Dr Wright concluded that harm will be significant for some at an individual level. However, given the relatively high resilience levels within the affected communities and

provided appropriate mitigations are properly implemented, the community level risk to wellbeing is generally low.

Dr Kerkin provided a response to Dr Wright's evidence in her supplementary statement (D187). She considered that Dr Wright's assessment was subject to the same methodological flaws as the SIA, primarily an over-reliance on the EES and other Technical Reports. In addition she considered Dr Wright:

- should have further interrogated her own baseline data on trust, safety, social connection and community division, which (for Moorabool) are below Victorian averages
- incorrectly assumed agriculture is the dominant land use in Section 4 (which includes the Moorabool Shire), and accordingly her analysis over-emphasised stress on farmers at the expense of other groups for whom impacts are directly related to loss of amenity, loss of aspirational lifestyles, fear and so on
- should have applied a larger study area, as she (Dr Kerkin) considered large populations in Ballan and Bacchus Marsh will be socially affected even if they cannot see the Project.

Some of the Councils put questions to Dr Wright during cross examination about whether partial undergrounding would result in better wellbeing outcomes. She said it was not possible to determine whether this would be beneficial overall, because some areas would be underground and others would not. She considered that potentially the areas with partial undergrounding might require less resources to help that community adapt to the Project, and resources could be directed to areas where it is above ground.

(iii) Discussion

Dr Wright's evidence was thorough, well considered and applied an appropriate methodology. Her assessment used a systematic approach, and included both a quantitative and qualitative assessment. It:

- characterised the baseline wellbeing and resilience of the community
- identified how the Project may impact on wellbeing through a wide range of stressors that she sourced from a comprehensive review of community submissions
- assessed whether the resources available to the community are adequate to provide tools for the community to manage those stressors
- recommended additional management measures to ensure the community has sufficient resources to manage the impacts identified.

The IAC does not agree with Dr Kerkin's criticisms of Dr Wright's methodology. Dr Wright's assessment of wellbeing and resilience levels across the study area was comprehensive, and based on objective and reliable data. While the baseline data on levels of trust, safety, social connection and community division may have been below Victorian averages in some areas, this does not necessarily result in lower community wellbeing and resilience scores in those areas.

The IAC does not consider that Dr Wright's assessment was inappropriately biased toward wellbeing impacts on farmers. She provided a comprehensive and balanced assessment of impacts on a wide range of groups within the community, as well as on

individuals. Her assessment specifically recognised the Project's impacts on wellbeing of those who will experience a loss of amenity, a loss of highly valued vistas and disruptions to a sense of place. She considered, in some detail, the impacts of fear, anxiety and stress on the wellbeing of a wide range of individuals and groups within the community.

While the IAC does not rule out the possibility that indirect social or wellbeing impacts may be felt within the wider community, including those in Ballan and Bacchus Marsh, it considers that it was appropriate for Dr Wright to have focussed her assessment on those within the 9.2 kilometre study area identified in the SIA. Social impacts will be much more likely in areas where the Project can be seen.

The IAC accepts Dr Wright's finding that overall, the affected communities generally have a good level of community wellbeing and resilience. This is not universal, and as Dr Wright fairly recognised, some individuals in the community will have significantly lower levels of wellbeing and resilience, and will find it much harder to adapt to the change if the Project proceeds.

The IAC agrees with Dr Wright that while partial undergrounding might assist in managing the Project's wellbeing impacts in the communities where the Project was undergrounded, it would not be effective in mitigating impacts in other areas. In fact, it could exacerbate community division, as some may have difficulty in understanding or accepting why the Project is being undergrounded in some locations but not in their community. This might compound the wellbeing impacts for those communities.

Many of the mitigations to manage wellbeing impacts will be less effective unless trust can be rebuilt between the Proponent and the community. This is discussed in Chapter 13.5.

(iv) Findings

The IAC finds:

- The methodology of Dr Wright's assessment of the wellbeing impacts of the Project was appropriate.
- Dr Wright's conclusion that the risk to wellbeing at a community level is low is heavily dependent on the effectiveness of the proposed mitigations, which in turn depend on a rebuilding of trust.

13.4 Workforce impacts

(i) Key issues

The key issues are:

- whether social impacts arising from the presence of the Project's workforce in small rural communities have been accurately assessed and are acceptable
- whether the proposed mitigations (primarily separate temporary workforce accommodation facilities) are appropriate.

(ii) What did the EES say?

The SIA identified that during the construction phase, the workforce (anticipated to be around 700 workers) could place significant pressure on access to housing and services, and be a significant presence in the small towns in the study area that could impact social cohesion. These impacts will be largely avoided with the provision of two purpose-built temporary workforce accommodation facilities near Lexton and Ballan. With this mitigation, workforce-related social impacts were assessed as minor to negligible.

(iii) Evidence and submissions

Mr Weston considered the influx of the Project's workforce has the potential to put pressure on accessibility and affordability of housing and community facilities in the small rural communities in the study area. He considered that if left unmitigated, this impact would have a 'major' to 'severe' rating. Consistent with the assessment in the SIA, Mr Weston considered that the temporary workforce accommodation facilities would mitigate the impact to 'negligible'.

Mr Weston recognised that separating workers in the temporary workforce accommodation facilities would have some potential disadvantages for local communities, primarily a reduction in the potential for imported workers to spend in the local townships. However he considered other economic opportunities would arise (such as those associated with constructing and operating the workforce accommodation facilities). He noted that EPR EC2 requires prioritisation of procurement of goods and services from local businesses, including for the construction and operation of the workforce accommodation facilities.

Dr Kerkin considered the proposal to provide stand-alone workforce accommodation facilities is based on unsupported assumptions, and would create new social impacts rather than resolve existing ones. This approach actively separates workers from communities, entrenching an 'us and them' dynamic and reinforcing fear rather than fostering integration.

Dr Kerkin considered there was no evidence base for the assumption in the SIA that integrating workers into existing towns would cause severe disruption to housing and community services. She considered EPR SC2 (which requires a Code of Conduct for workers centred on controlling socially disruptive behaviour) reinforces fears in the community that the workers will be disruptive when there is no evidence that this will be the case.

Dr Kerkin considered that integrated accommodation models could deliver positive outcomes, including increased local spending, social interaction, reduced distrust of the workforce, and improved community understanding of the Project. However there is no genuine assessment of alternatives such as billeting workers in existing homes.

(iv) Discussion

The IAC prefers Mr Weston's evidence in this regard to that of Dr Kerkin. The Proponent advised that the 700 strong construction workforce would be likely to have a younger

male demographic. If they were not housed in purpose built accommodation facilities, there would be a significant increase in demand for housing in the small towns in the study area that could make housing harder (and more expensive) to access for the existing local population.

The workforce could also potentially place a significant burden on local services (such as medical services). The IAC considers it is appropriate for the Proponent to be responsible for ensuring the workforce has access to these services within the workforce accommodation facilities, avoiding impacts on access to existing local facilities.

Dr Kerkin's suggestion of billeting the workforce for the duration of the construction phase in local homes (including with senior citizens) is unrealistic. The IAC also considers that her suggestion of accommodating the workforce in caravan parks is not practical or realistic. Even if there was available capacity, this could have significant impacts on tourism in the local areas, which Dr Kerkin appears to have not accounted for.

In any event, EPR SC1 includes flexibility for the Councils to agree to alternative arrangements. If locals are willing to billet workers and workers are willing to accept a billet, this can be facilitated under EPR SC1. Likewise with local accommodation that may be available, including caravan parks.

The IAC is satisfied the temporary workers accommodation facilities, combined with EPRs SC1 and SC2, are appropriate to manage potential negative social impacts on access to housing and services in the local areas as well as social cohesion resulting from a large influx of workers into the area. Impacts will be acceptable.

(v) Findings

The IAC finds:

- The large influx of workers into the area could have negative social impacts on access to housing and services in the local areas as well as social cohesion in the small towns in the study area.
- The temporary workers accommodation facilities, combined with EPRs SC1 and SC2, are appropriate to manage these risks. Impacts will be acceptable.

13.5 Environmental Management Framework

(i) Environmental performance requirements

The Proponent added a number of new EPRs designed to manage social impacts in response to submissions and evidence. These are included in the Proponent's Day 3 version.

The full suite of social EPRs now includes:

- SC1 – include the following in the Operational Management Plan for the workforce accommodation facilities, with flexibility to agree alternative arrangements with the relevant Council:
  - a commitment that at least 95 percent of non-local workers will reside in the facilities
  - protocols that limit worker visits to nearby towns to essential trips

  - a commitment to provide medical services in the facilities to attend to the medical needs of workers
- SC2 – develop a Code of Conduct in consultation with the relevant Council that sets out expectations around workers interacting with local communities, using local roads, noise and alcohol consumption
- SC3 – develop a plan in consultation with the relevant Council containing initiatives to maximise employment opportunities for local communities, First Nations people and vulnerable and disadvantaged groups, including commitments to training and upskilling
- SC4 (new) – develop community partnerships and investments to leave a positive legacy for communities that host the Project, focussing on local issues of concern such as telecommunications and housing
- SC5 (new) – develop a community benefit fund that is co-designed with the communities that host the Project, so they have input into making decisions regarding the allocation of funding.

Other EPRs specifically designed to manage social impacts are:

- EM5 – develop a Communications and Stakeholder Engagement Plan in consultation with the Councils to:
  - guide communication and engagement during construction
  - enable timely and accurate provision of information
  - address consultation matters required by other EPRs
- EM7 – develop a Complaints Management System to be implemented during construction that requires (among other things) engagement with the Australian Energy Infrastructure Commissioner to support and advise in addressing community concerns
- EM10 – develop a Residential Mitigation and Support Strategy to be implemented during both construction and operation to avoid and minimise impacts to directly affected landholders to the extent reasonably practicable
- EM12 (new) – publish information about the Project on the Project website for the construction period and two years after operation commences.

Mental health support services

The key measures to manage wellbeing impacts are the following (new) EPRs:

- EM13 – provide training and awareness to all personnel undertaking direct community engagement to be aware of potential psychological and wellbeing stress and be able to provide information regarding access to all available resources, including those provided under EM14
- EM14 – provide free, independent mental health support services to the community.

These requirements apply throughout the construction period and for a two year period after construction is completed. They were recommended by Dr Wright to:

- ensure resources are available to affected communities to build resilience and develop coping tools and strategies
- remove barriers to seeking help (particularly important in rural and farming communities)

- improve the quality of staff interactions with the community and prevent inadvertent harm occurring through consultation.

Dr Wright considered these measures would help communities achieve what she described as 'wellbeing homeostasis' (providing the necessary resources to exceed challenges, so that wellbeing stabilises). Dr Wright concluded that if these measures are implemented properly and consistently, the Project's impacts on wellbeing would be manageable.

Dr Wright was cross examined on whether two years post construction was a sufficient period for the provision of mental health support services, given the wellbeing impacts (many of which are associated with being able to see the Project) will potentially last for 80 or more years.

Dr Wright maintained the view that two years would be appropriate. She noted that the support services would also be available throughout the construction period which would be the period of greatest change, and a suitable timeframe for the services to become well established and for the community to become aware of them. She considered that at two years post construction, it would be reasonable to expect that people would have established their own tools and coping mechanisms to deal with the changes. She considered this would (for most) be enough time to move forward. The IAC accepts this evidence.

Dr Wright emphasised the importance of ensuring that the mental health support services are readily accessible to the community. She considered it would assist if community organisations such as the Councils and local community groups were made aware of the existence of the services so that they can inform the community of the availability of the services. The Proponent accepted that this would be useful. The IAC agrees, and encourages the Proponent to liaise with the Councils and local medical services and community groups to ensure they are aware of the available services and know how to refer people to the services. It recommends a change to EPR EM14 to this effect.

(ii) Rebuilding trust

Building trust requires early, effective and ongoing engagement with the community. The community needs to feel heard and respected. It needs to know that its views have been understood and considered, even if the community's preferences have not been able to be accommodated. It appears that the early engagement undertaken by the Proponent has not been able to achieve these outcomes.

The effectiveness of many of the mitigation measures (not just those designed to address social impacts) depends on there being a level of trust between the Proponent and the community. If trust cannot be rebuilt, individuals and the community are more likely to experience prolonged fear and anxiety about the Project, notwithstanding the fact that information is available (including this assessment) that demonstrates that most of the Project's risks and impacts will be manageable.

The IAC asked Dr Wright whether (and how) it would be possible to rebuild trust in the community. She considered trust can be improved, but it requires sustained effort on both sides. She supported:

- ongoing engagement between the Proponent and the community, including with those who have previously refused to engage – this will prevent misinformation, reduce uncertainty and support coping and adaptation within the community
- information being provided to the community that is clear, transparent and culturally appropriate – this will reduce fear driven by misinformation and misunderstanding, and will help people to contextualise and understand risk
- explaining what the technical assessments of impact mean for people's lived experience
- one on one discussions where anxiety levels are high.

In response to Dr Wright's evidence, the Proponent added a new EPR EM16, requiring a plan to provide timely and accurate information, and if necessary to dispel misinformation, on matters of concern to the community. The plan must be implemented during construction and for two years after construction is completed.

The IAC asked Dr Wright whether it might assist in rebuilding trust if an independent facilitator could be interposed between the Proponent and the community. She considered this was a good suggestion provided the person or organisation was:

- independent with no prior history of liaising with either the Proponent or the community
- very good at communication
- fully across the services on offer so that they could direct people to what they need for their own personal situation.

The IAC considers that the techniques recommended by Dr Wright (now incorporated into the EMF through EPRs EM13, EM14 and EM16) are an important step toward rebuilding trust. However the challenge is significant. Rebuilding trust will require a sustained effort on both sides, as well as an open mind and a degree of good will. If the Project proceeds, the Proponent will need to listen carefully to the concerns of the community and help them adapt to the change. This will require time and patience, and may require a more individualised approach to managing landowner concerns around property access and adaptation of farming practices to the Project infrastructure.

The Proponent indicated it has no in principle objection to interposing an independent third party to liaise with the community in the implementation of the EPRs, but was unsure whether this would be practical. The IAC considers this would be beneficial for EPRs that require direct engagement with landholders or the community, at least during the construction phase where impacts are likely to be more disruptive, and where this is the preference of the landholder or community. It would establish a neutral and conflict free setting that would give the community a chance to gather information about the Project and its effects, and to rebuild trust. Land Liaison Officers are not independent of the Proponent, and having an independent facilitator(s) may assist some directly affected landholders to engage (including with their Land Liaison Officers) going forward.

(iii) Compensation and community benefit sharing

The Proponent submitted that as well as Project design and the EPRs, social impacts are sought to be addressed through:

- compensation for the acquisition of the easement
- measures directed to sharing community benefits (detailed in TN01), including the Near Neighbour Benefit Program and the community benefit fund.

Compensation and payments under the Near Neighbour Benefits Program are discussed in Chapters 9.4 and 13.2.

Community benefit funds are a recognised method in the CEC Guidelines and the draft VicGrid *Community Engagement and Social Value Guidelines for Renewable Energy and Transmission Projects*, Sep 2025 for offsetting some of the social impacts of a project.

Moorabool Council submitted the benefit sharing program has the potential to reinforce community opposition and division, as it is seen by some as the Proponent 'buying' support for the Project:

> This has created a spectre over participating in the benefit sharing program, where participants risk being perceived as 'betraying' parts of their communities that oppose the Project.

Dr Kerkin considered the benefit sharing program has the potential to reduce some social impacts, but the spread of the fund and its scope to respond to community priorities needs to be tested. She strongly advocated for the community benefit fund to adopt a co-design model, where the community has some input into how the fund should be allocated. Mr Weston considered this would be a positive development.

In response to submissions and evidence, the Proponent included a new EPR SC5 which requires a co-designed community benefit fund to be established for the communities that host the Project, to ensure the community has input into deciding where funding should be directed. The fund would be convened by a facilitator independent of the Proponent.

The IAC regards this as a positive step toward offsetting the Project's social impacts. The IAC does not consider the fund will create or entrench further community division over the Project. The establishment and administration of the fund will be after Project approvals are granted. There should be no reason for anyone in the community to consider that participation in the co-design process is allowing the Proponent to 'buy' support for the Project, or is 'betraying' those in the community who remain opposed to the Project.

Overall, the IAC is satisfied the EPRs are generally appropriate to mitigate the Project's social impacts. In fact, the suite of measures included in the Proponent's Day 3 EMF is among the more comprehensive the IAC has seen for managing the social impacts of a large scale infrastructure project. Minor modifications are required to some of the EPRs, including to remove qualifications that limit EPRs to landowners who agree to engage. As Dr Wright pointed out, continuing to engage, including with those who have previously refused to engage, is essential for rebuilding trust.

That said, the residual social impacts of the Project will be significant.

(iv) Findings and recommendations

The IAC finds:

- With some adjustments, the mitigations proposed to manage the Project's social impacts are generally appropriate.
- The Proponent should engage an independent facilitator(s) to liaise with individual landholders and community members (at their option) to assist the implementation of EPRs that require direct community engagement. This should help rebuild trust.
- The co-designed community benefit fund is a positive step toward offsetting the Project's social impacts, and should not result in further negative social impacts.

The IAC recommends:

Environmental Management Framework

Include the following changes:

- Amend EPR EM14 to include a requirement to liaise with the Councils and local medical services and community groups to ensure they are aware of the mental health services provided by the Proponent and know how to refer people to the services.
- Amend the EMF to include a requirement for the Proponent to engage an independent facilitator(s) to liaise with individual landholders and community members (at their option) in relation to the implementation of any EPRs that require direct engagement between AusNet or its contractors and individual landholders or community members.
- Amend EPRs EM10 and EM16 to improve clarity and implementation.
- Amend EPRs EM5, EM10, LV2, EC1, LV1 and LV2 to delete qualifications that limit EPRs to landowners who agree to engage.

13.6 Overall conclusions on social impacts

Generally, while social impacts have not been avoided, efforts have been made to minimise social impacts through route selection and through a now comprehensive suite of EPRs that seek to help the community adapt to the Project should it proceed.

On balance, the IAC is satisfied the social impacts of the Project are consistent with relevant policy and legislation and the relevant evaluation objectives.

That said, even with the additional EPRs, the Project is likely to have significant residual social impacts in many parts of the area surrounding the Proposed Route, particularly in Sections 2 and 3 and in Darley. This needs to be considered within the broader integrated and net community benefit assessment (see Chapter 16).

14 Water, ground and air

14.1 Groundwater

(i) Introduction

The evaluation objective is:

> Maintain the functions and values of aquatic environments, surface water and groundwater quality and stream flows and prevent adverse effects on protected beneficial uses.

Groundwater effects are assessed in:

- EES Chapter 24 Groundwater
- EES Technical Report S Groundwater Impact Assessment.

The exhibited EMF includes the following EPRs:

- GW1 Site works to reduce the potential of direct physical impact to groundwater receptors
- GW2 Develop and implement a Groundwater Management Plan.

No groundwater expert evidence was provided.

Other key documents are:

- D662 – Landholder Guide - Options for Easement process, compensation and benefits.

The IAC has had regard to relevant policy and guidelines, including:

- *Environment Protection Act 1970*
- *Water Act 1989*
- Environment Protection Regulations 2021
- Environment Reference Standard 2021[38]
- *Civil construction, building and demolition guide*, EPA Publication 1834.2.

(ii) Key issues

The key issues are whether:

- groundwater information is sufficient for assessing potential impacts
- groundwater impacts have been appropriately avoided and minimised, and are acceptable.

The DTP opening submission stated:

> Matters which we would suggest require minimal consideration by the IAC and were considered to have been adequately dealt with during the development of the EES and engagement with TRG agencies, include construction-based impacts associated with the project (air quality, noise and vibration, groundwater, surface water, contaminated land, geology and soils).

Many submitters raised general and specific concerns about these matters and the IAC has considered them where relevant.

[38] As published 25 May 2021, and as amended by Environment Reference Standard No. S158 Gazette 29 March 2022

(iii) What did the EES say?

The Groundwater Impact Assessment assessed the potential impact to groundwater from the construction of tower footings and earthworks at the terminal stations. The area assessed was limited to areas used for construction and operation of the Project, but the assessment included impacts on other groundwater receptors (such as groundwater dependent ecosystems, or GDEs) outside the Project Area.

Existing State-wide groundwater mapping information provided information on the depth of groundwater, groundwater quality and location of groundwater bores.

The construction of transmission towers typically requires earthworks to a depth of nine metres or potentially deeper in some areas. With groundwater as shallow as five metres below the surface in some area (but typically occurring at depths of 10 to 20 metres), the EES assumed that groundwater will be encountered.

The construction methodology outlined in the EES includes piling in wet conditions (if groundwater is encountered, construction will generally occur without the need for groundwater dewatering). However if groundwater is encountered or the excavations are filled by rainwater, dewatering may be required. The impact on any nearby GDEs or groundwater users was assessed as negligible due to the short duration of any pump out (less than one day).

Groundwater levels were not expected to be impacted by the Project given its footprint and the size of the groundwater aquifer systems along the proposed route.

The risk of groundwater contamination from chemical spills and waste management was assessed as negligible with the implementation of the EPRs.

Consultation with government agencies, CMAs and water authorities aided in the development of the EPRs to eliminate or mitigate risks to groundwater such that the residual risks to groundwater were evaluated as minor to negligible.

As decommissioning activities will be similar to those that occur during construction, the impacts relating to land, surface water and groundwater contamination were assessed to be largely similar to the construction stage.

(iv) Submissions

The Proponent submitted the EES adequately assessed the potential impacts on groundwater and any impacts are minor to negligible as they are expected to be temporary and limited to the immediate area of ground works.

The Environment Protection Authority (EPA) noted in its submission (S253):

> EPA has no outstanding issues regarding environmental risks at this time, as matters raised during the TRG process were adequately addressed by the Proponent.

The IAC heard oral submissions from three submitters (S313, S320 and S500) that described the importance of groundwater for their farming activities and concerns that groundwater bores may be damaged or their use compromised from construction activities or limitations on use due to the transmission lines.

Ballarat Council noted that the groundwater assessment was desktop based and submitted that risk-based field testing should be undertaken. Several other submitters also expressed this view.

(v) Discussion

The IAC accepts that a desktop analysis provides an adequate basis for assessing risks to groundwater along the route. There are extensive publicly available databases containing information on the location of groundwater resources and GDEs and information on over 500,000 bores across Victoria. EPR GW1 specifies groundwater monitoring where site specific circumstances warrant testing.

Where bores may be compromised by construction activities or proximity to the transmission lines, EPR GW1(c) requires that a mitigation strategy be prepared. The IAC interprets this to mean mitigation strategies would include the replacement of that bore with an equivalent if necessary. The Landholder Guide: Option for Easement Process, Compensation and Benefits includes compensation for property specific impacts and for property damage during construction.

The IAC has reviewed the changes proposed by submitters based on the Proponent's Day 3 versions of the Incorporated Document and EMF and is satisfied that no further changes are necessary.

The IAC is satisfied that impacts to GDEs can be largely avoided or mitigated by the EPRs which require a construction site walkover and landholder consultation before works commence, and where practical a buffer distance from GDEs. Micro-siting of towers could also aid in avoiding or minimising any impacts to GDEs.

(vi) Findings

The IAC finds:

- The Groundwater Impact Assessment appropriately assessed groundwater impacts.
- The Environmental Management Framework provides an appropriate framework for avoiding and minimising impacts on groundwater during construction and operation.
- Groundwater impacts will be acceptable.

14.2 Surface water

(i) Introduction

The evaluation objective is the same as that for groundwater, namely:

> Maintain the functions and values of aquatic environments, surface water and groundwater quality and stream flows and prevent adverse effects on protected beneficial uses.

Surface water effects are assessed in:

- EES Chapter 25 Surface Water
- EES Technical Report T Surface Water Impact Assessment.

The exhibited EMF includes the following EPRs:

- SW1 Site works to reduce potential for surface water impact
- SW2 Develop and implement a Surface Water Management Plan
- SW3 Monitor water quality
- SW4 Minimise risks from changes to flood levels, surface flows and velocities
- SW5 Manage stormwater runoff to reduce potential for surface water impact
- SW6 Operational emergency flood response management.

No surface water expert evidence was provided.

The Proponent provided the following Technical Note:

- TN011 – Operation of the EPRs – Directly Affected Landholders.

The IAC has had regard to relevant policy and guidelines, including:

- *Environment Protection Act 1970* (EP Act)
- *Water Act 1989*
- Environment Protection Regulations 2021
- Environment Reference Standard 2021
- *Civil construction, building and demolition guide*, EPA Publication 1834.2.

(ii) Key issues

The key issues are whether:

- the Project will change local surface water flow paths on farmland
- the impacts have been appropriately avoided and minimised, and are acceptable.

(iii) What did the EES say?

The Surface Water Impact Assessment considered the impact of construction of the new terminal stations, stringing pads, transmission towers, easement, laydown areas and access tracks on waterways and water bodies along the proposed route.

An existing conditions assessment was used to identify key surface water values which informed the risk screening and route selection. Primarily, this was through identification of high value waterways and floodplain areas where construction and tower placement should be avoided.

The transmission towers are generally set back from waterways. If proposed access tracks, transmission towers and/or terminal stations are located within the setback distance nominated by the relevant CMA then in accordance with the EPRs, a site-specific assessment will be made to determine potential impacts and adopt site-specific monitoring and mitigation strategies. The Project will likely require Works on Waterways Permits from the relevant CMA where the Project crosses a designated waterway or will disturb the banks adjacent to a designated waterway.

Access tracks for the towers cross numerous waterways. The majority of these are small, unnamed waterways or drainage lines. The Surface Water Impact Assessment found that the biggest impacts were identified as potential changes to surface water flow paths and increased sedimentation in run off from unsealed surfaces.

Mitigation measures to reduce project impacts included using existing waterway crossings for access tracks where possible, such as on the Lerderderg River. Where this is

not possible, individual crossings will be designed and constructed according to best practice risk minimisation, including construction outside of flow periods in ephemeral waterways to avoid sediment input to waterway or flow disruption.

Several EPRs include measures to minimise impacts of access tracks, waterway crossings, laydown areas, worker accommodation and tower construction. The Surface Water Impact Assessment concluded that with the EPRs, residual impacts are minor for waterway health, minor for water quality, negligible for flow regime and negligible for floodplain function.

Liquid storage and handling will be in accordance with EPA guidelines to minimise the risk of spills into waterways so far as reasonably practicable.

The risk of flood impacts will be managed through flood risk assessment of terminal stations, access roads and relevant tower sites during the design stage. These flood impact assessments will be completed in accordance with the requirements of the referral authorities (CMAs) and be supported by flood modelling as required. Given the depth of tower footings, the Surface Water Impact Assessment found that destabilisation of towers located within active floodplains during a flood extremely was unlikely.

Provided that mitigation measures relating to design and construction of these assets are implemented, and ongoing management to avoid impacts from sediment runoff or weed spraying is maintained, the EES concluded that there should only minor impacts to surface waters during the Project's operation.

(iv) Submissions

Pyrenes Council identified that the workforce accommodation area at Lexton was not in an area serviced by reticulated sewerage. Moorabool Council submitted the closest sewer connection is about 100 metres from the proposed Ballan workforce accommodation facility.

EPA advised that depending on the size and nature of the wastewater infrastructure at the temporary workforce accommodation sites, an EPA permission may be required.

Concerns about access tracks and laydown pads affecting water drainage were raised by submitters. The concerns related to altering local drainage lines that may reduce runoff to dams or cause water to pool on cropping or pasture paddocks. Submitter 267 was concerned that vegetation cleared from hills for tower construction would increase water runoff and lead to erosion and sedimentation of waterways.

The Proponent considered the EES adequately assessed potential impacts on surface waters within the area surrounding the Proposed Route.

(v) Discussion

Both Moorabool and Pyrenes Councils identified the Ballan and Lexton accommodation facilities being in areas not currently serviced by reticulated sewerage. The EES states that temporary sewage collection and storage facilities will be installed in the workforce accommodation and laydown areas. Where required, the toilets would be pumped out for off-site disposal at an appropriate facility. Detailed plans have not yet been developed for the workforce accommodation facilities.

To allow for appropriate approvals to be obtained before construction works on the accommodation facilities begins, the IAC considers that wastewater management and disposal should be considered during the preparation of the Temporary Workforce Accommodation Plan required under clause 1.13 of the Incorporated Document.

The IAC notes that EPA permission may be required for waste water infrastructure.

Access tracks are required so plant and equipment can be transported to the tower assembly areas and other temporary construction areas. Access tracks will typically be four to six metres wide with a one metre allowance on either side for drainage and retaining batters, where required. At a few locations where the access track is on a steep slope, the total width may extend between 10 to 15 metres.

The Surface Water Impact Assessment recognised the potential for access tracks to alter surface water flow paths. An objective of the Surface Water Management Plan required under EPR SW2 is to maintain the key functions of existing flow paths and drainage lines wherever possible.

EPR SW2 requires an inspection of areas where works are proposed and the identification of local and ephemeral drainage paths and potential flow impacts to farm dams. Earth works are to accord with AS3798-2007 *Guidelines on Earthworks for Commercial and Residential Developments* which specify drainage erosion and sedimentation control measures.

The Proponent provided TN011 that described the contents of the PAMP (EPR EM3) to be tailored for specific properties. Soil management and drainage are among the issues to be addressed in the PAMP and the IAC is satisfied that drainage matters are appropriately addressed.

The IAC is satisfied the works on a waterway permit scheme would appropriately regulate the impact of works on designated waterways. An application for works must be lodged with the relevant CMA for assessment and a permit issued before those works commence.

The combined Councils (D595) proposed an amendment to the surface water EPRs to include consultation with local councils on the development of the Surface Water Management Plan. Local government does have a role in the management of waterways and drainage, and the IAC agrees local councils should be consulted during the development the Surface Water Management Plan and has included a requirement in the IAC recommended EMF in Appendix E:2.

The Surface Water Management Plan incorporates measures to manage stormwater runoff in accordance with relevant EPA guidelines. Works near waterways, soil disturbance and chemical management are required by the Surface Water Management Plan in accordance with EPA guidance. Compliance with the Surface Water Management Plan is included as part of the environmental auditing function to be undertaken by the Independent Environmental Auditor. The IAC is satisfied that the implementation of the Surface Water Management Plan will minimise impacts to surface waters to acceptable levels.

The IAC has reviewed the changes to the Day 3 project documents proposed by other submitters and is satisfied that no further changes are necessary.

VC278, gazetted in mid December 2025 part way through the Hearing, strengthened planning controls for waterways (as discussed in Chapter 4.7).

(vi) Findings and recommendations

The IAC finds:

- The Surface Water Impact Assessment has appropriately assessed surface water impacts.
- The Environmental Management Framework provides an appropriate framework for avoiding and minimising impacts on surface waters. Impacts will be acceptable.

Incorporated Document

Include the following change:

- Amend clause 4.13 (Temporary Workforce Accommodation Facilities) to add a requirement to clause 4.13.2 (c) to consider sewage and greywater management.

These changes are included at Appendix E:1.

Environmental Management Framework

Include the following changes:

- Amend Table 29.9 and EPR SW2 to require consultation with local councils on the Surface Water Management Plan.

These changes are included at Appendix E:2.

14.3 Geology and soils

(i) Introduction

The evaluation objective is:

> Maintain the functions and values of aquatic environments, surface water and groundwater quality and stream flows and prevent adverse effects on protected beneficial uses.

Geology and soil effects are assessed in:

- EES Chapter 22 Geology and Soils
- EES Technical Report Q Geology and Soils Impact Assessment.

The exhibited EMF includes the following EPRs:

- GSL1 Develop and implement a pre-construction Site Investigation Plan to inform detailed design
- GSL2 Develop and implement a Sediment and Erosion Control Management Plan
- GSL3 Identify and remediate erosion and land stability issues
- GSL4 Maintain current public access to geologically significant sites.

No expert evidence on geology and soils was provided.

The IAC has had regard to relevant policy and guidelines, including:

- EP Act
- Environment Protection Regulations 2021
- Environment Reference Standard 2021

- *Civil construction, building and demolition guide*, EPA Publication 1834.2
- Australian Geoguide LR8 (Construction Practice) – Hillside Construction Practice.

(ii) Key issues

The key issues are whether:

- soil compaction impacts can be mitigated
- works will cause land instability and landslips
- geology and soils impacts have been appropriately avoided and minimised, and are acceptable.

(iii) What did the EES say?

The Geology and Soils Impact Assessment examined the geology and soils and considered processes such as erosion and land instability. The assessment was largely based on existing soil and geology databases and Light Detection and Ranging (LiDAR) information, which was used to map features such as potential landslide risks, areas prone to erosion, existing drainage pathways and waterways.

Field investigations and targeted site inspections/walkovers were untaken at 38 checkpoint locations identified in the desktop review. The study area encompassed all areas where construction will occur and varied in width between 300 metres to four kilometres wide.

Construction in dispersive or erodible soils, reactive soils, and saline soils has the potential to erode soils leading to sedimentation of waterways and potentially land instability. The Project seeks to avoid high risk areas through a pre-construction site investigation plan (EPR GSL1 and GSL3) and a CEMP (EPR EM2). With the implementation of these EPRs, the EES concluded that the extent and magnitude of impacts associated with soil erosion and dispersive soils would be low.

The EES identified that compressible soils are likely to be encountered near waterways, but with the application of the EPRs the extent and magnitude of impacts can be appropriately mitigated.

The proposed route passes close to Mount Beckworth and Hepburn Lagoon, which are classified as having local geological significance. The EES proposed mitigation measures to avoid geologically significant sites as far as practical and assessed the residual risk as negligible.

Observations of existing hill slopes indicated that most slopes along the route are stable. Where earthworks cut into the slope or could otherwise cause slope instability, the EES found that the EPRs would reduce the likelihood, extent and magnitude of any residual impacts to minor.

The Geology and Soils Impact Assessment found that the cumulative impacts of relevant future projects can be managed effectively through avoidance, engineering and administrative controls. The potential for significantly adverse cumulative impact is negligible.

(iv) Evidence and submissions

A recurrent theme in many submissions from farmers, as well as agricultural evidence (notably Mr Beever), was a concern about compaction of soils. It was the expert opinion of Mr Beever that clay rich soils along the proposed route are prone to compaction. It was his opinion that compaction issues can be managed and his report outlined management options to minimise soil compaction impacts.

The Joint Expert Statement for agriculture and forestry noted agreement that the requirement in EPR GSL2 that vehicle movements be confined to designated tracks is an important requirement to avoid soil compaction. In its final submission, the Proponent explained that the Day 3 EMF included an amended EPR GL2 to explicitly require consideration of compaction in the preparation of the Sediment and Erosion Control Plan.

Several submitters raised concerns about land stability issues that may arise during construction.

Other submissions said that the soils on their properties are subject to erosion and were concerned that construction of the access tracks and laydown pads would cause erosion.

The Proponent submitted that complete avoidance of compaction was unlikely to be practicable and that the EPRs were appropriate to manage compaction impacts.

(v) Discussion

The Day 3 EMF has been amended to specifically identify soil compaction as an issue to be managed. This aligns with the drafting comments from the combined Councils (D595).

The IAC agrees with the Proponent that complete avoidance of compaction is unlikely to be practicable. It notes the importance of measures identified by the Proponent to reduce and minimise compaction such as targeting construction in normally wet areas during the dryer months and the use of lighter axle load vehicles in wet areas. The IAC also notes that the Proponent is required to rehabilitate land disturbed by construction, and this will include dealing with compaction.

EPR GSL2 requires the development and implementation of a Sediment and Erosion Control Management Plan as part of the CEMP. The Sediment and Erosion Control Management Plan must incorporate drainage, erosion and sediment control measures and stockpile management from industry guidelines, including International Erosion Control Association (Australia) (IESCAA), *Best Practice Erosion and Sediment Control*, 2008 and EPA Victoria Publication No. 1834.1: *Civil construction, building and demolition guide*. The IAC is satisfied the implementation of the appropriate control and management measures contained in these publications would minimise erosion risks to acceptable levels.

Landslide risk and slope stability issues are matters that the construction industry is experienced in managing. The Australian Geoguides produced by the Australian Geomechanics Society are reference documents in the EPRs and provide appropriate guidance on identifying and managing these risks.

Measures specific to the geological and soil conditions present in the Project Area (such as erodible, dispersive or compressible soils and construction on slopes) have been successfully implemented in similar projects through comprehensive geotechnical and soils investigation programs. With careful consideration of these factors during the detailed design and construction management, the IAC is satisfied that geological and erosion impacts can be acceptably managed.

The IAC has reviewed the changes proposed by other submitters based on the Proponent's Day 3 project documents and is satisfied that no further changes are necessary.

(vi) Findings

The IAC finds:

- The Geology and Soils Impact Assessment has appropriately assessed geology and soil impacts.
- The Environmental Management Framework provides an appropriate framework for avoiding and minimising impacts on geology and soils. Impacts will be acceptable.

14.4 Contamination

(i) Introduction

The evaluation objective is:

> Maintain the functions and values of aquatic environments, surface water and groundwater quality and stream flows and prevent adverse effects on protected beneficial uses.

Contamination effects are assessed in:

- EES Chapter 23 Contaminated Land
- EES Technical Report Contaminated Land Impact Assessment.

The exhibited EMF includes the following EPRs:

- CL1 Minimise contaminated land impacts through investigation and design
- CL2 Develop and implement contaminated land management and mitigation measures for construction
- CL3 Develop and implement a Spoil Management Plan.

No contamination expert evidence was provided.

The IAC has had regard to relevant policy and guidelines, including:

- EP Act
- Environment Protection Regulations 2021
- Environment Reference Standard 2021
- Victorian Government Gazette, No. S 301 Friday 18 June 2021, Specifications Acceptable to the Authority for Receiving Fill Material
- *Potentially contaminated land – A guide for business*, EPA Publication 2010
- *Civil construction, building and demolition guide*, EPA Publication 1834.2.

(ii) Key issues

The key issues are whether:

- the Project will contaminate land
- contamination impacts have been appropriately avoided and minimised, and are acceptable

(iii) What did the EES say?

Contaminated land is defined in the EP Act as land where waste, a chemical substance, or a prescribed substance is present in a concentration above the background level and creates a potential to harm to human health or the environment.

The Contaminated Land Impact Assessment assessed the risk of soil contamination within the area surrounding the Proposed Route, plus an additional 500 metre buffer to identify potentially contaminated land that could impact the Project.

A desktop review was conducted using public databases including aerial imagery, current and historic mining, extractive, and landfill activities, EPA priority sites, audit reports, per- and polyfluoroalkyl substances contamination information, Groundwater Quality Restricted Use Zones, and the probability of occurrence of acid sulfate soils. Soil samples were also collected from a number of locations including the Bulgana Terminal Station.

The Project has been designed to avoid areas with high contamination potential where practicable and would be subject to more detailed site-specific assessment through EPR CL1. Investigations of any potentially contaminated land would be consistent with Schedule A *of the National Environment Protection (Assessment of Site Contamination) Measure* (NEPM) 2013.

Residual impacts due to the generation, storage and disposal of spoil during construction were assessed as negligible, as spoil would be sampled and assigned an appropriate waste classification, and if required treated on site prior to transport (EPR CL3).

In some instances, imported fill may be required for earthworks. The CEMP (EPR EM2) is required to include a process to assess the suitability of imported materials, to limit the potential for contaminated material to be imported into the Project Area (EPR CL2).

With the implementation of the EPRs, all soil contamination risks were evaluated as negligible.

(iv) Submissions

The VFF was concerned about the use of chemicals within the easement by the Proponent and whether the consent of landholders would be sought. Other submitted raised concerns about:

- potential chemical contamination resulting from spills of diesel or hydraulic fluids and the washout of concrete trucks (S32, S162, S273 and S386)
- the threat of contaminated fill material used for access track construction (S496)

- whether the desktop review of mining-related impacts may have underestimated the threat of potential contamination from historic mining activities (S45 and S517).

Several submitters raised concerns that the Project would impact on the ability to comply with Livestock Production Assurance (LPA) Integrity Systems. They submitted that most livestock farms operate under the LPA program. One submission included an extract from the accreditation checklist (S313)[39] that asked whether livestock has access to leaking electrical transformers, capacitors, hydraulic equipment, solar panels, wind turbines, coal seam gas structures or coal mine wastes.

The Proponent responded that the LPA question is targeted to establishing if there is potential chemical contamination that could affect livestock rather than whether there are power lines or even transmission lines on the property.

(v) Discussion

The IAC is satisfied the Contaminated Land Impact Assessment has adequately assessed contamination issues and that the recommended EPRs are appropriate.

The IAC understands the importance of having and maintaining accreditation under the LPA program. The IAC agrees with the Proponent that one of the hurdles in gaining accreditation is to establish whether livestock could be contaminated from chemicals on the farm. While old timber power poles could be a potential issue, the proximity of metal pylons and transmission lines are not relevant to this assessment.

On herbicide use and notification provided to landholders, the IAC notes that EES Chapter 6 – Project Description states:

> Herbicides may be used to control weeds in some sections of the easement to meet AusNet's obligations under the Catchment and Land Protection Act 1994. Herbicide use will be in accordance with AusNet procedures and the EPRs and will be undertaken in consultation with landholders.

The IAC is satisfied the CEMP requirements relating to the storage and use of chemicals, fuels and hazardous materials during construction and the process for assessing the suitability of any imported material provides assurance that contamination risks can be managed.

The EES has identified areas with actual or potential mining wastes. The measures described in the EMF such as testing and a Spoil Management Plan accord with those recommended by EPA for working on land in historic mining regions. The IAC is satisfied that any mining wastes encountered can be appropriately managed.

The Proponent addressed the drafting comments and associated commentary from the combined Councils (D595) regarding notification to landholders of any soil contamination on their properties in a revised EPR CL2.

[39] Tabled Document 533 slide 17.

The IAC has reviewed the changes proposed by other submitters based on the Proponent's Day 3 project documents and is satisfied that no further changes are necessary.

(vi) Findings

The IAC finds:

- The Contaminated Land Impact Assessment has appropriately assessed contaminated land impacts.
- The Environmental Management Framework sets an appropriate framework for avoiding and minimising impacts from contaminated land. Impacts will be acceptable.

14.5 Air quality

(i) Introduction

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects for community amenity, health and safety, with regard to … dust….

Air quality effects are assessed in:

- EES Chapter 18 Air Quality
- EES Technical Report I Air Quality Impact Assessment.

The exhibited EMF includes the following EPRs:

- AQ1 Develop and implement an Air Quality Management Plan
- AQ2 Implement air quality management and mitigation measures for operation.

No air quality evidence was provided.

The IAC has had regard to relevant policy and guidelines, including:

- EP Act
- Environment Protection Regulations 2021
- Environment Reference Standard 2021
- *Guideline for assessing and minimising air pollution in Victoria*, EPA Publication 1961.2
- *Guidance for assessing nuisance dust*; EPA Publication 1943
- *Civil construction, building and demolition guide*, EPA Publication 1834.2.

(ii) Key issues

The key issues are whether:

- dust emissions are acceptable
- air quality impacts have been appropriately avoided and minimised, and are acceptable.

(iii) What did the EES say?

The Air Quality Impact Assessment examined the potential air quality impacts associated with the construction, operation and decommissioning of the Project. Particulate matter (dust) during construction of the towers and the converter stations was identified as the primary impact on air quality and was the focus of the assessment. During construction, contaminated soil, rock, and groundwater may be encountered, giving rise to odour.

Potential dust impacts within a 500 metre buffer of the Project were assessed using the method described in *Guidance for assessing nuisance dust*, EPA Publication 1943. The nature and proximity of sensitive receptors to the project was assessed, and sensitivity of the receptors to human health and nuisance impacts from dust was evaluated.

With the implementation of the recommended controls and monitoring required under the EPRs and the conditions of the Incorporated Document, and with consideration of the guidance from the EPA Publication 1943, the EES concluded that residual dust impacts are very unlikely.

Other less significant air quality issues considered in the EES included exhaust emissions from construction plant and equipment as well as odours and other specific emissions from contaminated soils that may be found on or near construction sites. Similar to the dust assessment, potential impacts were qualitatively considered based on the magnitude of expected emissions, and the likelihood that they would affect surrounding receptors.

Based on the relatively minor nature of potential exhaust emissions from construction plant and equipment, and the separation distances to sensitive receptors, unmitigated impacts from these emissions were assessed as low.

No significant sources of contamination that would be disturbed as part of the Project's construction were identified, and therefore the potential impacts of odour from disturbance of contaminated soil, rock or groundwater are anticipated to be low.

Limited air emissions are expected during operations. The only potential emissions may include dust resulting from inspection and maintenance activities. Dust may also be generated from exposed surfaces resulting from the clearance of vegetation. Limited exhaust emissions will also be generated from associated plant and equipment.

(iv) Submissions

Many submissions expressed concerns about dust impacts without explaining the nature or the reason for that concern. Submissions raised concerns about:

- the health impacts on humans and/or animals
- exhaust fumes from construction plant.

Northern Grampians Council raised concerns about construction traffic generating dust on unsealed roads that would contaminate drinking water supplies from rainwater tanks. Northern Grampians, Ballarat and Hepburn Councils made changes to the Day 3 EPRs to include a requirement that the CEMP require the Proponent to provide publicly available real time or close to real time reporting of air monitoring (D685).

(v) Discussion

Air emissions were assessed using the framework contained in EPA Publication 1961 with nuisance dust impacts assessed using the methodology contained in EPA Publication 1943. These guidelines use a risk management approach involving identifying hazards, assessing risks, implementing controls, and checking controls.

Under the EP Act emitters of air pollution must minimise those risks so far as reasonably practicable. This is an obligation referred to as the General Environmental Duty.

Consistent with the General Environmental Duty, the proposed EPRs accord with an 'all reasonable measures' approach. The EPRs reflect the preferred hierarchy of controlling hazards and risks set out in EPA Publication 1961.

The risks associated with construction activities are well understood and the proposed mitigation measures are commonly used in the construction industry and are proven to be effective at minimising emissions. In most cases, other than the construction of the converter station, impacts at any particular location will be of a short duration. Dust impacts will be significantly less during winter or following rain events.

Dust monitoring will be undertaken at all laydown areas, the terminal sites and near a number of public roads. The IAC considers that dust impacts can be managed to avoid health impacts and the dust monitoring program can provide evidence of performance that would be reviewed by the Independent Environmental Auditor.

The IAC agrees with the position of the Proponent (expressed in D685) that provision of real time air quality data is not required. This data will be reviewed by the Independent Environmental Auditor and the audit summary reports will be made publicly available as well as containing other environmental performance information. Dust emissions are expected to be low, and it is not necessary to separately report on this one particular element of environmental performance.

The IAC does not consider that exhaust emissions will be a concern from properly maintained equipment operating in an open environment.

The IAC has reviewed the changes proposed by other submitters based on the Proponents Day 3 versions of the project documents and is satisfied that no further changes are necessary.

(vi) Findings

The IAC finds:

- The Air Quality Impact Assessment has appropriately assessed air quality impacts.
- The Environmental Management Framework sets an appropriate framework for avoiding and minimising impacts on air quality. Impacts will be acceptable.

14.6 Electromagnetic radiation

(i) Introduction

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects for community amenity, health and safety, with regard to … electromagnetic radiation.

Electromagnetic Interference (EMI) and Electric and Magnetic Field effects are assessed in:

- EES Chapter 17 Electromagnetic Interference and Electric and Magnetic Field
- EES Technical Report L EMI and EMF Impact Assessment.

The exhibited EMF includes the following EPR:

- EL1 Undertake an Electric and Magnetic Field and Electromagnetic Interference Assessment.

Table 19 lists the experts providing evidence on EMI and electric and magnetic fields.

Table 19 Evidence on electromagnetic radiation

Party	Expert	Firm	Expertise	Document number
Proponent	Rodney Urban	Jacobs Group	Electromagnetic interference/ electromagnetic fields	D118

The IAC has had regard to relevant policy and guidelines, including:

- International Commission on Non-Ionizing Radiation Protection (ICNIRP) *Guidelines for Limiting Exposure to Time-Varying Electric and Magnetic Fields (1Hz to100kHz)*[40]
- Australian Standard (AS) 2344 - 2016: *Limits of electromagnetic interference from overhead a.c. powerlines and high voltage equipment installations in the frequency range of 0.15MHz to 3000MHz*.

(ii) Key issues

The key issues are whether:

- electromagnetic radiation levels are below levels where health impacts may occur
- functionality of sensitive farm equipment such as GPS is compromised
- electromagnetic radiation impacts have been appropriately avoided and minimised, and are acceptable.

(iii) What did the EES say?

Electric and magnetic fields are generated whenever electricity is used. The earth has a static magnetic field generated by the earth's core and electric fields are naturally present in the atmosphere.

The EES considered the impact from electromagnetic effects within a study corridor five kilometres wider than the proposed transmission easement.

The proposed Project infrastructure was modelled to determine the worst-case electromagnetic radiation. Modelling was verified by measurements of electromagnetic fields from existing infrastructure. The calculated electromagnetic radiation levels were assessed against reference levels and design limits developed by the International Commission on Non-Ionizing Radiation Protection and adopted by the Australian Radiation Protection and Nuclear Agency.

[40] Recognised by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) as the relevant criteria for the protection of people.

Calculated worse case levels were well below levels where impacts may occur to humans and animals apart from minor impacts to bees directly beneath the transmission lines (refer to Table 20).

Table 20 Worse case electric and magnetic fields

Operating State	Exposure Scenario	Electric Field (KV/m)		Magnetic Flux Density (μT)	
		Design Limit	Calculated Field	Reference Level	Calculated Level
Double Circuit 500kV transmission line	Directly under the line	7	5.51	200	28.3
	30m from centreline	7	0.94	200	7.68
	50m from centreline	7	0.04	200	2.5
Single Circuit 500kV transmission line	Directly under the line	7	6.43	200	23.9
	30m from centreline	7	0.90	200	10.9
	50m from centreline	7	0.15	200	4.8

Source: EES Chapter 17, Table 17.6

The EES found that interference to mobile phone and WiFi broadcast reception within the study area will not be significant under any weather conditions in areas currently experiencing good reception.

The EES found no loss of performance of GPS receivers under transmission lines during normal or bad weather. There may however be a minor impact on differential GPS correction signals directly under the transmission lines in heavy rain conditions. This momentary interruption of correction signals as mobile agricultural equipment passes directly under the line was assessed as minor. It will not impact autonomous operations as the existing correction would be utilised and updated once the equipment clears the area.

The EES reported the findings of a review of the health of farm animals in America, Canada and Sweden in various studies over multiple farms from the effect of high voltage (up to 765kV) transmission lines. These studies showed that transmission lines do not pose a significant risk of adverse health effects or negative impacts on production in livestock.

The impact assessment concluded that it will not be necessary to contain electromagnetic radiation from the Project or to shield or buffer nearby sensitive receptors as electromagnetic radiation from the Project is expected to be well below levels that would require mitigation.

(iv) Evidence and submissions

Submitters raised various concerns, including:

- non-specific concerns about the potential impact to health from the Project
- concerns about cancer or childhood leukaemia or the potential impact on implanted medical devices
- effects on cattle and humans that may experience micro shocks when they contact metal items near the transmission lines
- the potential impact on very accurate farm navigation equipment and concerns that machinery such as autonomous equipment, drones or other plant that relies on accurate GPS information including virtual fencing may be compromised
- impacts on radio, television, NBN broadband and mobile phone signals.

Northern Grampians, Ballarat and Hepburn Councils made changes to EPR EL1 in the Day 3 EMF to include taking remedial measures to address any exceedance of relevant electromagnetic limits during the operation and decommissioning of the Project. The Proponent responded that this was unnecessary as EPR CL1 required pre- and post-construction testing such that if any remedial action was required it would be identified before commissioning of the Project and hence operation testing would not be necessary. Decommissioning the line will eliminate any electromagnetic radiation emissions.

The evidence of Dr Urban who prepared EES Technical Report L was the impact of the electric and magnetic fields generated from the transmission lines and substations on sensitive people, livestock, flora and fauna was acceptable based on the limits within international standards and guidelines. He stated that impacts on native fauna are not well understood except for some species for which there has been specific, but limited work. His view was that any native fauna impacts would be minimal (and therefore acceptable) given the understanding of impacts on other animals (particularly livestock) and humans for which there is more information.

In regard to bees, Dr Urban noted that recent published research showed that any impact is associated with hives directly under transmission lines, rather than a significant impact on foraging bees. His opinion was that bees would still be able to function in the area surrounding the Proposed Route but hives should not be placed directly under the transmission lines.

Dr Urban found that the impact of any electromagnetic interference from the operation of the Project infrastructure on sensitive electrical or electronic equipment or systems, including agricultural equipment and systems, was acceptable.

(v) Discussion

The IAC accepts the expert evidence of Dr Urban that the maximum calculated electric and magnetic fields from the Project are well below accepted impact limits for the protection of human health. The IAC notes that even under worse case scenarios such as maximum power load the reference levels or design limits are not exceeded under the transmission lines and electromagnetic field levels are well below the limits at the edge of the easement.

The IAC accepts Dr Urban's evidence that electromagnetic fields are safe for people with active implantable medical devices (such as pacemakers).

Based on the overseas studies referenced in the EES, the IAC agrees with Dr Urban's assessment that the transmission lines do not pose a significant risk of adverse health effects or negative impacts on production in livestock.

The issue of micro shocks which can occur when contact is made with wire fencing or other metallic items under the transmission lines can, as stated by Dr Urban, be mitigated by standard earthing practices.

The IAC accepts there may be some limited impact on bees directly under the transmission lines. The evidence of Dr Urban was that the impact does not affect the ability of bees to function or forage in the area surrounding the Proposed Route but hives should not be placed at the low point under the lines where the sag is at its maximum and ground clearance is at its minimum. The IAC does not consider this is an unacceptable limitation.

The IAC is mindful that many farms along the transmission line route may have concerns about the impact on GPS systems increasingly used on farms. The evidence before the IAC was that there may be a short-lived impact on GPS signals directly under the transmission line during heavy rain conditions. The momentary signal loss as the equipment passes directly under the line would not compromise the function of the plant, and signals would be recovered as soon as the equipment passes under the lines. Dr Urban did not consider any mitigation necessary. No contrary evidence was provided. The IAC accepts the evidence of Dr Urban on this matter.

The EES found that there may be some minor impact on radio reception. Impact on FM reception would be negligible, and only AM radio stations with weaker signals may be affected. Emergency services broadcasts should not be impacted under either dry or wet conditions. There should be no interference detected for television reception. Dr Urban confirmed this in his evidence.

The IAC notes the advice of the CFA that no radio communication issues have been reported near transmission lines.

The IAC accepts the Proponent's view that no adjustment to the EPRs is required in relation to operational testing of electromagnetic radiation levels. The levels emitted by the Project are expected to be an order of magnitude (or more) below the relevant limits. The pre- and post-construction testing required under EPR CL1 would identify any issues before commissioning of the Project. Operational testing is not justified.

The IAC has reviewed the changes proposed by other submitters based on the Proponent's Day 3 versions of the project documents and is satisfied that no further changes are necessary.

(vi) Findings

The IAC finds:

- The EMI and EMF Impact Assessment has appropriately assessed electromagnetic fields and electromagnetic interference impacts.

- The Environmental Management Framework sets an appropriate framework for avoiding and minimising impacts from electromagnetic fields and electromagnetic interference. Impacts will be minimal and acceptable.

14.7 Noise and vibration

(i) Introduction

The evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects for community amenity, health and safety, with regard to construction noise, vibration….

Noise and vibration effects are assessed in:

- EES Chapter 19 Noise and Vibration
- EES Technical Report O Noise and Vibration Impact Assessment.

The exhibited EMF includes the following EPRs:

- NV1 Develop and implement a Construction Noise and Vibration Management Plan
- NV2 Minimise construction outside of Normal Working Hours
- NV3 Minimise construction vibration impacts on amenity
- NV4 Design operational noise sources to minimise noise so far as reasonably practicable
- NV5 Undertake commissioning noise monitoring of terminal stations
- NV6 Minimise the impact of noise from maintenance activities.

Table 21 lists the experts providing evidence on noise and vibration.

Table 21 Evidence on noise and vibration

Party	Expert	Firm	Expertise	Document number
Proponent	Tom Evans	Resonate	Noise and vibration	D105

The Proponent provided the following Technical Note:

- TN 010 – Option to Purchase.

The IAC has had regard to relevant policy and guidelines, including:

- EP Act
- Environment Protection Regulations 2021
- Environment Reference Standard 2021
- *Noise limit and assessment protocol for the control of noise from commercial, industrial, and trade premises and entertainment venues* (EPA Publication 1826.5) (Noise Protocol)
- *Civil construction, building and demolition guide*, EPA Publication 1834.2.

(ii) Key issues

The key issues are whether:

- construction noise impacts are acceptable
- ongoing noise emissions from the Project are acceptable

- noise and vibration impacts have been appropriately avoided and minimised, and are acceptable.

(iii) What did the EES say?

Noise modelling of the various stages of construction was used to assess the noise impact on houses and other sensitive receptors such as schools and hospitals within a 10-kilometre corridor either side of the proposed route. The Noise and Vibration Impact Assessment included noise from the construction of the two proposed workforce accommodation and laydown areas near Lexton and Ballan. Dwellings within the proposed easement were not considered in the assessment as it assumed that they would be relocated.

Construction works will be conducted during daytime hours with afterhours works carried out in accordance with EPA Publication 1834.2, *Civil construction, building and demolition guide*. Transmission towers construction will be intermittent with potentially weeks between each phase of their construction. The cumulative duration of construction work at each tower will be approximately 9 to 22 weeks (over a two year period).

Noise modelling was based on the typical loudest expected activities for each stage and assumed the use of a rock drill during foundation construction. Rock drilling is the noisiest activity during the construction of foundations, and may not be necessary at all locations so noise levels will generally be less than the modelled worst case scenario.

The noisiest activity during above ground construction works will be stringing of lines or tower construction by helicopters. Not all lines will be strung using helicopters and helicopters will not be required for tower constructions in all instances. This activity will be during the day only and of a short duration. Predicted noise levels from ground-based construction of stringing methods is significantly quieter.

One dwelling was modelled with construction noise levels of 76 - 79dB $L_{Aeq,30mi}$. This level of noise will persist for a few hours at a time across several days during normal working hours.

Table 22 Number of dwellings with typical worst case noise levels within range indicated

Noise Level $L_{Aeq\,30\,min}$	Site Establishment	Foundations	Structure assembly	String activities with helicopter	Stringing activities without helicopter	Demobilisation	Laydown areas, workforce accommodation
> 75dB	1	0	0	4	0	0	0
66 – 75dB	12	11	2	68	0	0	0
56 - 65dB	67	117	24	781	14	13	0
46 - 55dB	420	1016	217	2608	155	123	63

Source: EES Technical Report O – Noise and Vibration Assessment. Table 7.3

In general, noise levels from the construction of workforce accommodation facilities and laydown areas are predicted to be below 45dB L_{Aeq} at nearby dwellings. Noise levels between 46 and 50dB L_{Aeq} were predicted for six dwellings near the proposed facility southeast of Lexton.

Works at the existing Bulgana Terminal Station and Elaine Terminal Station are not predicted to exceed 45dB L_{Aeq} at any time. The noise may be intermittently audible for up to 34 weeks but will not exceed existing daytime ambient noise levels.

During construction of the access track connection to Vances Crossing Road at Bulgana, one dwelling may temporarily experience elevated construction noise of up to 70dB L_{Aeq}. This level of noise will be during the day and limited in duration.

Vibration from construction works is not expected to be perceptible beyond 50 to 100 metres from the work site. For residences within 100 metres, vibration could be managed by using alternative equipment that produces a lower vibration level or, where this is not reasonably practicable, scheduling works to normal working hours and notifying residents in advance of the works. Offers of respite may be made if vibration is expected to be perceptible over a number of days. No risk of building damage arising from vibration was predicted.

Corona noise from the transmission line, which is only expected to be generated during occasional weather conditions, is predicted to comply with the noise limits at all but two of the identified dwellings. With the implementation of design measures, the EES found that noise emissions will be below the applicable noise limits.

Noise from the operation of the completed terminal stations is predicted to comply with the applicable noise limits for all times of day.

The Noise and Vibration Impact Assessment concluded that, during construction and decommissioning of the Project, temporary impacts can be managed through the implementation of measures to reduce construction noise and vibration so far as reasonably practicable.

In regard to cumulative projects, the EES found that due to timeframes and physical separation between different sites, no significant cumulative impacts related to construction noise or vibration are anticipated.

(iv) Evidence and submissions

General concerns about construction noise impacting on the amenity of their homes and the local environment were expressed by several submitters. Other submissions were concerned about vibrations impacts to their dwellings where they are located close to works.

Concerns were also raised about noise impacts from transmission lines associated with corona discharge noise and the noise of wind passing through the wires (referred to as aeolian noise).

Northern Grampians, Ballarat and Hepburn Councils made changes to the Day 3 EPRs (D643) to require real time or close to real time noise monitoring data to be made publicly available. The Proponent responded that this is not necessary, as noise data will

be reviewed by the Independent Environmental Auditor and the audit summary reports will be made publicly available.

The evidence of Mr Evans, the author of the Noise and Vibration Impact Assessment, was:[41]

> Considering the information available in the EES and submissions received, I am of the opinion that the Project can operate in accordance with relevant requirements that apply in Victoria relating to noise and vibration.

Mr Evans advised construction noise and vibration levels are predicted not to exceed the applicable construction noise provisions of EPA Publication 1834.1. He stated that as with all major construction projects, out of hours works will be required at times however these must meet specific requirements (consistent with EPA guidelines) in order to be permitted.

On vibration impacts, Mr Evans gave evidence that only nine dwellings may experience detectable vibrations if heavy vibratory compaction is required. He did not consider the vibration levels sufficient to cause structural damage and levels could be mitigated by using a smaller vibratory roller.

Mr Evans advised corona noise, if it occurs, is generally in wet weather and the noise level can comply with noise limits given the transmission line would be designed in accordance with the relevant Australian Standard. His evidence was that aeolian noise is relatively rare. He was satisfied that the transmission line design principles minimise the risk of aeolian noise.

(v) Discussion

Adherence to the requirements specified in the *Civil construction, building and demolition guide*, EPA Publication 1834.2 will be critical to minimising construction noise impacts. EPR NV1 specifies that the Construction Noise and Vibration Management Plan will be developed taking this publication into account.

EPA Publication 1834.2 and its earlier versions have been used for many years to aid the construction industry in meeting its environmental obligations. The Proponent's Day 3 EMF was amended to align working hours to those specified in EPA Publication 1834.2.

Compliance with the appropriate measures in EPA Publication 1834.2 can be used to demonstrate the Project is meetings its General Environmental Duty. Where works may cause an impact, such as the potential vibration impact, then consistent with Publication 1834.2, and as stated by Mr Evans, a respite offer could be made. EPR NV1 (4)(f) refers to "*management actions and mitigation measures to reduce noise and vibration impacts so far as reasonably practicable*". This could include offers of respite.

The IAC accepts the evidence of Mr Evans that wind noise or aeolian noise is a relatively rare event and mitigation measures are provided in the EES to minimise the risk of aeolian noise.

[41] D105 Expert Evidence Statement of Tom Evans

Similarly for corona noise, the IAC accepts Mr Evans' evidence that corona noise is more likely to occur during wet weather. Mr Evans considered corona noise, if it occurs, can comply with noise limits subject to incorporation of the appropriate transmission line design principles specified in the EES.

The IAC agrees with the Proponent that provision of real time noise monitoring data is not required.

The IAC has reviewed the changes proposed by other submitters based on the Proponent's Day 3 project documents and is satisfied that no further changes are necessary.

(vi) Findings

The IAC finds:

- The Noise and Vibration Impact Assessment has appropriately assessed noise and vibration impacts.
- The Environmental Management Framework sets an appropriate framework for avoiding and minimising impacts from noise and vibration impacts. Impacts will be acceptable.

14.8 Greenhouse gas and climate change

(i) Introduction

The relevant evaluation objective is:

> Avoid, or minimise where avoidance is not possible, adverse effects for community amenity, health and safety, with regard to … greenhouse gas emissions….

Greenhouse gas and climate change effects are assessed in:

- EES Chapter 26 Greenhouse Gas
- EES Chapter 28 Climate Change
- EES Technical Report M Greenhouse Gas Impact Assessment
- EES Technical Report N Climate Change Assessment.

The exhibited EMF includes the following EPRs:

- CC1 Undertake a climate change risk assessment
- CC2 Review climate change risk
- SG1 Develop and implement sustainability targets and a Sustainability Management Plan
- SG2 Consider environmentally sustainable design.

The Proponent provided the following Technical Notes:

- TN06 – Tower Design Standards and Climate Change
- TN08 – Response to IAC RFI Section 9, Request 17.

The IAC has had regard to relevant policy and guidelines, including:

- *Climate Change Act 2017*
- EP Act
- Victoria's Climate Change Strategy 2021.

(ii) Key issue

The key issue is:

- whether greenhouse gas and climate change impacts have been appropriately avoided and minimised, and are acceptable.

(iii) What did the EES say?

Greenhouse gas

The Greenhouse Gas Impact Assessment assessed the key construction, operation and decommissioning activities that would generate greenhouse gas emissions. It found the unmitigated impacts would be:

- 464 kilotonnes of carbon dioxide equivalent (CO_2e) are predicted to be emitted during the construction of the Project
- 35.8 to 0.27 kilotonnes of CO_2e are predicted to be emitted annually during the operation of the Project, a figure which reduces over time due to electricity grid decarbonisation
- the construction of the Project would constitute approximately 0.3 percent of Victoria's overall greenhouse gas emissions and 0.05 percent of Australia's emissions, while the operation of the Project would constitute 0.03 percent to less than 0.01 percent of Victoria's, and 0.006 percent to less than 0.001 percent of Australia's overall greenhouse gas emissions
- the Project would aid in the reduction of greenhouse gases by increasing the uptake of renewable energy.

The Greenhouse Gas Impact Assessment recommended two EPRs to mitigate effects:

- a Sustainability Management Plan
- the consideration of environmentally sustainable design.

The residual construction impacts after mitigation were assessed as moderate. The residual operation impacts after migration were assessed as minor. The residual decommissioning impacts after mitigation were assessed as moderate to minor, while noting the difficulty in predicting emissions given likely changes in technology and policy.

Climate change

The Climate Change Assessment developed climate change projections for the area surrounding the Proposed Route and assessed trends that might impact on the Project including changes to temperature, solar radiation, precipitation, wind, storms and lightening and fire weather. It described how weather extremes and climate change could impact transmission infrastructure and found that design and construction of the Project are anticipated to mitigate most resulting potential impacts.

The Climate Change Assessment recommended two EPRs:

- undertake a detailed climate change risk assessment during detailed design
- review climate change risk every five years.

(iv) Submissions

Submissions raised concerns about the level of greenhouse gas emissions associated with the Project and the impact on climate change. Submissions also raised concerns

about the impacts of climate change on the security and safety of transmission infrastructure, particularly in the context of tower collapse and increased bushfire risk.

Some submitters raised broader policy issues in relation to greenhouse gas and climate change that are beyond the scope of the IAC's Terms of Reference.

In relation to greenhouse gas emissions, the Proponent relied on the Greenhouse Gas Impact Assessment and submitted that with the implementation of the EPRs the relevant evaluation objective would be met. It noted that the moderate to negligible residual impacts would primarily be a result of embedded emissions from construction materials. It submitted the Project would facilitate the connection of renewable energy sources to energy consumers, and would contribute to its own emissions reduction, in addition to an overall reduction in greenhouse gas emissions from the national electricity grid.

In relation to climate change, the Proponent relied on the Climate Change Assessment and was satisfied the climate change impacts have been and will continue to be appropriately assessed and responded to, including through the EPRs. The Proponent provided TN06 that responded to concerns about tower design standards and extreme wind conditions. This is discussed in detail in Chapter 8.4, which deals specifically with tower collapse.

The Proponent noted that EPA was an active member of the TRG and had no outstanding issues regarding environmental risk, including in relation to greenhouse gas and climate change.

(v) Discussion

The IAC is satisfied the Greenhouse Gas Impact Assessment and Climate Change Assessment have adequately assessed greenhouse gas and climate change issues. It notes that the rationale for the Project is to assist the transition to renewable energy and would contribute to addressing greenhouse gas and climate change issues.

The IAC supports the proposed EPRs and believes the climate change requirements relating to risk assessment during design and periodic risk review provide a framework for addressing concerns about the safety of the transmission infrastructure raised by submitters.

EPR SG2 requires the Project to "*consider*" environmentally sustainable design as means of reducing greenhouse gas emissions. The IAC believes that the EPR should be more proactive and require the Project to "*implement*" environmentally sustainable design. This change is included in the recommended EMF at Appendix E:2.

The IAC notes the advice in TN08, and does not consider any changes to the EMF are required.

(vi) Findings and recommendation

The IAC finds:

- The Greenhouse Gas Impact Assessment and Climate Change Assessment have adequately assessed greenhouse gas and climate change issues for the purposes of the EES.

- The Project will assist in implementing renewable energy policies and reducing overall greenhouse gas emissions. Impacts will be acceptable.
- Climate change issues will be adequately addressed through the EPRs relating to the design of the Project and the periodic review of climate change impacts.

The IAC recommends:

Environmental Management Framework

Include the following change:

- Amend EPR SG2 to refer to the "*implementation*" of environmentally sustainable design.

14.9 Overall conclusions on water, ground and air effects

Subject to applying its recommendations, the IAC is satisfied the Project is consistent with relevant policy and legislation and the draft evaluation objectives relating to impacts on water, ground and air. The likely water, ground and air effects are not significant and the IAC is satisfied any effects are acceptable.

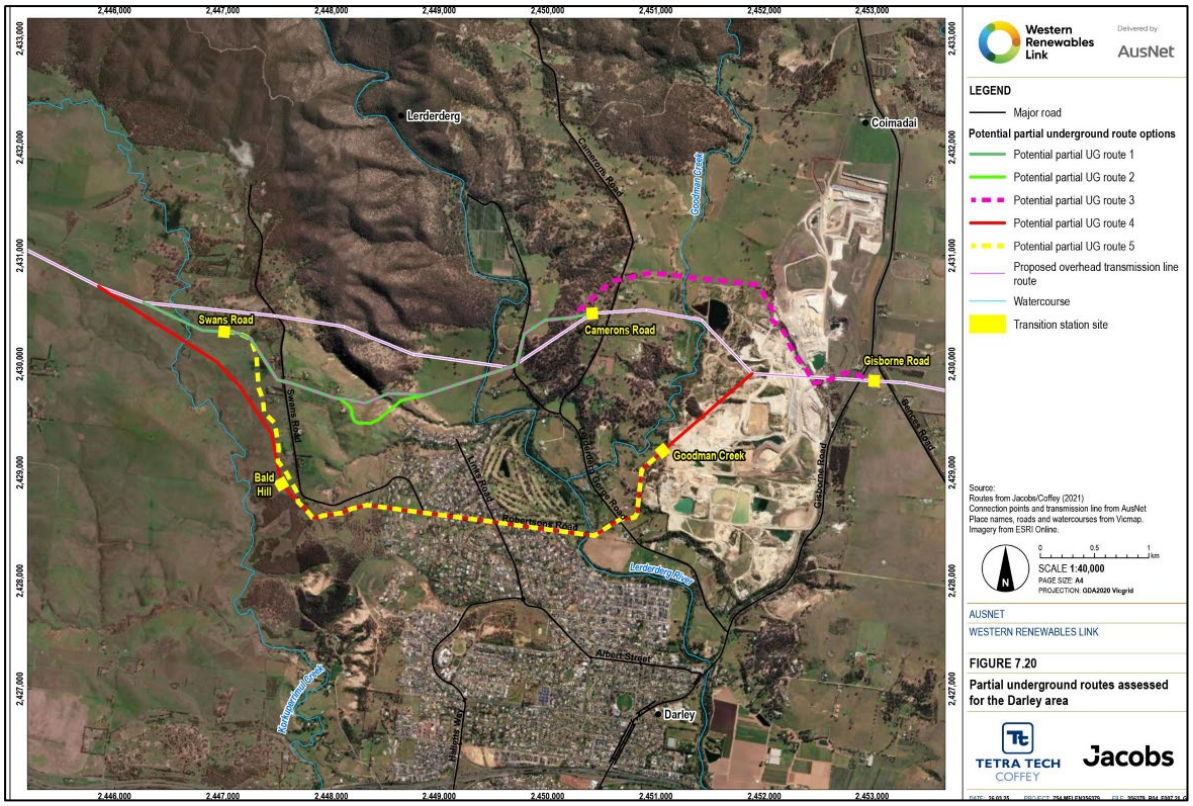
15 Specific areas and sites

15.1 Darley

(i) Introduction

The Proposed Route passes between the Wombat-Lerderderg National Park (to the north) and the urban part of Darley (to the south). From the west, it crosses Korkuperrimul Creek and Swans Road, then travels generally eastwards, crossing the Lerderderg River, Lerderderg Gorge Road and Camerons Roads before turning to the southwest and crossing through a large quarry on the west side of Gisborne Road. The Proposed Route is shown in pale pink in Figure 25.

Figure 25 Proposed Route and potential underground route options at Darley



Source: EES Attachment 1 Figure 7.20

The EES recognised the area around Darley is highly constrained. EES Attachment 1 explained that the Darley area warranted an investigation of partial undergrounding options due to:

- the type and expected level of impact, noting that the residential areas on the north facing slopes of Darley were expected to experience the greatest visual impact compared to other dwellings along the route
- the presence of a number of species listed under the FFG Act, including a large population of Melbourne Yellow Gum as well as Bacchus Marsh Wattle and Austral Tabacco
- habitat for TECs.

Alternative overhead options through the Darley area were explored, however were not considered feasible due to existing built infrastructure and limited space to achieve separation from dwellings.

EES Attachment I assessed five alternative underground route options through Darley, which are shown in Figure 25. After assessing the underground alternatives, it concluded:

> … the Proposed (overhead) Route and other mitigation options are preferred given that, while the partial underground routes minimise biodiversity and visual amenity impact, they result in other impacts due to their increased ground disturbance, and partial undergrounding does not align with Project objectives given the materially higher cost and associated Project delays.

(ii) Submissions

Darley was one of the areas that attracted a large number of submissions. Moorabool Council and Darley residents expressed very significant concerns about the Project's impacts on Darley and the area to its north, stretching from Long Forest to Coimadai. As well as loss of amenity, concerns included:

- impacts on the biodiversity values in the area to the south of the Wombat-Lerderderg National Park, including a number of flora species and TECs listed under the FFG Act (Chapter 4)
- impacts on the existing Myrniong, Korkuperrimul Creek and Camerons Road biolink, which connects the National Park to other reserves (Chapter 4)
- landscape and visual impacts on the landscapes protected by the Moorabool SLO1, on residents and on the Bald Hill Activation Area (Chapter 6)
- increased bushfire risk (Chapter 8)
- economic impacts associated with a reduction in property values in the area (Chapter 9)
- social impacts (Chapter 13).

The Proponent submitted undergrounding at Darley is not feasible for the reasons set out in EES Attachment I. It submitted:

- impacts on the area's biodiversity values have been avoided and minimised by the application of 'no go zones' and the bespoke clearance approach outlined in TN02 (see Chapter 4)
- Mr Potter and Mr Taylor considered the retention of additional vegetation in the area under the bespoke approach was acceptable from a bushfire perspective (see Chapter 8.8)
- given the existing limited access and egress options north of Darley, residents should have a bushfire response plan that involves leaving before entrapment becomes a risk (see Chapter 8.8).

The Proponent acknowledged that a number of residents in Darley would experience high unmitigable visual impacts (30 dwellings according to the LVIA, or 65 on Mr Schutt's evidence). However:

> The argument put by some submitters and Moorabool City Council is that the broader Victorian community should be required to pay an additional $369 million to preserve the current amenity offer of a limited number of dwellings via undergrounding the WRL Project through Darley. This would be an extraordinary impost upon the broader community of Victoria, to merely protect the existing views of a relatively small number of residents. It

> would be an outcome at odds with fundamental principles relating to the assessment of acceptable as distinct from ideal or optimal outcomes.

It submitted that Darley residents within 1 kilometre of the Proposed Route will be entitled to payments under the Near Neighbour Benefit Program. "*This contributes, in part, to the achievement of a fair outcome for owners of impacted dwellings*."

(iii) Discussion

The IAC acknowledges the challenges associated with route selection through Darley. There is a narrow corridor through this area that avoids the urban parts of Darley to the south and the National Park to the north.

While the Proposed Route avoids the Wombat-Lerderderg National Park, it has not been possible to avoid significant impacts to the biodiversity values present to the south of the National Park. Chapter 4 discusses the high biodiversity values present in this area. The BIA and BD1 conclude that the Project will have 'high' residual impacts on the FFG Act listed Melbourne Yellow Gum, much of which is located in the Darley area. There are also impacts to the Myrniong, Korkuperrimul Creek and Camerons Road biolink.

The conclusion in the BIA and BD1 Report of 'high' residual impacts on Melbourne Yellow Gum is based on the bespoke minimised vegetation clearance approach outlined in TN02 being implemented in Darley. The IAC is not satisfied that the fire risk associated with the bespoke clearance approach in Darley has been fully investigated, for the reasons set out in Chapters 4.3 and 8.8. If the bespoke clearance approach cannot be implemented, impacts on Melbourne Yellow Gum (and other threatened species present in the Project Area through Darley, such as Austal tobacco) will be higher than currently assessed.

Chapter 6 discusses the visually sensitive nature of the landscape around Darley and the National Park, and the expectation set by the Moorabool Planning Scheme that the residential and visual amenity of residents in Darley will be considered in planning decisions. The IAC found that the number of highly impacted dwellings in Darley is understated in the LVIA, and the visual impacts of the Project are not consistent with the objectives of the Moorabool SLO1 that seeks to protect the significant hilltops and ridgelines in the Darley area. The IAC concluded that the visual and landscape impacts in the Darley area could, in isolation, be considered unacceptable.

As discussed in Chapter 8, Darley is in one of the highest bushfire risk areas along the Proposed Route, with a high population present. Access and egress routes in the area north of Darley are limited. Access and egress from some areas is only available by roads crossed by the Project. Even if minimum safe clearances at these road crossing points can be achieved, the limited access, combined with terrain and high fuel loads, means that firefighting (and potentially evacuations) in the area north of Darley would likely be challenging. On that basis, the IAC has concluded that the Project's small incremental increase in the existing very high bushfire risk in the Darley area is unlikely to be acceptable.

Chapter 7 notes that the Project traverses areas to the north of Darley that are within the RCZ and RLZ and various overlays that recognise environmental and landscape values.

The high level of visual impact to dwellings in Darley has consequential economic and social impacts on the Darley community, discussed in Chapters 9 and 13.

The IAC considers the cumulative impacts of the Project in the Darley area are unacceptable. The section of the Proposed Route extending from the Korkuperrimul Creek through to Gisborne Road requires an alternative solution. This could include further consideration of the partial underground options investigated in EES Attachment I. All options other than route 3 would avoid the impacts that the IAC has identified as unacceptable.

Chapter 3.1 includes a discussion of the relative costs of overhead and underground transmission lines, including an indicative six kilometres of undergrounding through Darley. Based on the material provided to it, the possible costs for this section of the route range between:

- $43 million and $47 million for overhead
- $380 million and $480 million for underground.

The IAC acknowledges that undergrounding would involve very significant additional cost. However this must be considered in the context of the IAC's conclusion that impacts of the proposed overhead Project in this area will be unacceptable.

The IAC discusses the implications of its conclusions in relation to the Darely area, and a possible way forward, in its integrated assessment in Chapter 16.

(iv) Finding and recommendation

The IAC finds:

- Cumulatively, the impacts of the Project as currently proposed in the Darley area are unacceptable.

The IAC recommends:

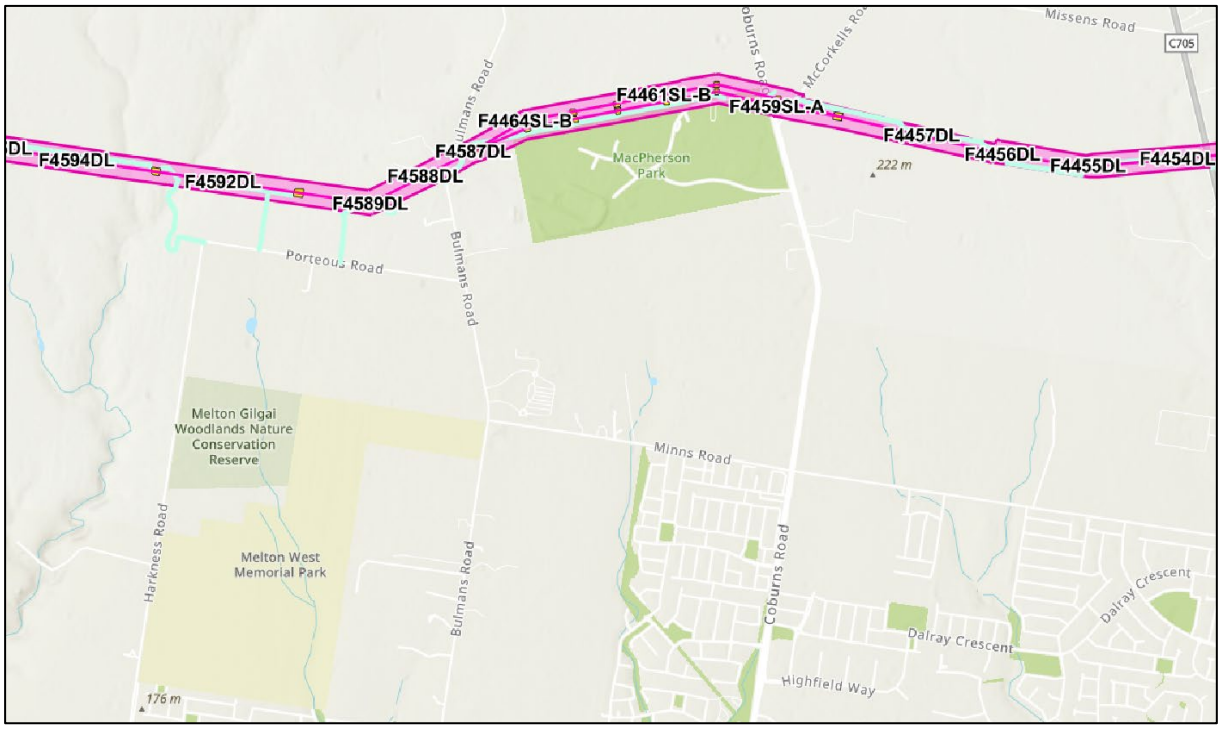
- The Proponent should investigate alternative options for the design or route of the Project through Darley. This may include further investigation of the options assessed in EES Attachment 1.

15.2 Toolern Vale

(i) Introduction

The Proposed Route runs through the Toolern Vale area to the north of Melton as shown on Figure 26. It skirts the northern boundary of MacPherson Park, with the Melton Aerodrome further to the north. As noted in Chapter 11, the exhibited route in the vicinity of the Melton Aerodrome includes 35 metre tall paired 500kV single circuit towers in order to reduce impacts on the aerodrome.

Figure 26 The Project alignment through Toolern Vale



Source: Extract from WRL Interactive Map

EES Attachment I noted that the area north of Melton is highly constrained by existing and planned development and described various route options that were investigated.

(ii) Submissions

Melton Council's primary submission was that the transmission line should be undergrounded in full through Melton but if this was not accepted, it should be partially undergrounded in the vicinity of MacPherson Park. Melton Council's concerns about the Project's impacts in this area were primarily in relation to MacPherson Park (discussed in Chapters 6 and 13), Melton Aerodrome (discussed in Chapter 11), the historic Melton Park (discussed in Chapter 5) and Harkness Memorial Park.

Melton Council advised that Harkness Memorial Park is being developed by the Greater Metropolitan Cemeteries Trust and is due to commence operations in 2027 in accordance with a masterplan (D528). The site is shown in Figure 26 (as the Melton West Memorial Park) and abuts the northern boundary of the urban area of Melton. The park is approximately one kilometre south of the Proposed Route at its closest point. The Melton Gilgai Woodlands Nature Conservation Reserve (also shown on Figure 26) is within part of the intervening area.

Melton Council made submissions about the cost of partial undergrounding based on Mr Touzel's evidence that is discussed in Chapter 3.1. This material was based on an indicative six kilometre section of underground transmission line. Melton Council acknowledged that undergrounding through this area would be more expensive than an overhead line but the additional cost would be worthwhile in mitigating impacts. Melton Council submitted that the further investigations required in support of partial

undergrounding could be undertaken through a supplementary EES process and would not create any significant delay for the Project.

Melton Air Services and others submitted the Project would impact the operation and future development of Melton Aerodrome and introduce a significant safety hazard. They submitted the Project should either be realigned or undergrounded in the vicinity of the aerodrome. These issues are discussed in Chapter 11.

The Proponet's submissions and evidence in relation to MacPherson Park and Melton Aerodrome are discussed in Chapters 6, 11 and 13. The Proponent assessed the potential impacts on Harkness Memorial Park and concluded they can be acceptably managed having regard to:

- the site's distance from the Project (between approximately 1 and 2.6 kilometres at its closest and furthest points)
- the existing landscape screening provided by the Melton Gilgai Woodlands Nature Conservation Reserve to the north and west of the site
- the large size of the site and the potential to establish landscaping works
- the proposed south to north development sequence that would allow time for early tree planting in the northern area to mitigate views of the Project.

The Proponet did not support undergrounding the Project in this area.

(iii) Discussion

The IAC acknowledges that there is a relatively narrow corridor through this area that avoids urban development to the south (Melton and Bacchus Marsh) and biodiversity values to the north (Wombat-Lerderderg National Park). Selecting an acceptable route within this corridor is challenging because of existing and planned land uses that could be impacted by the Project, including those referred to by Melton Council. Not surprisingly, the Proponent considered and documented various options through this area and configured the arrangement and height of towers to mitigate impacts on Melton Aerodrome.

The IAC discussed the Project's impacts in this area earlier in Part B and concluded:

- visual impacts on MacPherson Park will be acceptable (Chapter 6)
- social impacts on MacPherson Park will be acceptable (Chapter 13)
- potentially negative impacts on Melton Aerodrome need to be considered in the broader planning policy context including renewable energy policy (Chapter 11).

The IAC has reviewed submissions and evidence in relation to the Harkness Memorial Park and is satisfied its development can be staged and planned to have regard to the Project and to mitigate visual impacts. The IAC notes the large size of the site and the opportunity for early landscaping in the northern area will provide opportunities to mitigate visual impacts. The Greater Metropolitan Cemeteries Trust did not make a submission on the Project.

The IAC is not aware of any other potential impacts in the Toolern Vale area that would be significant or unacceptable.

Chapter 3.1 includes the IAC's discussion of the relative costs of overhead and underground transmission lines, including an indicative six kilometres of undergrounding

through Toolern Vale. Based on the material provided to it, the IAC notes the possible costs for this section of the route range between:

- $43 million and $47 million for the exhibited overhead arrangement
- $380 million and $468 million for an underground arrangement.

This cost difference is significant in the context of the IAC's findings that impacts in this area will be limited and generally acceptable.

On balance, the IAC is satisfied the potential impacts in this area do not warrant the Project adopting a different route or being undergrounded.

(iv) Finding

The IAC finds:

- The impacts of the exhibited overhead arrangement and alignment through Toolern Vale are acceptable, and do not warrant the Project adopting a different route or being undergrounded.

15.3 Bullarook Streamside Reserve

(i) Introduction

Bullarook Streamside Reserve is a public reserve situated at an s-shaped bend of Birch Creek near Kingston, used for informal recreation. The Project crosses Birch Creek three times in the vicinity of the reserve.

(ii) Submissions

Many submitters, including Hepburn Council and KDPA, expressed concerns about impacts on the Bullarook Streamside Reserve, including:

- impacts on the biodiversity values of Birch Creek, including platypus (Chapter 4)
- constraining the opportunity to establish a biolink along Birch Creek (Chapter 4)
- loss of the Algerian Oak tree (Chapter 5)
- impacts on Kerrins Bridge, including direct physical impacts during construction and loss of visual amenity (Chapters 5 and 12)
- loss of amenity within and near the reserve.

The Proponent submitted two options for modifying the Project to avoid removal of the Algerian Oak (TN14):

- Option A - Movement of the proposed transmission line approximately 50 metres to the north
- Option B - Increased height of the towers on either side of the Algerian Oak (Towers F6014DL and F6015DL) while retaining the EES alignment.

The Proponent submitted it preferred Option B, because it avoids shifting a tower into a landholder's property. It noted Option A would increase vegetation clearing requirements.

(iii) Discussion

The IAC has concerns regarding the cumulative effects of the Project on Bullarook Streamside Reserve including the reach of Birch Creek impacted by the Project. The options outlined by the Proponent in TN14 mitigate some of these impacts to varying degrees.

TN14 did not explore the possibility of relocating the Project further away from Bullarook Streamside Reserve to completely avoid the reserve and the s-bend crossing of Birch Creek. The IAC notes that while this might be beneficial for the reserve and the creek, it could lead to greater impacts in other areas, including on farmland and houses, which have not been assessed.

On balance, the IAC considers a modified version of Option B could mitigate impacts on the biodiversity values of Birch Creek and the Algerian Oak. This would involve the following two measures:

- taller towers (including F6014DL, F6015DL and F6016DL) to increase the height of the conductors over the Algerian Oak and the three crossings of Birch Creek
- a partial clearance approach (as proposed in TN02 and TN09 for Darley and Lexton), if feasible.

This would allow the retention of the Algerian Oak, and would allow taller trees and riparian vegetation to grow in the easement corridor (existing vegetation and future revegetation).

The increased opportunity to retain vegetation in the easement corridor would be beneficial for mitigating impacts on the amenity of the reserve. A potential drawback of taller towers would be an incremental increase in visual impacts including from outside the reserve, but the IAC does not consider that this would be significant or unacceptable.

The IAC's recommended changes to EPR BD10 (see Chapter 4) provide for further areas in which the partial clearance approach, potentially in combination with raised tower heights, should be investigated. EPR BD10 should include a specific reference to the Bullarook Streamside Reserve and Birch Creek riparian zone. The IAC has included a recommendation to this effect.

(iv) Finding and recommendation

The IAC finds:

- The impacts of the Project on the Bullarook Streamside Reserve including Birch Creek can potentially be further mitigated with a partial clearance approach, potentially in combination with raised tower heights. The Proponent should investigate whether this approach is feasible in this location.

The IAC recommends:

Environmental Management Framework

Include the following change:

- Amend EPR BD10 to require investigation of the feasibility of using modified clearance requirements and/or higher towers to minimise impacts on the Bullarook Streamside Reserve and Birch Creek riparian zone.

These changes are included at Appendix E:2.

15.4 Barunah Park

(i) Introduction

Barunah Park is a farming property located to the east of Diggers Rest-Coimadai Road in Long Forest that has an unoccupied dwelling and various farm buildings and dams.

The Project traverses the property and includes three transmission towers that have been sited to minimise biodiversity impacts and avoid the existing dwelling.

(ii) Submissions

Barunah Park Geelong Pty Ltd (BPG) (S283) lodged a written submission that advised:

- it is seeking to rezone the property to allow residential development
- the rezoning has been delayed pending further environmental assessment and the approval of the Project
- it has had discussions with the Proponent about the alignment through the property, the proposed rezoning and an Option for Easement proposal.

BPG objected to the proposed alignment and submitted that alternative routes had not been adequately assessed. It preferred an alignment further to the south and made submissions about visual and biodiversity impacts. It provided two options described as BPG Alternative Route A and BPG Alternative Route B.

The Proponent responded to the submission in TN020 (D527) that described five options (Routes A, B, C, D and E). Route B was the exhibited route included in the EES. The Proponent advised that Routes D and C were unacceptable for technical and biodiversity reasons and provided an assessment of biodiversity impacts prepared by Jacobs. The Proponent did not make submissions about the relative merits of Routes A, B and E.

BPG advised the IAC (D545) that Route E was acceptable and sought a recommendation that it be adopted.

(iii) Discussion

The IAC has reviewed Routes A, B and E and notes that BPG's preferred Route E would maximise the area of land available for residential development should the rezoning proceed and would be less of a constraint if agricultural use of the land continues. It would, however, impact the existing dwelling.

In relation biodiversity impacts, Jacobs (D527) reported Routes A and E would have greater impacts on native vegetation, the EPBC Act listed GBGW TEC, scattered trees, large patch trees, and fauna habitat than Route B. The Proponent submitted offsets are available for Route B but the availability of offsets for Routes A and E has not been confirmed.

Route E would impose less constraints on land use than Route B but would have greater ecological impacts. The IAC is particularly concerned about the greater impact of Route E on the EPBC Act listed GBGW TEC (1.47 hectares for Route E compared to 0.02 hectares

for Route B), which is equivalent to 19 percent of the total impacts of the whole Project on this MNES (7.56 ha) as assessed in the BD1 Report.

The IAC is satisfied that the exhibited Route B should be retained as the preferred alignment at this location, to avoid and minimise impacts on biodiversity.

(iv) Finding

The IAC finds:

- The exhibited alignment through the Barunah Park Geelong Pty Ltd property should be retained.

15.5 Reviewing the siting of Project infrastructure within directly affected properties

(i) Introduction

The IAC has considered whether there should be an opportunity to further review and refine the siting of Project infrastructure within directly affected properties. This was foreshadowed in Chapter 10 in relation to the Project's agricultural impacts. This discussion only applies to changes *within* a property and not to changes that would relocate the infrastructure to a different property.

In considering the scope of this issue the IAC notes that:

- only 46 of the 230 directly affected landowners lodged submissions on the EES
- 91 of the 230 landowners had entered into an Option for Easement at the time of the Hearing, representing 42 percent of the Project Route.

This suggests there is a level of agreement or acceptance about how the Project is proposed to be developed within many of the affected properties.

The framework for regulating the siting of Project infrastructure is provided in the Incorporated Document:

- Clause 4.5 requires that Development Plans be approved by the Minister for Planning before development starts. The Development Plans must be generally in accordance with the Development Plan submitted for the Minister's Assessment.
- Development Plans can be amended with the approval of the Minister and an application must be accompanied by a written statement explaining and supporting the proposed amendment.
- Clause 4.7 provides for a Micro-siting Plan to be approved by the Minister for Planning that allows for the micro-siting of transmission towers and stringing pads without the need to amend the approved Development Plan. Subject to various conditions, the transmission towers and stringing pads must not be moved more than 50 metres as shown on the approved development plan.

(ii) Submissions

Some submitters opposed the siting of the Project on any part of their land but also submitted that better agricultural and amenity outcomes might be achieved if the

Project infrastructure (typically towers and access tracks) was repositioned within their properties. These issues were raised in written and oral submissions and during the accompanied inspections of various farms when the practical implications of the Project were highlighted and alternative alignments and siting were discussed.

The Proponent did not respond to all the detailed, property specific submissions, and focussed on providing high-level thematic responses to key issues in dispute. It generally considered property specific impacts at an agglomerated (regional and local) level. However, it did provide detailed responses to some submitters during the Hearing, such as S283 (discussed in Chapter 15.4), and to others in its reply submission (D651). It also noted that property specific impacts would be considered during the acquisition and compensation process.

(iii) Discussion

The IAC believes the Proponent should review the location of Project infrastructure on the properties where siting issues were raised in submissions, including the siting of towers and access tracks. While the IAC would have preferred to respond to these submissions itself, it did not have enough information, including relevant technical advice from the Proponent, to form definitive conclusions about many of the detailed issues these submissions raised.

The IAC accepts the Proponent's focus on higher-level issues during the Hearing and understands that the ability to respond to site specific issues would have been impacted by landowners choosing not to engage with the Project and refusing access to their land. However, the IAC would have been assisted by having more detailed property specific information, including property specific technical advice from the Proponent.

The IAC considers the further review should be limited to relevant submissions lodged in response to the EES and involve consultation with the landowners where possible. This should include submitters who have previously chosen to not engage with the Project or have refused access to their properties, but who might agree to consult with the Proponent if the Project is approved. Landowners who choose not to engage in the process would have to accept that this could result in sub-optimal outcomes for their properties and businesses.

The IAC does not believe it is necessary to define a formal process for reviewing these submissions and is satisfied it could occur after the draft PSA is approved. Consequently it has included a general recommendation that the Proponent review relevant submissions in consultation with the landowner. Any agreed changes could be implemented through an amendment to the Development Plan/s under clause 4.5 of the Incorporated Document. The micro-siting provision in clause 4.7 could also be used, but it would have limited practical utility given it only provides for transmission towers and stringing pads to be moved up to 50 metres.

The IAC has reviewed these provisions and has recommend changes to clauses 4.5 and 4.7 to provide for:

- consultation with landowners and neighbouring landowners
- an assessment of impacts on agricultural productivity and general amenity.

(iv) Findings and recommendations

The IAC finds:

- The Proponet should review property specific submissions that sought the relocation of Project infrastructure within a property.
- The review should include consultation with the landowner and with neighbouring landowners who may be adversely affected by a proposed change.
- Changes agreed between the Proponent and landowner should be implemented.

The IAC recommends:

Incorporated Document

Include the following changes:

- Amend clause 4.5.3 (applications to amend the Development Plans) to require the written statement accompanying an application to amend the Development Plans to include:
  - consultation with neighbouring landowners
  - assessing any implications for agricultural productivity and general amenity.
- Amend clause 4.7 (Micro-siting of Transmission Towers and Stringing Pads Plan) to add a new clause 4.7.4 requiring a Micro-siting Plan to be accompanied by a report that describes:
  - consultation with the landowner and neighbouring landowners who may be impacted by a proposed change
  - implications for agricultural productivity and general amenity.

These changes are included at Appendix E:1.

Other recommendation

The IAC recommends:

- The Proponet must review submissions that sought the relocation of Project infrastructure within a property, and consult with the landowner where possible and with neighbouring landowners who may be adversely affected by a proposed change. Where agreed with the landowner and relevant neighbouring landowners, the Proponent should seek approval for changes to the Development Plan/s under clause 4.5 or through the Micro-siting Plan under clause 4.7 of the Incorporated Document.

PART C: INTEGRATED ASSESSMENT

16 Integrated assessment

16.1 Introduction

In Chapter 3.1 the IAC outlines its views on the scope of its task. It concluded that:

- its task is to inquire into and report on the significance and acceptability of the likely environmental effects of the Project described in the EES, namely an overhead transmission line from Bulgana to Sydenham, generally aligned within the area of interest
- it is required to consider whether project modifications are necessary and effective to avoid, mitigate or manage any significant environmental effects of the Project
- it is open to the IAC to consider project modifications involving undergrounding, provided the extent of undergrounding can be properly described as a modification to the Project as described in the EES (not a different project)
- full undergrounding might be considered a different project.

16.2 Significance and acceptability of impacts

For most of the Proposed Route, the IAC has found that subject to its recommendations, the Project's impacts are consistent with legislation and policy, and the evaluation objectives set out in the Scoping Requirements can be met. Should the Project proceed, the IAC is satisfied that its impacts, although significant in some cases, can be managed to an acceptable level.

There are, however, some qualifications and exceptions to this finding.

As discussed in Chapter 4, if the Project proceeds there will be significant impacts on Melbourne Yellow Gum and Brittle Greenhood, which are listed as endangered and critically endangered under the FFG Act. With the application of a bespoke clearance approach at Darley, and strengthened EPRs in relation to seed collection, revegetation and understorey protection, the IAC is satisfied these impacts can be managed to an acceptable level. However, the IAC does not consider the implications of the bespoke clearance approach for bushfire risk have been fully investigated. The bespoke clearance approach may not be approved by ESV. If a bespoke clearance approach cannot be implemented at Darley, then the impacts on biodiversity in this area, particularly Melbourne Yellow Gum, will be considerably greater than assessed.

The Project will have likely significant impacts on two MNES TECs, and possible significant impacts on one MNES TEC and four MNES fauna species. The IAC is satisfied that while significant (if they occur), these impacts can be acceptably managed through the IAC's recommended EPRs and offsets, to achieve acceptable outcomes. See Chapter 4.9.

If the Project proceeds it will have very high visual impacts in many locations along the Proposed Route that cannot be effectively mitigated. The Project's visual impacts in some parts of the volcanic cones landscapes and the Darley area will not meet policy objectives that seek to protect and preserve significant landscape values and visual

amenity. Impacts in those areas may, in isolation, be considered unacceptable. Impacts on some individuals may, in isolation, also be considered unacceptable. See Chapter 6.

Bushfire impacts and risks were a key area of concern for the communities impacted by the Project. The IAC has found that in most locations the Project's bushfire impacts are acceptable. The probability of the Project causing an ignition that escalates into a bushfire is very low. The Project will have some impact on firefighting operations, but with careful management and implementation of the IAC's recommended bushfire mitigation measures, the IAC is satisfied that firefighting operations will not be unduly compromised. Provided safe clearances are observed (including at road crossing points), the presence of the transmission infrastructure would present minimal risk to firefighter or community safety, including from flashover. See Chapter 8.

The exception is the Darley area. The bushfire impacts in Darley are not consistent with the bushfire evaluation objective. The IAC considers the Project's small increase in the already very high bushfire risk in this area is not acceptable, for the reasons set out in Chapters 8.8 and 15.1.

If it proceeds, the Project will negatively impact on agriculture through the loss of productive agricultural land. While this is inconsistent with State planning policy relating to the protection of agricultural land, the impacts on agriculture at a regional level would not be significant and are considered acceptable. Most impacts on directly affected farms would be subject to compensation.

Melton Aerodrome will likely experience negative impacts from the Project if it proceeds. This would not be consistent with State planning policy relating to the protection of airports and airfields. Apart from the impacts on Melton Aerodrome, the IAC is satisfied the Project is consistent with relevant policy and legislation and the draft evaluation objectives relating to impacts on aviation. The likely aviation effects are not significant and the IAC is satisfied any effects are acceptable.

The IAC expects the overarching economic effects of the Project for the Victorian community would be positive. Subject to applying the IAC's recommended change to EPR EC3, the IAC is satisfied the Project is consistent with relevant policy and legislation and the relevant evaluation objective relating to economic impacts. However, there will likely be uncompensated impacts on residential property values for some near neighbours, including in Darley. See Chapter 9.

Efforts have been made to minimise social impacts through route selection and a now comprehensive suite of recommended EPRs that seek to help the community adapt to the Project should it proceed. On balance, the IAC is satisfied the social impacts of the Project are consistent with relevant policy and legislation and the relevant evaluation objectives can be met. That said, even with the additional EPRs, the Project is likely to have significant residual social impacts in many parts of the area surrounding the Proposed Route, particularly in Sections 2 and 3 and in Darley.

16.3 Net community benefit analysis

Net community benefit is relevant for assessing whether the Project should receive planning approval (whether the draft PSA should be adopted). It is also a form of integrated assessment of the Project's environmental, social and economic impacts.

The Project is needed to assist Victoria in its transition to renewables and achievement of net zero. There is strong policy support for renewables, and these policies need to be given considerable weight in the assessment of whether the Project can deliver a net community benefit notwithstanding the residual impacts (some significant) discussed in Chapter 16.2.

The Project will deliver a more secure supply of electricity and facilitate the transition to renewables and the achievement of net zero emissions in Victoria. These are very significant community wide benefits. The Project will likely have a positive overall economic impact for the Victorian community, through facilitating a reliable supply of electricity, securing investment and increasing job numbers (at least during the construction phase).

With some exceptions, the Project is broadly consistent with state and local planning policy and the applicable zoning of the land in the Project Area and surrounds. The Project is generally consistent with applicable overlays, except some of the SLOs. While the Project is not entirely consistent with policies relating to the protection of productive agricultural land and those relating to the protection of aerodromes, the IAC considers these impacts are acceptable when weighed against the Project's benefits.

The inconsistency with policies that seek to protect significant landscape values and visual amenity are more troubling. If the Project proceeds, significant impacts will remain in many parts of the area surrounding the Proposed Route that cannot be effectively mitigated. Many of these areas have significant landscape values, and the applicable planning schemes set a legitimate expectation that those values will be protected and landscape and visual impacts will be considered in planning decisions. If considered in isolation, visual impacts in some of these areas, and for some residents, might be considered unacceptable.

The significant social impacts discussed in Chapter 13 are also troubling. Many of the social impacts currently being experienced by local communities are a result of the nature of the Project development and consultation processes to date. If the Project proceeds, there will be significant and ongoing social impacts, including impacts that are more directly related to the Project itself. However, the EMF includes a comprehensive suite of EPRs designed to help the community adapt to the change. Provided trust can be rebuilt between the Proponent and the community (which will require a sustained effort on both sides), the IAC is satisfied the EPRs will be effective in managing the Project's social impacts to an acceptable level.

The IAC is satisfied that on a proper assessment of the bushfire risk presented by the Project, considering both likelihood and consequence, the risks are both low and acceptable. The IAC is satisfied that except in the Darley area (discussed below), the Project meets the policy directive to prioritise human life above all other considerations.

At a Project level, the IAC is satisfied the Project will deliver a net community benefit.

Darley

In the Darley area, the IAC considers the increase in bushfire risk associated with the Project, while small, is unacceptable for the reasons set out in Chapters 8.8 and 15.1. When those risks are considered cumulatively with the other very significant impacts of the Project on the Darley area and its community, including biodiversity, visual and social impacts, the IAC considers the Project will have unacceptable impacts in that area, for the reasons set out in Chapter 15.1.

Notwithstanding that the Project as a whole will deliver a net community benefit, an alternative approach is required for the section of the Project through Darley. As stated in Chapter 15.1, the IAC does not have sufficient information before it to recommend a particular alternative, including whether this section of the Project should necessarily be undergrounded. The IAC acknowledges the significant additional cost associated with undergrounding, but as stated in Chapter 15.1, this must be considered in the context of the IAC's finding that the impacts of the proposed overhead Project in Darley will be unacceptable.

A way forward

The IAC's findings in relation to the Project's impacts in the Darley area do not mean the Project as a whole should not proceed. The Project could be approved (in part) while further investigations into the Darley area are undertaken.

The IAC does not consider the section of the Project through Darley should receive approval until the investigation into alternatives has been undertaken and an assessment can be made of whether the selected alternative can deliver acceptable outcomes, consistent with legislation, policy and the evaluation objectives. This approach would require amending the extent of the SCO to excise the section of the Proposed Route through Darley, extending from the Korkuperrimul Creek through to Gisborne Road. It would also require consequential changes to the recommended EMF that has been drafted to accommodate the exhibited overhead route through this area.

16.4 Recommendations

The IAC recommends:

If the Project proceeds, approve draft Planning Scheme Amendment GC209 with the following changes:

- **(a) excise the section of the Proposed Route through Darley, extending from the Korkuperrimul Creek through to Gisborne Road, from the Specific Controls Overlay**
- **(b) make the changes to the draft Incorporated Document shown in Appendix E:1.**

If the Project proceeds, amend the Environmental Management Framework as follows:

- **(a) make the changes to the Environmental Management Framework shown in Appendix E:2**
- **(b) review the Environmental Management Framework for consistency, clarity and to address any consequential changes resulting from other**

recommendations in this Report, including the recommendation to excise the section of the Proposed Route through Darley.

PART D: IMPLEMENTATION

17 Project implementation

17.1 Draft Planning Scheme Amendment GC209

(i) Introduction

The IAC was appointed as an Advisory Committee pursuant to section 151(1) of the PE Act. Clause 5 of the IAC's Terms of Reference require it to review the draft PSA, consider issues raised in submissions and recommend any changes it considers necessary.

Table 23 lists the land use and planning evidence.

Table 23 Evidence on land use and planning

Party	Expert	Firm	Expertise	Document number
Proponent	Rob Milner	Milner Planning Advisory	Planning	D107

(ii) What did the EES say?

EES Attachment III includes the draft PSA, planning report and draft Incorporated Document. The PSA proposes to apply a SCO to the Project Area. The Incorporated Document will regulate the use and development of Project infrastructure including utility installations, a new terminal station, upgrades of existing terminal stations and new transmission line infrastructure and associated ancillary purposes.

(iii) Submissions and evidence

The Proponent explained the rationale for the PSA and proposed controls, and relied on EES Attachment III and Mr Milner's evidence. Mr Milner was satisfied the use of the SCO was appropriate and the PSA had been satisfactorily drafted. He considered it was appropriate to base the extent of the SCO mapping on cadastral boundaries rather than the easement boundaries. He considered the SCO would not impact on the continuity of non-Project related land uses in the Project Area, and the micro-siting provision provided a degree of flexibility. He considered the PSA should be reviewed to take account of *Ministerial Direction No.22 – Climate Change Considerations,* Plan for Victoria and planning scheme amendments VC268 and VC283.

Submissions raised various issues that are discussed in relation to specific impacts in Part B of this Report. General drafting issues are discussed below.

Specific Controls Overlay

Submitters raised concerns about the extent of the SCO mapping and the constraints it would impose on landowners. Clause 4.9 of the exhibited Incorporated Document requires the Proponent to prepare a report that reviews the extent of land affected by the SCO and the removal of land not required for the Project. The report must be provided to the Minister as soon as practicable, but no later than three months following completion of construction.

Incorporated Document

The Proponent proposed changes to the Incorporated Document to clarify various requirements and respond to evidence and submissions. The changes are described in D651 and included in the Day 3 Incorporated Document (D653).

Submissions on the Day 3 version raised issues related to:

- preparatory buildings and works being allowed before various plan are prepared and requirements met
- further consultation requirements.

Clause 4.12 of the exhibited Incorporated Document allows preparatory buildings and works to be undertaken prior to other requirements in the Incorporated Document being satisfied.

As previously noted, clause 4.7 of the exhibited Incorporated Document provides for micro-siting of towers and stringing pads no more than 50 metres in any direction from locations shown in the endorsed Development Plans.

Clause 72.01

The Proponent proposed a change to the exhibited schedule of clause 72.01 to limit the role of the Minister as responsible authority within the SCO to: "*administering and enforcing ~~the planning scheme, including~~ the incorporated document….*" (D651). The correction would delete the unintended requirement that the Minister would be responsible for administering and enforcing the whole planning scheme, not just the SCO. The IAC supports this correction and has recommended it be included in the adopted PSA.

(iv) Discussion

The IAC has reviewed the draft PSA and is satisfied that the use of the SCO with the Incorporated Document is an appropriate use of the VPPs. It is also satisfied the preparation and exhibition of the draft PSA have been consistent with the requirements of the PE Act and there are no statutory impediments to it being approved.

The Proponent recommended various changes to the draft PSA, particularly the Incorporated Document, following its consideration of submissions and evidence. The IAC generally supports those changes and has recommended further changes based on the matters discussed in Part B of this Report. It is satisfied the draft PSA will provide a suitable framework for managing the use and development of the Project.

Other general and drafting issues are discussed below.

Specific Controls Overlay

The IAC agrees with Mr Milner that the use and scope of the SCO are appropriate given the nature of the Project. The IAC supports the requirement in the Incorporated Document that the SCO mapping be reviewed following the Project's construction. The IAC does not believe the SCO will be as constraining as submitters fear and is satisfied the requirement to provide the mapping review report "*as soon as practicable, but no later than 3 months following completion of construction of the Project*" provides an appropriate level of flexibility about when this work is done.

Incorporated Document

The IAC has reviewed the definition of 'preparatory buildings and works' that can proceed prior to various conditions being met and is satisfied it is appropriate. It notes the buildings and works are generally minor and are typical of those subject to similar provisions for other major projects. Preparatory works do not include works that would otherwise require a planning permit.

The IAC notes the Day 3 version of the Incorporated Document introduced a new element into the definition of preparatory buildings and works:

> k) Construction of access tracks required to enable any Preparatory Buildings and Works to be carried out.

This inclusion was opposed in submissions because access tracks could be constructed without regard to the EMF and impacts on matters such as agriculture, biosecurity, sediment control, ground water and surface water.

The IAC notes that these access tracks are limited to those associated with preparatory buildings and works and are not the permanent access tracks that would be subject to a carriageway easement. The IAC is satisfied that access tracks for preparatory buildings and works would be less impactful and need not be subject to the EMF.

However, the IAC recommends the alignment, construction and use of the tracks be decided in consultation with the affected landowners to identify and address any potential property specific impacts. As discussed in Chapter 10, the IAC adopted a similar approach in relation to biosecurity requirements that should be observed when preparatory buildings or works are being undertaken.

Recommended changes to consultation and engagement provisions in the Incorporated Document and EMF are discussed in:

- Chapter 4.4 (considering local knowledge in the mapping of eagle nesting sites)
- Chapter 5.2 (increased consultation with RAPs and Traditional Owner groups)
- Chapter 5.3 (consultation with the relevant statutory authority and/or the owner of the heritage place in relation to archival recording and repair or reinstatement works)
- Chapter 8.3 (consultation with relevant fire authorities in relation to vegetation management in the easement)
- Chapter 8.6 (consultation with relevant fire authorities in relation to information, support and training, advice on minimum road clearances of the transmission lines at each road crossing point, and pre-planning any additional resources that may be required)
- Chapter 8.6 (real time or close to real time information about de-energisation and re-energisation of lines in an incident or emergency)
- Chapter 13.5 (liaising with the Councils and local medical services and community groups in relation to informing the community of the availability of mental health support services)
- Chapter 13.5 (engaging an independent facilitator to assist with the implementation of EPRs that require direct community engagement)
- Chapter 14.2 (consultation with local Councils on the Surface Water Management Plan).

Clause 72.01

The IAC supports the correction sought by the Proponent and has recommended it below.

(v) Finding and recommendations

The IAC finds:

- The draft PSA and Incorporated Document are appropriate to facilitate the Project.

The IAC recommends:

Incorporated Document

Include the following change:

- Amend clause 4.12 to require that the alignment, construction and use of access tracks for preparatory buildings and works be decided in consultation with the landowner to address any potential property specific impacts.

Draft Planning Scheme Amendment GC209

The IAC recommends:

If the Project proceeds, approve draft Planning Scheme Amendment GC209 with the following changes:

(c) modify the schedule to clause 72.01 in the relevant planning schemes to establish the Minister for Planning as responsible for administering and enforcing the Project's Specific Control Overlay, not the whole planning scheme.

17.2 Environmental Management Framework

(i) Introduction

Clause 35f of the IAC's Terms of Reference require its Report to contain:

> recommendations as to the structure and content of the proposed environmental management framework, including with respect to monitoring of environmental effects and contingency plans and site rehabilitation

The IAC discusses the relevant elements of the EMF in Part B of this Report where it makes various recommendations that are included in the recommended EMF at Appendix E:2.

(ii) What did the EES say?

The EMF is included at EES Chapter 29.

The exhibited Incorporated Document requires an EMF to be approved by the Minister for Planning. The Incorporated Document describes what the EMF must include and establishes that the use and development of the Project must be in accordance with the EMF, including the EPRs and all plans and procedures required by them. This is the mechanism by which the EMF becomes enforceable.

(iii) Submissions

The Proponent's submissions described the changes it proposed following its consideration of evidence and submissions. It also provided responses to submissions that sought changes to the EMF, including submissions on the Day 3 version.

The Proponent noted that there are references to AEMO in the EMF that should be replaced with VicGrid (D690).

Submitters raised general concerns about:

- the enforceability of the EMF
- the use of terms such as *"generally in accordance with"* and *"to the extent reasonably practicable"*
- the deferral of detailed plans to later in the process
- the lack of detail in EPR EM11 (Develop and implement a Decommissioning Management Plan).

The Proponent submitted:

- The EMF and EPRs are enforceable through the Incorporated Document.
- Some of the language in the EMF is intended to provide some post-approval flexibility. This is consistent with typical planning approvals, including approvals for complex major projects.
- The deferral of detailed plans is necessary where further investigations and information are required. This is consistent with typical planning approvals, including approvals for complex major projects.
- EPR EM11 includes appropriate detail and flexibility given that decommissioning would not occur for many years. The Day 3 version includes new consultation requirements.

The specific issues raised by submitters and experts, particularly in relation to the mitigation measures, are discussed in Part B of this Report.

(iv) Discussion

The Proponent made extensive changes to the exhibited EMF following its consideration of submissions and evidence. The IAC generally supports the Proponent's responses to submissions and evidence about the EMF and its Day 3 EMF unless otherwise stated in this Report.

The IAC has considered the general concerns raised by submitters that were noted above and the Proponent's responses. It agrees with the Proponent that the EMF is enforceable through the Incorporated Document and the PE Act, and that the language used in the EMF is typical of these types of planning approvals, is well understood and provides appropriate flexibility. As discussed in Chapter 10.2, detailed plans are not necessary at this stage of the approval process in all circumstances, and can be deferred until later in the process and when further information is available.

The IAC is satisfied the EMF will provide an appropriate framework approving the Project, subject to the recommended changes discussed in Part B of this Report and included in Appendix E:2.

The IAC has also recommended various language and content changes to the EMF that clarify its requirements and the actions that need to be undertaken. These will assist its implementation. Some of these address detailed drafting matters raised by submitters.

The IAC has undertaken a limited review for the consistent use of language and formatting. The EMF will need further revision, including format changes and updated page and section numbering and cross referencing, so that it can be read as a standalone document rather than as part of the EES. References to AEMO should also be reviewed and where appropriate replaced with VicGrid.

(v) Finding and recommendation

The IAC finds:

- The recommended Environmental Management Framework will provide an appropriate framework for managing the Project's environmental effects.

The IAC recommends:

If the Project proceeds, amend the Environmental Management Framework as follows:

(a) replace relevant references to AEMO with VicGrid.

17.3 Other statutory approvals

(i) Environment Protection and Biodiversity Conservation Act

The Project was determined to be a controlled action under the EPBC Act because of likely significant impacts on MNES. The EES forms the basis of the assessment of environmental impacts under the EPBC Act, pursuant to the Bilateral Agreement between the Commonwealth and Victorian governments.

MNES are discussed in Chapter 4.9. The IAC is satisfied the recommended mitigation measures provide an appropriate framework for compliance with the EPBC Act. Relevant biodiversity EPRs in the EMF and the offset conditions in the Incorporated Document should be translated into conditions on approvals issued under the EPBC Act.

(ii) Environment Protection Act

The EP Act provides the legislative framework for managing pollution and waste and establishes the Environment Reference Standard and General Environmental Duty.

Environmental impacts that are regulated under the EP Act are discussed in Chapter 14. The IAC is satisfied the recommended EPRs provide an appropriate framework for compliance with the EP Act.

(iii) Aboriginal Heritage Act

The Aboriginal Heritage Act requires the approval of nine CHMPs before the Project can proceed. Chapter 5.2 discusses the CHMP process, including the status and further actions that are necessary to finalise them.

Based on the material presented to it, the IAC is not aware of any impediments to the CHMPs being finalised.

(iv) Heritage Act

The Heritage Act requires a permit from Heritage Victoria to interfere with a heritage place or object listed on the Victorian Heritage Register, a site listed on the Victorian Heritage Inventory or an 'archaeological site' not listed on the Victorian Heritage Inventory. Chapter 5.3 discusses historical heritage impacts and notes when consent might be required from Heritage Victoria.

The IAC is satisfied the recommended EPRs provide an appropriate framework for compliance with the Act.

(v) Road Management Act

Transport is discussed in Chapter 12. The *Road Management Act 2004* requires consent from the relevant road authority to conduct works in, on, or under public roads in the Victorian road network. The relevant road authorities are:

- the Head, Transport for Victoria (coordinating road authority) for declared arterial roads and freeways
- municipal councils for municipal roads within their municipal districts.

Any works that are required will be confirmed through the further work required under the EMF, including the TMPs that will be prepared to the satisfaction of the relevant road authorities.

The IAC is satisfied there are no impediments to approval under this Act, subject to compliance with relevant EPRs.

(vi) Flora and Fauna Guarantee Act

The FFG Act lists threatened flora and fauna species and communities and includes requirements for removing listed species. The Project may require a permit or licence from DEECA to take or remove listed flora from public land pursuant to section 48 of the FFG Act.

The IAC is satisfied there are no impediments to any required approval under this Act, subject to compliance with relevant EPRs.

(vii) Wildlife Act

The Project will require authorisation pursuant to sections 22, 28A and 28G of the *Wildlife Act 1975* should any wildlife be encountered during construction and require salvage. A suitably qualified wildlife handler holding a current management authorisation under the *Wildlife Act 1975* may be engaged to salvage wildlife if required.

The IAC is satisfied there are no impediments to any required approval under this Act, subject to compliance with relevant EPRs.

(viii) Water Act

A permit is required for any works on designated waterways or to construct, alter, operate, remove or decommission a bore, in accordance with section 67 of the *Water Act 1989*. The Project will cross designated waterways at several different locations. The Project might also require a permit for the taking or use of water from a waterway or groundwater from bores, pursuant to section 51 of the *Water Act 1989*.

Surface water and groundwater are discussed in Chapters 14.1 and 14.2. The IAC is satisfied there are no impediments to approvals under this Act, subject to compliance with relevant EPRs.

(ix) Crown Land Reserves Act

Parks Victoria manages the Lexton (H5) Bushland Reserve and the Bullarook Creek Streamside Reserve in accordance with the *Crown Land (Reserves) Act 1978* (CLRA). The Proponent would need to apply for authorisation to undertake works in the reserves. The IAC is satisfied there are no impediments to any required approval under this Act, subject to compliance with relevant EPRs.

(x) Recommendation

The IAC finds:

- The recommended Environmental Management Framework will provide an appropriate framework for managing the Project's environmental effects.

The IAC recommends:

If the Project proceeds, include conditions on the approval under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) consistent with:

(a) the relevant native vegetation offset conditions (clause 4.10) in the Incorporated Document as shown in Appendix E:1

(b) the relevant biodiversity (BD) Environmental Performance Requirements in the Environmental Management Framework as shown in Appendix E:2.

PART E: RESPONSE TO TERMS OF REFERENCE

18 Response to Terms of Reference

18.1 Analysis and findings

Clause 35 of the Terms of Reference details what analysis and findings the IAC's report must contain. Table 24 summarises the IAC's response to clause 35 including the relevant Report reference. The detailed information and analysis supporting the IAC's conclusions are included in Part B of this Report.

Table 24 Response to Terms of Reference (analysis and findings)

Terms of Reference	Analysis and findings	Report reference
35a analysis and conclusions with respect to the environmental effects of the Project and their significance and acceptability	Subject to the IAC's recommendations, most of the Project's environmental effects are not expected to be significant and can be acceptably managed through the IAC's recommended EMF, Incorporated Document and other recommendations. The IAC has assessed effects in Darley as being significant, including biodiversity, landscape and visual, bushfire, economic, and social effects. Biodiversity, landscape and visual effects and social effects will be significant elsewhere in the area surrounding the Proposed Route. However, with the exception of Darley, when considered cumulatively in the context of the Project's benefits, the effects are considered acceptable.	Parts B, C and D
35b findings on whether acceptable environmental outcomes can be achieved, having regard to legislation, policy, best practice, and the principles and objectives of ecologically sustainable development	Subject to its recommendations, the IAC considers acceptable environmental outcomes can be achieved. The IAC considers that the cumulative adverse effects in the Darley area are unacceptable and further investigation of options in this area is necessary.	Parts B, C and D
35c recommendations and/or specific measures that it considers necessary and appropriate to prevent, mitigate or offset adverse significant environmental effects	The IAC has recommended specific measures to prevent, mitigate or offset adverse significant environmental effects. A consolidated list of these recommendations is provided in Table 26.	Parts B and D
35d recommendations relating to the Project alternatives considered through the EES and	The IAC has recommended changes to the EMF and Incorporated Document to improve the management of the Project's significant environmental effects. This includes some Project	Part B

Terms of Reference	Analysis and findings	Report reference
any feasible modifications to the design or management of the Project that would offer improved environmental outcomes, particularly in relation to reducing or mitigating significant environmental effects	modifications (for example, modifications required to achieve better biodiversity outcomes and modifications to ensure minimum safe clearances can be provided at key road crossing points). As noted above, the IAC concluded that effects in the Darley area are unacceptable and investigation of alternative options in this area is necessary. The EES assessed alternatives in Darley, but did not include adequate information for the IAC to recommend an alternative or feasible modification. Consequently, further investigation of options in this area are necessary.	
35e recommendations for any appropriate conditions that may be lawfully imposed on any approval for the Project, including with respect to the structure or content of the draft PSA	Table 26 includes a consolidated list of the IAC's recommended changes to the conditions of the Incorporated Document. It has not identified conditions that it considers should be imposed on any other Project approval, save for appropriate biodiversity EPRs and offset conditions that should be reflected in approvals under the EPBC Act. Except for the Darley area, the IAC is not aware of any matters that would preclude any relevant statutory approvals.	Parts B and D and Appendices E1 and E2
35f recommendations as to the structure and content of the proposed EMF, including with respect to monitoring of environmental effects and contingency plans	The IACs recommended changes to the EMF (consolidated in Table 26) provide an appropriate framework to manage the Project's environmental effects.	Parts B and D and Appendix E2
35g specific findings and recommendations about the predicted impacts on MNES and their acceptability, including appropriate controls and environmental management	There are likely to be: - significant impacts on two MNES TECs - possible significant impacts on one MNES TEC - possible significant impacts on four MNES fauna species. These impacts can be acceptably managed through conditions and offsets. The approvals under the EPBC Act should include appropriate conditions that reflect the relevant biodiversity EPRs in the EMF and the offset conditions in the Incorporated Document.	Chapter 4.9

18.2 Information the Report should contain

Clause 36 of the Terms of Reference details what information the IAC's report should include. Table 25 identifies where this information is located in the Report.

Table 25 Response to Terms of Reference (information the Report should contain)

Clause 36 report requirements	Report reference
36a information and analysis in support of the IAC's findings and recommendations	Parts B and C
36b a list of all recommendations, including cross-references to relevant discussions in the Report	Table 26
36c a description of the public hearing conducted by the IAC, and a list of those persons consulted with or heard	Chapter 1 and Appendix C
36d a list of all submitters in response to the exhibited EES and draft PSA	Appendix B
36e a list of the documents tabled during the proceedings	Appendix D

18.3 List of recommendations

Clause 36b of the Terms of Reference requires the IAC to list all recommendations, including cross-references to relevant sections of this Report. Table 26 includes this information.

Table 26 Response to Terms of Reference (consolidated list of recommendations)

IAC recommendation	Report reference
Primary recommendations	
If the Project proceeds, approve draft Planning Scheme Amendment GC209 with the following changes: (a) excise the section of the Proposed Route through Darley, extending from the Korkuperrimul Creek through to Gisborne Road, from the Specific Controls Overlay (b) make the changes to the draft Incorporated Document shown in Appendix E:1 (c) modify the schedule to clause 72.01 in the relevant planning schemes to establish the Minister for Planning as responsible for administering and enforcing the Project's Specific Control Overlay, not the whole planning scheme.	Chapters 16.4 and 17.1
If the Project proceeds, amend the Environmental Management Framework as follows: (a) make the changes to the Environmental Management Framework shown in Appendix E:2 (b) review the Environmental Management Framework for consistency, clarity and to address any consequential changes resulting from other recommendations in this Report, including the recommendation to excise the section of the Proposed Route through Darley	Chapters 16.4 and 17.2

IAC recommendation	Report reference
(c) replace relevant references to AEMO with VicGrid.	
If the Project proceeds, include conditions on the approval under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) consistent with: (a) the relevant native vegetation offset conditions (clause 4.10) in the Incorporated Document as shown in Appendix E:1 (b) the relevant biodiversity (BD) Environmental Performance Requirements in the Environmental Management Framework as shown in Appendix E:2.	Chapter 17.3
Incorporated Document	
Amend clause 4.5 (Development Plans) to require the Development Plans to specify the minimum clearance of the transmission lines above the road surface at all road crossing points along the Project alignment.	Chapter 8.6
Amend clause 4.5.3 (applications to amend the Development Plans) to require the written statement accompanying an application to amend the Development Plans to include: - consultation with neighbouring landowners - assessing any implications for agricultural productivity and general amenity.	Chapter 15.5
Amend clause 4.7 (Micro-siting of Transmission Towers and Stringing Pads Plan) to add a new clause 4.7.4 requiring a Micro-siting Plan to be accompanied by a report that describes: - consultation with the landowner and neighbouring landowners who may be impacted by a proposed change - implications for agricultural productivity and general amenity	Chapter 15.5
Amend clause 4.10 (Native Vegetation) to include a requirement for offsets to be sourced locally to the extent reasonably practicable.	Chapter 4.8
Amend clause 4.11 (Bushfire Management) to insert additional requirements in clause 4.11.1 to ensure the Bushfire Management Plan: - applies during both the construction and operational phases - includes a requirement to consult with fire authorities in relation to vegetation management in the easement throughout the operations phase - includes procedures to ensure an ignition resulting from a failure of Project infrastructure is immediately identified and brought under control.	Chapters 8.3 and 8.4
Amend clause 4.11 (Bushfire Management) to add a new clause 4.11.2 to require the Development Plans to provide a minimum road clearance of 25 metres (plus the height of a firefighting appliance) at any road crossing point on a road: - that is designated in a Municipal Fire Management Plan as a strategic fire control line, fuel break or priority access and egress route, or - where suitable safe alternative access and egress routes are not available.	Chapter 8.7
Amend clause 4.11 (Bushfire Management) to add a new clause 4.11.4 requiring consultation and coordination with the relevant fire authorities to ensure: - appropriate information, support and training is available to firefighting personnel to enable them to adapt to the presence of the Project in the	Chapter 8.6

IAC recommendation	Report reference
landscape - fire authorities are aware of the minimum heights of the transmission lines (in worst case conditions) at every road crossing point along the Project alignment - pre-planning occurs for any additional firefighting resources that may be required in the area surrounding the Proposed Route as a result of constraints placed on firefighting operations by the Project.	
Amend clause 4.11 (Bushfire Management) to add a new clause 4.11.5 requiring fire authorities to be notified when the transmission line is de-energised and re-energised in an incident or emergency.	Chapter 8.6
Amend clause 4.12 (Preparatory Buildings and Works) to require that: - preparatory buildings and works have regard to existing biosecurity arrangements that are in place for specific properties and any biosecurity issues raised by the landowner - the alignment, construction and use of access tracks for preparatory buildings and works be decided in consultation with the landowner to address any potential property specific impacts.	Chapters 10.5 and 18.1
Amend clause 4.13 (Temporary Workforce Accommodation Facilities) to add a requirement to clause 4.13.2 (c) to consider sewage and greywater management.	Chapter 14.2
Environmental Management Framework	
Biodiversity	
Amend EPR BD2 to require the Construction Vegetation Management Plan to identify: - areas in which a partial or minimised clearance approach will be implemented (depending on the outcome of the further investigations required under EPR BD10) - measures to minimise impacts in those areas and areas identified in the understorey retention plan in EPR BD9 - measures to avoid the use of heavy machinery and ground disturbance in Brittle Greenhood habitat areas. - additional measures to mitigate impacts on Melbourne Yellow Gum if the bespoke minimised clearance approach in the Darely area cannot be implemented and the extent of clearance is more than as assessed in the BIA and BD1 report - low impact techniques for any removal of overstorey vegetation in Brittle Greenhood habitat and in areas identified in the understorey retention plan based on arborist advice.	Chapter 4.5
Amend BD2 to require the Construction Vegetation Management Plan to include measures to minimise impacts on "*any other threatened indigenous flora identified during the completion of the field surveys or the construction phase of the Project*".	Chapter 4.5
Amend BD2 to require the threatened flora measures in the Construction Vegetation Management Plan to include requirements for:	Chapter 4.5

IAC recommendation	Report reference
- seed collection from the Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia threatened ecological community for use in revegetation and remediation for the Project - local Landcare Groups to be provided the opportunity for seed collection from threatened species trees that are to be removed, including Yarra Gum.	
Amend EPR BD3 to require local knowledge to be considered in the mapping of eagle nesting sites.	Chapter 4.6
Amend EPR BD4 to require the Threatened Fauna Management Plans to include measures to minimise impacts to habitat for any other threatened indigenous fauna identified during the completion of the field surveys or the construction phase of the Project (in addition to the species already listed).	Chapter 4.5
Amend EPR BD5 to require: - annual publication of the results of the carcass monitoring program - periodic review of the carcass monitoring plan taking into account the effects of climatic variability on bird and bat movements.	Chapter 4.4
Amend EPR BD7 to require the Operational Vegetation Management Plan to include: - practices and processes for retaining as much vegetation as reasonably practical in the easement, including in the areas in which partial clearance approaches will be implemented (subject to the further investigations required under EPR BD10) - low impact tree removal techniques and measures to avoid the use of heavy machinery and ground disturbance in Brittle Greenhood habitat areas.	Chapter 4.5
Amend EPR BD10 to require further investigation of the partial clearance approach in other areas of higher biodiversity value (other than the Lexton Bushland Reserve area), including the Darley area and other areas identified by the IAC in this Report.	Chapter 4.3
Amend EPR BD10 to require investigation of the feasibility of using modified clearance requirements and/or higher towers to minimise impacts on the River Red Gums that line the riparian zone of Kororoit Creek.	Chapter 4.7
Amend EPR BD10 to require investigation of the feasibility of using modified clearance requirements and/or higher towers to minimise impacts on the Bullarook Streamside Reserve and Birch Creek riparian zone.	Chapter 15.3
Add a new EPR BD12 that requires funding to support revegetation within the biolinks impacted by the Project, and offers affected landholders support for revegetation to replace remnant vegetation and native vegetation plantings within their properties.	Chapter 4.7
Amend EPRs BD1, BD2, BD6, BD7 and BD9 to reflect the IAC's recommended changes to EPR BD10.	Chapter 4.3
Amend EPRs BD2, BD4, BD6, BD7, BD8 and BD9 and BD10 to make other changes to improve clarity and implementation.	Chapter 4.5

IAC recommendation	Report reference
Aboriginal cultural heritage	
Amend EPR EM15 to require the Traditional Owner Engagement and Communications Plans to: - be prepared consistent with the Leading Practice Principles: First Nations and Renewable Energy Projects guidelines - outline how to best support Traditional Owner groups' participation in EPRs ACH2 (negotiating and implementing CVAs), ACH3 (registrations of intangible values), EC2 (procurement) and BD11 (culturally significant species and materials salvage plans) (as well as SC3).	Chapter 5.2
Amend EPR EC2 (procurement) to include a reference to the Traditional Owner Engagement and Communications Plans.	Chapter 5.2
Amend EPR ACH2 to ensure better engagement with Traditional Owner groups and greater opportunities for self-determination in relation to CVAs.	Chapter 5.2
Amend EPR BD2 (construction vegetation management plan) to provide for Traditional Owner involvement in seed collection for Melbourne Yellow Gum.	Chapter 5.2
Amend EPR BD6 (measures to manage riparian and aquatic habitat) to provide for consultation with Traditional Owner groups with land and waterway management responsibilities.	Chapter 5.2
Amend EPR BD11 (culturally significant species and materials salvage plan) to provide for: - surveys (as well as salvage) by Traditional Owner groups - information to be provided to construction personnel on culturally significant species - the plan to be consistent with the engagement approach outlined in the Traditional Owner Engagement and Communications Plans.	Chapter 5.2
Amend EPR SC3 (employment opportunities) to require consultation with Traditional Owner groups on aspects relating to First Nations people.	Chapter 5.2
Historical heritage	
Amend EPR HH1, HH2 and HH5 to ensure appropriate consultation with the relevant statutory authority and/or the owner of the heritage place in relation to archival recording and repair or reinstatement works.	Chapter 5.3
Economic	
Amend EPR EC3 to clarify that the Business Mitigation and Support Strategy must address operational as well as amenity impacts.	Chapter 9.5
Agriculture and forestry	
Amend EPR AF1 to include a requirement to define the safety assessment and permit to work processes in the Agriculture and Forestry Business Mitigation and Support Strategy.	Chapter 10.5
Amend EPR EM8 to require that the Biosecurity Management Plan applies to the operational phase and makes provision for property specific plans where	Chapter 10.6

IAC recommendation	Report reference
appropriate.	
Aviation	
Amend EPR EC3 so that it applies to businesses that operate out of the Melton Aerodrome.	Chapter 11.3
Social	
Amend EM14 to include a requirement to liaise with the Councils and local medical services and community groups to ensure they are aware of the mental health services provided by the Proponent and know how to refer people to the services.	Chapter 13.5
Amend the EMF to include a requirement for the Proponent to engage an independent facilitator(s) to liaise with individual landholders and community members (at their option) in relation to the implementation of any EPRs that require direct engagement between AusNet or its contractors and individual landholders or community members	Chapter 13.5
Amend EPRs EM10 and EM16 to improve clarity and implementation.	Chapter 13.5
Amend EPRs EM5, EM10, LV2, EC1, EC3, LV1 and LV2 to delete qualifications that limit EPRs to landowners who agree to engage.	Chapter 13.5
Surface water	
Amend Table 29.9 and EPR SW2 to require consultation with local councils on the Surface Water Management Plan.	Chapter 14.2
Greenhouse gas	
Amend EPR SG2 to refer to the "*implementation*" of environmentally sustainable design.	Chapter 14.8
Other recommendations	
The Proponent should revise and update the guidance related to safety assessments and permits to work to better reflect the material provided in Technical Note 17 (D519) and to proactively assist landowners in understanding and effectively managing those processes. This material should be published on the Project website and be made available to directly affected landowners.	Chapter 10.5
The Proponent should investigate alternative options for the design or route of the Project through Darley. This may include further investigation of the options assessed in EES Attachment 1.	Chapter 15.1

Appendix A Terms of Reference

Terms of Reference

Western Renewables Link Inquiry and Advisory Committee
Inquiry and Advisory Committee

Version: June 2025

The Western Renewables Link Inquiry and Advisory Committee (IAC) is appointed to inquire into, and report on, the proposed Western Renewables Link (the project) and its environmental effects in accordance with these terms of reference.

The IAC is appointed pursuant to:

- section 9(1) of the *Environment Effects Act 1978* (EE Act) as an inquiry; and
- part 7, section 151(1) of the *Planning and Environment Act 1987* (P&E Act) as an advisory committee, to consider the draft planning scheme amendment (PSA) GC209.

Name

1. The IAC is to be known as the 'Western Renewables Link IAC'.

Skills

2. The IAC should consist of members with expertise in:
   a. electrical transmission infrastructure and engineering;
   b. land use (including agriculture, socio-economic and bushfire) and social effects;
   c. biodiversity and ecology; and
   d. statutory planning.
3. The IAC will comprise an appointed Chair (IAC Chair), a Deputy Chair and other appropriately qualified members.

Purpose of the IAC

4. The IAC is appointed by the Minister for Planning (the Minister) under section 9(1) of the EE Act to hold an inquiry into and report on the environmental effects of the project. The IAC is to:
   a. review and consider the environment effects statement (EES), the other exhibited documents and submissions received in relation to the project, with a focus on matters where there is potential for significant environmental effects, in particular for biodiversity and ecology, Aboriginal and historic cultural heritage values, landscape and visual values, land use and the community;
   b. consider and report on the significance and acceptability of likely environmental effects of the project, having regard to relevant policy and legislation and relevant evaluation objectives in the EES scoping requirements;
   c. consider and report on potential significant impacts on relevant matters of national environmental significance protected under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), including the significance and acceptability of residual impacts;
   d. identify any additional mitigation measures and/or project modifications beyond those identified in the EES the IAC considers necessary and effective to avoid, mitigate or manage the significant environmental effects of the project consistent with relevant policy and legislation; and
   e. advise on how these modifications and measures should be implemented through the necessary approvals and consents for the project.
5. The IAC is also appointed as an advisory committee under section 151(1) of the P&E Act to:

a. review draft PSA GC209, which has been prepared to apply a Specific Controls Overlay (SCO) and establish planning approval for the project under an incorporated document;
b. consider issues raised in public submissions received in relation to the draft PSA; and
c. recommend any changes to the draft PSA that it considers necessary.

6. The IAC must produce a report of its findings and recommendations to the Minister on the environmental effects and draft PSA, to inform:
   a. the Minister's assessment under the EE Act, which will be considered by statutory decision makers for the project;
   b. the Minister's consideration of the draft PSA under the P&E Act in due course.

Background

Project outline

7. Western Renewables Link comprises the development of high voltage transmission infrastructure to link the Western Renewable Energy Zone to the Victorian transmission grid. The project was identified through a regulatory investment test for transmission (RIT-T) process undertaken by the Australian Energy Market Operator (AEMO) in its capacity as Victoria's transmission network planner.
8. The proponent's preferred configuration for the project, as described in the EES, comprises the development of overhead high voltage transmission lines that will carry electricity from Bulgana in western Victoria to Sydenham in Melbourne's north-west. The new transmission lines will operate at 500kV end to end. The total length of the project is approximately 190km.
9. The project's proponent is AusNet Transmission Group Pty Ltd (AusNet), which is responsible for preparing technical studies, consulting with the public and stakeholders and preparing an EES and draft PSA.

EES assessment process

10. In response to a referral under the EE Act from the proponent, the then Minister for Planning determined on 4 August 2020 that an EES was required for the project and issued his decision with procedures and requirements for the preparation of the EES.
11. On 11 August 2023 a new referral was accepted for the project which does not encompass construction of a new terminal station north of the existing Sydenham Terminal Station. In response to this new referral, the Minister for Planning determined on 22 August 2023 that an EES was required for the updated project and issued her decision with procedures and requirements for the preparation of the EES as specified in Attachment 1.
12. The EES was prepared by the proponent in response to the updated final EES scoping requirements issued by the Minister for Planning in November 2023.
13. The EES (including the draft PSA) will be placed on public exhibition for forty (40) business days. The public comment process is in accordance with the procedures and requirements issued for this EES by the Minister. AusNet is responsible for public notice of EES exhibition.

Commonwealth assessment process

14. Because of its likely significant impacts on matters of national environmental significance, the project was determined to be a controlled action requiring assessment and approval under the EPBC Act on 2 September 2020. The relevant controlling provisions under the EPBC Act are listed threatened species and communities (sections 18 & 18A).
15. Under the EPBC Act bilateral agreement between the Australian and Victorian governments, the Victorian EES process is serving as the accredited assessment process to address EPBC Act assessment requirements for this project. The assessment of environmental effects to be made by the

Victorian Minister for Planning will be provided to the Commonwealth Minister for Environment and Water to inform the approval decision under the EPBC Act.

Planning approval process

16. The IAC is to consider and provide advice on draft PSA GC209 which proposes planning controls and provisions that will allow for, and facilitate, the use and development of the project. The PSA is proposed to apply a SCO to land along the transmission alignment within the Northern Grampians, Pyrenees, Ballarat, Hepburn, Moorabool and Melton Planning Schemes. The incorporated document will regulate the use and development of project infrastructure including utility installations, a new terminal station, upgrades of existing terminal stations and new transmission line infrastructure and associated ancillary purposes.

Other approvals

17. The project will require other statutory approvals and/or consents, as outlined in the EES, which is expected to include the following:
    a. approved cultural heritage management plans under the *Aboriginal Heritage Act 2006*;
    b. a permit to remove listed flora and fauna under the *Flora and Fauna Guarantee Act 1988*;
    c. an oversize overmass permit for the transport of materials on Victorian roads under the *Heavy Vehicle National Law Application Act 2013*;
    d. a permit to install and/or maintain electricity lines in proximity to land or adjacent to rail infrastructure under the *Rail Management Act 1996*;
    e. consents or agreements for works undertaken in a road under the *Road Management Act 2004*;
    f. consent to disturb a site listed on the Victorian Heritage Register (VHR) or the Victorian Heritage Inventory (VHI) or an archaeological site not listed under the *Heritage Act 2017*;
    g. approvals for works in waterways under the *Water Act 1989*; and
    h. an authority to take or disturb wildlife under the *Wildlife Act 1975*.

Process

Stage 1 – Submissions

18. Submissions on the EES and draft PSA are to be provided in writing on or before the close of submissions.
19. Submissions will be collected by the office of Planning Panels Victoria (PPV) through the Engage Victoria platform. All submissions must state the name and address of the person making the submission. Submissions will be collected and managed in accordance with the privacy guidance on the PPV website.
20. Petition responses will be treated as a single submission and only the first names from a petition submission will be registered and contacted.
21. Pro-forma submitters will be registered and contacted individually if they provide their contact details. However, the IAC should encourage pro-forma submitters who want to be heard at the hearing to present as a group, given their submissions raise the same issues.
22. All written submissions and other supporting documentation or evidence received through the course of the IAC process will be published online, unless the IAC specifically directs that the submission or other material, or part of it, is to remain confidential. Requests for submissions or other material to be kept confidential must be clearly stated in writing to the IAC through PPV, consistent with the process outlined in the IAC's Privacy Collection Statement. The IAC will review these and base its decision to maintain confidentiality on whether it would be fair to the proponent and other parties to the hearing. It is common practice that confidential submissions must be shared with the proponent to ensure issues

raised can be appropriately considered and dealt with. In these instances, confidential submissions will be allocated a submission number but will not be made publicly available or only published in part depending on the IAC's decision.

23. PPV must provide electronic copies of each submission on the EES and draft PSA to the proponent, Department of Transport and Planning (DTP) (Impact Assessment and Infrastructure Assessment), Northern Grampians Shire, Pyrenees Shire, Ballarat Shire, Hepburn Shire, Moorabool Shire, City of Melton, Barengi Gadjin Land Council Aboriginal Corporation, Eastern Maar Aboriginal Corporation, Dja Dja Wurrung Clans Aboriginal Corporation, Wadawurrung Traditional Owners Aboriginal Corporation, Wurundjeri Woi-Wurrung Cultural Heritage Aboriginal Corporation and First Peoples – State Relations.
24. PPV must retain any written submissions and other documentation provided to the IAC for a period of five years after the time of the IAC's appointment.

Stage 2 – Public hearing

25. The IAC must hold a public hearing and may make other such enquiries as are relevant to undertaking its role, consistent with these terms of reference.
26. Prior to the commencement of the public hearing, the IAC must hold a directions hearing to make directions it considers necessary or appropriate as to the conduct, scope or scheduling of the public hearing.
27. When it conducts a public hearing, the IAC has all the powers of an advisory committee that are specified in section 152(2) of the P&E Act.
28. The IAC may inform itself in any way it sees fit, but must review and consider:
    a. the exhibited EES and draft PSA;
    b. all submissions and evidence provided to the IAC by the proponent, state agencies, local councils and submitters;
    c. the views (if known) of Traditional Owners and Registered Aboriginal Parties;
    d. any information provided by the proponent and parties that respond to submissions or directions of the IAC; and
    e. any other relevant information that is provided to, or obtained by, the IAC.
29. The IAC must conduct its process in accordance with the following principles:
    a. the public hearing will be conducted in an open, orderly and equitable manner, in accordance with the principles of natural justice;
    b. the public hearing will be conducted with a minimum of formality and without legal representation being necessary for parties to be effective participants; and
    c. the IAC process and hearing itself is to be exploratory and constructive, with adversarial behaviour discouraged and with cross-examination/questioning to be regulated by the IAC in the context of these three principles.
30. The IAC may limit the time of parties appearing before it.
31. The IAC may direct that a submission or evidence is confidential in nature and the hearing be closed to the public for the purposes of receiving that submission or evidence.
32. The IAC may conduct a public hearing when there is a quorum of at least two of its members present or participating through electronic means, one of whom must be an IAC Chair or Deputy Chair.
33. If directed by the IAC, an audio recording of the hearing must be procured by the proponent. If recorded, the audio recording will be provided to PPV as a weblink and would be made publicly available as soon as practicable after the conclusion of each day of the hearing, or otherwise as directed by the IAC.
34. Any other recording of the hearing by any other person or organisation may only occur with the prior consent of, and strictly in accordance with, the directions of the IAC.

Stage 3 – Report

35. The IAC must produce a written report for the Minister for Planning containing its:
    a. analysis and conclusions with respect to the environmental effects of the project and their significance and acceptability;
    b. findings on whether acceptable environmental outcomes can be achieved, having regard to legislation, policy, best practice, and the principles and objectives of ecologically sustainable development;
    c. recommendations and/or specific measures that it considers necessary and appropriate to prevent, mitigate or offset adverse significant environmental effects;
    d. recommendations relating to the project alternatives considered through the EES and any feasible modifications to the design or management of the project that would offer improved environmental outcomes, particularly in relation to reducing/mitigating significant environmental effects;
    e. recommendations for any appropriate conditions that may be lawfully imposed on any approval for the project, including with respect to the structure or content of the draft PSA;
    f. recommendations as to the structure and content of the proposed environmental management framework, including with respect to monitoring of environmental effects and contingency plans;
    g. specific findings and recommendations about the predicted impacts on matters of national environmental significance and their acceptability, including appropriate controls and environmental management.
36. The report should include:
    a. information and analysis in support of the IAC's findings and recommendations;
    b. a list of all recommendations, including cross-references to relevant discussions in the report;
    c. a description of the public hearing conducted by the IAC, and a list of those persons consulted with or heard;
    d. a list of all submitters in response to the exhibited EES and draft PSA; and
    e. a list of the documents tabled during the proceedings.

Timing

37. The IAC should hold a directions hearing no later than 20 business days from the final date of the exhibition period.
38. The IAC should commence the hearing no later than 50 business days from the final date of the exhibition period.
39. The IAC must submit its report in writing to the Minister within 40 business days from its last day of its proceedings.
40. The DTP's Impact Assessment must liaise with PPV to agree on the directions hearing and hearing dates.

Minister's assessment

41. The Minister for Planning will make an assessment of the environmental effects of the project after considering the IAC's report as well as the EES, submissions and any other relevant matters.
42. PPV will notify submitters of the release of the Minister's assessment and IAC report.

Fee

43. The fees for the members of the IAC will be set at the current rate for a panel appointed under part 8 of the P&E Act.

44. All costs of the IAC, including the costs of obtaining any expert advice, technical administration and legal support, venue hire, accommodation, recording proceedings and other costs must be met by the proponent.

Miscellaneous

45. The IAC may apply to the Minister for Planning (or their delegate) to vary these terms of reference in writing, at any time prior to submission of its report. This includes to seek variation to the required hearing or reporting timeframes, providing there are special circumstances that necessitate a longer timeframe.
46. The IAC may retain specialist expert advice, additional technical support and/or legal counsel to assist if considered necessary.
47. PPV is to provide any necessary administrative support to the IAC. The proponent is to provide any necessary administrative or technical support to the IAC in relation to the conduct of the hearing.

Sonya Kilkenny MP
Minister for Planning

Date: 28/6/2025

Appendix B Submitters to the EES

No.	Submitter	No.	Submitter
1	Salvo Salanitri	31	Deborah Bayard
2	Leanne Lukies	32	Claire McAdie and Brad Mason
3	Emma Schlieff	33	Mario Magri
4	Name withheld	34	Christopher Arbuckle
5	Alasdair Wardle	35	Elyse Hocking
6	Ashley Merrett	36	Peter Smith
7	Adrian Tusek	37	Liam Clifford
8	Michael Koutsofta	38	Haydn Swan
9	Emma Stott	39	Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation
10	Joanne Farrugia	40	Iain Gilmore
11	Name withheld	41	Grant Hollingworth
12	Travis Beer	42	Roger Lowery
13	Paul Carroll	43	Name withheld
14	Name withheld	44	Louise Charleson
15	Les Martin	45	Ben Charleson
16	Mount Souvenir Pty Ltd	46	Shane Jenkins
17	Xatech International Pty Ltd/ Epsilon Cable	47	SERGI Transformer Protector
18	Jeff Bain	48	Delwyn Wales
19	Gina Kilpatrick	49	E Cameron
20	Janet Addinsall	50	Brayden Edwards
21	Scott Howell	51	Maddox Edwards
22	Robert Kustura	52	Rhett Hanson
23	Odile Cascales	53	Brian Jurcic
24	Melissa Coulson	54	Con Gavriel
25	Elaine Charlesworth	55	Jamie Kline
26	Christopher Taylor	56	Ashley Hiscock
27	Dianna Ayres	57	Adam Begg
28	John Bardsley	58	Name withheld
29	Susanne Perera	59	Mark Stuart-Russell
30	Jim Phasey	60	Angela Webster

No.	Submitter	No.	Submitter
61	Stephen Pole	91	John McKinnon
62	Gabrielle Prendergast	92	Name withheld
63	Neil Sidwell	93	Daniel Kalusevicius
64	Morgan Eastwood	94	Stevan Banjanin
65	Val Lysenko	95	WestWind Energy Development Pty Ltd
66	Mike Timewell	96	Peter and Sue Robson
67	David Evans	97	Meg Richardson
68	Richard Warren	98	Kain Richardson
69	Jeff Keir	99	Ashlee Johnson
70	Leanne Riggs	100	Lucy Watts
71	Emilie Petrowski	101	Robyn Russell
72	John Carter	102	Keith Tully
73	Philip Keir	103	David Ravenscroft
74	Name withheld	104	Val Andrew
75	Michelle Stephenson	105	Jasmin Dearing
76	Stephen Guilmartin	106	Matt McInnes
77	Ivan Cmrlec	107	Kyama Fraser
78	David Toose	108	Wendy Todd
79	Adrian Slade	109	Pete Sheen
80	Vesna Salkovic	110	Daniele Sheen
81	Steve White	111	Ridmani M P Geegana Premasirige
82	Cassie Lunn	112	Mat Wakelin
83	Natalie Porter	113	Pamela Evers
84	Andrew Neal	114	Troy Evers
85	Frank Kiss	115	Wayne Cox
86	Chris Kiss	116	Donna Cox
87	Energy Grid Alliance	117	S Baker
88	Ken McDonald	118	Susanne Feeny
89	Coimadai Avenue of Honour Restoration Association Inc	119	Sam Herald
90	Kevin Nolan	120	Maureen Lebner

No.	Submitter	No.	Submitter

121	Karen Yates	151	Anne Wilson
122	Samantha Goodwin	152	Gregory McConnell
123	Derek Viner	153	Tony Wood
124	Mark Peirce	154	Paul Rodger
125	Alexander Cran Reith	155	Bryan McGrath
126	Natalie and Slavko Holowka	156	Ross Kenneally
127	Paul McGoldrick	157	The Peninsula Aero Club
128	Fay Toohey	158	Matthew Botherway
129	Harrison Cowie	159	Country Fire Authority (CFA)
130	Oscar Hines	160	Luke Gnit
131	Joe Pace	161	Michelle Wilson
132	Georgie Hodges	162	Steve Harper
133	Greg May	163	Susan Ballantyne
134	Michael Xeni	164	Glen Jones
135	Claire Robson	165	Maze House
136	Julia Lidgett	166	Darryl Williams
137	Theresa MacDonald	167	Michael Erhardt
138	Jeanette McGonegal	168	Moira and Rob Smith
139	Lisa Aldenhoven	169	Alister Smith
140	Suzanne Prendergast	170	Leigh Morrish
141	Kieran Prendergast	171	Paul Baker
142	Maxine Rousch	172	Tanya Albrecht
143	Emma Muir	173	Andrew Matheson
144	Gerald Conroy	174	Chris Fawcett
145	Northern Grampians Shire Council	175	Brendan Toohey
146	Paul Ryan	176	Emma Cox
147	National Trust of Australia (Victoria)	177	Jennifer Blackett-Smith
148	Chris Barks	178	Joe Mugliett
149	Antique Aeroplane Association of Australia Inc.	179	Stephen Edmonds
150	Michael Borg	180	Frank Deeth

No.	Submitter	No.	Submitter
181	Pauline Attard	212	Ranee Rofail

182	Daniel MacDonald	213	Phil Vabre
183	Deborah Denning	214	Puay Ling Ang
184	Alana Gibson	215	Dimitrios Thimaras
185	Hayley Rowe	216	Darren Edwards
186	Jack Cooper	217	Pyrenees Shire Council
187	Alan Saunders	218	Jeanette McConville
188	Lynette Pelech	219	Stewart Pope
189	Randall Cape	220	Terence Fogarty
190	Jenna Davies	221	Dianne Cabrie
191	Ed Keane	222	Peter Pless
192	Cleo Lanyon	223	Andrew Low
193	Christopher Godfrey	224	Rod Phillips
194	David Skinner	225	Tony McLeish
195	Brenda Clarke	226	Fred Spielvogel
196	Flying Circus Pty Limited.	227	Name withheld
197	Peter Godfrey	228	Jordan Kirk
198	DeCarbonate Energy Pty Ltd	229	Darley Power Fight
199	Amy Crevola	230	Neil Dart
200	Bryan and Julie Millard	231	Kevin Clohesy
201	Name withheld	232	Bacchus Marsh Aero Club
202	Donald Pollock	233	Brendan Howden
203	Scott Matthews	234	Laurie Pelech
204	Michael Whitty	235	Wendy Lyle
205	Peter Della Bosca	236	Bernice Rogan
206	Nick Freeman	237	Julie Lidgett
207	Violet Della Bosca	238	Julie Lidgett
208	Mr and Mrs McDaid	239	Sarah de Saville
209	Jeff Farrow	240	Highlands Potatoes and Ag
210	Helen Boreham	241	Geoff May
211	Francis Frisina	242	Kirrily Hartnell

No.	Submitter	No.	Submitter
243	David Morrison	271	Destination Central Victoria
244	Melton Phoenix FC Inc.	272	Rita Russo

245	Kingston, Friends of the Avenue Inc.	273	Frank Schipano
246	Daniel Blanch	274	Alan Baulch
247	Stefan Drury	275	Darren Hodkinson
248	Rebecca Dunlop and David Tucker	276	Maria Rinaldo
249	Geoff Bell	277	Philip Iglesias
250	Allison Backhouse	278	Name Withheld
251	Jennifer Anne Morrison	279	Terry Weatherley
252	Daniel Radcliffe	280	Name Withheld
253	Environment Protection Authority (EPA) Victoria	281	Parks Victoria
254	City of Ballarat	282	Dianne Pym
255	Natalie Malle	283	Barunah Park Geelong Pty Ltd
256	Hudson Malle	284	Catherine King
257	K Lee	285	Susan Gay
258	Anthony Briody	286	Margaret Robinson
259	Deer Park Nominees Pty Ltd	287	Moorabbin Airport Chamber of Commerce Inc (MACCI)
260	Melton City Council	288	Dianne Oram
261	Jeremy Harper	289	Sam Churchward
262	Shaun Weatherill	290	Barry Doman
263	Southern Wimmera Renewables Research Association and Wallaloo and Gre Gre District Alliance	291	Kane Treloar
264	Ian Lewis	292	Andrew De La Rue
265	Cameron Pelech	293	Gregory Thom
266	Darcy Gervasoni	294	Daryl and Sue Eastcott
267	Gordon Family Partnership - Heather Gordon, Jock Gordon, Kate Gordon and Victoria Gordon	295	Bob Wilson
268	William Logan	296	Name withheld
269	The Heritage Engagement Partnerships Network	297	Blampied Kooroocheang Landcare Group
270	Graeme Thom	298	Donna Scobie

No.	Submitter	No.	Submitter
299	Robyn Muir	329	Kevin Robinson

300	Larissa Koroznikova	330	Ballarat Group of Fire Brigades
301	Byron Graham	331	Name withheld
302	James Stewart	332	Brian Grinter
303	Trace Williams	333	Brian Armstrong
304	Natalie Koroznikova	334	Peter Zyhalak
305	Louise Lindsay	335	Name withheld
306	Deborah Blight	336	David Anderson
307	Moorabool Shire Council	337	Ramah Christian Sewell
308	Heath Robins-Powell	338	Royal Federation of Aeroclubs of Australia
309	Trevor and Rhonda Davis	339	Lake Harrison
310	Mark Porter	340	Faye Reeve
311	Wattle Flat Pootilla Landcare Group	341	Rodney Ashdown
312	Dr Joanna Lidgett	342	Craig Woods
313	Nathan Lidgett	343	Rob Hutchison
314	Rohan Scarfe	344	Mandy Mifsud
315	Western Victorian Community Alliance (WVCA)	345	Brian William May
316	Emily Giordano	346	Claire Rowlands
317	Deniz Tanriyioever	347	Kingston Agricultural Society
318	Kane Stiegler	348	Name withheld
319	Ralf Schumann	349	Adrian Wall
320	Robert Conroy	350	Wayne Hodge
321	Danilo Agricola	351	Paul Granvillani
322	Thoi Spaul	352	Kathleen Luke
323	AWPA	353	Virginia Imhoff
324	Julie Edwards	354	Sandra Cleary
325	Peter Lukies	355	Jenny Blakey
326	James Lukies	356	Mac Charleson
327	David Roberts	357	Ned Charleson
328	Jacqueline Riggs	358	Noel Cleary

No.	Submitter	No.	Submitter
359	Pauline Cockcroft	389	Andrew McCready
360	Anne Boundy	390	Kerry McCready

361	Phil Holmes	391	David Jordan
362	Lachlan Andrews and Camille Davey	392	Darryl Howe
363	Rachel Jelley	393	Val McCready
364	Michael Young	394	Reg McCready
365	Name withheld	395	Wimmera Catchment Management Authority
366	Save Our Surroundings Riverina	396	Melanie Borlase
367	Gemma Welch	397	Poppy Charleson
368	Surinder Jan Alles	398	Cassandra Rochaix
369	Brett Gervasoni	399	Loretta M Toohey
370	Jessica and Bryce Ford	400	ACCIONA
371	Amanda Gray	401	S Gould
372	Karen Phillips	402	Jennifer Taylor
373	Kate Toohey	403	Melton Football Netball Club Inc
374	Debbie Gervasoni	404	Name withheld
375	Gerald Toohey	405	Name withheld
376	Robert Eastgate	406	David Kaiser
377	Scott Morton	407	Name withheld
378	Rebecca O'Callaghan	408	Barengi Gadjin Land Council Aboriginal Corporation (BGLC)
379	Michael Tzikas	409	Amber Morris
380	Karen Sherriff	410	Jayne Duggan
381	Michael Hirmiz	411	Lyn Lefoe
382	Roger McKay	412	Terry Lefoe
383	Daniel Dalton	413	Paul and Loretta Greco
384	Marlon Alberto	414	Zoe Nolan
385	Ben Crnojacki	415	Kim Yoannidis
386	Sandra Attard	416	Steve Nolan
387	Gillian Carron	417	Michael Kronk
388	John and Maree Caldow	418	Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC)

No.	Submitter	No.	Submitter
419	Francis and Carmel Duggan	448	Hepburn Shire Council
420	Margaret Wood	449	Department of Transport and Planning

			on behalf of Head Transport for Victoria
421	Friends of the Koalas Inc.	450	Daniel Webber
422	Rod Reading	451	Chris Hillard
423	Luke Phillips	452	Doug May
424	Grazyna Garbowski	453	Bronwyn Smith
425	Penny Swain	454	Shelley Sutton
426	Marc Sibun	455	Kellie McPherson
427	Holly Ann Masterson Harper	456	Melton Air Services Investments Pty Ltd
428	Central Highlands Historical Association	457	Andrew Davies
429	John G Chew	458	Aidan Morrison
430	Michael Azzopardi	459	Victorian Farmers Federation
431	Aileen Toohey	460	Michelle Foley
432	Matthew Franklin	461	Daniel Toohey
433	Kim Bouchier	462	Dennis Smith
434	VicGrid	463	Australian Helicopter Industry Association (AHIA)
435	Victorian Soaring Association	464	Allison Munari
436	Dja Dja Wurrung Clans Aboriginal Corporation (DJAARA)	465	Marko and Ivka Budimir
437	Benjamin Marshall	466	J Finneran
438	Kate Oxley	467	Ashley Orafferty
439	Sirous Jkousari	468	Glenn Ford
440	Kifah Bourne	469	Julie Baulch
441	Nick Rousch	470	Kylie Logan
442	Janie Thomas	471	Department of Energy, Environment and Climate Action (DEECA)
443	Name withheld	472	Melissa Dimond
444	Edwina Johnston	473	Thomas Toose
445	Leonie Rousch	474	Andrew Cross
446	A Prem	475	Marc Hinch
447	Adrian Lane	476	Barbara D Ford

No.	Submitter	No.	Submitter
477	Paul and Jenni Dridan	506	Name Withheld

478	Dr Lynsey Etheridge	507	Charlotte Ann Myers
479	Tom Drife	508	Leah Armstrong
480	Martin Conroy	509	Kate Watkins
481	Marta Czosnowski	510	Ian Binks and Marian Lawrence
482	Phil Heintze	511	Melissa Thompson
483	Paul Oxbrow	512	Ron Thompson
484	Name withheld	513	Matthew Kerr
485	Christian Nikolajsen	514	Evan Reeve
486	Name withheld	515	Sarah Harvey
487	Cherie Henderson-Drife	516	Bald Hills-Creswick Landcare Group Inc
488	Shaun Cleary	517	Peter Lynch
489	Joanne Coulton	518	Neil Francis
490	MacRest Pty Ltd, MacBare Pty Ltd and MacPrime Holdings Pty Ltd	519	Ashleigh Mahon
491	Tanya Lauder	520	Levente Szabo
492	Wessley Edgar	521	Steven Clark
493	Peter Coulton	522	Scott Snibson
494	Duncan Paterson	523	Katherine and Ben Myers
495	David and Alison Myers; Tourello Pastoral Company; Bradenthorpe Pty Ltd	524	Vicki Johnson
496	Kingston and District Power Alliance Inc (KDPA)	525	Gayle Harrison
497	Hayley Plageman	526	Toolern Vale Landcare Group
498	John and Billie Henderson-Drife	527	Denia and Tom Gilheany
499	Luke Rochaix	528	Grant Harrison
500	Sara Kinnersly	529	Brigita Szabo
501	Mellissa Kirk	530	Heather Muir
502	George and Marissa Portelli	531	Gavin Ronan
503	Margaret Armstrong	532	Lisa Gervasoni
504	Sharon Bear	533	Name Withheld
505	Bryony Fitzgerald	534	Thomas Fisher

Appendix C Parties to the IAC Hearing

Submitter	Represented by
AusNet Transmission Group Pty Ltd (AusNet Services; Proponent)	Nick Tweedie SC, Marita Foley SC, Alexandra Guild and Sean McArdle of Counsel instructed by White & Case, who called: Barton Napier of Tetra Tech Coffey to provide an overview of the Project and an explanation of the route selection process Expert evidence on: - agriculture and forestry from Shayne Annett of RMCG - aviation from Ian Jennings of Chiron - aviation from Peter White of Aviation Safeguarding Australia - biodiversity/offset strategy from Brett Lane of Nature Advisory and Andrew Stephens of Jacobs - bushfire and fire risk from Mark Potter and Graeme Taylor of Fire Risk Consultants - economics from Craig Fenton of PWC - electromagnetic interference (EMI) and electric and magnetic fields (EMF) from Rodney Urban of Jacob - energy policy and the role of Western Renewables Link from Richard Bolt of Richard Bolt Consulting Pty Ltd - historic heritage from Martin Zweep of Jacobs - noise and vibration from Tom Evans of Resonate - land use and planning, Planning Scheme Amendment and Incorporated document from Rob Milner of Milner Planning Advisory - landscape and visual from Hayden Burge of Landform Architects and Steve Schutt of Hansen - social impacts from Glenn Weston of Public Place - traffic and transport from Christina Emmitt of Jacobs - wellbeing from Jackie Wright of Enriks
DTP Impact Assessment Unit	Tasha Latham
Country Fire Authority (CFA)	Andrew Andreou and Mark Allen
Department of Energy, Environment and Climate Action (DEECA)	Meg Lee and Sal Lennon of Hall and Wilcox
DTP, on behalf of Head Transport for Victoria (DTP Transport)	Jozef Vass

Submitter	Represented by
VicGrid	Juliet Forsyth SC, Emma Peppler and Georgina Long of counsel instructed by King & Wood Mallesons
Barengi Gadjin Land Council Aboriginal Corporation (BGLC)	Taylor Fitzgerald, Jarrod Troutbeck, Colin Gorton and Niah Boundy
Dja Dja Wurrung Clans Aboriginal Corporation (DJAARA)	Harley Douglas, Chris Considine and Auriel Yeap
Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC)	Uncle Norm McPherson, Sarah Eccles, Samantha Suendermann, Matthew Hansen and Samuel Smits
City of Ballarat	Kristen Richardson of Maddocks, who called expert evidence on: - agriculture from Gavin Beever of Cumbre Consultants Note: Mr Beever presented evidence for City of Ballarat and Hepburn Shire Council.
Hepburn Shire Council	Greg Tobin and Xander Nguyen Meacham of Harwood Andrews Lawyers, who called expert evidence on: - agriculture from Gavin Beever of Cumbre Consultants Note: Mr Beever presented evidence for Hepburn Shire Council and City of Ballarat. - costing and engineering from Rod Touzel of Worley Note Mr Touzel presented his evidence for Hepburn Shire Council and Melton Shire Council. - landscape and visual from Brendan Papworth of Papworth Design - tourism from Karl Flowers of Decisive Consulting Pty Ltd
Melton City Council	James Lofting of Russell Kennedy, who called expert evidence on: - aviation from Bryan Fitzgerald of Airport Surveys Pty Ltd - costing and engineering from Rod Touzel of Worley Note: Mr Touzel presented evidence for Melton Shire Council and Hepburn Shire Council. - landscape and visual from Chris Goss of Orbit Solutions - social impacts from Robert Panozzo of ASR Research
Moorabool Shire Council	Louise Hicks of Counsel instructed by Guthrie Legal, who called expert evidence on: - electricity transmission and undergrounding from Les Brand of Amplitude Consultants Pty Ltd

Submitter	Represented by
	- planning and environmental matters related to bushfire from Professor Michael Buxton of RMIT University and Professor Alan March of the University of Melbourne - social impacts from Dr Kate Kerkin of K2 Planning Council officer Catherine McLay also provided an explanation of the combined Councils' changes to the Day 3 Project documents in D594, 595 and 596
Northern Grampians Shire Council	Sarah Kernohan and Steven Cobden
Pyrenees Shire Council	Rachel Blackwell
Charleson, Ford, Henderson Drife, May and Bouchier group: - Barbara Ford - Ben Charleson - Brian May - Cherie Henderson-Drife - Glenn Ford - John and Billie Henderson-Drife - Kim Bouchier - Louise Charleson - Tom Drife	Ian Munt of Counsel instructed by Rennick & Gaynor, who called expert evidence on: - economic impacts from Andrew Perkins of Hall Chadwick - heritage from Christopher Clark of Latitude Heritage
Melton Air Services Investments Pty Ltd	John Ribbands and David Robertson of Counsel and instructed by Norton White, who called expert evidence on: - aviation safety and aerodrome operations from Daniel O'Donnell of Sequoia Aviation Pty Ltd - aviation safety and risk assessment from Julian Fraiser of Australian Helicopter Industry Association
Aidan Morrison	
Aileen Toohey	
Alexander Reith	
Allison Backhouse	
Anne Wilson	
Anthony (Tony) Briody	
Antique Aeroplane Association of Australia Inc.	Gordon Rick Phillips
Australian Helicopter Industry Association	Julian Fraser
Bald Hills-Creswick Landcare Group	David Unwin

Submitter	Represented by
Inc	
Ballarat Group of Fire Brigades	Ian Terrill
Barunah Park Geelong Pty Ltd	Chris Wiseman of Mills Oakley Lawyers
Brenda Clarke	
Brett Gervasoni	
Bryony Fitzgerald	
Camerons Road group - Moira and Rob Smith - Peter Della Bosca - Violet Della Bosca - Wendy Lyle - Deborah Blight - Lyn Lefoe - Terry Lefoe	
Celeste Hevey	
Coimadai Avenue of Honour Restoration Association Inc	Ken McDonald
Craig Woods	Craig Woods and Steve Harper
Daniel Toohey	
Darcy Gervasoni	
Darren Edwards	
David and Alison Myers; Tourello Pastoral Company; Bradenthorpe Pty Ltd	David and Alison Myers
David Kaiser	
Debbie Gervasoni	
Deborah Denning	
Donald Pollock	
Emma and Peter Muir	
Emma Schlieff	
Evan Reeve	
Frank Kiss	
Frank Schipano	Frank and Michelle Schipano
Gerald Conroy	
Gerald Toohey	

Submitter	Represented by
Gillian Carron	
Gordon Family Partnership - Heather Gordon, Jock Gordon, Kate Gordon and Victoria Gordon	Victoria Gordon
Grant Harrison	
Hayley Plageman	
Holly Harper	
Ian Binks and Marian Lawrence	David Binks
Ian Lewis	
Jayne Duggan	
Jennifer Anne Morrison	
Jennifer Blackett-Smith	
Jeremy Harper	
Jim and Susan Phasey	
Dr Joanna Lidgett	
Joe Finneran	
Julie Baulch	
Julie Edwards	
Kain Richardson	
Katherine and Ben Myers	
Kieran Prendergast	
Kingston Agricultural Society	John Rowlands
Kingston and District Power Alliance Inc (KDPA)	Kain Richardson, Donald Pollock, Penny Swain, Virginia Imhoff, Vicki Johnson, Scott Williams, Trish Kevin, Sue Prendergast, Doug May, Phillip Gay, Katherine Myers and Claire Rowlands
Kingston, Friends of the Avenue Inc.	Julie Baulch, Clarie Rowlands, Leah Armstrong and Penny Swain
Lachlan Andrews and Camille Davey	
Leonie Rousch	
Lisa Gervasoni	
Loretta Toohey	
Mac Charleson	
MacRest Pty Ltd, MacBare Pty Ltd and MacPrime Holdings Pty Ltd	David McGlashan

Submitter	Represented by
Margaret Wood	
Marlon Alberto	
Matthew Kerr	
Maxine Rousch	
Maze House	Trish Kevin
Meg Richardson	
Michael Koutsofta	
Michael Whitty	
Moorabbin Airport Chamber of Commerce Inc. (MACCI)	Dr Sean Runacres
Mount Souvenir Pty Ltd	Roderick (Ian) McLeod
Nathan Lidgett	
Ned Charleson	
Nick Rousch	
Paul McGoldrick	
Penny Swain	
Poppy Charleson	
Randall Cape	
Rebecca O'Callaghan	
Robert Conroy	
Roger McKay	
Sara and Phillip Kinnersly	
Scott Morton	
SERGI Transformer Protector	Francisco Dutra
Shane Jenkins	
Stevan Banjanin	
Steve Harper	
Steven Clark	
Submitter 280 (name withheld)	
Submitter 353 (name withheld)	
Submitter 533 (name withheld)	
Suzanne Prendergast	
Tanya Lauder	

Submitter	Represented by
Terence Fogarty	
Toolern Vale Landcare Group	Sally MacPherson
Trace Williams	
Vicki Johnson	
Victorian Farmers Federation	Nicholas Ayres-Wearne, Brett Hosking and Katherine Myers
Western Victorian Community Alliance (WVCA)	Jim Phasey, Steve Harper and Emma Muir

Appendix D Document list

No.	Date	Description	Provided by
1	14 Aug 25	Letter to Inquiry and Advisory Committee (IAC) - Notification of update to closing date of EES exhibition period – 13 August 2025	Department of Transport and Planning Impact Assessment Unit (DTP IAU)
2	2 Sep 25	Directions Hearing notification	PPV
3	5 Sep 25	Requests to be heard and key issues	PPV
4	5 Sep 25	Email and letter to IAC - Objection to VicGrid provision of additional information	Mr Conroy
5	5 Sep 25	Letter to IAC - Objection to VicGrid attendance at hearing	Energy Grid Alliance
6	5 Sep 25	Letter to IAC - Objection to VicGrid and AEMO being part of the EES process	Mr Kiss
7	6 – 8 Sep 25	Example - Proforma letter/email - Objection Vic Grid and AEMO participation at hearing	Various
8	7 Sep 25	Letter to IAC - Procedural matters (VicGrid, desktop studies, exhibition, hearing)	Western Victorian Community Alliance (WVCA)
9	7 Sep 25	Letter to IAC - Objection to VicGrid and Ausnet Submissions	WVCA
10	7 Sep 25	Email to IAC - Objection VicGrid and AEMO participation at hearing	Mr and Ms Greco
11	7 Sep 25	Email to IAC - AusNet additional information	Ms Johnson
12	7 Sep 25	Email to IAC - Objection VicGrid and AEMO participation at hearing	Ms Perera
13	7 Sep 25	Email to IAC - Objection VicGrid and AEMO participation at hearing	Ms Attard
14	8 Sep 25	Email to IAC - Site visit suggestions	Ms Johnson
15	8 Sep 25	Email to IAC - Procedural matters (timetable and efficiency options)	Kingston & District Power Alliance (KDPA)
16	8 Sep 25	Email to IAC - Site visit suggestions	KDPA
17	8 Sep 25	Email to IAC - Biodiversity Report and Offset Management Strategy	AusNet (Proponent)

No.	Date	Description	Provided by
18	8 Sep 25	Letter to IAC - Objection VicGrid and AEMO participation at hearing	Ms Ford
19	8 Sep 25	Email to IAC - Objection VicGrid and AEMO participation at hearing	Mr Pelech
20	8 Sep 25	Letter to IAC - Procedural matters (peer reviews and program change)	Moorabool Shire Council
21	8 Sep 25	Email to IAC - AusNet additional information	WVCA
22	8 Sep 25	Letter to IAC - AusNet additional information	Energy Grid Alliance
23	8 Sep 25	Email to IAC - Vic Grid and AEMO participation at hearing	Mr Binks
24	9 Sep 25	Email to IAC - Procedural matters (VicGrid, desk top studies, exhibition, hearing, additional information)	Mr Harper
25	10 Sep 25	Letter to IAC – Procedural matters	Proponent
26	11 Sep 25	Letter to IAC - Late submission of AusNet additional information -	Submitter 385
27	11 Sep 25	Letter to IAC -Site visit suggestions	DEECA
28	11 Sep 25	Letter to IAC - Procedural matters in response to Proponent letter	Energy Grid Alliance
29	11 Sep 25	Letter to IAC - No longer speaking at Hearing	WestWind Energy
30	12 Sep 25	Email to IAC – Request for time AusNet additional information	Bald Hills Creswick Landcare Group Inc
31	12 Sep 25	Email to IAC - AusNet additional information	KPDA
32	12 Sep 25	Letter to IAC - Request for Procedural Rulings (filing of documents and montages)	Melton City Council
33	15 Sep 25	Letter to IAC - Procedural matters (limits on in-person verbal submission)	Mr Lidgett
34	17 Sep 25	Compare of the exhibited Offset Management Strategy and revised Offset Management Strategy	Proponent
35	17 Sep 25	Email to IAC and IAC response - Procedural issues and confirmation of time	Mr Edwards and PPV
36	17 Sep 25	Letter to IAC - Follow up matters from Directions Hearing	Mr Harper
37	18 Sep 25	Email to IAC - Confirmation no longer calling expert witness	Ms Johnson

No.	Date	Description	Provided by
38	19 Sep 25	Letter to IAC - Confirmation of expert witnesses	Moorabool Shire Council
39	19 Sep 25	Email to IAC - Confirmation of expert witness	Ms Henderson-Drife
40	19 Sep 25	Letter to IAC - Confirmation of expert witnesses	Melton City Council
41	19 Sep 25	Letter to IAC - Confirmation of expert witnesses	Hepburn Shire Council
42	19 Sep 25	Letter to IAC - Confirmation no longer calling expert witness	Barunah Park Geelong Pty Ltd
43	19 Sep 25	Letter to IAC - Confirmation of expert witnesses	Proponent
44	19 Sep 25	Email to IAC - Confirmation of expert witnesses	City of Ballarat
45	19 Sep 25	Email to IAC - Confirmation of expert witnesses	Mr Reeve and Melton Air Services
46	22 Sep 25	Letter to IAC - Confirmation of representation, expert witnesses and site visit	Charleson, Ford, Henderson Drife, May and Bouchier group
47	23 Sep 25	WRL IAC - Directions and Distribution List (v1)	PPV
48	23 Sep 25	WRL IAC - Request for Information	PPV
49	23 Sep 25	Biodiversity Report 1 on Ecological Surveys Required by EPR-BD1	Proponent
50	23 Sep 25	updated Draft Offset Management Strategy	Proponent
51	23 Sep 25	EES Independent Peer Review - Agriculture-Forestry	Proponent
52	23 Sep 25	EES Independent Peer Review - Aviation	Proponent
53	23 Sep 25	EES Independent Peer Review - Biodiversity	Proponent
54	23 Sep 25	EES Independent Peer Review - Bushfire	Proponent
55	23 Sep 25	EES Independent Peer Review - Electromagnetic interference (EMI) and electromagnetic fields (EMF)	Proponent
56	23 Sep 25	EES Independent Peer Review - Historic-Heritage	Proponent
57	23 Sep 25	EES Independent Peer Review – Landscape and Visual	Proponent
58	23 Sep 25	EES Independent Peer Review – Land-Use-and-Planning	Proponent
59	23 Sep 25	EES Program change Technical Specialists Brief	Proponent

No.	Date	Description	Provided by
60	23 Sep 25	EES Program change advice: a) Aboriginal Cultural Heritage b) Agriculture and forestry c) Air quality d) Aviation e) Biodiversity f) Bushfire g) Climate change h) Contaminated land i) Economic j) EMI and EMF k) Geology and soils l) Greenhouse gas m) Groundwater n) Historical Heritage o) Landscape and visual p) Land use and planning q) Noise and vibration r) Social s) Surface water t) Transport	Proponent
61	30 Sep 25	Letter to IAC - Visits to farms and neighbouring properties	Victorian Federated Farmers (VFF)
62	30 Sep 25	Letter to IAC - Expert meetings, evidence and AI	Proponent
63	1 Oct 25	Letter to IAC - Response to Proponent letter on directions on AI use	Mr Edwards
64	2 Oct 25	Email from Proponent - Dropbox Document Share Details	Proponent
65	2 Oct 25	Document Share Instructions: How to upload files How to view and download files	Proponent
66	2 Oct 25	Hearing Timetable (v1)	PPV
67	2 Oct 25	Email to IAC - Clarification on experts attendance at aviation expert meeting	Melton City Council
68	2 Oct 25	Email to IAC - Clarification on experts attendance at aviation expert meeting	Melton Air Services
69	2 Oct 25	Letter to IAC - Clarification on experts attendance at expert meeting	Moorabool Shire Council

No.	Date	Description	Provided by
70	3 Oct 25	Letter to IAC - Expert meetings and opening submission	Melton City Council
71	3 Oct 25	WRL IAC - Confirmation on expert meetings, evidence and AI	PPV
72	3 Oct 25	Letter to IAC - Opening submission, site visit suggestions and attendance	Moorabool Shire Council
73	3 Oct 25	Email to IAC - Opening submission	City of Ballarat
74	3 Oct 25	Email to IAC - Aboriginal Cultural Heritage Impact Assessment and Cultural Values Assessment	Proponent
75	3 Oct 25	Letter to IAC - Adding expert and expert meetings	Hepburn Shire Council
76	15 Sep to 3 Oct 25	Parties collated site visit suggestions	Various
77	3 Oct 25	Letter to IAC - Site visit suggestions, proposed accompanied site visit and attendance	KDPA
78	3 Oct 25	Letter to IAC - Site visit suggestions	VFF
79	3 Oct 25	Letter to IAC - Additional site visit suggestions	Charleson, Ford, Henderson Drife, May and Bouchier group
80	1 Oct 25	Email to IAC - Site visit suggestions and attendance	North Grampians Shire Council
81	3 Oct and 7 Oct 25	Email to IAC - Site visit suggestions	City of Ballarat
82	6 Oct 25	Letter to IAC - Site visit suggestions	Melton City Council
83	6 Oct 25	Letter to IAC - Site visit suggestions	Hepburn Shire Council
84	6 Oct 25	Submission on VC268 (Direction 18)	VicGrid
85	6 Oct 25	Part A Submission (including submissions response table and RFI responses)	Proponent
86	7 Oct 25	Letter to IAC - Site visit suggestions for Proponents accompanied visit	Charleson, Ford, Henderson Drife, May and Bouchier group

No.	Date	Description	Provided by
87	7 Oct 25	**CONFIDENTIAL** - Submitter map As outlined in Direction 16 for privacy reasons the map is only provided to the IAC and will not be published and made available to other parties.	Proponent
88	7 Oct 25	Email to IAC - Evidence of Mr Schutt	Proponent
89	8 Oct 25	Expert Evidence statement of Shayne Annett (Agriculture and Forestry)	Proponent
90	8 Oct 25	Expert Evidence statement of Craig Fenton (Economics)	Proponent
91	8 Oct 25	Expert Evidence statement of Ian Jennings (Aviation)	Proponent
92	9 Oct 25	Letter to IAC - Landscape and visual evidence and Proponent RFI response	Moorabool Shire Council
93	9 Oct 25	Expert evidence statement of Graeme Taylor and Mark Potter (Bushfire and risk)	Proponent
94	10 Oct 25	Email to IAC – Additional aviation expert witness	Proponent
95	10 Oct 25	Email to Proponent - Response to additional aviation expert witness	PPV
96	10 Oct 25	Expert Evidence statement of Peter White (Aviation)	Proponent
97	10 Oct 25	Letter to IAC - No longer calling bushfire evidence	Charleson, Ford, Henderson Drife, May and Bouchier group
98	13 Oct 25	Email to Parties - Update on further site inspection suggestions	PPV
99	14 Oct 25	WRL IAC - IAC Member and response to Moorabool Shire Council on RFI responses	PPV
100	14 Oct 25	Email to IAC and PPV Response - Request for clarification on addresses in expert reports	Proponent and PPV
101	14 Oct 25	Email to IAC - Confirmation on details for aviation expert meeting	Proponent
102	14 Oct 25	Email to IAC - Mr Mountain attendance at economic expert meeting	Melton City Council
103	14 Oct 25	Email to Parties - IAC response on Mr Mountain attendance at economic expert meeting	PPV
104	28 Nov 25	Expert Evidence statement of Les Brand (electricity transmission and undergrounding) (Updated) (Initial statement provided on 15 Oct 25 replaced with updated statement on 28 November 2025 as outlined in TD334)	Moorabool Shire Council

No.	Date	Description	Provided by
105	15 Oct 25	Expert Evidence Statement of Tom Evans (Noise and Vibration)	Proponent
106	15 Oct 25	Expert Evidence Statement of Steve Schutt (Landscape and Visual)	Proponent
107	15 Oct 25	Expert Evidence Statement of Robert Milner (Land Use and Planning)	Proponent
108	15 Oct 25	Expert Evidence Statement of Dr Jackie Wright (Human Health)	Proponent
109	15 Oct 25	Expert Evidence Statement of Richard Bolt (Energy Policy and the role of WRL)	Proponent
110	15 Oct 25	Expert Evidence Statement of Glenn Weston (Social)	Proponent
111	15 Oct 25	Expert Evidence Statement of Martin Zweep (Historic Heritage)	Proponent
112	15 Oct 25	Expert Evidence Statement of Mr Bryan Fitzgerald (Aviation)	Melton City Council
113	15 Oct 25	Expert Evidence Statement of Chris Goss (Landscape and Visual Impact Assessment (LVIA) - Part A Methodology)	Melton City Council
113a	15 Oct 25	Email to IAC - Landscape and Visual evidence, extension request and support for Hepburn Shire Council's request	Melton City Council
114	15 Oct 25	Letter to IAC – Extension for undergrounding evidence and circulation of other reports	Hepburn Shire Council
115	15 Oct 25	Expert Evidence Statement of Gavin Beever (Agriculture)	City of Ballarat
115a	21 Nov 25	Brief to Gavin Beever (Agriculture) dated 3 Oct 2025	City of Ballarat
116	15 Oct 25	Letter to IAC - Extension for expert heritage report	Charleson, Ford, Henderson Drife, May and Bouchier group
117	15 Oct 25	Expert Evidence Statement of Andrew Perkins (Economics)	Charleson, Ford, Henderson Drife, May and Bouchier group
117a	15 Dec 25	Addendum to Expert Evidence Statement of Andrew Perkins (Economics)	Charleson, Ford, Henderson Drife, May and Bouchier group

No.	Date	Description	Provided by
118	15 Oct 25	Expert Evidence Statement of Rodney Urban (EMI and EMF)	Proponent
119	15 Oct 25	Expert Evidence Statement of Hayden Burge (Landscape and Visual) Provided higher resolution version on 20 October 2025	Proponent
120	15 Oct 25	Expert Evidence Statement of Christina Emmitt (Transport) - Part 1	Proponent
121	15 Oct 25	Expert Evidence Statement of Christina Emmitt (Transport) - Part 2	Proponent
122	15 Oct 25	Expert Evidence Statement of Brett Lane (Biodiversity)	Proponent
123	15 Oct 25	Expert Evidence Statement of Andrew Stephens (Biodiversity)	Proponent
124	15 Oct 25	**CONFIDENTIAL** - Expert Evidence Statement of Andrew Stephens (Biodiversity) - Responses to confidential submissions	Proponent
125	15 Oct 25	Accompanied Site Inspection Itinerary	Proponent
126	15 Oct 25	Accompanied Site Inspection Maps	Proponent
127	15 Oct 25	Technical Note 001 (TN01) - Community Benefits	Proponent
128	15 Oct 25	Technical Note 002 (TN02) - Vegetation Risk Clearance Footprint, Partial Clearance and Darley Vegetation Removal	Proponent
129	16 Oct 25	Email to IAC - Response to Hepburn Shire Council evidence extension request	Proponent
130	16 Oct 25	Email to IAC – Follow up information on request for extension	Charleson, Ford, Henderson Drife, May and Bouchier group
131	16 Oct 25	Email to IAC - Extension for bushfire evidence	Moorabool Shire Council
132	16 Oct 25	Email to Moorabool Shire Council – IAC response to extension for bushfire evidence	PPV
133	16 Oct 25	Email to IAC – Response to Charleson, Ford, Henderson Drife, May and Bouchier group evidence extension request	Proponent
134	16 Oct 25	Email to IAC – Response to Proponents correspondence on extension request	Hepburn Shire Council
135	16 Oct 25	Expert Evidence Statement of Brendan Papworth (LVIA - Scope and Part A Methodology)	Hepburn Shire Council

No.	Date	Description	Provided by
136	16 Oct 25	Expert Evidence Statement of Gavin Beever (Agriculture)	Hepburn Shire Council
136a	21 Nov 25	Brief to Gavin Beever (Agriculture) dated 3 Sep 25	Hepburn Shire Council
136b	3 Dec 25	Addendum to Expert Evidence Statement of Gavin Beever (Agriculture) dated 02 12 25	Hepburn Shire Council
136c	3 Dec 25	Brief to Gavin Beever undergrounding (Agriculture) dated 1 Dec 25	Hepburn Shire Council
137	16 Oct 25	Expert Evidence Statement of Karl Flowers (tourism impacts)	Hepburn Shire Council
137a	31 Oct 25	Instructions for Karl Flowers (Tourism)	Hepburn Shire Council
138	16 Oct 25	Expert Evidence Statement of Professor Michael Buxton and Professor Alan March (Bushfire)	Moorabool Shire Council
139	16 Oct 25	Expert Evidence Statement of Rod Touzel (Undergrounding)	Melton City Council
140	17 Oct 25	Email to Rennick and Gaynor - IAC response to extension request for expert heritage report	PPV
141	17 Oct 25	Higher resolution image of Figure 3-1 in Burge's expert evidence	Proponent
142	17 Oct 25	WRL IAC - Letter to Hepburn Shire Council regarding undergrounding evidence	PPV
143	17 Oct 25	WRL IAC - Letter to Melton Air Services Investments Pty Ltd regarding aviation evidence	PPV
144	17 Oct 25	Letter to IAC - Request for supporting documents be tabled	Moorabool Shire Council
145	17 Oct 25	Email to IAC - Update regarding aviation evidence	Melton Air Services
146	20 Oct 25	Email to Moorabool Shire Council - Response to request for supporting documents be tabled	PPV
147	20 Oct 25	Letter to IAC - Providing Mr O'Donnell evidence and update on remainder aviation evidence	Melton Air Services
148	20 Oct 25	Expert Evidence Statement of Daniel O'Donnell (Aviation Safety and Aerodrome Operations)	Melton Air Services
149	20 Oct 25	Email to IAC - No longer calling economics evidence	Melton City Council
150	20 Oct 25	Landscape and visual expert evidence of Mr Hayden Burge	Mr and Ms Edwards
151	21 Oct 25	Email to IAC - Clarification on Directions for RFI responses	Proponent

No.	Date	Description	Provided by
152	21 Oct 25	Email to Proponent – Response to clarification on Directions for RFI responses	PPV
153	11 Nov 25	Expert Evidence Statement of Christopher Clark (Heritage) *(Initial statement provided on 22 Oct 25 replaced with updated statement on 11 November 2025)*	Charleson, Ford, Henderson Drife, May and Bouchier group
153a	11 Nov 25	Email from Rennick and Gaynor to IAC – Updated version of D153 compliant with Practice Note 1	Charleson, Ford, Henderson Drife, May and Bouchier group
154	22 Oct 25	Expert Evidence Statement of Brendan Papworth (Part B - Landscape and Visual)	Hepburn Shire Council
154a	3 Dec 25	Addendum to Expert Evidence Statement of Brendan Papworth (Landscape and Visual)	Hepburn Shire Council
155	23 Oct 25	Indicative schedule of submissions and experts (Direction 27) (updated)	Proponent
156	22 Oct 25	Indicative schedule of submissions and experts (Direction 27)	Moorabool Shire Council
157	22 Oct 25	Email to IAC - Extension for social evidence	Moorabool Shire Council
158	22 Oct 25	Email to IAC - Request for extension for expert aviation meeting and joint expert statement	Proponent
159	22 Oct 25	Email to Moorabool Shire Council - Response to extension for social evidence	PPV
160	22 Oct 25	Indicative schedule of submissions and experts (Direction 27)	Hepburn Shire Council
161	22 Oct 25	Indicative schedule of submissions and experts (Direction 27)	Melton Air Services
162	22 Oct 25	Email to IAC - Extension for Landscape and visual evidence	Melton Shire Council
163	22 Oct 25	Hearing submission	DTP IAU
164	22 Oct 25	Expert Evidence statement of Dr Kate Kerkin (Social)	Moorabool Shire Council
165	22 Oct 25	Email to IAC - Confirmation on aviation experts and timing of Mr Fraser evidence	Melton Air Services
166	22 Oct 25	Indicative schedule of submissions and experts (Direction 27)	Melton City Council
167	22 Oct 25	Response to Item 2 of the IAC's Request for Information (RFI)	Proponent

No.	Date	Description	Provided by
168	22 Oct 25	Email to Melton City Council - Response to extension for Landscape and visual evidence	PPV
169	22 Oct 25	Email to Proponent and Melton Air Services - Aviation evidence, extension for expert meeting and joint expert statement	PPV
170	23 Oct 25	Expert Evidence Statement of Rob Panozzo (Social)	Melton City Council
171	23 Oct 25	Expert Evidence Statement of Rod Touzel (Undergrounding)	Hepburn Shire Council
172	23 Oct 25	Hearing Timetable (v2)	PPV
173	23 Oct 25	Email to IAC - Request about site inspection mapping	Ms Johnson
174	23 Oct 25	Indicative mapping example of bus route overlaid over project route	Ms Johnson
175	24 Oct 25	Email to Submitter 524 - Response to request about site inspection mapping	PPV
176	24 Oct 25	Hearing submission	VicGrid
177	24 Oct 25	VNI West and WRL NEVA Order (Gazette No. S 60, 20 February 2023)	VicGrid
178	24 Oct 25	VNI West and WRL NEVA Order (Gazette No. S 267, 27 May 2023)	VicGrid
179	24 Oct 25	Moorabool and Central Highlands Power Alliance Inc v Minister for Energy and Resources [2023] VSC 774	VicGrid
180	24 Oct 25	Draft Renewable Energy Zone Community Benefits Plan	VicGrid
181	24 Oct 25	2025 Enhanced Locational Information (ELI) Report *Note: document size is too large to be uploaded to Engage Victoria page*	VicGrid
182	24 Oct 25	2025 Victorian Transmission Plan (without appendices)	VicGrid
183	24 Oct 25	2025 Victorian Annual Planning Report	VicGrid
184	24 Oct 25	Hearing presentation	VicGrid
185	24 Oct 25	Email to IAC – Joint Expert Statement undergrounding and supplementary Expert Witness Statements	Moorabool Shire Council
186	24 Oct 25	Joint Expert Statement - Undergrounding	Moorabool Shire Council
187	24 Oct 25	Supplementary Expert Evidence statement of Dr Kerkin (Social)	Moorabool Shire Council
188	24 Oct 25	Supplementary Expert Evidence Statement of Professor Buxton and Professor March (Bushfire Planning matters)	Moorabool Shire Council

No.	Date	Description	Provided by
189	24 Oct 25	Email to IAC - Joint Expert Statements and update on Joint Expert Statement Agriculture and forestry	Proponent
190	24 Oct 25	Joint Expert Statement - Economics	Proponent
191	24 Oct 25	Joint Expert Statement - Landscape and Visual (methodology)	Proponent
192	24 Oct 25	Joint Expert Statement - Bushfire	Proponent
193	24 Oct 25	Expert Evidence Statement of Julian Fraser (Aviation Safety and Risk Assessment)	Melton Air Services
194	24 Oct 25	Project Route Overview Presentation	Proponent
195	24 Oct 25	Map 1 - Western Victoria Transmission Network	Proponent
196	24 Oct 25	Map 2 - Proposed Route *Note: document size is too large to be uploaded to Engage Victoria page*	Proponent
197	24 Oct 25	Map 3 - Proposed Route – Western Section	Proponent
198	24 Oct 25	Map 4 - Proposed Route – Central Section	Proponent
199	24 Oct 25	Map 5 - Proposed Route – Eastern Section	Proponent
200	24 Oct 25	Expert Evidence Statement of Chris Goss (Part B - Landscape and visual)	Melton City Council
201	24 Oct 25	Expert Evidence - Chris Goss - Visual Amenity Evidence images	Melton City Council
201a	3 Nov 25	Correspondence outlining corrections to Chris Goss Visual Amenity Evidence	Melton City Council
201b	3 Nov 25	Expert Evidence - Chris Goss – Corrected Visual Amenity Evidence images (KOP01 and KOP03)	Melton City Council
202	24 Oct 25	Expert Evidence - Chris Goss - Landscape and visual assessment	Melton City Council
202a	3 Nov 25	Expert Evidence - Chris Goss –Landscape and visual assessment - Addendum A - partial underground line	Melton City Council
202b	3 Nov 25	Expert Evidence - Chris Goss –Visual Amenity Evidence images - Addendum A *Note: document size is too large to be uploaded to Engage Victoria page*	Melton City Council
203	27 Oct 25	Opening submission (Part B)	Proponent
204	27 Oct 25	Technical Note 003 (TN03) - Compulsory Acquisition of Easements and Compensation	Proponent
205	27 Oct 25	Technical Note 004 (TN04) - Voluntary payments to landholders	Proponent

No.	Date	Description	Provided by
206	27 Oct 25	Technical Note 005 (TN05) - Relative Costs of Fully Overhead, Fully Underground and Partially Underground Transmission Lines	Proponent
207	27 Oct 25	Letter to IAC - Photomontages	Hepburn Shire Council
208	27 Oct 25	Proponent Day 1 version – Incorporated Document	Proponent
209	27 Oct 25	Proponent Day 1 version – Environmental Management Framework (EMF)	Proponent
210	27 Oct 25	Opening submission presentation	Melton City Council
211	28 Oct 25	Email to IAC - Update on aviation joint expert meeting and statement	Proponent
212	28 Oct 25	Email to IAC - Response to Proponents update on aviation joint expert statement and request for delay	Melton City Council
213	28 Oct 25	Email to IAC - Response to Proponents update on aviation joint expert statement - 28 Oct 25	Melton Air Services to IAC
214	29 Oct 25	Email to IAC - Follow up response on aviation joint expert statement following correspondence	Proponent
215	29 Oct 25	Email to Parties - Response on aviation joint expert statement and request to delay aviation evidence	PPV
216	29 Oct 25	Email to IAC - Documents Referred to in Tabled Document 167	Proponent
217	29 Oct 25	Documents referred to in Tabled Document 167 - Response to RFI Request Item 2	Proponent
218	29 Oct 25	Hearing submission - Visual impact assessment flaws and nonconformances	Mr Kiss
219	30 Oct 25	Preliminary Response to IAC's Questions	VicGrid
220	30 Oct 25	Attachment 1 - CEO VicGrid to Assist AEMO (WRL) NEVA Order (Gazette No. S 605, 8 Nov 2024)	VicGrid
221	30 Oct 25	Attachment 2 - Special Order Amending the VNI West and WRL NEVA Orders (Gazette No. S 590, 28 Oct 2025)	VicGrid
222	30 Oct 25	Attachment 3 - Western Victoria Renewable Integration PADR (December 2018)	VicGrid
223	30 Oct 25	Attachment 4 - Western Victoria Renewable Integration PACR (July 2019)	VicGrid
224	30 Oct 25	Email to IAC - Unit Cost Calculations of Rod Touzel	Melton City Council
225	30 Oct 25	Unit Cost Calculations of Rod Touzel (D139)	Melton City Council

No.	Date	Description	Provided by
226	30 Oct 25	VNI WEST - Project Assessment Conclusions Report dated May 2023 (VNI-West PACR)	Melton City Council
227	30 Oct 25	Topic Guide for Economics	Proponent
228	30 Oct 25	Presentation for Economics	Proponent
229	30 Oct 25	Topic Guide for Historical Heritage	Proponent
230	30 Oct 25	Presentation for Historical Heritage	Proponent
231	30 Oct 25	Email to IAC – VicGrid's role following NEVA Special Orders Gazetted 28 Oct 25	Mr Edwards
232	30 Oct 25	Email to Submitter 216 - Response to request on Directions on VicGrid's role following NEVA Special Orders	PPV
233	31 Oct 25	Joint Expert Statement – Aviation	Proponent
234	31 Oct 25	Topic Guide for Aviation	Proponent
235	31 Oct 25	Presentation for Aviation	Proponent
236	31 Oct 25	Joint Expert Statement - Agriculture and Forestry	Proponent
237	3 Nov 25	Melton Aerodrome Maps - 3 November 2025	Proponent
237a	21 Jan 26	Melton Aerodrome Maps - updated to included Manual of Standards extracts Note TD441 outlines the changes that have been made to the original document.	Proponent
238	3 Nov 25	Email to Proponent - Photomontages	PPV
239	3 Nov 25	Email to Melton City Council - Photomontages of Chris Goss D201	PPV
240	3 Nov 25	Email to Hepburn Shire Council – Photomontages recommended by Mr Brendan Papworth	PPV
241	3 Nov 25	Presentation for Noise	Proponent
242	3 Nov 25	Presentation for EMI and EMF	Proponent
243	3 Nov 25	Orbit Visual Amenity Document (photomontages from five viewpoints)	Hepburn Shire Council
244	3 Nov 25	Orbit Visual Amenity Statement of Methodology	Hepburn Shire Council
245	3 Nov 25	Correspondence on issues with landscape and visual expert evidence	Ms Harper
246	3 Nov 25	Email to IAC - Correction to Mr Goss's evidence and addendum on undergrounding Note the corrections and addendum documents for Mr Goss can be found under documents 201a, 201b, 202a and 202b	Melton City Council

No.	Date	Description	Provided by
247	5 Nov 25	Presentation for Landscape and Visual - Hayden Burge	Proponent
248	5 Nov 25	Presentation for Landscape and Visual - Steve Schutt	Proponent
249	6 Nov 25	Technical Note 006 (TN06) - Tower Design Standards and Climate Change	Proponent
250	6 Nov 25	Email to IAC - 2021 Australian Energy Infrastructure Commissioner's (AEIC) Annual Report on Setback Recommendations	Mr and Ms Harper
251	6 Nov 25	2021 Australian Energy Infrastructure Commissioner's (AEIC) Annual Report (Year ending 31 December 2021)	Mr and Ms Harper
252	7 Nov 25	Response to IAC's Questions	VicGrid
253	7 Nov 25	Email to IAC – Documents referred to in D144 and the IAC's response (D146)	Moorabool Shire Council
254	7 Nov 25	2022 Australian Energy Infrastructure Commissioner's (AEIC) Annual Report	Moorabool Shire Council
255	7 Nov 25	Moorabool Shire Council - High Voltage Transmission Line Setback Policy	Moorabool Shire Council
256	7 Nov 25	Conceptual design prepared by Mott Macdonald 'WRL – HVDC System Design Alternative' (24 February 2023)	Moorabool Shire Council
257	7 Nov 25	Costs report by RLB - HVDC fully underground conceptual configuration, 'Cost Methodology Report —WRL DC Options' (28 Aug 23)	Moorabool Shire Council
258	7 Nov 25	Costs report by RLB - partial underground conceptual configuration, 'Cost Methodology Report — WRL' (9 Feb 23)	Moorabool Shire Council
259	7 Nov 25	Topic Guide for Bushfire	Proponent
260	7 Nov 25	Fire Risk Potential from the Western Renewables Link – Report of Professor Trent Penman and Brett Cirulis	Proponent
261	10 Nov 25	Presentation for Bushfire Risk	Proponent
262	10 Nov 25	AS-3891-1-2021 – Air navigation – Cables and their supporting structures – Marking and safety requirements (Part 1: Marking of overhead cables and supporting structures) *Note: document not uploaded to Engage Victoria page or the document share due to copyright status*	Proponent
263	10 Nov 25	AS-3891-2-2018 - Air navigation – Cables and their supporting structures – Marking and safety requirements (Part 2: Low level aviation operations) *Note: document not uploaded to Engage Victoria page or the document share due to copyright status*	Proponent

No.	Date	Description	Provided by
264	10 Nov 25	Topic Guide for Social Impacts	Proponent
265	10 Nov 25	Presentation for Social	Proponent
266	10 Nov 25	Presentation for Wellbeing	Proponent
267	10 Nov 25	Fire impact map	Mr and Ms Harper
268	10 Nov 25	Electricity Transmission Lines - Bushfire and Management and Community Safety	Proponent
269	10 Nov 25	Email to IAC - Correction to Table 8-2 of the Social Impact Assessment (EES Technical Report F)	Proponent
270	10 Nov 25	Social Impact Assessment (SIA) (EES Technical Report F) updated Table 8-2	Proponent
271	10 Nov 25	WRL Project Landscape-reliant Businesses Consultation Outcomes	Proponent
272	10 Nov 25	Technical Note 007 (TN07) - Social Procurement	Proponent
273	11 Nov 25	MacPherson Park Equestrian and Greyhound Clubs - Ecology existing conditions assessment	Melton City Council
274	11 Nov 25	Topic Guide for Biodiversity	Proponent
275	11 Nov 25	Presentation for Biodiversity (Brett Lane)	Proponent
276	11 Nov 25	Presentation for Biodiversity (Andrew Stephens)	Proponent
277	11 Nov 25	Technical Note 008 (TN08) - Response to IAC RFI Section 9, Request 17	Proponent
278	11 Nov 25	Technical Note 009 (TN09) - Further Avoidance and Minimisation of Biodiversity Impacts - 11 Nov 25	Proponent
279	13 Nov 25	Email to Proponent – Clarification on hard copy photomontages to be printed	PPV
280	14 Nov 25	Technical Note 010 (TN10) - Option to Purchase (OTP)	Proponent
281	14 Nov 25	**CONFIDENTIAL** - Technical Note 010 (TN10) - Confidential Annexure	Proponent
282	17 Nov 25	Topic Guide for Agriculture and Forestry	Proponent
283	17 Nov 25	Presentation for Agriculture and Forestry	Proponent
284	17 Nov 25	Technical Note 011 (TN11) - Operation of EPRs - Directly Affected Landholders	Proponent
285	17 Nov 25	WRL Landholder Guide – Easement Safety and Permitted Activities	Proponent
286	18 Nov 25	Topic Guide for Transport	Proponent
287	18 Nov 25	Presentation for Transport	Proponent
288	18 Nov 25	Addendum to Expert Evidence Statement of Christina	Proponent

No.	Date	Description	Provided by
		Emmitt (Transport)	
289	19 Nov 25	Topic Guide for Land Use and Planning	Proponent
290	19 Nov 25	Presentation for Land Use and Planning	Proponent
291	19 Nov 25	Letter to IAC - Response to queries on Melton Aerodrome	Melton City Council
292	19 Nov 25	Melton Shire Council Permit P1515_94	Melton City Council
293	19 Nov 25	Melton Shire Council Permit P1515_94 Endorsed Plan 1	Melton City Council
294	19 Nov 25	Melton Shire Council Permit P1515_94 Endorsed Plan 2	Melton City Council
295	19 Nov 25	Clarification from Steve Schutt (Landscape & Visual)	Proponent
296	19 Nov 25	Email to IAC - IAC requested documents and references used in questioning of Burge LVIA	Moorabool Shire Council
297	19 Nov 25	Rural-Land-Use-Strategy-2024	Moorabool Shire Council
298	19 Nov 25	Plan - RLUS Agricultural Land Classes within Proposed WRL Route in Moorabool Shire	Moorabool Shire Council
299	19 Nov 25	Plan - RLUS Policy Area 1 Map	Moorabool Shire Council
300	19 Nov 25	Memo to IAC - Chronology DDO2 and SLO1	Moorabool Shire Council
301	19 Nov 25	Memo - Attachment 1 – Amendment NPS1 1999 Panel Report	Moorabool Shire Council
302	19 Nov 25	Memo - Attachment 2 – Amendment NPS1 2000 SLO1	Moorabool Shire Council
303	19 Nov 25	Memo - Attachment 3 – Amendment NPS1 2000 DDO2	Moorabool Shire Council
304	19 Nov 25	Memo - Attachment 4A – Amendment C003 (Part 1) 2004 Explanatory Report	Moorabool Shire Council
305	19 Nov 25	Memo - Attachment 4B – Amendment C003 (Part 1) 2004 List of Changes	Moorabool Shire Council
306	19 Nov 25	Memo - Attachment 5 –Amendment C003 (Part 1) 2004 DDO2	Moorabool Shire Council
307	19 Nov 25	Memo - Attachment 6 – Amendment C092 2021 Explanatory Report	Moorabool Shire Council
308	19 Nov 25	Memo - Attachment 7 – Amendment C092 2021 SLO1	Moorabool Shire Council

No.	Date	Description	Provided by
309	19 Nov 25	Memo - Attachment 8 – Amendment C092 2021 DDO2	Moorabool Shire Council
310	19 Nov 25	Letter to IAC - Information and documents provided to Buxton and March	Moorabool Shire Council
311	19 Nov 25	8 Plans dated 10 October 2025	Moorabool Shire Council
312	19 Nov 25	17 Plans dated 3 October 2025	Moorabool Shire Council
313	20 Nov 25	Clarifications from Route Inspection	Proponent
314	20 Nov 25	Melton Aerodrome Near map Images	Proponent
315	21 Nov 25	Email to IAC - Brief to Gavin Beever (Agriculture) Note the brief document for Mr Beever can be found under document 136a	Hepburn Shire Council
316	21 Nov 25	Email to IAC - Brief to Gavin Beever (Agriculture) Note the brief document for Mr Beever can be found under document 115a	City of Ballarat
317	21 Nov 25	Email to IAC - Change in order of expert evidence in Hearing Timetable	Melton City Council
318	24 Nov 25	Letter to IAC - Bundle of Certification Evidence	Melton Air Services
319	24 Nov 25	Closing Submissions (Part C)	Proponent
320	24 Nov 25	Responses to RFIs from IAC (Final response table)	Proponent
321	24 Nov 25	Technical Note 012 (TN12) - Response to Request to Clarify Consultation	Proponent
322	24 Nov 25	Technical Note 013 (TN13) - Hard Rock Investigation Area near Mt Kororoit - Length of the Southern Alternative Route	Proponent
323	24 Nov 25	WRL Interactive Map Source Data	Proponent
324	25 Nov 25	Response from Mr Touzel to further letter of instructions (Goss expert report addendum)	Melton City Council
325	25 Nov 25	Presentation for Social	Moorabool Shire Council
326	26 Nov 25	Email from Proponent to IAC - Request for information relating to TD324	Proponent
327	26 Nov 25	Email to Parties - Proposed timetable changes from Melton City Council	PPV
328	26 Nov 25	Email to IAC – Clarification on lead author in bushfire and planning related bushfire matters	Moorabool Shire Council

No.	Date	Description	Provided by
329	26 Nov 25	Presentation for bushfire and planning related bushfire matters	Moorabool Shire Council
330	26 Nov 25	Consolidated document(s) to be referred to during the cross examination of Professor Buxton and Professor March: a) Proponent – VAGO Report – Reducing Bushfire Risk b) Document 268 – Transmission Lines: Vic Govt Report (Not tabled as already tabled with the IAC) c) Proponent – 13.02 Moorabool Planning Scheme d) Proponent – 44.06 – Moorabool Planning Scheme e) Proponent – 44.06 (s1) – Moorabool Planning Scheme f) Proponent – 53.02 – Moorabool Planning Scheme g) Proponent – Booth v Strathbogie SC [2023] VCAT 782 h) Proponent – Moorabool C81 Panel Report i) Proponent – Moorabool C108 Panel Report j) Proponent – EES Technical Report K – Bushfire History	Proponent
331	28 Nov 25	Response to Proponent request (D326) - Partial Underground Costings and Route Mapping	Melton City Council
332	28 Nov 25	Response to Coimadai Avenue of Honour Restoration Association Inc questions	Proponent
333	28 Nov 25	Presentation for electricity transmission and undergrounding	Moorabool Shire Council
334	28 Nov 25	Letter to IAC - Calculation change in Mr Brand expert evidence statement and updated tracked change version of statement (TD104)	Moorabool Shire Council
335	30 Nov 25	Cross examination material - HVAC UG AEMO TCD Cost estimates with adjustments 1	Proponent
336	30 Nov 25	Cross examination material - HVAC UG AEMO TCD Cost Estimates with adjustments 2	Proponent
337	30 Nov 25	Cross examination material - HVDC Converters AEMO TCD Costs Estimate	Proponent
338	30 Nov 25	Cross examination material - HVDC UG Cable AEMO TCD Cost Estimate	Proponent
339	30 Nov 25	Cross examination material - Reference document 11 (Europacable)	Proponent

No.	Date	Description	Provided by
340	30 Nov 25	Cross examination material – 2025 electricity network options report	Proponent
341	30 Nov 25	Cross examination material - Attachment 1b - HVDC Costs	Proponent
342	30 Nov 25	Cross examination material - Brand Attachment 1	Proponent
343	30 Nov 25	Cross examination material - Brand Attachment 2	Proponent
344	30 Nov 25	Cross examination material - GHD 2025 transmission cost database update final report	Proponent
345	1 Dec 25	Letter to IAC - Addenda to Beever and Papworth expert evidence *Note: Addendum statement for Mr Beever is TD136b* *Note: Addendum statement for Mr Papworth is TD154a*	Hepburn Shire Council
346	1 Dec 25	Email to IAC - Response to IAC questions on tower height near MacPherson Park / Melton Aerodrome	Proponent
347	1 Dec 25	Email to Parties - Updates to version 2 timetable for Melton City Council case	PPV
348	1 Dec / 2 Dec 25	Hearing Submission: a) Part 1 b) Part 2	Moorabool Shire Council
349	2 Dec 25	Presentation for Landscape and Visual Impact	Melton City Council
350	2 Dec 25	Email to IAC - Further Information regarding Melton Aerodrome (interactions between Council and Melton Airfields)	Melton City Council
351	2 Dec 25	Email from Melton City Council to Melton Airfield Services regarding Planning Permit dated 14 Feb 2022	Melton City Council
352	3 Dec 25	Costs Comparison RLB and Brand	Proponent
353	3 Dec 25	Presentation for Undergrounding (Rod Touzel)	Melton City Council and Hepburn Shire Council
354	3 Dec 25	Day 22 version - Environmental Management Framework (EMF) (track changes)	Moorabool Shire Council
355	3 Dec 25	Cross examination material - Marinus Link Construction	Proponent
356	3 Dec 25	Cross examination material -Overhead and Underground Factsheet - Accessible Version	Proponent
357	3 Dec 25	Cross examination material - Comparing High Voltage Overhead and Underground Transmission Infrastructure	Proponent

No.	Date	Description	Provided by
358	4 Dec 25	Letter to IAC - Request for direction seeking further info from Proponent on undergrounding HVDC	Ms Perera
359	4 Dec 25	Supplementary submission to support request for further information	Ms Perera
360	4 Dec 25	Letter from Rennick and Gaynor to IAC – Request for Mr Clark (Heritage) to no longer appear at hearing	Charleson, Ford, Henderson Drife, May and Bouchier group
361	4 Dec 25	Letter from White and Case to Rennick and Gaynor - Heritage evidence – Latitude Heritage Report (TD 153) dated 1 Dec 25	Charleson, Ford, Henderson Drife, May and Bouchier group
362	5 Dec 25	Presentation for Social	Melton City Council
363	6 Dec 25	Hearing submission	Melton City Council
364	8 Dec 25	Email to IAC - Notification of order of expert presentation	Hepburn Shire Council
365	8 Dec 25	Cross examination material - Planning for Community Infrastructure in Growth Areas - Apr 08	Proponent
366	8 Dec 25	Presentation for Landscape and visual	Hepburn Shire Council
367	8 Dec 25	Technical Note 014 (TN14) - Algerian Oak	Proponent
368	9 Dec 25	Cross examination material - 5.2[9] - Scotland - Cairngorms National Park (*Electricity Pylons to be removed from Cairngorms National Park – Herald – 4 Dec 18*)	Proponent
369	9 Dec 25	Cross examination material - 5.2[10] - UK - Lake District National Park (*The Lake District is still threatened by Pylons – 1 Sep 16*)	Proponent
370	9 Dec 25	Cross examination material - 5.2[11] - United States - Everglades National Park, Florida (*The federal government has shut down. Unfortunately, our parks should too – 30 May 14*)	Proponent
371	9 Dec 25	Cross examination material - 5.2[12] - California - PG&E Underground Program (*PG&E Receives Approval for Undergrounding Projects from California Public Utilities Commission – 29 Nov 23*)	Proponent

No.	Date	Description	Provided by
372	9 Dec 25	Cross examination material - 5.2[13] - United Kingdom - Dorset Area of Outstanding Natural Beauty (*Pylons coming down in Dorset as major National Grid project nears completion – 22 Sep 22*)	Proponent
373	9 Dec 25	Cross examination material - 5.2[14] - Mendip Hills AONB, Somerset *(Underground cables through the AONB connecting homegrown, low carbon energy – 2025)*	Proponent
374	9 Dec 25	Cross examination material - Central Victorian Goldfields Economic Benefit Assessment Summary (Oct 22)	Proponent
375	9 Dec 25	Presentation for agriculture	Hepburn Shire Council and City of Ballarat
376	9 Dec 25	Day 24 version - Environmental Management Framework (EMF) (track changes) dated 8 December 2025 *Note: Melton City Council track changes build on those proposed by Moorabool Shire Council version (TD354)*	Melton City Council
377	9 Dec 25	Email to Rennick and Gaynor - Response to letter on heritage expert presenting at hearing	PPV
378	9 Dec 25	Email from PPV - Response to request for Direction seeking further info on undergrounding	PPV
379	9 Dec 25	Proponent Day 2 version – Environmental Management Framework (EMF)	Proponent
380	9 Dec 25	Shayne Annett (Agriculture) EPR information request	Proponent
381	9 Dec 25	Hearing submission	Hepburn Shire Council
382	10 Dec 25	Hearing submission	Pyrenees Shire Council
383	10 Dec 25	WRL IAC - Letter to parties seeking more than 2 hours confirming timetable requests	PPV
384	10 Dec 25	Hearing submission	City of Ballarat
385	12 Dec 25	Cross examination material - Guidebook Using Powered Mobile Plant Near Overhead Assets	Proponent
386	12 Dec 25	Cross examination material - Permitted Vehicle and Equipment Heights	Proponent

No.	Date	Description	Provided by
387	12 Dec 25	Letter from Rennick and Gaynor to IAC – Providing submission and videos and seeking extension for addendum	Charleson, Ford, Henderson Drife, May and Bouchier group
388	12 Dec 25	Hearing submission	Charleson, Ford, Henderson Drife, May and Bouchier group
389	12 Dec 25	Video 1 (IMG_4477) *Note: document size is too large to be uploaded to Engage Victoria page*	Charleson, Ford, Henderson Drife, May and Bouchier group
390	12 Dec 25	Video 2 (IMG_4479) *Note: document size is too large to be uploaded to Engage Victoria page*	Charleson, Ford, Henderson Drife, May and Bouchier group
391	12 Dec 25	Video 3 ***Note: the following video contains content from firefighting that people may find confronting*** *Note: document size is too large to be uploaded to Engage Victoria page*	Charleson, Ford, Henderson Drife, May and Bouchier group
392	15 Dec 25	Email granting Melton Air Services extension to file submission	PPV
393	15 Dec 25	Evidence presentation of Daniel O'Donnell (aviation safety and aerodrome operations)	Melton Air Services
394	15 Dec 25	Response to Submitter 251 regarding Proponent appointment of contractors	PPV
395	15 Dec 25	Hearing submission	Melton Air Services
396	15 Dec 25	Australian Transport Safety Bureau (ATSB) - Avoidable Accidents No. 3 – Managing partial power loss after take-off in single-engine aircraft	Melton Air Services
397	15 Dec 25	NTSB Report No. WPR25FA161 - Wire strike involving Cessna S550 approach (22 05 2025)	Melton Air Services
398	15 Dec 25	ATSB Report No. 200400437 – Wire strike involving Piper PA-28R-200 (07 02 2004	Melton Air Services
399	15 Dec 25	Bundle of plans submitted to Melton City Council (as referred to in TD350)	Melton Air Services

No.	Date	Description	Provided by
400	16 Dec 25	ATSB Report - Wire-strike Accidents in General Aviation 1994 to 2004	Proponent
401	16 Dec 25	Response to Submitter 524 request for further information	PPV
402	16 Dec 25	AIP ENR extract 10.14.3	Melton Air Services
403	16 Dec 25	Email to IAC - Response to question about Runway 04 22	Melton City Council
404	17 Dec 25	Email to DEECA - Response to request for extension for DEECA's submission	PPV
405	17 Dec 25	Hearing submission	Northern Grampians Shire Council
406	17 Dec 25	Hearing submission	Head of Transport for Victoria (DTP Transport)
407	17 Dec 25	Hearing submission	DEECA
408	18 Dec 25	Memorandum of Mr Brand responding to questions from proponents table (TD352)	Moorabool Shire Council
409	18 Dec 25	Letter to IAC - Site inspections	Charleson, Ford, Henderson Drife, May and Bouchier group
410	19 Dec 25	Responses to IAC questions taken on notice 18 December	DEECA
411	19 Dec 25	Letter to IAC - Responses to IAC questions taken on notice	City of Ballarat
412	19 Dec 25	WRL IAC - Letter to Charleson Ford Henderson Drife May and Bouchier group regarding site visit requests	PPV
413	19 Dec 25	WRL IAC - Letter to KDPA regarding site visit requests	PPV
414	19 Dec 25	WRL IAC - Letter to VFF regarding site visit requests	PPV
415	19 Dec 25	WRL IAC - Letter to Submitters 162 and 427 regarding site visit requests	PPV
416	19 Dec 25	WRL IAC - Letter to Submitter 312 and 313 regarding site visit requests	PPV
417	19 Dec 25	WRL IAC - Letter to Submitter 342 regarding site visit request	PPV
418	19 Dec 25	Hearing Timetable (v3)	PPV

No.	Date	Description	Provided by
419	6 Jan 26	Response to Document 266 and Technical Note 005	Mr Kiss
420	14 Jan 26	Letter to IAC – Response regarding site visit requests and itinerary	Charleson, Ford, Henderson Drife, May and Bouchier group
421	16 Jan 26	Email to IAC - Response to questions raised by IAC during the Hearing and operating procedure	CFA
422	16 Jan 26	Standard Operating Procedure - 11.04 Working Near Electrical Structures and Conductors	CFA
423	17 Jan 26	Letter to IAC - Response regarding site visit request and itinerary	Mr and Dr Lidgett
424	19 Jan 26	Hearing submission	Ms Toohey
425	19 Jan 26	Email to IAC - Further response to IAC question's	DEECA
426	19 Jan 26	Letter to IAC - Request for reply submission and update on Councils EPRs	Moorabool Shire Council
427	19 Jan 26	Hearing presentation	Mr Finneran
428	20 Jan 26	Day One Hearing presentation V1 Part 1 (Introduction, Planning, Landscape & Visual Impact, Undergrounding)	KDPA
429	20 Jan 26	Day One Hearing presentation V1 Part 2 (Biodiversity, Fire and firefighting impacts)	KDPA
430	20 Jan 26	Letter to from KDPA to CFA Nov 2025	KDPA
431	21 Jan 26	Day One Hearing presentation Part 3 (Heritage, Bullarook Creek Hepburn Lagoon, Berry Deep and Rivers of Gold)	KDPA
432	21 Jan 26	Burra Charter Practice Note Cultural Landscapes	KDPA
433	21 Jan 26	Burra Charter Practice Note Understanding and assessing cultural significance	KDPA
434	21 Jan 26	Extract from Victoria's Framework of Historical Themes	KDPA
435	21 Jan 26	Draft Proposed Statement of Outstanding Universal Value for the Central Victorian Goldfields	KDPA
436	21 Jan 26	World Heritage Bid Submission made 28-01-2025	KDPA
437	21 Jan 26	AusNet WRL Construction Considerations Presentation - CCG Meeting 14-08-2022	KDPA
438	21 Jan 26	Day Two Hearing presentation V1 Part 1 (Agricultural impact)	KDPA
439	21 Jan 26	Day Two Hearing presentation V1 Part 2 (Tourism	KDPA

No.	Date	Description	Provided by
		impact)	
440	21 Jan 26	Day Two Hearing presentation V1 Part 3 (Tourism impact, Land use – economic and social impact, closings)	KDPA
441	21 Jan 26	Email to IAC - Providing Technical Note 015 and updated version of TD 237 (TD237a)	Proponent
442	21 Jan 26	Technical Note 015 (TN15) - Solatium for Compulsory Acquisition of Easements	Proponent
443	21 Jan 26	Buried Rivers of Gold – Map of the Deep Lead Mines self-guided tour pamphlet	KDPA
444	21 Jan 26	Email from CFA to PPV and response from PPV to CFA in regard to KDPA letter	CFA/PPV
445	22 Jan 26	KDPA – Day One Hearing presentation speaking notes biodiversity	KDPA
446	22 Jan 26	Email to IAC - Response regarding site visit request and itinerary	Mr and Ms Harper
447	22 Jan 26	Hearing submission and Addendum 1 - Enforcing the Ethereal: A Rigorous Framework for Securing Binding Environmental Performance Requirements for the Western Renewables Link	WVCA
448	22 Jan 26	Photomontage - WVCA who we are and what we want	WVCA
449	22 Jan 26	Plumpton landowner assault video – 22 Jan 26 *Note: file type cannot be uploaded to Engage Victoria page*	WVCA
450	22 Jan 26	Hearing submission - Addendum 2 - Network Outage Review – February 2024 Storm and Power outage event - Final Report, DEECA, June 2024	WVCA
451	22 Jan 26	Hearing submission	Mount Souvenir Pty Ltd
452	22 Jan 26	CASA Part 139 (Aerodromes) Manual of Standards 2019 (as amended) - 12 June 2025	Proponent
453	22 Jan 26	Civil Aviation Authority advisory publication - CAAP 92-1(1) - Guidelines for aeroplane landing areas - July 1992	Proponent
454	23 Jan 26	Hearing submission	Mr Conroy
455	23 Jan 26	Technical Note 016 (TN16) – Change of Construction Method	Proponent
456	23 Jan 26	Hearing presentation and submission notes	Bald Hills-Creswick Landcare group

No.	Date	Description	Provided by
457	26 Jan 26	Hearing presentation *Note: document size is too large to be uploaded to Engage Victoria page*	SERGI Transformer Protector
458	26 Jan 26	Hearing presentation	Ms Hevey
459	26 Jan 26	Valuation letter, WBP Valuers	Mr Banjanin
460	26 Jan 26	Image - View without high voltage towers and power lines	Mr Banjanin
461	26 Jan 26	Image - View with high voltage towers and power lines	Mr Banjanin
462	27 Jan 26	Hearing presentation	Mr McKay
463	27 Jan 26	Hearing presentation	Toolern Vale Landcare Group
464	27 Jan 26	Hearing presentation	Mr Binks
465	27 Jan 26	Hearing submission	Mr Reith
466	27 Jan 26	Map	Mr Banjanin
467	27 Jan 26	Hearing submission	Mr Harper
468	28 Jan 26	468. Toolern Vale Landcare Group - Toolern Vale Biodiversity Action Plan - January 2026 - 28 Jan 26	Toolern Vale Landcare Group
469	28 Jan 26	Hearing submission with references	Toolern Vale Landcare Group
470	28 Jan 26	Map 1 - Toolern Vale threatened flora and fauna (BAP Trengrove 2006)	Toolern Vale Landcare Group
471	28 Jan 26	Map 2 - Heritage trees & Sensitive Biodiversity Locations, Vicplan	Toolern Vale Landcare Group
472	28 Jan 26	Map 3 - Bushfire Prone Areas in Toolern Vale, VicPlan 2025	Toolern Vale Landcare Group
473	28 Jan 26	Hearing Timetable (v4)	PPV
474	28 Jan 26	Letter to IAC - Response regarding site visit request and itinerary	KDPA
475	28 Jan 26	KDPA - proposed site inspection route - mark-up of EES Map Book	KDPA
476	29 Jan 26	WRL IAC - Letter to KDPA regarding site visit response	PPV
477	29 Jan 26	Map of property	Mr McGlashin

No.	Date	Description	Provided by
478	29 Jan 26	Historic buildings	Mr McGlashin
479	29 Jan 26	Email to IAC - Response regarding site visit request and itinerary	VFF
480	30 Jan 26	Hearing presentation	Mr and Ms Muir
481	30 Jan 26	Hearing submission	Mr and Ms Muir
482	30 Jan 26	WRL IAC - Letter to Charleson Ford Henderson Drife May and Bouchier group - Response to site visit itinerary	PPV
483	30 Jan 26	WRL IAC - Letter to Proponent response to Charleson Ford Henderson Drife May and Bouchier group site visit itinerary	PPV
484	2 Feb 26	Hearing presentation	Kingston Friends of the Avenue
485	2 Feb 26	Letter to IAC - Further response regarding site visit	KDPA
486	2 Feb 26	Hearing presentation	Kingston Agricultural Society
487	2 Feb 26	Hearing submission	Ballarat Group of Fire Brigades
488	2 Feb 26	FAQ - Firefighting and Transmission Lines - October 2023	Ballarat Group of Fire Brigades
489	2 Feb 26	Map of property	Mr and Ms Muir
490	2 Feb 26	Map of property	Mr and Ms Muir
491	2 Feb 26	Pamphlet - Kingston Friends of the Avenue	Kingston Friends of the Avenue
492	2 Feb 26	Pin	Kingston Friends of the Avenue
493	2 Feb 26	a) Photo 1 - Hands Around the Oak Rally at Kingston 20 Aug 25 b) Photo 2 - The Old Coach Track c) Photo 3 - The Algerian Oak d) Photo 4 - The Algerian Oak e) Photo 5 - Children swimming in Birch's Creek under Kerins Bridge, Summer 2024	Mr Harper
494	10 Feb 26	Petition to AusNet Safe and Sound Underground – 2 Feb 26 (updated 25 Feb 26)	Mr Harper

No.	Date	Description	Provided by
495	3 Feb 26	Hearing video presentation *Note: document size is too large to be uploaded to Engage Victoria page*	Ballarat Group of Fire Brigades
496	3 Feb 26	**CONFIDENTIAL** - Hearing presentation	Mr and Ms Richardson
497	3 Feb 26	CFA document fighting fires around transmission lines	Ballarat Group of Fire Brigades
498	3 Feb 26	Hearing presentation	VFF
499	3 Feb 26	Email to IAC - Request for additions to interactive mapping	Ms Johnson
500	4 Feb 26	Maze House - Hearing presentation	Ms Kevin
501	4 Feb 26	Email to IAC - Safety performance report - Victorian Electricity Networks	Ballarat Group of Fire Brigades
502	4 Feb 26	2020 Safety Performance Report on Victorian Electricity Networks	Ballarat Group of Fire Brigades
503	4 Feb 26	2021 Safety Performance Report on Victorian Electricity Networks	Ballarat Group of Fire Brigades
504	4 Feb 26	2022 Safety Performance Report on Victorian Electricity Networks	Ballarat Group of Fire Brigades
505	4 Feb 26	2023 Safety Performance Report on Victorian Electricity Networks	Ballarat Group of Fire Brigades
506	4 Feb 26	**CONFIDENTIAL** - - Hearing presentation	Barengi Gadjin Land Council Aboriginal Corporation (BGLC)
507	4 Feb 26	**CONFIDENTIAL** - Hearing presentation	Submitter 533
508	4 Feb 26	**CONFIDENTIAL** - Hearing submission	Dja Dja Wurrung Clans Aboriginal Corporation (DJAARA)
509	4 Feb 26	**CONFIDENTIAL** - Hearing presentation	DJAARA
510	4 Feb 26	**CONFIDENTIAL** - DJAARA comments on TD379. Proponent - Day 2 version EMF	DJAARA
511	4 Feb 26	**CONFIDENTIAL** - Hearing presentation	Submitter 353

No.	Date	Description	Provided by
512	4 Feb 26	**CONFIDENTIAL** - Hearing submission	Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC)
513	4 Feb 26	**CONFIDENTIAL** - Hearing presentation	WTOAC
514	4 Feb 26	WRL IAC - Letter to KDPA - Response to site visit itinerary	PPV
515	4 Feb 26	WRL IAC - Letter to Charleson Ford Henderson Drife May and Bouchier group - Response to site visit May property	PPV
516	4 Feb 26	WRL IAC - Letter to Proponent response to KDPA and May site visit itinerary	PPV
517	4 Feb 26	**CONFIDENTIAL** - Email to IAC - ChatGPT Analysis of Compensation	Submitter 280
518	4 Feb 26	Email to IAC - Image of proposed alignment and property productive land	Ms Johnson
519	4 Feb 26	Technical Note 017 (TN17) - Safety Assessments and Permits to Work	Proponent
520	4 Feb 26	Technical Note 018 (TN18) - Benefit Sharing with Traditional Owners	Proponent
521	4 Feb 26	Technical Note 019 (TN19) - Status of Cultural Heritage Management Plans	Proponent
522	4 Feb 26	Email to Submitter 524 - Response to request for additions to interactive mapping	PPV
523	5 Feb 26	Email to IAC - Presentation information resource list	Ballarat Group of Fire Brigades
524	5 Feb 26	Email to IAC - Details for May property site inspection	Charleson Ford Henderson Drife May and Bouchier group
525	5 Feb 26	Documents provided onsite inspection (updated 24 Feb 26)	Ms Ford
526	6 Feb 26	Email to IAC - Technical Note 20 and Harkness Memorial Park Cemetery Masterplan	Proponent
527	6 Feb 26	Technical Note 020 (TN20) - Response to Barunah Park Geelong Pty Ltd	Proponent
528	6 Feb 26	Harkness Memorial Park Cemetery Masterplan, February 2023	Proponent
529	6 Feb 26	Development Timeline — Harkness Memorial Park	Proponent

No.	Date	Description	Provided by
530	8 Feb 26	Hearing Timetable (v5)	PPV
531	9 Feb 26	Camerson Road group - Hearing presentation *Note: document size is too large to be uploaded to Engage Victoria page*	Ms Lyle
532	9 Feb 26	Hearing presentation	Ms Schlieff
533	9 Feb 26	Hearing presentation	Mr Lidgett
534	9 Feb 26	Hearing submission	Mr Lidgett
535	9 Feb 26	Email to IAC - Details for KDPA site inspection	KDPA
536	9 Feb 26	Email to IAC - Further materials underpinning Mr Touzel's underground trench design	Melton City Council
537	9 Feb 26	Response to Request re Mr Touzel's Cable Rating Calculations - 4 Feb 26	Melton City Council
538	10 Feb 26	Hearing submission	Mr and Mrs Phasey
539	10 Feb 26	Appendix 1 -Roaring winds, dry country and rugged terrain - Why Victoria is prone to devastating bushfires - ABC News	Mr and Mrs Phasey
540	10 Feb 26	Video – Firefighting helicopter *Note: document size is too large to be uploaded to Engage Victoria page*	Mr and Mrs Phasey
541	10 Feb 26	Email to IAC - Objection to Melton City Council materials of Rod Touzel (TD537)	Proponent
542	10 Feb 26	Hearing submission	Mr and Mrs Edwards
543	10 Feb 26	Letter to IAC - Amendments VC278 and GC282 to Melton Planning Scheme	Melton City Council
544	10 Feb 26	Hearing submission	Ms Schlieff
545	10 Feb 26	Letter to IAC - No longer appearing at Hearing and Routes TN20	Barunah Park Geelong Pty Ltd
546	10 Feb 26	Submitter 189 - Hearing presentation	Mr Cape
547	10 Feb 26	Camerson Road group - Links to documents regarding biodiversity questions	Ms Lyle
548	10 Feb 26	Camerson Road group – Hearing submission	Ms Lyle
549	11 Feb 26	Video – Pykes Creek Reservoir *Note: document size is too large to be uploaded to Engage Victoria page*	Mr and Mrs Phasey

No.	Date	Description	Provided by
550	11 Feb 26	Email to IAC - Supplementary submission on amendments to the proposed EMF, with attachment: a) Supplementary submission on updated EMF	WVCA
551	11 Feb 26	Email to IAC – Request for closing submission	Hepburn Shire Council
552	11 Feb 26	**CONFIDENTIAL** - Woodlands Agriculture landholdings	Mr Lidgett
553	11 Feb 26	Hearing presentation, with attachments: a) Aviation Safety Investigation report (ATSB) 198601430 b) Aviation Safety Investigation report (ATSB) 200303579 c) Letter to AEIC 20 August 2025 d) Letter to AEIC 9 September 2025 e) Melton Airfield Planning Report *Note: Hearing presentation document (553) is too large to be uploaded to Engage Victoria page*	Mr Reeve
554	11 Feb 26	Supplementary submission	Mr Reeve
555	11 Feb 26	Hearing presentation photos of volcanic plains	Submitter 74
556	13 Feb 26	Hearing Timetable (v6)	PPV
557	12 Feb 26	Letter from Rigby Cooke to Australian Energy Infrastructure Commissioner dated 12 July 22	Mr Reeve
558	13 Feb 26	Hearing presentation	Mr Jenkins
559	13 Feb 26	Hearing submission	Ms Harper
560	13 Feb 26	Hearing submission	Mr Woods
561	13 Feb 26	Hearing submission - 2 Feb 26	Kingston Friends of the Avenue
562	16 Feb 26	Civil Aviation Safety Authority (CASA) - Advisory Circular AC139.E-01 – Reporting of tall structures – Dec 2021	Proponent
563	16 Feb 26	Civil Aviation Safety Authority (CASA) - Advisory Circular AC139.E-05 – Obstacles (including wind farms) outside the vicinity of a CASA certified aerodrome – Oct 2022	Proponent
564	16 Feb 26	Civil Aviation Safety Authority (CASA) - Draft Multi-Part Advisory Circular AC139.0E-01 and AC 175.E-02 – Objects and structures that affect aviation safety – Aug 2025	Proponent
565	16 Feb 26	WRL IAC - Letter to Submitters 162 and 427 - Response to site visit itinerary	PPV

No.	Date	Description	Provided by
566	16 Feb 26	WRL IAC - Letter to Submitters 312 and 313 - Response to site visit itinerary	PPV
567	16 Feb 26	WRL IAC - Letter to Proponent response to Submitters 162 and 427 and 312 and 313 site visit itinerary	PPV
568	16 Feb 26	Camerons Road Group - Site visit suggestions	Ms Lyle
569	16 Feb 26	Hearing presentation	Ms Backhouse
570	16 Feb 26	Hearing presentation	Mr and Mrs Prendergast
571	17 Feb 26	Hearing presentation	Mr Pollock
572	18 Feb 26	a) 1 - Pacific-hydro submission to WestVic RIT-T consultation b) 2 - Project Land c) 3 - AER Demand and energy - Annual electricity consumption NEM DATA_2_20220104135459 572 d) 4 - Potatoes Chapter 15 Agriculture and forestry (Table 15.1)	Mr Rousch
573	18 Feb 26	Image - Landscape with towers	Mr and Mrs Prendergast
574	18 Feb 26	Attachment I Project development and assessment of alternatives Hepburn Lagoon (Table 7.2)	Mr and Mrs Prendergast
575	18 Feb 26	Hearing submission	Ms Morrison
576	18 Feb 26	Hearing presentation	Ms Morrison
577	18 Feb 26	Hearing presentation (updated 19 Feb 26)	Dr Blackett-Smith and Mr McGoldrick
578	18 Feb 26	Hearing presentation - Background matters	Ms Gervasoni
579	18 Feb 26	Hearing presentation	Ms Gervasoni
580	18 Feb 26	Hearing presentation	Ms Williams
581	18 Feb 26	Site visit material - received 13 Feb	Mr May
582	18 Feb 26	Land access plan – 16 Feb 26	Mr Woods
583	18 Feb 26	Book - America's Newton - The Reception of the Work of Randell Mills - Thomas Stolper (2008)	Ms Backhouse
584	18 Feb 26	Book - Randell Mills and the search for Hydrino Energy - Brett Holverstott (2016)	Ms Backhouse
585	18 Feb 26	Brilliant Light Power - Information folder (updated – 24 Feb 2026)	Ms Backhouse
586	19 Feb 26	Letter to IAC - Algerian Oak and Bullarook Creek Streamside Reserve	KDPA

No.	Date	Description	Provided by
587	19 Feb 26	Hearing submission	Mr Conroy
588	19 Feb 26	Hearing submission (updated)	Dr Blackett-Smith and Mr McGoldrick
589	19 Feb 26	Barry Golding book reference	Ms Morrison
590	19 Feb 26	Hearing submission	Ms Williams
591	20 Feb 26	Hearing presentation	Ms Fitzgerald
592	20 Feb 26	WRL IAC - Hearing Timetable (v7)	PPV
593	20 Feb 26	Email to IAC - Councils consolidated set of amendments to the Incorporated Document and EMF	Moorabool Shire Council
594	20 Feb 26	Explanation of proposed drafting amendments	Moorabool Shire Council, Melton City Council, Hepburn Shire Council, Ballarat City Council, Pyrenees Shire Council and Northern Grampians Shire Council (Councils)
595	20 Feb 26	Incorporated Document Amendments - Combined Councils	Councils
596	20 Feb 26	Environmental Management Framework (EMF) Amendments - Combined Councils	Councils
597	22 Feb 26	Email to IAC - Explanation of image, Interactive map and EES technical reports	Ms Kinnersly
598	22 Feb 26	Image - 40-Year-old Pine Trees in windmill paddock Glendaruel	Ms Kinnersly
599	22 Feb 26	Image - Tree on mount	Ms Kinnersly
600	23 Feb 26	Image - 1. North View from home	Mr Koutsofta
601	23 Feb 26	Image - 2. North View from home	Mr Koutsofta
602	23 Feb 26	Image - 3. North View from home	Mr Koutsofta
603	23 Feb 26	Image - 4. North windows	Mr Koutsofta
604	23 Feb 26	Hearing presentation	Ms Lauder
605	24 Feb 26	Hearing submission	Mr Briody
606	24 Feb 26	Hearing submission	Ms Carron

No.	Date	Description	Provided by
607	24 Feb 26	Email to IAC – Explanation of image, with attachment: a) Image – Bolton Gap	Proponent
608	24 Feb 26	Hearing submission	M Wood
609	25 Feb 26	Hot air balloon images	Ms Rousch
610	25 Feb 26	Hearing presentation (updated 26 Feb 26) *Note: document size is too large to be uploaded to Engage Victoria page*	Mr Clark
611	26 Feb 25	Video - Where We Live, Work and Play *Note: document size is too large to be uploaded to Engage Victoria page*	Ms Clarke
612	26 Feb 25	Video - The Voice of The Community *Note: document size is too large to be uploaded to Engage Victoria page*	Ms Clarke
613	26 Feb 25	Video – Kingston & Surrounds *Note: document size is too large to be uploaded to Engage Victoria page*	Ms Clarke
614	26 Feb 25	Brochure – Impact on Us	Ms Clarke
615	26 Feb 26	Hearing presentation	Ms Denning
616	26 Feb 26	Hearing submission	Ms Denning
617	26 Feb 26	Hearing submission	Mr Whitty
618	26 Feb 26	Hearing submission	Ms Swain
619	26 Feb 26	Hearing presentation	Ms Plageman
620	26 Feb 26	Hearing submission	Ms Plageman
621	26 Feb 26	Email to IAC - Map WRL transmission corridor child population exposure	Ms Clarke
622	26 Feb 26	Map - Child population exposure zones WRL (updated 10 March 2026)	Ms Clarke
623	26 Feb 26	Map - North Gordon Goldfield	Mr Clark
624	26 Feb 26	Email to IAC - Links to videos of wedge-tailed eagles and Spotted Hyacinth Orchid -	Mr Clark
625	26 Feb 26	Video - Wedge-tailed eagle flying over farm *Note: document size is too large to be uploaded to Engage Victoria page*	Mr Clark
626	26 Feb 26	Video - Wedge-tailed eagles flying over farm *Note: document size is too large to be uploaded to Engage Victoria page*	Mr Clark

No.	Date	Description	Provided by
627	26 Feb 26	Video - Rosy Hyacinth Orchid *(name of orchid corrected from Spotted Hyacinth Orchid on 27 February TD634)* *Note: document size is too large to be uploaded to Engage Victoria page*	Mr Clark
628	26 Feb 26	Video - Korjamnunnip Creek *Note: document size is too large to be uploaded to Engage Victoria page*	Mr Clark
629	26 Feb 26	**CONFIDENTIAL** - Woodlands Agriculture landholding (with references)	Dr Lidgett
630	26 Feb 26	Hearing presentation	Dr Lidgett
631	27 Feb 26	Further Materials of Rod Touzel underground trench design	Melton City Council
632	27 Feb 26	Attachment 1 Detailed Data (further CYMCAP software calculations following TD537)	Melton City Council
633	27 Feb 26	Attachment 3 Detailed Data (further CYMCAP software calculations following TD537)	Melton City Council
634	27 Feb 26	Email to IAC - Correction to orchid name and video	Mr Clark
635	27 Feb 26	Video - Spotted Hyacinth Orchid (14 Feb 26) *Note: document size is too large to be uploaded to Engage Victoria page*	Mr Clark
636	27 Feb 26	Email to IAC - Closing submission and video link	Moorabool Shire Council
637	27 Feb 26	Closing submission	Moorabool Shire Council
638	27 Feb 26	Email to IAC - Further written submission	Ms Perera
639	27 Feb 26	Further written submission	Ms Perera
640	27 Feb 26	Closing submission	Melton City Council
641	27 Feb 26	Letter to IAC - Further information requested by IAC and proposed additions to EMF on Transport	Northern Grampians Shire Council
642	27 Feb 26	Email to IAC - Additional City of Ballarat and Hepburn Shire Council changes to EMF	City of Ballarat
643	27 Feb 26	Combined Councils EMF (20 Feb 26) with City of Ballarat and Hepburn Shire Council additions	City of Ballarat and Hepburn Shire Council
644	27 Feb 26	Letter to IAC - Response to IAC questions	Melton Air Services

No.	Date	Description	Provided by
645	27 Feb 26	Closing submission	Hepburn Shire Council
646	28 Feb 26	Email to IAC - Documents referenced in presentation and Gang Gang Cockatoos video	Mr Clark
647	2 Mar 26	Email to IAC - Transmission Line Setback Policy Guidelines	Mr Edwards
648	2 Mar 26	High-voltage-Transmission-Line-Setback-Policy-Guidance	Mr Edwards
649	2 Mar 26	Email to IAC - Filing of closing submissions	Proponent
650	2 Mar 26	Proponent - Reply Submission - Part I	Proponent
651	2 Mar 26	Proponent - Reply Submission - Part II	Proponent
652	2 Mar 26	Proponent - Day 3 EMF	Proponent
653	2 Mar 26	Proponent - Day 3 Incorporated Document	Proponent
654	2 Mar 26	Response to Councils' Proposed Drafting Amendments	Proponent
655	2 Mar 26	Attachment 1 - Cost Reports - Summary of Cost Estimates RLB & Brand	Proponent
656	2 Mar 26	Attachment 2 - Cost Reports - Touzel Cost Estimates Summary	Proponent
657	2 Mar 26	Attachment 3 - Cost Reports - Touzel Cost Estimates (with Indirect costs & 30% contingency)	Proponent
658	2 Mar 26	Memorandum from Jacobs - WRL Offset Calculations (dated 5 Feb 26)	Proponent
659	2 Mar 26	Letter from Fire Risk Consultants to Proponent - Darley Fire Risk (dated 26 Feb 26)	Proponent
660	2 Mar 26	Email from Guthrie Legal to Les Brand (dated 27 Oct 25)	Proponent
661	2 Mar 26	Victorian State Budget - 2025-2026 - Focused on What Matters Most	Proponent
662	2 Mar 26	Landholder Guide Option for Easement Process, Compensation and Benefits	Proponent
663	2 Mar 26	Memorandum from Mr Hayden Burge - Review of Schedule 4 to Clause 42.03 SLO (dated 27 Feb)	Proponent
664	2 Mar 26	WRL - Statement of Christopher Grinter (AusNet)	Proponent
665	2 Mar 26	**CONFIDENTIAL** - Proponent proposed response to DJAARA's proposed EMF and Incorporated Document Amendments	Proponent
666	2 Mar 26	**CONFIDENTIAL** - Proponent - Photomontages - Submitter 433 - P004 WRL ID ME 169803 Leakes Road E	Proponent

No.	Date	Description	Provided by
667	2 Mar 26	**CONFIDENTIAL** - Proponent - Photomontages - Submitter 476 - P004 WRL ID ME 169801 Leakes Road E	Proponent
668	2 Mar 26	Email to IAC - Permit application material (PA2025.9942.1)	Proponent
669	2 Mar 26	PA2025.9442.1 - Application Form	Proponent
670	2 Mar 26	PA2025.9442.1 - Planning Report	Proponent
671	2 Mar 26	PA2025.9442.1 - Planning Report - Main Report	Proponent
672	2 Mar 26	PA2025.9442.1 - Planning Report - Appendices - Part 1	Proponent
673	2 Mar 26	PA2025.9442.1 - Planning Report - Appendices - Part 2	Proponent
674	2 Mar 26	PA2025.9442.1 - Plans	Proponent
675	2 Mar 26	Hearing speaking notes and map (22 Jan 2026)	KDPA
676	2 Mar 26	Hearing submission (23 Feb 26)	Ms Toohey
677	2 Mar 26	Hearing presentation (23 Feb 26)	Ms Toohey, D Toohey and G Toohey
678	2 Mar 26	Response on LPA accreditation question	Ms Toohey, D Toohey and G Toohey
679	3 Mar 26	Community engagement and benefit sharing guide in Renewable Energy Development in Victoria, 2021	Moorabool Shire Council
680	3 Mar 26	Draft Community Engagement and Social Value Guidelines for Renewable Energy and Transmission Projects, Sep 2025	Moorabool Shire Council
681	3 Mar 26	VC278 14.02-1S Catchment Planning and Management track changes Approval Gazetted	Moorabool Shire Council
682	3 Mar 26	VC278 12.03-1S River and Riparian Corridors, Waterways, Lakes, Wetlands and Billabongs track changes Approval Gazetted	Moorabool Shire Council
683	3 Mar 26	Hearing Supplementary Submission	Mr Morrison
684	3 Mar 26	**CONFIDENTIAL** - Web map layer submitters' properties	Proponent
685	6 Mar 26	Response to additional amendments from Councils provided 27 Feb	Proponent
686	12 Mar 26	Comments on Proponents Day 3 EMF and Incorporated Document	Blampied Kooroocheang Landcare Group
687	13 Mar 26	Final comments on Proponents Day 3 EMF	Northern Grampians

No.	Date	Description	Provided by
			Shire Council
688	15 Mar 26	Comments on Proponents Day 3 EMF and Incorporated Document	Mr Lidgett
689	15 Mar 26	Comments on Proponents Day 3 EMF and Incorporated Document	Dr Lidgett
690	16 Mar 26	Correction to references to AEMO in Day 3 EMF	Proponent
691	16 Mar 26	**CONFIDENTIAL** – Email from DJAARA, BGLC and WTOAC to IAC – Joint comments on Proponents Day 3 EMF	DJAARA, BGLC and WTOAC
692	16 Mar 26	**CONFIDENTIAL** - Comments on Proponents Day 3 EMF	DJAARA, BGLC and WTOAC
693	16 Mar 26	Final response to proposed drafting amendments and Day 3 changes	Moorabool Shire Council
694	16 Mar 26	Final comments on Proponents Day 3 Incorporated Document	Moorabool Shire Council
695	16 Mar 26	Final comments on Proponents Day 3 EMF	Moorabool Shire Council
696	16 Mar 26	Comments on Proponents Day 3 EMF and Incorporated Document	Ballarat Group of Fire Brigades
697	16 Mar 26	Letter to IAC - Final response on Proponents Day 3 EMF and Incorporated Document	Melton City Council
698	16 Mar 26	Final comments on Proponents Day 3 Incorporated Document	Melton City Council
699	16 Mar 26	Final comments on Proponents Day 3 EMF	Melton City Council
700	16 Mar 26	Letter to IAC - Final response on Proponents Day 3 EMF	Hepburn Shire Council
701	16 Mar 26	Hearing presentation	Gordon Family Partnership
702	16 Mar 26	Email to IAC - Final response on Proponents Day 3 EMF and Incorporated Document	City of Ballarat
703	16 Mar 26	Comments on Proponents Day 3 EMF and Incorporated Document	Mr Edwards

Appendix E Recommended project documentation

E:1 Recommended Incorporated Document

The following Incorporated Document includes the IAC's recommended changes based on the Proponent's final (Day 3) version (D653)

Tracked Added

~~Tracked Deleted~~

DRAFT

Western Renewables Link

Incorporated Document

June 2025

Proponent Day 3 version dated 2 March 2026 – clean copy

PPV tracked added

~~PPV tracked deleted~~

1 INTRODUCTION

1.1 This document is an Incorporated Document in the Northern Grampians, Pyrenees, Ballarat, Hepburn, Moorabool and Melton Planning Schemes (planning schemes) and is made pursuant to Section 6(2)(j) of the *Planning and Environment Act 1987*.

1.2 This is an Incorporated Document pursuant to Clause 45.12 Specific Controls Overlay and Clause 72.04 Incorporated Documents of the planning schemes.

1.3 This Incorporated Document facilitates the delivery of the Western Renewables Link (the Project).

1.4 The land identified in Clause 3 of this document may be used and developed for the purposes of the Project in accordance with the specific control in Clause 4 of this Incorporated Document.

1.5 The control in this document prevails over any contrary or inconsistent provision in the planning schemes.

2 PURPOSE

2.1 The purpose of the controls in Clause 4 is to permit and facilitate the use and development of land described in Clause 3 for the purposes of the Project, in accordance with the requirements specified in Clause 4.

3 LAND TO WHICH THIS DOCUMENT APPLIES

3.1 The control in Clause 4 applies to land shown as Specific Controls Overlay (SCO8) on the planning scheme maps, forming part of the planning schemes (Project Land). The land extends between the Bulgana Terminal Station in the Northern Grampians Shire, across the local government areas of Pyrenees, Ballarat, Hepburn and Moorabool, to the Sydenham Terminal Station in the City of Melton.

4 CONTROL

Exemption from planning scheme requirements

4.1 Despite any provision to the contrary or any inconsistent provision in the planning schemes, no planning permit is required for and no provision in the planning scheme operates to prohibit, restrict or regulate the use or development of the Project Land for the purposes of the Project.

4.2 The use and development of the Project Land for the purposes of, or related to, the Project includes, but is not limited to:

a) Utility installations, including a new terminal station, upgrades of existing terminal stations and new transmission line infrastructure.

b) Any building or works or associated infrastructure activities for the Project.

c) Relocation of utility installations and associated services and protective works.

d) Earthworks and ground support structures or measures, kerbs, channels, water quality and soil treatment structures or works, retaining walls, noise and screening barriers, cuttings, batters and fill associated with the Project.

4.3 Ancillary activities to the use and development of the Project Land for the purposes of the Project includes, but is not limited to:

a) Use and development of laydown areas for construction purposes.

b) Use and development for temporary workforce accommodation sites including all associated infrastructure requirements.

c) Use and development of temporary site workshops and storage, administration and amenities buildings.

d) Removing, destroying and lopping trees and vegetation, including native vegetation and dead vegetation.

e) Demolishing, removing or relocating buildings and infrastructure.

f) Constructing or carrying out works for excavation, stabilisation, mounds, landscaping, the salvage of artefacts, water treatment, water storage and flood mitigation.

g) Restoration and reinstatement works.

h) Creating or altering access to a road in a Transport Zone 2.

i) Creating or altering access to land in a Public Acquisition Overlay if the purpose of acquisition is for a road.

j) Storage and assembly of materials and equipment required for the Project, including concrete batching plants where required.

k) Constructing and carrying out works to install, alter or relocate drainage infrastructure, utility installations and services.

l) Roadworks and constructing and using temporary access roads, diversion roads and vehicle parking areas.

m) Displaying construction, directional and business identification signs.

n) Temporary stockpiling of excavation material.

o) Constructing fences, temporary site barriers and site security (including security lighting).

p) Constructing or carrying out earthworks including cutting, excavating, land forming, landscaping, placement of fill, construction of batters, bunds, kerbs, channels, water quality and soil treatment structures or works, retaining walls and alterations to drainage services.

Conditions

4.4 The use and development may be completed in stages and any corresponding obligations arising under this Incorporated Document may similarly be completed in stages, where 'stage' includes any stage or part of the Project, whether for construction or operation or both.

4.5 Development Plans

4.5.1 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 minimum clearance of the transmission lines above the road surface (in worst case conditions) at all road crossing points along the route of the transmission line; 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 a minimum setback from occupiable buildings of 19 metres to bushfire hazards); and the details of materials and finishes for the terminal stations and transmission towers.

4.5.2 The use and development must be undertaken generally in accordance with the Development Plans except as permitted under Clause 4.7.

4.5.3 The Development Plans may be amended with the approval of the Minister for Planning. An application for approval of an amendment to the Development Plans must be accompanied by:

a) Amended Development Plans and a schedule explaining the proposed amendments.

b) A written statement explaining and supporting the proposed amendment, including:

i. A description of the form and extent of any consultation undertaken with relevant landholders, including neighbouring landholders who might be impacted by the amendment;

ii. A description of the form and extent of any other consultation undertaken with councils, government agencies and other stakeholders concerning the proposed amendment;

iii. Any written comments from relevant councils, government agencies and other stakeholders as a result of consultation undertaken as outlined above; ~~and~~

iv. A written response to any comments received from relevant landholders, councils, government agencies and other stakeholders; ~~-~~ and

v. An assessment of the benefits and disbenefits of the amendment for relevant landholders, including any implications for agricultural productivity and general amenity.

4.6 Specifications

4.6.1 Except with the written consent of the Minister for Planning, the overall maximum height of the transmission towers must not exceed 80 metres in height from natural ground level at the centre of the tower base. Any request for consent must be accompanied by an explanation of the avoidance of native vegetation removal that would be achieved by the exceedance and an assessment of the visual impact of the exceedance.

4.7 Micro-siting of Transmission Towers and Stringing Pads Plan

4.7.1 Before development starts, if micro-siting is required, a Micro-siting Plan will be approved and endorsed by the Minister for Planning identifying the footprint at ground level of any transmission tower and stringing pad that requires micro-siting. The footprint of any tower and stringing pad identified on a Micro-siting Plan:

a) In the case of the towers must not be moved outside the route for the transmission line as shown on the endorsed Development Plans.

b) In the case of the towers must not be moved more than 50m in any direction from the centre of the towers at ground level as shown on the endorsed Development Plans.

c) In the case of stringing pads must not be moved more than 50m in any direction from the edge of the stringing pads as shown on the endorsed Development Plans.

d) For both the towers and stringing pads, must not result in a material change to the amount and type of native vegetation, listed threatened species and their habitats or listed threatened communities that are impacted without approval under clause 4.10.1a).

e) For both the towers and stringing pads, must not be moved to closer than within 30 metres of a designated waterway without consultation and approval from the relevant catchment management authority or Melbourne Water Corporation as relevant.

4.7.2 Any changes to access tracks arising from the micro-siting of a transmission tower, in accordance with Clause 4.7.1, do not require further written consent from the Minister for Planning, and do not require amendment to the Development Plans endorsed under Clause 4.5.1 providing the access tracks move no more than 25m from the outside edge of the access track as shown on the endorsed Development Plans.

4.7.3 The Micro-siting Plan must be submitted with written confirmation, to the satisfaction of the Minister for Planning, from a suitably qualified ecologist, confirming that the Micro-siting Plan meets the requirements in Clause 4.7.1d.

4.7.4 The Micro-siting Plan must be accompanied by a report that describes the consultation undertaken with the landowner and any neighbouring landowner that might be impacted, and any implications for agricultural productivity and general amenity.

4.7.5 The approved Micro-siting Plan must not be altered or modified without the written consent of the Minister for Planning.

4.8 Environmental Management Framework

4.8.1 Before the use or development starts, an Environmental Management Framework must be prepared to the satisfaction of the Minister for Planning. The Environmental Management Framework must be accompanied by a statement explaining any difference between it (including the Environmental Performance Requirements), and the matters set out in the Minister's assessment under the *Environment Effects Act 1978* [insert date].

4.8.2 The Environmental Management Framework must include Environmental Performance Requirements addressing the following areas, and any other relevant matters:

a) Aboriginal cultural heritage.

b) Agriculture.

c) Air quality.

d) Aviation.

e) Biodiversity.

f) Climate change.

g) Contamination and soil management.

h) Economics and business continuity.

i) Electric and magnetic fields and electromagnetic interference.

j) Geology and soils.

k) Greenhouse gas.

l) Groundwater.

m) Historical heritage.

n) Land use and planning.

o) Landscape and visual.

p) Noise and vibration.

q) Social.

r) Surface water.

s) Transport.

4.8.3 The Environmental Management Framework must set out the process, content and timing for the development of:

a) Environmental Management System(s).

b) Construction Environmental Management Plan(s)

c) Construction Emergency Management Plan(s).

d) Construction Communications and Stakeholder Engagement Management Plan(s).

e) Document change management process.

f) Other plans and procedures required by the Environmental Performance Requirements as relevant to any stage of the Project.

g) The consultation with relevant authorities including, but not limited to, councils, the Head, Transport for Victoria, the Department of Transport and Planning, Heritage Victoria, relevant floodplain management authority, relevant fire authority, relevant water authorities, relevant catchment management authority, Department of Energy, Environment and Climate Action (DEECA), and the Environment Protection Authority as relevant.

4.8.4 The Environmental Management Framework may be amended from time to time, to the satisfaction of the Minister for Planning. An application for approval of an amendment to the Environmental Management Framework must be accompanied by:

a) A ‘track changes’ version with a schedule explaining the proposed amendment(s) and why they are required.

b) A description of the form and extent of any consultation undertaken concerning the amendment(s) with relevant councils, relevant government agencies and other stakeholders as required.

4.8.5 The use and development of the Project must be carried out in accordance with the approved Environmental Management Framework including the Environmental Performance Requirements and all plans and procedures required by them.

4.9 Review of the extent of the Specific Controls Overlay

4.9.1 A review of the extent of land affected by the Specific Controls Overlay (SCO8) must be undertaken, and a report prepared for the Minister for Planning which identifies any land

which is not required for the purpose of the Project, and which may be removed from the SCO.

4.9.2 The report must be provided to the Minister for Planning as soon as practicable, but no later than 3 months following completion of construction of the Project.

4.10 Native Vegetation

4.10.1 Prior to the removal, destruction or lopping of native vegetation for the Project:

a) Information about that native vegetation in accordance with the relevant Application Requirements ~~of~~ in Section 6.4 of the *Guidelines for removal, destruction or lopping of native vegetation* (Department of Energy, Environment~~al~~ and Climate Action, August 2025, v1.1) (Guidelines) must be provided to the satisfaction of the Secretary to the Department of Environment, Land, Water and Planning (as constituted under Part 2 of the *Conservation, Forests and Lands Act 1987*) (currently, the Secretary to the Department of Energy, Environment and Climate Action (DEECA)). The native vegetation removal extent must be generally in accordance with the Ministers assessment under the *Environment Effect Act 1978*, but may be altered due to micro-siting of infrastructure and/or as needed to comply with any other requirement of this Incorporated Document and EMF, to the satisfaction of the Secretary to DEECA.

b) For the avoidance of doubt, the information provided to the Secretary to DEECA must also include information about any native vegetation that has been, or is to be, removed under Clauses 4.12 and 4.13.

c) The biodiversity impacts from the removal of that native vegetation must be offset in accordance with the Guidelines to the satisfaction of the Secretary to DEECA. Offsets should be sourced locally to the extent reasonably practicable.

d) Evidence that the required offset(s) has been secured must be provided to the satisfaction of the Secretary to DEECA.

4.10.2 In exceptional circumstances, the Secretary to DEECA may vary the timing requirement in Clause 4.10.1.

4.10.3 The secured offset(s) for the Project may be reconciled at the completion of the Project in accordance with the Assessor's handbook – Applications to remove, destroy or lop native vegetation (DELWP, October 2018).

4.10.4 For the purpose of this document, the term 'removal of native vegetation' includes to destroy and/or lop native vegetation.

4.11 Bushfire Management

4.11.1 Before development starts, a ~~Construction~~ Bushfire Management Plan must be prepared in consultation with the relevant fire ~~authority~~ authorities and approved and endorsed by the Minister for Planning to address bushfire risks during both construction and operation. The ~~Construction~~ Bushfire Management Plan must address the following:

a) Controls on hot works, flammable liquid storage, vehicle use and other activities that could result in fire ignition, including additional controls during the declared fire danger period, Total Fire Ban days and any days of Catastrophic fire weather conditions.

b) Securing CFA permits for any essential hot works on Total Fire Ban days.

c) Management of stores of fuel or other flammable materials.

d) Management of vegetation within the easement to ensure bushfire risks are appropriately mitigated.

e) Separation of any offices, lunch rooms and other buildings in which people will congregate in laydown areas from bushfire fuels, resulting in no more than BAL-12.5 exposure.

f) Construction of occupiable buildings at the workforce accommodation areas and the terminal station sites to have a minimum of BAL 12.5 construction (or other construction rating determined necessary by the CFA).

g) Provision of mains and / or static water supply and hoses at laydown areas and near occupiable buildings.

h) Provision of vehicle-based fire water supply, pumps and hoses at all transmission line construction sites during declared fire danger period.

i) Coordination with councils and the relevant fire authority to develop conditions under which municipal fire control lines and strategic fire access routes are used by construction and maintenance traffic during the declared fire danger period and periods of elevated fire weather.

j) Communication of forecast fire weather conditions to the construction and maintenance workforce.

k) Removal of vegetation residue from clearing of vegetation for the Project.

l) Applicable bushfire-related training and competency requirements for construction and maintenance personnel.

m) Procedures for on-going management of vegetation within the terminal station sites and the workforce accommodation and laydown areas to maintain those sites as low threat vegetation as per AS3959:2018 Construction of buildings in bushfire prone areas.

n) Procedures for ensuring that in the event of a failure of Project infrastructure (including a tower collapsing or conductor disconnecting), any resulting ignition of nearby vegetation, trees or structures is immediately brought under control. This applies in the event that AusNet's network-wide Bushfire Management Plan or Electricity Safety Management System approved and implemented under the Electricity Safety Act does not already contain a requirement to this effect.

4.11.2 Prior to commencement of construction, unless the Minister agrees otherwise, the Development Plans must provide a minimum clearance of 25 metres plus the height of a firefighting appliance at any road crossing point on a road:

a) that is designated in a Municipal Fire Management Plan as a strategic fire control line, fuel break or priority access and egress route, or

b) where suitable alternative safe access and egress routes are not available.

4.11.3 Prior to commencement of construction, all relevant fire authorities must be notified (for dissemination to incident control personnel) that the infrastructure is not electrically active during the construction phase. These agencies must also be notified prior to the activation of the Project, of the date that the infrastructure should be assumed to be electrically active. The second notification must be accompanied by the provision of spatial data on the locations of transmission towers, conductors, new components of the Bulgana and Sydenham terminal stations and the new terminal station near Bulgana.

4.11.4 Prior to commencement of construction, the Proponent must consult and coordinate with the relevant fire authorities to ensure that:

a) appropriate information, support and training is available to firefighting personnel to ensure they are aware of the Project and any operating procedures that need to be applied to ensure crew safety when operating near the Project

b) fire authorities are aware of the heights above ground of the transmission lines (in worst case conditions) at every road crossing point along the transmission line route, to allow fire authorities to:

i. identify road crossing points for which a dynamic risk assessment may be required to assess whether it is safe to use the road in fire conditions

ii. pre-plan alternative access and routes that are not crossed by the transmission lines (where required)

c) planning occurs for any additional firefighting resources that may be required in the Project area as a result of constraints placed on firefighting operations by the Project, including access constraints.

4.11.5 All relevant fire authorities must be immediately notified (for dissemination to incident control personnel) any time the infrastructure is de-energised during an incident or emergency, and given advanced notice of at least 1 hour prior to the infrastructure being re-energised. This applies if AusNet's network-wide Bushfire Management Plan or Electricity Safety Management System approved and implemented under the Electricity Safety Act does not already contain a requirement to this effect.

4.12 Preparatory Buildings and Works

4.12.1 Preparatory Buildings and Works may commence on the Project Land prior to the conditions in Clauses 4.5 to 4.11 and Clauses 4.13 to 4.14 being satisfied.

14.12.2 Preparatory Building and Works must have regard to any biosecurity arrangements in place for the affected property or any biosecurity issues raised by the landowner.

14.12.3 The Preparatory Buildings and Works for the Project include:

a) Investigations, testing and preparatory works to determine the suitability of land, and property condition surveys.

b) The establishment of environment and traffic controls and 'no-go' zones.

c) The establishment of laydown areas comprising site fencing and hoarding, security lighting and cameras, site offices, amenities and temporary car parking.

d) Protection, modification or relocation of utility service assets or infrastructure required to facilitate the Project, including pipeline cathodic protection works.

e) Protection, modification or relocation of distribution line crossovers (except for distribution line crossover works in areas where biodiversity values have been identified and where native vegetation removal is proposed as those works must comply with the relevant biodiversity Environmental Performance Requirements).

f) Removal, destruction or lopping of native vegetation to the minimum extent necessary to enable Preparatory Buildings and Works.

g) Demolition to the minimum extent necessary to enable Preparatory Buildings and Works (this does not apply to demolition works that impact on land within the Heritage Overlay).

h) Salvage of Aboriginal cultural heritage material and other management actions required to be undertaken in compliance with the relevant cultural heritage management plan approved under the *Aboriginal Heritage Act 2006* or other compliance with that Act and to the satisfaction of the relevant Registered Aboriginal Party for the area.

i) Salvaging and relocating artefacts and other management actions required to be undertaken in accordance with any approved plan prepared for the Project as pursuant to the *Heritage Act 2017*.

j) Works, including vegetation removal, where, but for this incorporated document, a planning permit would not be required under the provisions of the Planning Schemes.

k) Construction of access tracks required to enable any Preparatory Buildings and Works to be carried out. The alignment, construction and use of these access tracks must have regard to any relevant issues raised by affected landowners.

4.13 Temporary Workforce Accommodation Facilities

4.13.1 The development of the temporary workforce accommodation facilities in Ballan and Lexton may commence on the Project Land prior to the conditions in Clauses 4.5 to 4.11 and Clause 4.14 being satisfied.

4.13.2 Before development of a temporary workforce accommodation facility starts, a Temporary Workforce Accommodation Plan (TWAP) must be prepared for the facility in consultation with the relevant council and abutting neighbours and approved and endorsed by the Minister for Planning. The TWAP(s) must include the following as relevant:

a) Fully dimensioned site plans and elevations for each accommodation site including:

i. The boundaries and dimensions of the site.

ii. The location of all on-site native vegetation and identification if it is to be removed or retained

iii. The siting and layout of all buildings and works and a description of all facilities provided.

iv. Elevation plans showing all buildings and works.

v. Allowance for a perimeter road that has a minimum width of 4 metres and is constructed to an all-weather use standard.

vi. Adjoining roads.

vii. The location and use of buildings and works on adjoining land.

viii. Relevant ground levels.

ix. All proposed driveways, car parking and loading areas.

x. Proposed landscape areas including perimeter fencing details, external lighting, drainage and stormwater treatment measures.

xi. All external storage and waste treatment areas.

xii. Demonstration that the demountable accommodation units (sleeping areas) are not sited within 35 metres of adjacent bushfire hazards.

xiii. Demonstration that ancillary buildings are not sited within 19 metres of adjacent bushfire hazards.

xiv. Any emergency management design features and facilities required as result of condition 4.13.3.

xv. Annotation on the site plan for the Lexton facility stating that the temporary workforce accommodation buildings will have a minimum of BAL 29 construction.

xvi. Annotation on the site plan for the Ballan facility stating that the temporary workforce accommodation buildings will have a minimum of BAL12.5 construction.

b) The estimated duration of operation of each accommodation site.

c) Demonstration that the building locations for accommodation on the site are appropriate having regard to:

i. Access, roads and on-site parking.

ii. Whether the land is flood prone, at risk of bushfire, or has any particular environmental sensitivity, and that the works will be suitably managed to address any risk.

iii. Building-to-building fire spread.

iv. Waste collection and storage.

v. Access to water, electricity and sewerage infrastructure.

vi. Drainage and stormwater management.

d) Where an accommodation facility requires new or altered access to a declared arterial road, demonstration that the access plans, including functional layout plans, and details of any required mitigation works have been prepared to the satisfaction of the Head, Transport for Victoria.

4.13.3 Before the development of a temporary workforce accommodation facility starts, a Construction Traffic Management Plan (CTMP) must be prepared in consultation with the relevant council and approved and endorsed by the Minister for Planning. The CTMP must include the following information:

a) Identification of appropriate traffic routes to be used by construction traffic.

b) Measures to be taken to manage traffic impacts associated with the construction of the Workforce Accommodation buildings.

c) Processes and practices for the protection and maintenance of the relevant Council managed roads along the traffic routes identified to be used during construction of the temporary workforce accommodation facility.

4.13.4 Before the development of any Temporary Workforce Accommodation starts, a Construction Bushfire Management Plan must be prepared in consultation with the relevant fire authority that addresses the requirements at Clause 4.11.1 where relevant to the temporary workforce accommodation sites.

4.13.5 Before use of the temporary Workforce Accommodation sites start, an Emergency Management Plan must be prepared in consultation with the relevant Fire Authority and the relevant councils, and approved and endorsed by the Minister for Planning. The Emergency Management Plan must include the following information:

a) Procedures for how to deal with fire in buildings, bushfire, and medical emergencies.

b) A Bushfire Preparedness and Response Plan addressing the following matters:

i. Actions for days with elevated fire danger

ii. Monitoring of and response to fire emergency warnings

iii. Water and power supply

iv. Evacuation and / or shelter in place instructions

v. Location of assembly areas

vi. Fire response roles, responsibilities and competency requirements

vii. Access to and use of fire water supplies, hoses and other fire response equipment

viii. Implementation of the preparedness and response plan.

c) Provide for the procedures outlined in the Bushfire Preparedness and Response Plan as well as Site Plan to be on prominent display in the Workforce Accommodation buildings.

4.13.6 Prior to the commencement of any works associated with the Temporary Workforce Accommodation, a Construction Environmental Management Plan (CEMP) must be approved and endorsed by the Minister for Planning. The CEMP must include the following:

a) Procedures to identify, manage and monitor environmental risks specific to the construction activities including air quality, biosecurity, ground water, contaminated land and spoil management, waste, noise, sediment and erosion, surface water, light spill, and unexpected finds protocol.

b) Measures to protect native vegetation that is to be retained.

c) Procedures to manage construction activities in accordance with the relevant EPA Publications.

d) The person(s) responsible for implementation and compliance of each of the CEMP requirements, including details of a site contact or site manager.

e) A process for inspections and monitoring, auditing, and reporting.

4.13.7 Before use of the temporary Workforce Accommodation sites starts an Operational Management Plan (OMP) must be prepared in consultation with the relevant council, and must be approved and endorsed by the Minister for Planning. The OMP must include:

a) Procedures for on-going management of vegetation with the sites to maintain it as low threat vegetation as per AS3959:2018 Construction of buildings in bushfire prone areas.

b) Details of staffing and management arrangements.

c) Information about the manner in which workers will be transported from the Workforce Accommodation facilities to the relevant worksite, including working hours, rostering and rotations.

d) A protocol for managing worker access to settlements in proximity to Workforce Accommodation facilities.

e) Information about arrangements for medical services to be available on-call and via programmed visits, to attend to the medical needs of workers if required.

f) Complaint management procedures.

4.13.8 The plans required by conditions 4.13.2 to 4.13.6 may be amended from time to time, to the satisfaction of the Minister for Planning. An application for approval of an amendment to the plans must be accompanied by:

a) A 'track changes' version with a schedule explaining the proposed amendment(s) and why they are required.

b) A description of the form and extent of any consultation undertaken concerning the amendment(s) with relevant councils or relevant government if required.

4.13.9 Following completion of construction of the Project, a decommissioning plan for Workforce Accommodation sites must be prepared in consultation with the relevant council and approved and endorsed by the Minister for Planning. Decommissioning and rehabilitation must be undertaken in compliance with the approved plan.

4.14 Availability of Approved Plans and Documents

4.14.1 The endorsed version of the following plans and documents must be available on a clearly identifiable Project website from the date of approval and must remain available on such website for at least five years after the start of the operation of the Project:

a) Development Plans approved under Clause 4.5.

b) Environmental Management Framework approved under Clause 4.8.

c) EXPIRY

5.1 The control in this document expires if any of the following circumstances apply:

a) The development allowed by this control is not started by [MONTH YEAR].

b) The development allowed by this control is not completed by [MONTH YEAR].

c) The use allowed by the control is not started by [MONTH YEAR].

5.2 The Minister for Planning may extend these periods if a request is made in writing before the expiry dates or within three months afterwards.

END OF DOCUMENT

E:2 Recommended Environmental Management Framework

The following EMF includes the IAC's recommended changes based on the Proponent's final (Day 3) version (D652)

Tracked Added

~~Tracked Deleted~~

CHAPTER 29 Environmental Management Framework

Proponent Day 3 version dated 2 March 2026 – clean copy

PPV tracked added

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Delivered by AusNet

29 Environmental Management Framework

This chapter presents the Environmental Management Framework proposed for the Western Renewables Link (the Project).

This Environmental Management Framework is proposed to provide a transparent governance framework for the management of environmental effects of the Project during construction, operation and decommissioning. It is one component of the overall governance framework developed for the delivery of the Project to meet statutory requirements, protect environmental values and provide stakeholder confidence.

Following the assessment of the EES by the Minister for Planning, this chapter will be updated to address any matters and recommendations made by the Minister for Planning and converted to a standalone 'Environmental Management Framework' document to take forward through to construction, operation and decommissioning of the Project.

If the proposed planning scheme amendment to facilitate the Project is approved, this standalone Environmental Management Framework will also require approval from the Minister for Planning.

The Environmental Management Framework outlines the roles and responsibilities for environmental management and monitoring of the Project's environmental performance. It provides a framework for governance and implementation of measures to manage environmental performance, including requirements for monitoring, reporting and auditing. It also includes accountabilities for the implementation of, and compliance with, the Environmental Management Framework and Environmental Performance Requirements (EPRs).

EPRs define the environmental outcomes as well as other environmental management requirements that must be achieved during the design, construction, and operation stages of the Project. The EPRs intend to avoid and mitigate identified impacts and the risk of harm to human health and the environment so far as reasonably practicable. The EPRs offer opportunity to contractors to explore innovative approaches as to how the required standards are achieved. Measures to reduce the potential impacts have been proposed in accordance with the mitigation hierarchy (avoid, minimise, manage, rehabilitate and offset) to inform the development of EPRs. However, alternative mitigation measures could be implemented to comply with the EPRs based on the specific site conditions, available resources, and the contractor's expertise.

Compliance with the Environmental Management Framework and EPRs will be monitored by an Independent Environmental Auditor (IEA) and enforced through the contractual requirements for delivery of the Project. It will also be mandated by the terms of the Incorporated Document requiring the Project to be developed in accordance with the Environmental Management Framework and EPRs approved by the Minister for Planning.

29.1 Purpose of the Environmental Management Framework

The requirement for an Environmental Management Framework is prescribed in the EES scoping requirements and is a condition of the draft Incorporated Document proposed as part of the draft planning scheme amendment. Once approved, it will outline the management arrangements for the Project, including:

- Summary of key statutory approvals obtained and their compliance requirements
- Requirements for community consultation, stakeholder engagement and communications during construction, operation and decommissioning
- Minimum environmental outcomes that must be achieved by the Project as stipulated in the EPRs
- Requirements for identification, assessment and management of environmental risks
- Environmental management documentation (including review and approval requirements) as specified by the Incorporated Document, Environmental Management Framework and EPRs to manage environmental risks and impacts through design, construction, operation and decommissioning
- Approaches to evaluating the Principal Contractor's Construction Environmental Management Plan (CEMP) and other documents in compliance with the Environmental Management Framework and EPRs, including monitoring, auditing and reporting processes.

The development of this Environmental Management Framework, including the EPRs, has been informed by technical reports completed as part of the EES and reflects the requirements of relevant legislation, policies, and guidelines. Section 29.3 highlights the works covered by the Environmental Management Framework, to which the EPRs are specifically related. The Environmental Management Framework and EPRs will be subject to revision in consideration of submissions made on the EES, during the hearing, in response to the report of the Inquiry and Advisory Committee, and the Minister for Planning's Assessment once they are received.

This chapter responds to section 3.7 of the EES scoping requirements which requires the EES to include an Environmental Management Framework that provides:

> "*a transparent framework with clear accountabilities for managing and monitoring the environmental effects and risks associated with the construction and operational phases*."

29.2 Statutory context and approvals

The statutory basis for the Environmental Management Framework is primarily set by the *Planning and Environment Act 1987* (Vic) (Planning and Environment Act) and *Environment Protection Act 2017* (Vic) (Environment Protection Act). This section provides an overview of the principal approvals and secondary approvals required for the Project.

29.2.1 Principal approvals

AusNet is responsible for preparing the EES for the Project under the *Environment Effects Act 1978* (Vic) (Environment Effects Act) and for seeking the following principal approvals:

- Approval under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act)
- Approval of a GC Planning Scheme Amendment under the Planning and Environment Act which introduces a Specific Controls Overlay and the Incorporated Document into the Northern Grampians, Pyrenees, Ballarat, Hepburn, Moorabool and Melton Planning Schemes to facilitate the use and development of the Project Land for the Project
- Approved Cultural Heritage Management Plans (CHMPs) under the *Aboriginal Heritage Act 2006* (Aboriginal Heritage Act).

AusNet is required to comply with legislation and the conditions of these principal approvals. Contractors engaged on the Project are also required to comply with legislation, the conditions of these principal approvals and to obtain and comply with all other secondary approvals, licences, permits and consents that may be required. Other approvals that may be required for the Project are discussed in **Chapter 3: Legislative framework and approval requirements**.

Incorporated Document

The use and development of land for the purposes of the Project is proposed to be facilitated by the 'Western Renewables Link – Incorporated Document' introduced into the Northern Grampians, Pyrenees, Ballarat, Hepburn, Moorabool and Melton Planning Schemes.

Condition 4.8 of the draft Incorporated Document requires the preparation of an Environmental Management Framework for the Project for approval by the Minister for Planning prior to the commencement of development, excluding Preparatory Buildings and Works (as defined in the draft Incorporated Document) and construction of the temporary workforce accommodation facilities. As required by the draft Incorporated Document, the use and development of the Project must be carried out in accordance with the approved Environmental Management Framework and EPRs. The EPRs are discussed further below. In some circumstances an EPR will require AusNet to prepare a further plan or take an action that may need additional consultation or approval prior to commencement of construction.

The draft Incorporated Document enables the Environmental Management Framework to be prepared and approved by the Minister for Planning in stages or parts and amended from time to time to the satisfaction of the Minister.

29.2.2 Secondary approvals

Table 29.1 provides an overview of the key secondary approvals and consents required for the Project to proceed. Conditions of these statutory approvals would be incorporated into and addressed through measures within the CEMP and other strategies and management plans required by this Environmental Management Framework and EPRs. Compliance with approval conditions will be monitored and evaluated as required by the statutory approval authority and as described in Section 29.7.

Table 29.1 Summary of key secondary approvals and consents

Legislation	Statutory approval authority	Statutory approval
***Flora and Fauna Guarantee Act 1988* (Vic) (FFG Act)**	Department of Energy, Environment and Climate Action (DEECA)	A permit to take is required to remove threatened flora, threatened flora communities and other protected flora from public land (defined as Crown land or land owned by, or vested in, a public authority). A range of FFG Act-listed flora species are present within the Project Area.
***Heavy Vehicle National Law Application Act 2013* (Vic)**	National Heavy Vehicle Regulator	Oversize Overmass (OSOM) transport vehicles used to carry large items for the construction of the Project will require an OSOM Permit (for travel on Victorian roads).
***Heritage Act 2017* (Vic) (Heritage Act)**	Heritage Victoria	A permit is required to interfere with a heritage place or object listed on the Victorian Heritage Register (VHR). There are no VHR places or objects identified that will be directly impacted by the Project. A consent is required to interfere with a site listed on the Victorian Heritage Inventory (VHI) or an 'archaeological site' not listed on the VHI. A small number of VHI places and unlisted archaeological sites may be directly impacted by the Project and will require consent from Heritage Victoria should they not be able to be avoided through micro-siting.

Legislation	Statutory approval authority	Statutory approval
***Rail Management Act 1996* (Vic)**	VicTrack	If works to install and/or maintain the transmission line are required within five metres of VicTrack assets, a permit to work will be required.
***Road Management Act 2004* (Vic) (Road Management Act)**	Transport for Victoria, Department of Transport and Planning (DTP), Councils	Consents or agreements are required for any construction or operation activities for the Project that involve works being undertaken in, on, under, or over a road reserve.
***Water Act 1989* (Vic) (Water Act)**	North Central, Corangamite and Wimmera Catchment Management Authorities	A licence is required to construct, alter, operate, remove or decommission any works on a designated waterway.
***Wildlife Act 1975* (Vic) (Wildlife Act)**	DEECA	Fauna species indigenous to Victoria are listed as protected under the Wildlife Act. Potential impacts to these species, including needing to relocate species temporarily or permanently, would require authorisation from DEECA.

29.2.3 Environment Protection Act

The Environment Protection Act is the regulatory mechanism within Victoria for protecting human health and the environment from pollution and waste. Responsible authorities are required, under the Planning and Environment Act, to consider environmental protection in decisions, refer certain applications to the EPA Victoria and consider associated orders and regulations, including the Environment Reference Standard.

The Environment Protection Act includes duties relevant to the Project, as detailed in Table 29.2. AusNet and its contractors are responsible for compliance with these duties during each stage of the Project.

Table 29.2 Environment Protection Act duties and obligations

Legal Requirement	Action
General environmental duty (GED) (s25)	A person who is engaging in an activity that may give rise to risks of harm to human health or the environment from pollution or waste must minimise those risks, so far as reasonably practicable.
Duty to respond to harm (s31)	If a pollution incident occurs (e.g., leak, spill or other unintended or unauthorised deposit or escape of a substance) and causes or is likely to cause harm to human health or the environment, the person engaging in the activity must, so far as reasonably practicable, restore the environment to its pre-incident state.
Duty to notify of an event (s32-33)	Contact EPA as soon as practicable if a pollution incident occurs and causes or threatens or is likely to cause harm to human health or the environment.
Duty to manage contamination (s39)	The person in management or control of contaminated land (vacant or occupied), including groundwater, must minimise risks of harm to human health and the environment from the contaminated land so far as reasonably practicable.
Duty to notify of certain contamination (s40)	Contact EPA as soon as practicable if the land, including groundwater, is contaminated by notifiable contamination (which includes any of the circumstances set out in the regulations).
Duties relating to industrial waste (s133-137 and Regulation 60-64)	The waste producer must appropriately classify the waste in accordance with the regulations, ensure that the transporter has sufficient information regarding the waste and ensure that the waste is going to a lawful place (a place legally authorised to receive the waste).

Legal Requirement	Action
Duties and controls relating to priority waste (s138-141 and Regulation 65-70)	In addition to the duties applicable to industrial waste, the waste producer must also contain the waste to prevent escape or contamination, isolate the waste to ensure resource recovery remains practicable and provide sufficient information about the waste to the next person in the supply chain so they can meet their duties. All reasonable steps to identify and assess alternatives to waste disposal must be taken. The priority waste must not be mixed, blended or diluted with other wastes to change the classification.
Duties and controls relating to reportable priority waste (s142-143 and Regulation 71-77)	In addition to the industrial waste and priority waste duties, the waste producer must record and notify transaction details relating to reportable priority waste through EPA's Waste Tracker. The waste producer must also ensure the transporter has appropriate EPA permission to transport the waste.

A systems and risk-based approach was adopted for the EES to assess the impacts of the Project. This approach considered the potential risk and impacts to the environment and human health through detailed assessments of the Project which have informed the development of EPRs to address those impacts through design, construction, operation and decommissioning. The EPRs require AusNet and its contractors to develop an Environmental Management System (EMS) for the construction stage and for AusNet to implement its existing Health, Safety, Environment and Quality (HSEQ) Management System (described in Section 29.7) during construction, operations and decommissioning to monitor and evaluate compliance. Both the construction EMS and EMS within the HSEQ Management System would be certified to AS/NZ ISO 14001. The EMS requires the establishment of systems and processes to identify, assess and control risks of harm to human health and the environment, and environmental duties are continually monitored for compliance, including assessment by an IEA.

The Environmental Management Framework requires that both AusNet and its contractors comply with all their environmental duties under the Environment Protection Act. Compliance with this Environmental Management Framework and the EPRs will form a key component of AusNet and contractor compliance with the General Environmental Duty (GED). The GED is an obligation under the Environment Protection Act that requires anyone engaging in activities that could result in a risk to human health and the environment to undertake actions to avoid or reduce the risk as far as reasonably practicable.

29.2.4 Energy safety

Energy Safe Victoria (Energy Safe) is a statutory body established by the *Energy Safe Victoria Act 2005*, and is Victoria's safety regulator for electricity, gas and renewable energy. Energy Safe monitors and enforces compliance with Victoria's energy safety legislative framework.

The operation of the Project will be governed under the *Electricity Safety Act 1998* (Electricity Safety Act) and subordinate regulations, and as approved by Energy Safe. AusNet has an existing Electrical Safety Management Scheme (ESMS), the scope of which meets the requirements of the Electricity Safety Act, subordinate regulations and the Australian Standard for Electricity Network Safety Management Systems (AS 5577:2013). The ESMS provides an overview of how assets are to be managed over their life cycle to ensure the safety of consumers, the public, AusNet staff and contractors. The Bushfire Mitigation and Vegetation Management plans are key documents and integral to AusNet's ESMS. The ESMS was initially established by AusNet and approved by Energy Safe in 2011. Legislation requires AusNet to submit the ESMS, together with the Bushfire Mitigation and Vegetation Management plans to Energy Safe for review and acceptance every five years. Submissions of revised plans may occur more frequently to reflect changes in the regulations or company practices or when required by Energy Safe. The ESMS and Bushfire Mitigation Plan are due for resubmission in 2029 and the Vegetation Management Plan in 2026.

Another key component of the ESMS is emergency preparedness and response. AusNet has a Strategic Plan for Integrated Response and Contingency System (SPIRACS) to address emergencies. This system provides for effective and timely response to emergency events such as natural events (e.g., bushfires, floods or high winds) leading to the failure of transmission lines, which may affect the operation of the network and the health and safety of personnel or the public.

Further details of the ESMS and associated plans is provided in Section 29.7.2.

29.3 Works covered by the Environmental Management Framework

This Environmental Management Framework covers the delivery of infrastructure for the Project within the Project Land, specifically relating to the construction, operation and decommissioning of the transmission line and terminal stations assessed in the EES. This includes:

- Construction and operation of the 500kV transmission line
- Construction and operation of the new terminal station near the existing Bulgana Terminal Station
- Expansion of the existing Bulgana Terminal Station and connection to the proposed new terminal station via a single circuit 220kV transmission line connection
- Connection works at the Sydenham Terminal Station
- Upgrade of Elaine Terminal Station through the diversion of an existing transmission line
- Protection system upgrades at connected terminal station sites
- Decommissioning of the transmission line and terminal stations.

Further description of the Project and its components to which this Environmental Management Framework applies is provided in **Chapter 6: Project description**.

29.4 Works excluded from the Environmental Management Framework

This Environmental Management Framework and associated EPRs do not apply to the construction the temporary workforce accommodation facilities and Preparatory Buildings and Works as defined in **Chapter 6: Project description**.

The construction of the temporary workforce accommodation facilities is instead managed through conditions of the draft Incorporated Document (Table 29.11). The conditions have been informed by the EES technical reports and include requirements to avoid, minimise and manage impacts through management plans to be approved by the Minister for Planning and implemented by the Principal Contractor.

Preparatory Buildings and Works are not covered by the Environmental Management Framework as these activities do not typically require planning approval and are able to be managed with standard environmental controls. Management plans will however be developed for these works to avoid and minimise environmental impacts from these works. Preparatory Buildings and Works include:

- Site investigations, testing and surveys to determine the suitability of land and inform design
- Establishment of environment and traffic controls, 'no-go' zones and temporary laydown areas
- Management of utility service assets or infrastructure required to facilitate the Project
- Power distribution line crossovers
- Removal, destruction or lopping of native vegetation to the minimum extent necessary to enable Preparatory Buildings and Works
- Demolition to the minimum extent necessary to enable Preparatory Buildings and Works
- Aboriginal cultural heritage and historic heritage management actions required to be undertaken in compliance with the relevant approvals.

Information about the native vegetation clearance associated with Preparatory Buildings and Works and the temporary workforce accommodation facilities in accordance with the relevant application requirements of the Guidelines for removal, destruction or lopping of native vegetation (DEECA, 2025 v1.1) must be provided to the satisfaction of the Secretary to DEECA and biodiversity impacts must be offset.

29.5 Roles and responsibilities

This section outlines the roles and responsibilities for environmental management during Project delivery. Roles and responsibilities for preparing, approving and auditing specific management plans and other required documents are set out in Sections 29.7.1 and 29.7.2.

AusNet is responsible for the design, construction, and operation of the Project, and for obtaining the principal approvals. Decommissioning will be the responsibility of the network planner at the time. During construction and decommissioning, there will be multiple principal contractors and sub-contractors involved in the delivery of the different Project components. This EES refers to Principal Contractor as a catch all term for the contractor responsible for the works. AusNet will be responsible for the operation and maintenance of the Project. AusNet is accountable for delivering the Project and ensuring compliance with the Project's statutory approvals, including compliance with this Environmental Management Framework. In addition, AusNet is responsible for overseeing and engaging contractors and consultants for all aspects of the Project, including site investigations, stakeholder engagement, preparing the EES, procurement, and for the construction and operation stages.

Legally binding contracts between AusNet and the Principal Contractor will require compliance with relevant aspects of the statutory approvals and consents including this Environmental Management Framework and the EPRs. AusNet will engage an Independent Environmental Auditor to review documentation to confirm compliance with the requirements of this Environmental Management Framework, the EPRs and relevant approvals prior to construction, and to undertake audits of construction activities to assess compliance with the CEMP and relevant EPRs. During operation, network safety audits will be completed annually by Energy Safe, and ISO certification audits will be completed regularly by a third-party independent auditor.

To assist with the implementation of EPRs that require direct engagement with landholders and/or the community, AusNet will engage an independent facilitator(s) to liaise with individual landholders and/or community members, at the option of the landholder or community members to be engaged. The independent facilitator(s) must be retained throughout the construction period, and for two years after construction is completed.

The governance framework for the construction and operation of the Project is presented in Figure 29.1 and Figure 29.2 respectively.

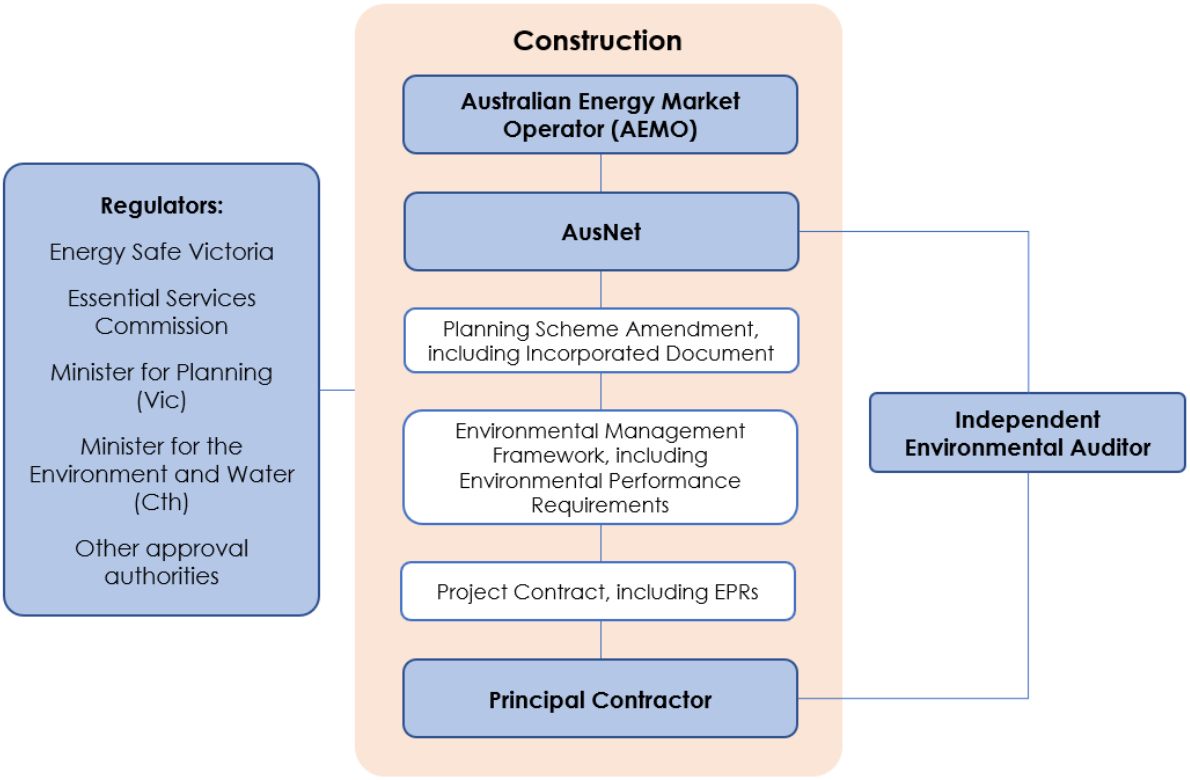

Figure 29.1 Governance framework for construction

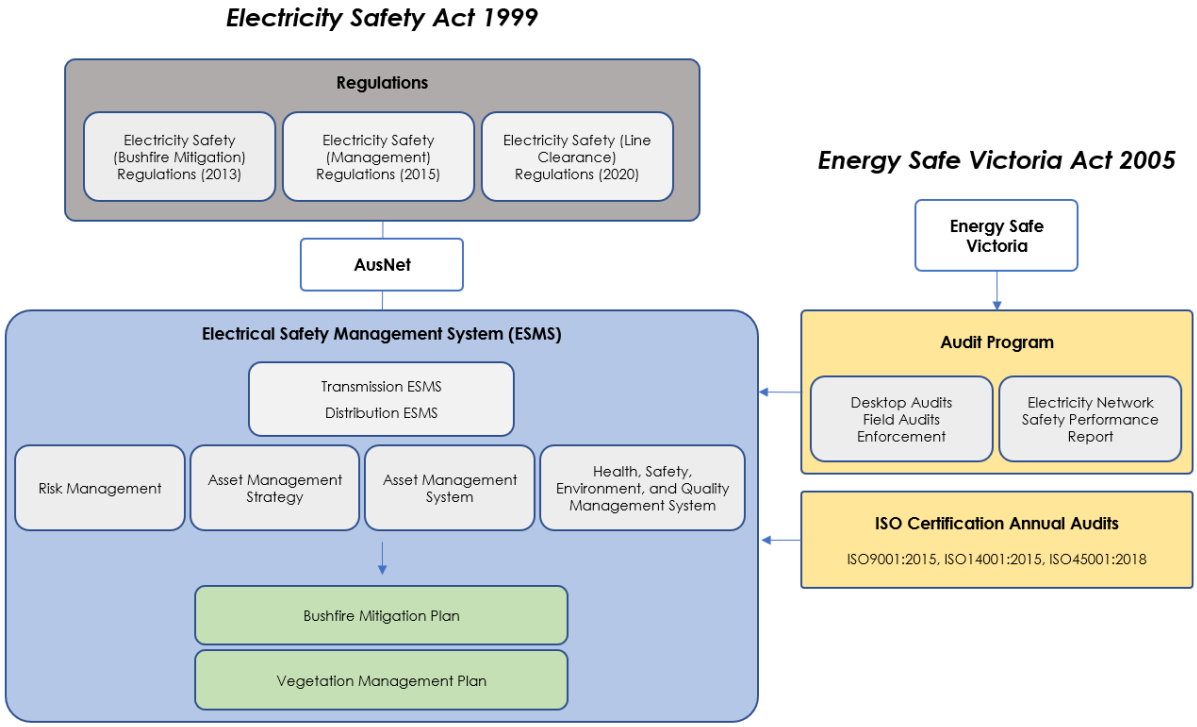

Figure 29.2 Governance framework for operation

Further detail on the key roles and responsibilities for environmental management are shown in Table 29.3.

Table 29.3 Roles and responsibilities for environmental management

Organisation	Role	Responsibility
Minister for Planning	Regulator	• Review and approve the Project's Environmental Management Framework (including EPRs), Development Plans and Micro-siting Plans, and any amendments of these documents, as required by the Western Renewables Link draft Incorporated Document • Receive six-monthly summary construction audit reports • Administer and enforce conditions within the Western Renewables Link draft Incorporated Document.
Department of Transport and Planning (DTP), Department of Energy, Environment and Climate Action (DEECA), EPA, councils, Registered Aboriginal Parties, Heritage Victoria, Catchment Management Authorities, water authorities	Regulator	• Administer and enforce statutory approvals and consents • Review, comment, engage in development of relevant plans and documents as required by the draft Incorporated Document including the development plans, Environmental Management Framework, and EPRs.

Organisation	Role	Responsibility
AusNet	Project Proponent	• Fulfill responsibilities and maintain compliance with contractual arrangements with AEMO • Obtain and comply with principal approvals including: a. Planning scheme amendment to the Northern Grampians, Pyrenees, Ballarat, Hepburn, Moorabool and Melton Planning Schemes b. Cultural Heritage Management Plans c. EPBC Act approval. • Finalise the Environmental Management Framework (including EPRs) in response to the relevant matters and recommendations made by the Minister for Planning in relation to the EES • Prepare amendments to the Development Plans (if required) for submission to the Minister for Planning for endorsement • Review and accept Micro-siting Plans prepared by the Principal Contractor prior to their submission to the Minister for Planning for endorsement • Review, accept or approve environmental management documentation, including the CEMP and other plans required by the EPRs • Implement and maintain the existing HSEQ Management System that is certified to AS/NZS ISO 14001 for the life of Project • Apply and integrate the requirements of the Environmental Management Framework into design drawings, plans and environmental management documentation and systems as necessary • Monitor and audit contractors' adherence to contractual requirements • Require corrective and preventative actions to be taken to address non-conformances and audit findings • Provide a Project induction to AusNet and contractor personnel outlining the Project approvals and addressing responsibilities for implementation of and compliance with the Incorporated Document, Environmental Management Framework and EPRs • Engage an Independent Environmental Auditor for the design and construction stages • Establish and maintain an environmental risk register throughout construction, operation and decommissioning • Develop and implement operational procedures and/or adopt existing operational environmental management procedures, addressing the requirements of the EPRs • In the event of an environmental incident, report to the EPA in accordance with the Environment Protection Act • Engage and consult with Traditional Owners, key stakeholders, landholders and communities affected by the Project • Respond to complaints (see Section 29.8.4and EPR EM7 (Complaints Management System) and close out actions to resolve issues or implement improvement measures as appropriate • Manage access to land in accordance with the Essential Services Commission Code of Practice (ESC, 2024) (see Section 29.9.1) • Provide six-monthly summary construction audit reports • Work with regulators as needed or requested to address any issues that are identified in audit reports.
Australian Energy Infrastructure Commissioner	Independent Energy Infrastructure Commissioner	• Receive and refer complaints from concerned community residents about wind farms, large-scale solar, energy storage facilities and new major transmission projects • Promote best practices for industry and government to adopt in regard to the planning and operation of the Project.
Australian Energy Market Operator (AEMO)	Australian Energy Regulator	• Manage the engagement of AusNet to deliver the Project • Operate the power system so it remains in a secure operating state and provides a secure, cost-efficient and reliable supply of energy for consumers.

Organisation	Role	Responsibility
Energy Safe Victoria (Energy Safe)	Electrical Safety Regulator	• Monitor and enforce compliance with the *Electricity Safety Act 1998* and Regulations (and other energy safety legislation including the *Gas Safety Act 1997* and *Pipelines Act 2005*, and supporting Regulations) • Conduct annual safety performance audits on AusNet's distribution and transmission business and identify compliance issues. Issues identified through these audits to be provided to AusNet to address and rectify • Issue Safety Performance Reports annually and publish on the Energy Safe Victoria website • Approve the electrical safety management scheme and safety management plans for the construction, operation and maintenance of the Project • Oversee bushfire management and vegetation management.
Powercor	Manager of electricity distribution network across the Project Area	• Design and manage works associated with their assets (utility service relocations) for the integration of the Project. These works are classed as Preparatory Buildings and Works (as defined in the draft Incorporated Document).
Principal Contractor	Development, design and construction (as relevant to the scope of the respective Project contract)	• Comply with legislative and approval requirements, including the approved Environmental Management Framework and EPRs • Prepare Micro-siting Plans for endorsement by the Minister for Planning • Obtain additional permits and approvals required to construct the Project (other than the approvals obtained by AusNet) • Develop and implement an EMS, certified to AS/NZS ISO 14001 • Arrange for all Project personnel to attend an AusNet Project induction • Provide training to Project personnel to address training requirements as specified in EPRs, and about compliance with documents and plans required by Incorporated Document, Environmental Management Framework the EPRs • Develop and implement a CEMP in accordance with the requirements of the Environmental Management Framework and EPRs • Establish and maintain an environmental risk register • Undertake regular internal audits to assess compliance with environmental documentation, including the approved CEMP and other documentation required by the EPRs • Assess and report on compliance with environmental obligations to AusNet and take corrective and preventative action. In the event of an environmental incident, report to the EPA in accordance with the Environment Protection Act • Respond to complaints as per the Complaints Management System (EPR EM7) and close out actions to resolve issues or implement improvement measures as appropriate • Monitor and audit sub-contractors' compliance with the Environmental Management Framework, EPRs, CEMP and other plans required by the EPRs. Review sub-contractors' performance against these plans and take or require corrective action • Work with the Independent Environmental Auditor to enable auditing functions to be undertaken and address issues identified by audits in a timely fashion.

Organisation	Role	Responsibility
Independent Facilitator	Facilitation	• Liaise with individual landholders and community members (at their option) in relation to the implementation of any EPRs that require direct engagement between AusNet or its contractors and individual landholders or community members.
Independent Environmental Auditor	Independent review, verification and auditing of compliance during construction	• Review the adequacy of and verify that the contractors' environmental management documentation, including the CEMP and other documents comply with the Project contract, including the Environmental Management Framework and EPRs, and conditions of Project approvals • Develop an audit plan, including a schedule, and audit scopes to the satisfaction of AusNet • Conduct audits of contractors' construction works at agreed intervals to assess compliance with the relevant legislation including Project approvals, Environmental Management Framework, relevant EPRs, CEMP and other plans as required by the EPRs • Prepare audit reports containing the results of each audit and provide to AusNet and the contractor • Audits must occur prior to and during construction, and for one year after commissioning of the Project or until the Minister for Planning is satisfied the audits by the Independent Environmental Auditor are no longer required • Review complaints where they are relevant to potential non-compliance with EPRs • Prepare six-monthly summary construction audit reports for the Minister for Planning, including status of non-conformances raised.

29.6 Risk assessment

A preliminary environmental risk register was developed for the Project to serve as a risk screening tool, guiding the scopes of the technical reports for the EES and the development of the EPRs. AusNet and the Principal Contractor will conduct a risk assessment for the Project, based on the EES technical reports and tailored to address the Principal Contractor's design and construction methods. This risk assessment will aid in managing environmental risks and to inform the development of construction and operational environmental management requirements to comply with this Environmental Management Framework. The development of management and mitigation measures to address the risks identified and meet the EPRs will minimise risks to human health and the environment.

Managing environmental risk

Managing environmental risks will be an ongoing process for both AusNet and the Principal Contractor.

A Project environmental risk register will be maintained and reviewed on a regular basis to respond to changes in legislation, design, construction or operational activities, work methods, new technology, or incidents or complaints. The reviews will also seek to confirm effectiveness of management measures throughout Project implementation. The environmental risk register will link risks to relevant EPRs that define the management standards for those risks.

During Project delivery, AusNet will actively review and track environmental risks through its Environmental Aspects and Impacts Register, which is regularly updated and maintained as part of its HSEQ Management System. AusNet's Risk Management Framework complies with the international standard for risk management (AS/NZS ISO11 31000:2009 Risk Management – Principles and Guidelines).

29.7 Environmental management documentation

This section provides an overview of the environmental management systems and plans required under this Environmental Management Framework and methods of documentation. It summarises the processes for preparing the systems and plans and who is responsible for preparation and approval.

An overview of the key environmental documentation and their relationships is provided in Figure 29.3.

29.7.1 Environmental Management System

An EMS certified to AS/NZS ISO 14001 will be implemented by AusNet and the Principal Contractor for the construction, operation and decommissioning of the Project. An EMS for construction will be established before construction activities begin by the Principal Contractor. The construction EMS will include systems and processes to identify, assess and control risks of harm to human health and the environment, comply with obligations and monitor environmental performance. The construction EMS will address organisational level policies, plans, procedures and activities for managing the Project's environmental aspects within each organisation's control or influence. The EMS will also enable AusNet and its Principal contractors to demonstrate compliance with the GED.

Additionally, AusNet has a HSEQ Management System in place, which will apply for all stages of the Project life. The HSEQ Management System covers the management (and all works associated) of energy delivery for AusNet's gas and electricity transmission and distribution networks. It provides a framework for AusNet's Health, Safety, Environment and Quality Policy and supporting processes, certified to Australian and international standards, including ISO45001:2018 - Occupational Health & Safety Management Systems, ISO9001:2015 – Quality Management Systems, and ISO 14001:2015 Environmental Management Systems. AusNet continuously review and improve the HSEQ Management System.

The HSEQ Management System includes contractor requirements which must be complied with and implemented for the effective control of hazards and risks. All contractors have a contractual obligation to adhere to all HSEQ legislative requirements and industry codes/standards in addition to AusNet's requirements. AusNet requires that all contractors are inducted on AusNet HSEQ requirements and monitors and assessed contractor performance through regular performance reviews.

29.7.2 Environmental management documents

In addition to the EMS, environmental management documents must be prepared to describe the specific processes, procedures and management and mitigation measures that will be implemented to manage the environmental effects of the Project and comply with Project approvals. The three levels of environmental management documents required for the Project are described in Table 29.4. Table 29.5 provides a summary of the Project's key environmental management documents and the review and approval requirements. The IEA will be engaged to review all management plans and strategies required by the EPRs to verify compliance with the EPRs prior to their implementation.

In addition to the environmental management documentation listed in Table 29.5, AusNet will be responsible for meeting the Project's offset requirements in accordance with the Guidelines for the removal, destruction or lopping of native vegetation (DEECA, 2025 v1.1) as required by the draft Incorporated Document. The Project's EPBC Act offset requirements will be achieved in accordance with the EPBC Act approval (if granted) and DCCEEW policy. The required management of each offset site will be detailed in a site-specific offset management plan. The offset related documentation will require review by and consultation with DEECA and/or DCCEEW.

Table 29.4 Overview of environmental management documentation requirements

Level	Owner	Purpose	Key Documentation
Strategic	AusNet	To set the strategic direction and governance of the Project that must be followed through construction, operation and decommissioning	• Environmental Management Framework with EPRs • Development Plans
Management of Project-wide impacts (construction and decommissioning)	Contractors	To guide specific programs or works to manage potential impacts on the wider community and environment	• Construction Environmental Management Plan • Micro-siting Plans • Construction emergency management plan • Decommissioning Management Plan • Plans to comply with EPRs
Management of Project wide impacts (operation)	AusNet	To guide specific programs or works to manage potential impacts on the wider community and environment	• AusNet's Electrical Safety Management Scheme (ESMS) • AusNet's HSEQ Management System

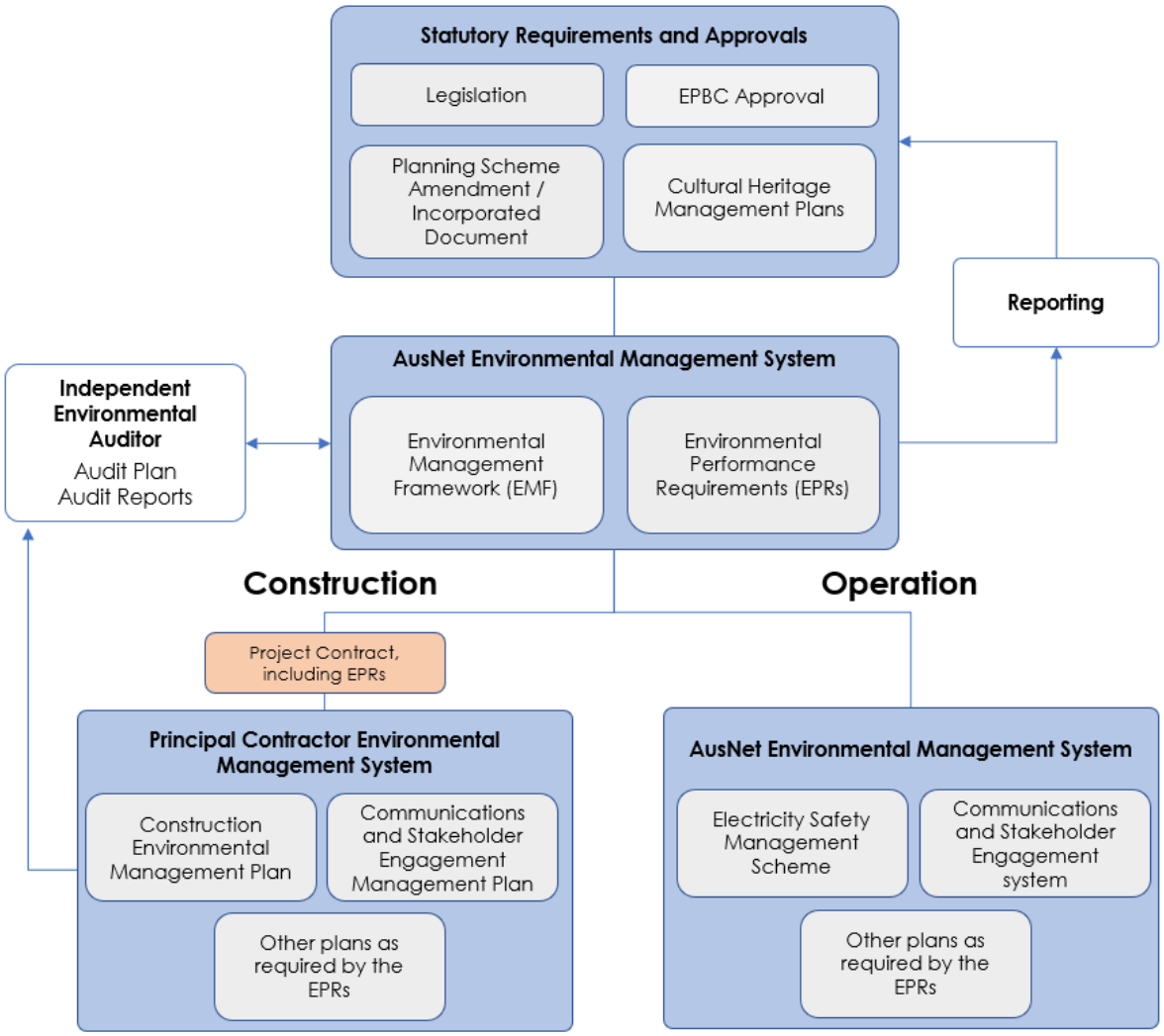

Figure 29.3 Key environmental management documentation

Table 29.5 Environmental management documentation - review and approval requirements

Documentation	Description	Prepare	Review/Verify	Type of Approval
Environmental Management Framework Environmental Performance Requirements	This Environmental Management Framework and the EPRs provide the governance framework and required environmental outcomes for design, construction, operation and decommissioning of the Project. The Environmental Management Framework and EPRs will be updated in response to the relevant matters and recommendations contained in the Minister for Planning's Assessment of the EES and be submitted to the Minister for Planning for approval.	AusNet	Review: DTP	Minister for Planning (approve)
Development Plans	AusNet will be required to prepare and obtain approval of Development Plans for specified Project works, as required by the draft Incorporated Document. The Principal Contractor will input to the Development Plans.	AusNet with input from Principal Contractor	Review and verify: AusNet	Minister for Planning (approve)
Micro-siting Plans	The Principal Contractor may be required to prepare and obtain approval of Micro-siting Plans identifying the footprint at ground level of any transmission tower and stringing pad that requires micro-siting.	Principal Contractor	Review and verify: AusNet, Independent Environmental Auditor	Minister for Planning (approve)
Construction Environmental Management Plan (CEMP)	Contractors must prepare a CEMP(s) in accordance with the draft Incorporated Document and applicable EPRs. The CEMP(s), and any sub-plans as required by the EPRs, must outline the requirements to manage the environmental impacts associated with construction in accordance with the mitigation hierarchy. The scope and consultation requirements for the CEMP(s) are captured in the applicable EPRs (see Table 29.10). Relevant works must not start until the CEMP and any sub-plans have been reviewed and verified by the Independent Environmental Auditor and accepted by AusNet. The CEMP must be prepared in accordance with the requirements of the Environmental Management Framework, EPRs and the draft Incorporated Document, with reference to best practice and EPA Publication 1834.1, Civil construction, building and demolition guide. The CEMP must include details as required by EPR EM2.	Principal Contractor	Review: AusNet Review and verify: Independent Environmental Auditor	AusNet (accept)
Communications and Stakeholder Engagement Management Plan (CSEMP)	A CSEMP must be developed in accordance with EPR EM5 to guide communication and engagement activities during construction to facilitate the timely and accurate provision of information. The CSEMP will address matters required by other EPRs, such as a process and procedure for recording, managing, and resolving complaints received regarding the Project. The CSEMP will be developed in accordance with the International Association for Public Participation (IAP2), discussed in **Chapter 7: Community and stakeholder engagement**.	AusNet	Review and verify: Independent Environmental Auditor	AusNet

Documentation	Description	Prepare	Review/Verify	Type of Approval
Property Access and Management Plan (PAMP)	An overarching PAMP must be developed detailing the process and procedures to be followed to access landholder's property for investigations and construction. The PAMP must include details as required by EPR EM3.	Principal Contractor	Review and verify: Independent Environmental Auditor	AusNet
ESMS	As the operator of Western Renewables Link, AusNet will operate the transmission assets under the existing ESMS. The ESMS is an integration of enterprise-wide policies, procedures, systems and standards that comply with the requirements of Division 2 of the *Electricity Safety Act 1998,* subordinate regulations and the Australian Standard for Electricity Network Safety Management Systems (AS 5577:2013). The purpose of the ESMS is to describe the assets forming AusNet's electricity transmission network, their location and the associated planning, design, construction, commissioning, operation, augmentation, inspection, testing, maintenance, refurbishment, replacement and decommissioning processes necessary to provide for the safety of consumers, the public, AusNet staff and contractors. It explains how AusNet protects: • The public and persons working on or near the network • Property and network assets • The community from bushfires ignited by the electricity network • The community from safety aspects arising from the loss of electricity supply. AusNet are required by Energy Safe Victoria to deliver a safety risk assessment as part of the ESMS to apply to any new transmission line, ensuring safety management systems are appropriate. The assessment must confirm the proposed safety management system mitigates bushfire risk as far as practicable and is appropriate for the design of the new transmission line.	AusNet	Review: AusNet, Energy Safe Victoria	Energy Safe Victoria (accept)
Bushfire Mitigation Plan – Electricity Transmission Network (BFM 10-02)	The Bushfire Mitigation Plan describes AusNet's preventative strategies, procedures and processes used to monitor, investigate, report, analyse and implement programs to mitigate the risk of fire ignition associated with its supply networks. As the owner and operator of electrical assets, AusNet is required under the *Electricity Safety Act* to provide a Plan (five-yearly), including requirements set out in the Electricity Safety (Bushfire Mitigation) Regulations (2023), for review and acceptance by Energy Safe Victoria. AusNet reviews the Bushfire Mitigation Plan internally on an annual basis to provide an objective and robust framework for its continued development, including the adoption of emerging technologies and innovative ideas. AusNet recently resubmitted its Bushfire Mitigation Plan to Energy Safe Victoria for review and acceptance in September 2024. AusNet will be required to review and update the existing Plan to reflect the extension of the transmission network due to the Project and confirm the proposed safety management system mitigates the risk of bushfire as far as practicable.	AusNet	Review: Energy Safe Victoria	Energy Safe Victoria (accept)

Documentation	Description	Prepare	Review/Verify	Type of Approval
Vegetation Management Plan – Transmission (BFM10-06)	The existing Vegetation Management Plan guides easement vegetation management practices during operation and maintenance of the transmission line in conformance with the Electricity Safety (Electric Line Clearance) Regulations 2020 and the Code of Practice for Electric Line Clearance. It also addresses monitoring and auditing of implementation and training requirements for personnel involved in vegetation management. The Plan is reviewed internally and submitted to Energy Safe Victoria for review and acceptance. The existing Plan (for the period 2021 to 2026) was approved by Energy Safe Victoria in 2021 and is therefore due for resubmission in 2026. AusNet will be required to review and update the existing Plan to reflect the extension of the transmission network due to the Project.	AusNet	Review: AusNet, Energy Safe Victoria	Energy Safe Victoria (accept)
Other plans required by the EPRs (for construction)	The EPRs (Section 29.9) set out requirements for AusNet and contractors to prepare relevant management plans to avoid, minimise and mitigate impacts. Assessments and plans required under these EPRs must be prepared by suitably qualified and experienced personnel and verified as adequate and compliant with the EPRs by the Independent Environmental Auditor (for construction). The management plans required by these EPRs may be included as part of the CEMP rather than as standalone plans.	AusNet and Principal Contractor	Review: AusNet Review and verify: Independent Environmental Auditor	AusNet (accept)
Other plans required by the EPRs (for operation and decommissioning)	The EPRs (Section 29.9) set out requirements for AusNet and contractors to prepare relevant management plans to avoid, minimise and mitigate impacts. This includes a Decommissioning Management Plan (EPR EM11). The management plans required by these EPRs will be included as part of AusNet's Transmission ESMS, and HSEQ Management System that is certified to AS/NZS ISO 14001:2016. Assessment and plans required under these EPRs must be prepared by suitably qualified and experienced personnel and verified as adequate and compliant with the EPRs by AusNet.	AusNet and Principal Contractor	Review: AusNet	AusNet (accept)

29.7.3 Timing for the preparation of environmental documents

Documents and plans required by the EPRs may:

- Be prepared, verified and accepted in stages
- Be developed for individual locations at which works or activities are proposed
- Be developed for individual locations at which works or activities are proposed in accordance with relevant approval conditions.

EPRs specify the stage of the Project and the specific location or Project component at which documents and plans are required to be implemented. This requires that the documents and plans be accepted or approved prior to the commencement of the stage of works (e.g., design, construction, operation or decommissioning) for the nominated locations or Project components. Where these documents and plans require review by the relevant Regulator as detailed in the EPRs, they may be provided in a staged approach with consolidation of edits and proposed changes where practicable to maximise efficiency.

29.7.4 Change management

This section outlines the process for managing changes to Project design and the environmental management documentation following receipt of approvals from the Minister for Planning.

Design change management

The EES technical reports assessed the impacts of a proposed Project design and proposed construction methods within the Project Area and considered potential measures to avoid and minimise environmental impacts so far as reasonably practicable. Each technical report used these potential measures to inform the development of EPRs. As discussed in Section 29.9, EPRs set out the environmental outcomes to be achieved through the implementation of mitigation measures and do not prescribe the manner in which the EPRs must be achieved. This performance-based approach seeks to encourage innovation from the Principal Contractor in Project delivery. Some EPRs also include more prescriptive measures that must be implemented.

The Principal Contractor will develop a design to comply with the Project's functional requirements and approvals. The Principal Contractor will be responsible for determining the specific measures to be implemented to comply with the EPRs and deliver the Project generally in accordance with the endorsed Development Plans and, if required, Micro-siting Plans.

The final design, construction areas, access tracks and construction method adopted by the Principal Contractor must comply with EPRs developed through the EES process and be located within the Project Land identified in the Incorporated Document within the Specific Controls Overlay (SCO). The final design will be shown in Development Plans and, where required, Micro-siting Plans to be endorsed by the Minister for Planning in accordance with the Incorporated Document.

Project design or construction method changes may arise following receipt of Project approvals due to matters such as:

- Findings of pre-construction surveys required by the EPRs (e.g., geotechnical investigations (EPR GSL1), targeted flora surveys (EPR BD1)) and any additional survey completed for land parcels or areas not previously surveyed
- Outcomes of ongoing landholder engagement
- Identification of opportunities to avoid or minimise impacts in accordance with the EPRs
- Unexpected finds during construction.

AusNet and the Principal Contractor will assess all proposed changes for compliance with the EPRs and to confirm the change does not introduce additional or greater environmental, social or cultural heritage impacts to that considered in the EES. To be compliant with the EPRs, the proposed change must meet the performance outcome and any more prescriptive measures of the EPR which together intend to avoid and mitigate identified impacts and the risk of harm to human health and the environment so far as reasonably practicable. If a change is proposed in an area not previously surveyed, then additional investigation would be undertaken to inform an investigation of potential impacts. This may involve technical specialist advice and/or investigation as required depending on the level of complexity and risk.

Table 29.6 summarises the change management process which varies depending on the nature of the change to the design. Changes that are generally in accordance with the endorsed Development Plan, compliant with the EPRs and do not introduce any new or greater impacts than assessed in the EES can be implemented. If the change does not meet these criteria, approval must be sought from the Minister for Planning. Where the change meets the definition of micro-siting a Micro-siting Plan will be prepared and submitted to the Minister for Planning for approval. If the change does not meet the definition of micro-siting, a Development Plan amendment will be prepared and submitted to the Minister for Planning for approval. Proposed changes would be consolidated, and the submission of Micro-siting Plans and Development Plan amendments may be staged, where practicable. A report will be prepared and submitted with the Micro-siting Plans and Development Plan amendments that will detail the reason for the design change, how EPRs will be complied with and how the change aligns with the EES impact assessments.

Relevant approvals will be sought if a change is proposed outside of the SCO. A flow chart summary of the design change management process is provided in Figure 29.4.

As part of the Environmental Management Framework, the Independent Environmental Auditor will review and verify the process for design change management and will audit the associated documentation during its compliance audits (see Section 29.8.5).

Table 29.6 Change management process summary

Type of change	Process
Change within the Project Land that is: • Generally in accordance with the endorsed Development Plan • Does not introduce additional or greater impacts compared to that considered in the EES • Compliant with the EPRs	• Change assessed for compliance with the EPRs and alignment with the EES impact assessments • Change can be implemented
Change within the Project Land that is: • Not generally in accordance with the endorsed Development Plan • Considered micro-siting of towers and stringing pads as defined by the Incorporated Document	• Change assessed for compliance with the EPRs and alignment with the EES impact assessments • Additional investigation if the change is proposed in an area not previously surveyed • Change incorporated in a Micro-siting Plan • Approval of the Micro-siting Plan to be sought from the Minister for Planning. If provided, the change can then be implemented
Change within the Project Land that is: • Not generally in accordance with the endorsed Development Plan • Not considered micro-siting as defined by the Incorporated Document	• Change assessed for compliance with the EPRs and alignment with the EES impact assessments • Additional investigation if the change is proposed in an area not previously surveyed • Consultation with relevant landholders, councils and government agencies where such consultation is considered relevant and necessary • Change incorporated into amended Development Plan • Approval of the amended Plan to be sought from the Minister for Planning. If provided, the change can then be implemented
Change outside the SCO	Relevant approvals will be sought

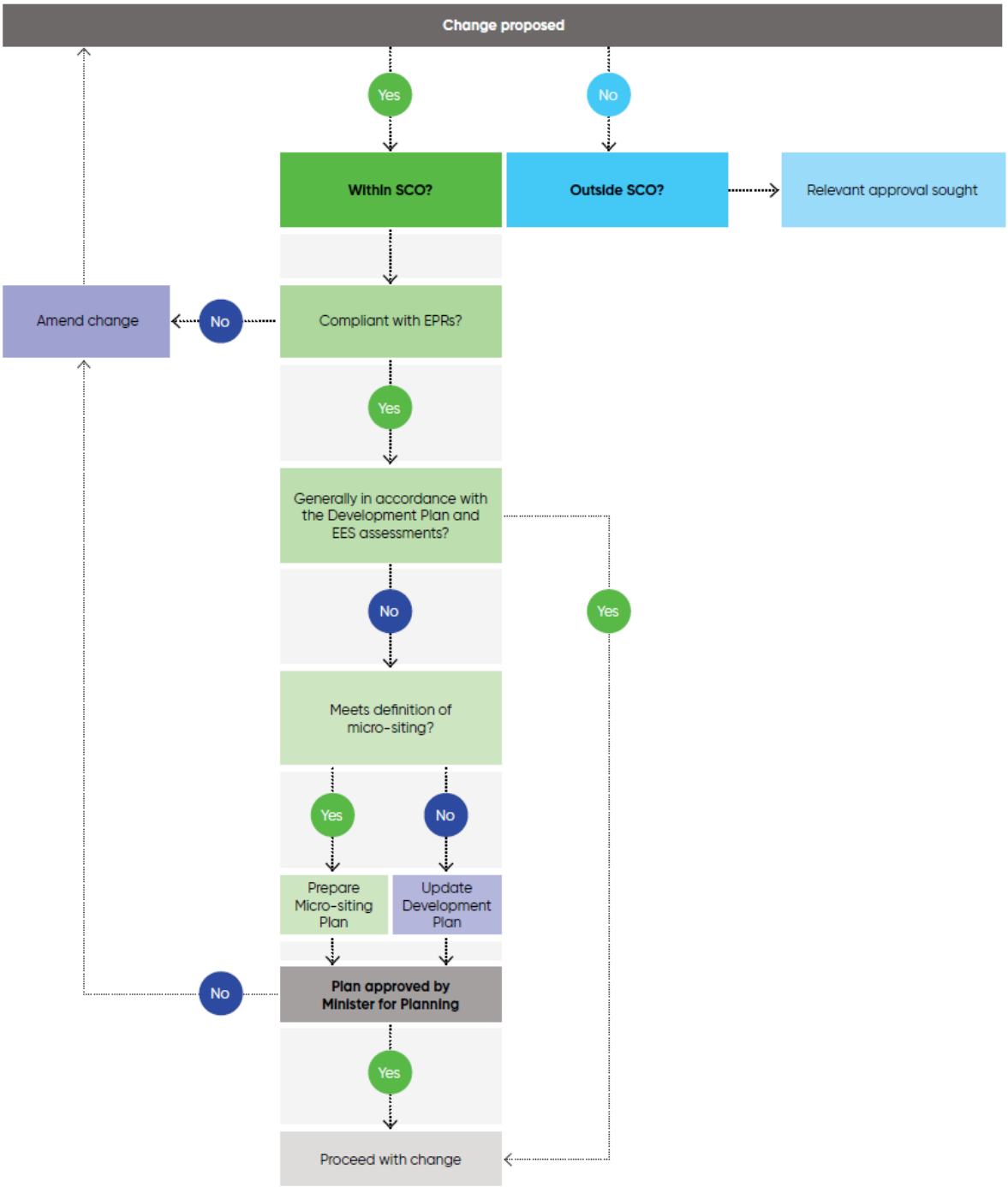

Figure 29.4 Change management process flow chart

Document change management

Revisions to the Environmental Management Framework, EPRs and associated environmental management documents may be required during the delivery of the Project. The changes could be due to changes in design and work practices, monitoring results, legislation, risks, or to facilitate continual improvement driven by audit results, incidents, complaints and other compliance obligations. Table 29.5 provides the review and approval requirements for the key environmental management documents.

Proposed revisions to the Environmental Management Framework and EPRs will be submitted to the Minister for Planning for approval.

Proposed revisions to the CEMP and other plans required by the EPRs for construction will be subject to review, verification and acceptance by AusNet prior to the relevant works commencing. The Independent Environmental Auditor will also review and verify major revisions to these documents prior to works commencing. Review or approval of these documents by regulators will only be required where expressly stated in Project approvals or required by law.

Where a major revision is proposed to a document which was produced following consultation in accordance with an EPR, further consultation may be required prior to verification or acceptance. Environmental management documentation for the operational stage follows revision processes set out in those documents and as required by the relevant approving authority.

AusNet's HSEQ Management System and the Principal Contractor's construction EMS will also require that plans are regularly reviewed and updated, as required by ISO14001. The CEMP and other plans (as listed in Table 29.5 or required by EPRs) will specify minimum review periods and outline the process for managing, reviewing, and seeking approval of revisions. This revision process is to be to the satisfaction of the approver or accepting authority identified in Table 29.5.

Minor revision:

- Changes to clarify or improve environmental management practices, to add new obligations and associated controls, or minor change of work practices onsite
- No increase in, or introduction of, new environmental risks or reduction of obligations.

Major revision:

- Changes to role and responsibilities
- Significant changes to environmental management practices on site, work methods or scope that result in increased or new environmental risks
- Changes to the location of native vegetation or listed species or communities impacted by the Project
- Changes to approved monitoring programs.

29.8 Evaluating environmental compliance

This section outlines the requirements for monitoring, contingency measures to respond to unexpected but foreseeable environmental risks, responding to environmental incidents and emergencies, management of complaints, auditing and reporting compliance with the Environmental Management Framework and EPRs. AusNet, contractors (the Principal Contractor and any sub-contractors that may be engaged) and the Independent Environmental Auditor each have responsibilities for evaluating environmental compliance.

29.8.1 Monitoring

A range of monitoring and inspection requirements are specified in the draft Incorporated Document and EPRs for construction and operation stages. The parameters and indicators to be monitored, frequency of monitoring and triggers for corrective actions will be developed as part of the CEMP and other management plans outlined in the Environmental Management Framework and EPRs. The monitoring programs will reflect regulatory requirements and the level of potential risk to the environment. Monitoring will include periodic inspections of construction works areas and assets constructed.

Reviews of monitoring requirements will be undertaken as part of management plan reviews or as required by EPRs. The plans will specify minimum review periods and seek to verify that:

- The monitoring frequency is sufficient to identify any significant non-conformances with the EPRs, Incorporated Document or plans that have occurred
- The range of parameters being monitored is adequate (this is particularly when an activity has led to an incident or complaint)
- Any changes to programmed construction activities are adequately covered by the monitoring programs
- Any proposed modifications to monitoring programs will be submitted to AusNet for approval prior to being implemented.

The Principal Contractor will be responsible for the ongoing management of baseline and monitoring data to provide transparency and accountability of environmental management. AusNet will be responsible for checking that baseline and other monitoring data meets requirements, including storing of monitoring datasets electronically.

Monitoring and inspection requirements are captured as EPRs and have been summarised in Table 29.7. These requirements and nominated reporting mechanisms will be further defined in the CEMP and other management plans, including post construction monitoring timeframes.

Monitoring and inspection requirements for the operation of the Project are set out in existing operational managements systems and plans for example the ESMS, Bushfire Mitigation Plan and Vegetation Management Plan. Additional Project-specific monitoring requirements from the EPRs and approval conditions will be set out in the HSEQ Management System.

AusNet and the contractors will monitor the effectiveness of the Environmental Management Framework to identify opportunities for continuous improvement. AusNet will contact relevant statutory authorities to report incidents identified during monitoring as required by legislation.

Table 29.7 Proposed monitoring (including inspection) programs as required by the EPRs set out in Table 29.10 below

Relevant EPR	Monitoring	Project stage(s)	Assigned responsibility	Objective(s)
EM2	Monitor performance against the CEMP and other plans required by the EPRs	Construction	Principal Contractor	To monitor compliance with the requirements and mitigations included in the CEMP and other management plans
EM5	Monitor the effectiveness and responsiveness of communications and engagement as required by the CSEMP	Construction	AusNet	To provide a measure of the effectiveness of communication and engagement activities as outlined by the CSEMP To verify community complaints are appropriately captured and responded to
EM6	Monitor fire weather conditions and bushfire emergency warnings as required by the CEMP	Construction	Principal Contractor	To provide early warning of severe weather conditions and allow contingency measures to be put in place
EM8	Monitor the presence of high-threat pest species within the Project Area as required by the Biosecurity Management Plan	Design, Construction, Operation	Principal Contractor, AusNet	To identify areas where control measures are required to control populations of high-threat pest species
EM8	Monitor performance against the policies and/or procedures for biosecurity breach detection as required by the Biosecurity Management Plan	Construction Operation	Principal Contractor	To monitor compliance with the requirements and mitigations included in the biosecurity breach detection policies and/or procedures
EM9	Review and audit the implementation of the CEMP, CSEMP, other plans required by the EPRs, duties under the EP Act, and relevant environmental approvals and permits	Construction	Independent Environmental Auditor	To provide the Minister for Planning an independent review of Project performance against the EPRs and other environmental requirements. Summary reports will be provided on a six-monthly basis prior to and during construction and for one year after commissioning of the Project, or until the Minister for Planning is satisfied that they are no longer required
ACH1	Implement any required monitoring programs, as required by the CHMPs (once approved)	Construction, Operation	Principal Contractor, AusNet	To verify compliance with the requirements and mitigations included within each CHMP
AQ1	Monitor the emission of dust, exhaust emissions, fumes, odour and other pollution, as required by the Air Quality Management Plan	Construction	Principal Contractor	To provide a measure of the effectiveness of control measures
BD2	Post construction monitoring of native vegetation and threatened flora, works associated with revegetation and remediation and weed management, as required by the WRL Construction Vegetation Management Plan	Construction	Principal Contractor	To minimise impacts to threatened flora, threatened ecological communities, and native vegetation To verify appropriate measures are implemented to manage the risk and spread of weeds

Relevant EPR	Monitoring	Project stage(s)	Assigned responsibility	Objective(s)
BD4	Post construction monitoring as required by the Threatened Fauna Management Plan	Construction	Principal Contractor	To confirm compliance with management plans to demonstrate impacts have been managed To determine the effectiveness of installed habitat (e.g., salvaged hollows, artificial hollows, nest boxes) and connectivity measures (e.g., glider poles and rope-bridges)
BD5	Post construction monitoring of bird and bat carcasses that occur as a result of collision with Project infrastructure as required by the Collision Risk Management Plan	Construction, Operation	Principal Contractor	To assess success of mitigation measures applied and to identify any further areas of collision concern, that require mitigation measures to be applied
BD7	Monitor the ongoing presence of threatened flora species, quality and extent of threatened ecological communities and weed presence and density within areas of native vegetation along the easement as required by the WRL_Operational Vegetation and Habitat Management Plan	Operation	Principal Contractor	To minimise impacts to threatened flora, threatened ecological communities, and native vegetation To verify appropriate measures are implemented to manage the risk and spread of weeds
CL3	Monitor and characterise spoil as required by the Spoil Management Plan	Construction	Principal Contractor	To determine the appropriate re-use options or off-site disposal To verify spoil is stored, handled, and re-used or disposed of in accordance with the Spoil Management Plan
GSL3	Inspect Project construction sites for land stability and erosion issues as required by the CEMP and AusNet's operational procedures	Construction Operation	Principal Contractor, AusNet	To inform adaptive management and any measures required to maintain the integrity of infrastructure during and post construction
GW1	Monitor groundwater on a site-specific basis where planned below ground works are within buffers to groundwater receptors specified in EPR GW1 and a groundwater risk assessment identifies potential for a physical impact, as required by the Groundwater Management Plan	Construction	Principal Contractor	To minimise potential for direct physical impact on groundwater receptors and beneficial uses of groundwater
GW2	Monitor groundwater dewatering as required by the site-specific field monitoring program as per the Groundwater Management Plan	Construction	Principal Contractor	To inform the management of potential changes to groundwater level and quality and develop site-specific mitigation strategies to prevent adverse outcomes
HH3	Implement any required monitoring programs, as required by *Heritage Act 2017* consents and permits	Construction	Principal Contractor	To verify compliance with the requirements and mitigations included within each consent or permit
NV1	Monitor noise and vibration associated with construction, as appropriate and with respect to reference levels as	Construction	Principal Contractor	To validate predictions and assess the effectiveness of management measures

Relevant EPR	Monitoring	Project stage(s)	Assigned responsibility	Objective(s)
	required by the Construction Noise and Vibration Management Plan			To verify noise predictions for Unavoidable Works and Managed-Impact Works
NV2	Monitor noise and vibration during Unavoidable Works and Managed-Impact Works as required by the Construction Noise and Vibration Management Plan	Construction	Principal Contractor	To confirm predicted levels and that appropriate mitigation measures are implemented
NV5	Undertake commissioning noise monitoring at the upgraded Bulgana Terminal Station, the new 500kV terminal station near Bulgana and connection into Sydenham Terminal Station as required by the Construction Noise and Vibration Management Plan	Commissioning	Principal Contractor	To assess noise levels with respect to the EPRs and implement contingency requirements if these are not met
SC3	Monitor the level of participation of local workers and businesses in the Project in accordance with the plan developed as per EPR SC3	Construction	Principal Contractor, AusNet	To verify the maximisation of employment and business opportunities for residents and businesses in surrounding communities to participate in the Project
SW1	Monitor surface water quality on a site-specific basis where construction works are within the setback distances to waterways as specified in EPR SW1, as required by the Surface Water Management Plan	Design Construction	Principal Contractor	To provide a measure of the effectiveness of mitigation measures
SW3	Monitor surface water quality at designated waterways likely to be directly impacted by Project activities as required by the Surface Water Management Plan	Design Construction	Principal Contractor	To establish baseline conditions, detect water quality impacts and identify required actions
SG1	Monitor the process of achieving sustainability targets as required by the Sustainability Management Plan	Design Construction Operation	Principal Contractor	To verify achievement of target reductions for greenhouse gas emissions from materials and energy consumption
SG2	Monitor the energy and carbon use during construction of the Project as required by the Sustainability Management Plan	Construction	Principal Contractor	To verify the reduction of greenhouse gas emissions from materials and energy consumption as far as practicable
T2	Monitor road conditions on any council managed roads that are used by heavy vehicles during construction of the Project as required by the Traffic Management Plans	Design Construction	Principal Contractor, AusNet	To understand road use and potential impacts and provide insight to local Councils and the relevant transportation authorities
T2	Undertake dilapidation surveys to identify roads that are degraded or damaged due to use by Project traffic as required by the Traffic Management Plans	Design Construction	Principal Contractor, AusNet	To enable any adverse impacts of the construction traffic to be identified and measures taken to restore roads to previous condition

29.8.2 Contingency measures

AusNet and the Principal Contractor will have contingency measures to respond to unexpected but foreseeable environmental risks, should they eventuate during construction, operation and decommissioning. Contingency measures will be contained within plans required by the EPRs and in some cases contingency measures are specified within EPRs.

Events for which contingency measures will be developed and implemented include, but not limited to:

- The discovery of previously unidentified Aboriginal cultural heritage or historic heritage objects or places
- Hazardous chemicals, fuel or waste spills
- Surface water incidents such as leaks and spills or un-authorised discharges
- Identification of the spread of declared noxious and environmental weeds (EPR EM8 requires contingency measures to be developed and implemented for controlling the introduction and/or spread of declared noxious and environmental weeds to, within and from the Project Area)
- Emergency shutdown of abnormal operation conditions
- Encountering unexpected threatened fauna species during construction
- The discovery of unexpected contaminated soil or groundwater identified during earthworks (EPR CL2 (Item 1(j)) requires a Contingency and Unexpected Finds Plan to be developed and implemented prior to construction commencing should unexpected, contaminated soil or groundwater be identified during earthworks)
- Monitoring results indicate outcomes are not as expected.

Contingency measures within the plans required by the EPRs will be developed to comply with relevant regulations, guidelines, standards and good industry practice. Contingency measures may also include changes to or implementation of additional mitigation measures to manage impacts.

29.8.3 Environmental incidents and emergencies

An environmental incident includes any action that has the potential to result in an unplanned environmental impact, including:

- Damage to native vegetation or protected flora or fauna habitat
- Damage to Aboriginal or historical heritage sites
- Injury or death of fauna
- Oil, chemical, fuel or other contaminant spillages
- Fires/explosions
- Introduction of weeds/quarantine issues
- Uncontrolled discharge (water or sediment)
- Environmental complaints from the public (including landholders).

AusNet will be responsible for implementing incident and emergency response procedures in the event of unexpected environmental events should they arise during construction, operation or decommissioning. AusNet will take the lead on incident and emergency response in accordance with AusNet's integrated HSEQ Management System and the Incident Management procedure to facilitate an efficient and effective response and investigation process. During the construction stage, this process will be coordinated by the Principal Contractor.

All environment incidents, hazards and near misses reported to AusNet will be entered into their risk, incident, compliance, audit and action management system to facilitate adequate management and control. The overall objective of reporting is to identify and mitigate risk, in order to avoid a recurrence of the event.

The following environmental event definitions apply:

- Hazard - any situation with the potential to cause harm to a sensitive receiver, equipment, property or the environment or a combination of these
- Near Miss - an incident that does not result in any property damage, environmental damage or other loss but had the potential to do so
- Incident - an undesired event that causes property damage or environmental damage.

Incidents, including pollution events that cause or threaten to cause material harm to the environment or human health as required under the Environment Protection Act and any other emergencies will also be reported where required to other relevant agencies such as emergency services, EPA Victoria, DCCEEW, DEECA, Heritage Victoria, First Peoples – State Relations, catchment management authorities, water authorities, and councils.

The Principal Contractor will be required to develop and implement a construction emergency management plan, as required by EPR EM6 consistent with AusNet requirements as detailed above. The construction emergency management plan will be developed prior to construction commencing.

29.8.4 Complaints management

Complaints received by the community or other stakeholders regarding environmental, social or cultural heritage issues related to construction, operation or decommissioning of the Project will be investigated by AusNet and/or the Principal Contractor. Complainant will be responded to within two working days, and the aim is to resolve a complaint within ten working days.

Where a resolution cannot be reached within ten working days, the complainant will be kept informed of the progress being made in handling the complaint and a revised timeframe advised.

EPR EM7 requires the development and implementation of a Complaints Management System at the commencement of the construction stage. The system will require processes covering the following matters:

- Recording of complaints regarding environmental performance
- Investigation processes and responsibilities, including close out processes and timeframes
- Engagement with the Australian Energy Infrastructure Commissioner as needed to support and advise in addressing community concerns
- Reporting and escalation requirements
- Closing out the complaint.

Once the Project is operational, complaints will be received and handled in accordance with AusNet's existing complaints process, or utilise other pathways for making complaints provided for in the Complaints Management System that forms part of the CSEMP.

29.8.5 Auditing

Independent Environmental Auditor audits

External audits will be conducted to monitor environmental performance of construction activities to assess compliance with the Project's environmental obligations, including this Environmental Management Framework and EPRs. These audits will be undertaken by an Independent Environmental Auditor appointed by AusNet, as set out in EPR EM9.

The Independent Environmental Auditor will be comprised of a body of professionals with appropriate qualifications and expertise to allow the roles specified for the Independent Environmental Auditor to be properly carried out.

The Independent Environmental Auditor must develop an audit plan to conduct regular audits of contractors' compliance with the Environmental Management Framework, EPRs, CEMP and any other plans required by the EPRs, and conditions of Project approvals is to the satisfaction AusNet.

Audits must occur prior to and during construction and for one year after commissioning of the Project, or as otherwise agreed with the Minister for Planning. The Environmental Management Framework and EPR compliance audits are to be conducted on a six-monthly basis, adopting a risk-based approach where compliance with all EPRs is audited at least once every 12-months and higher risk activities at higher frequencies. Audits must include a combination of documentation review as well as site inspections. For each audit a respective report must be prepared and provided to AusNet and the Principal Contractor.

In addition, routine performance audits of active Project work sites are proposed on a quarterly basis at a staggered frequency to the Environmental Management Framework and EPR compliance audits to:

- Observe Project activities and conduct interviews with staff
- Review documents and records
- Review environmental monitoring results
- Review work method statements, site plans and operating procedures
- Review incidents and complaints where they are relevant to potential non-compliance with EPRs
- Review of other documents relevant to assessment compliance with the Environmental Management Framework, EPRs, CEMP and any other plans required by the EPRs.

Considering the report findings, contractors must take corrective and preventative actions to address non-conformances and, where required by AusNet, other audit findings.

Audit requirements for Independent Environmental Auditor are presented in Table 29.8.

Table 29.8 Independent Environmental Auditor requirements, frequency, and roles/responsibilities

Audit	Scope	Frequency	Role/Responsibility		
			AusNet	Principal Contractor	Independent Environmental Auditor
Environmental Management Framework and EPR compliance audit by IEA	Contractor's compliance with the Environmental Management Framework, EPRs, CEMP and any other plans required by the EPRs	Prior to construction commencing, then six-monthly thereafter	Engage Independent Environmental Auditor Participate in audits	Participate in audits	Plan and lead the audits
Routine environmental performance audits	Environmental audits of active Project work sites and rehabilitated sites	Quarterly (staggered with the Environmental management Framework and EPR compliance audits), starting 3 months from commencement of works	Engage Independent Environmental Auditor Participate in audits	Participate in audits	Plan and lead the audits

Energy Safe Victoria audits

Energy Safe Victoria regularly conducts both systems (office based) audits and outcomes (field based) audits to review AusNet's compliance with its ESMS, Bushfire Mitigation Plan and Vegetation Management Plan, ensuring processes and work practice are being carried out as documented in those documents and in accordance with the requirements stated in the Electricity Safety Act. If a compliance issue is identified by Energy Safe Victoria it is communicated to AusNet to address and rectify. Energy Safe Victoria prepare annual Safety Performance Reports on Victorian electricity networks and publish the reports on their website.

Certification audits

AusNet maintains quality assurance over its HSEQ Management System through certification to ISO45001-- Occupational Health & Safety Management Systems, ISO9001 – Quality Management Systems, and ISO14001 – Environmental Management System.

Certification for these management systems is maintained through a program of regular conformance audits by an independent and accredited service provider, BSI Group. A re-certification audit is undertaken every three years, followed by two years of annual surveillance audits before the next recertification.

Internal audits

Internal audits must be conducted throughout construction, operation and decommissioning by AusNet and Principal contractors to evaluate compliance with the Environmental Management Framework and EPRs.

Internal audits must be planned in accordance with an audit schedule and audit scope to assess environmental performance and effectiveness of management measures and monitoring programs. This includes assessment of:

- Compliance with the Environmental Management Framework, CEMP, and any other plans required by the EPRs
- Compliance with the EPRs
- Legislative compliance, including with approval conditions
- Responses to non-compliances, incidents, and complaints received
- Effectiveness and implementation of management measures and monitoring programs.

Compliance can be assessed through observation of Project activities, interviews and review of records.

29.8.6 Reporting

AusNet and its contractors will be responsible for reporting compliance with the CEMP, other plans (as listed in Table 29.5 or required by EPRs) and conditions of Project approvals to regulators.

For the construction stage, the CEMP will describe the reporting requirements, including what needs to be reported and to whom, and the timeframe for reporting.

Contractors will be required to prepare monthly environmental performance reports for submission to AusNet. Reporting requirements depend upon the terms of the statutory approvals and will include:

- Project status report, comprising summary of key Project activities within the month and planned works
- Internal and external audit findings, including non-conformances and corrective and preventative actions taken
- Monitoring results
- Complaints register, including status of investigations
- Environmental incidents and status of investigations and follow up actions
- Proposed changes to environmental management documents or plans
- Copies of application for consents, licences and approvals
- Summary of consultation with and notifications to government agencies, regulatory authorities or other stakeholders, such as:
  - Notification to EPA Victoria as required by the Environment Protection Act of environmental incidents
  - Notification to First Peoples – State Relations or the Registered Aboriginal Party as relevant and DTP if a potential Aboriginal cultural heritage site or artefact is identified
  - Notification to Heritage Victoria and DTP if a historical heritage artefact is discovered.

As described in Section 29.8.5 for each audit conducted by the Independent Environmental Auditor, a respective report must be prepared and provided to AusNet and the Principal Contractor. AusNet will also be required to provide six-monthly summary construction audit reports to the Minister for Planning summarising the outcomes of audits conducted by the Independent Environmental Auditor in the reporting timeframe and the Project's compliance with Project approvals. Following acceptance by the Minister, AusNet will make these reports publicly available.

As described in Section 29.8.3, notifications and reporting of environmental incidents will occur in accordance with AusNet existing procedures, including reporting of pollution events to EPA Victoria.

29.9 Environmental Performance Requirements and conditions of the draft Incorporated Document

This section summarises the rationale and approach in preparing the EPRs for the Project. The proposed EPRs are provided in Table 29.10. Requirements relevant to the management of bushfire risk and the workforce accommodation facilities that informed the conditions of the draft Incorporated Document are provided in Table 29.11.

The EES adopted a systems and risk-based approach to inform the scope of the impact assessments and to focus the study effort for each environmental discipline. The impact assessment approach considered the potential impacts to the environment and human health through the initial identification of existing conditions, followed by detailed impact assessments of the Project. This has informed the development of the Project design and the proposed EPRs to be implemented during construction, operation and decommissioning.

The EPRs are intended to address the potential impacts identified in the EES so that the risks to human health and the environment are avoided or minimised to the extent reasonably practicable. The EPRs set out the environmental outcomes to be achieved through the implementation of mitigation measures during construction, operation and decommissioning. While some EPRs are performance based to allow flexibility in how they will be achieved other EPRs include more prescriptive measures that must be implemented. Compliance with the EPRs will be required as a condition of the Project's approval.

The Principal Contractor will be responsible for determining the specific mitigation and management measures to be implemented to comply with the environmental outcome required by the EPRs. In some cases, the EPRs also specify other requirements for environmental management. Through the preparation of impact assessments for the EES, potential mitigation and management measures were considered to avoid and minimise environmental impacts so far as reasonably practicable. These potential management measures have informed the development of the EPRs and adopt the hierarchy of avoid, minimise, manage and offset, and draw on standard industry practice measures, accepted construction techniques and experience from recent projects in Victoria and Australia. The Principal Contractor will use the EES technical reports as reference when developing the plans required by the EPRs. Early contractor involvement will enable contractors to understand the EPRs and propose environmental management measures and develop designs, plans and other environmental documents to comply with the Project's approvals and mitigate impacts. The IEA will verify the documentation and ongoing compliance.

AusNet are required by legislation and the electrical safety regulator, Energy Safe, to maintain an ESMS including a Bushfire Mitigation Plan (BFM 10-02) and a Vegetation Management Plan (BFM 10-06). As these are already referenced in Section 29.7.2 (Table 29.5) and required by regulation, they have not been reiterated here as an EPR. As outlined in section 29.7.1, AusNet's HSEQ Management System will apply during operation of the Project. The HSEQ Management System provides processes and procedures for the management of all works associated with AusNet's gas and electricity transmission and distribution networks to comply with Commonwealth and Victorian legislation, regulations, standards and codes applicable to its operations.

29.9.1 Consultation and engagement to deliver EPRs

Many of the EPRs require consultation and engagement to be undertaken with Traditional Owners, key stakeholders (including landholders) or regulatory authorities. This may include the manager or owner of an asset or land directly affected by the works or requirement, councils, EPA, DEECA, Registered Aboriginal Parties and Traditional Owner groups, Catchment Management Authorities, Melbourne Water, WorkSafe Victoria, Transport for Victoria, Country Fire Authority, Fire Rescue Victoria, Forest Fire Management Victoria, or other relevant regulatory authority or stakeholder group.

Consultative measures required under the EPRs include meetings, workshops, exchange and review of documentation and correspondence with AusNet and its contractors and the relevant stakeholder.

Table 29.9 outlines the plans required by the EPRs that have specific requirements for consultation with relevant regulatory authorities and Traditional Owner groups.

Table 29.9 Plans required by EPRs with requirements for consultation with authorities and Traditional Owner groups

Relevant plan	Relevant EPRs	Consultation requirement
Communications and Stakeholder Engagement Management Plan (CSEMP)	EM5	Local councils
Construction Environmental Management Plan (CEMP)	EM2	As required by relevant EPRs. See for example, BD6 and CL2(1)(i).
Construction Emergency Management Plan	EM6	Relevant emergency service authorities
Decommissioning Management Plan	EM11	Relevant regulators (at the time of decommissioning)
Delivery of cultural awareness and anti-racism training	EM13	Relevant Traditional Owner groups
Traditional Owner Engagement and Communications Plan(s)	EM15	Relevant Traditional Owner groups
WRL Construction Vegetation Management Plan	BD2	DEECA and DCCEEW
Fauna Management Plan	BD3	DEECA
Threatened Fauna Management Plans	BD4	DEECA and DCCEEW
Collision Risk Management Plan	BD5	DEECA
WRL Operational Vegetation and Habitat Management Plan	BD7	DEECA
Understorey retention plan	BD9	DEECA
Culturally significant species and materials salvage plan	BD11	Relevant Traditional Owner groups
Tourism Mitigation and Support Strategy	EC4	Local councils and relevant Victorian Government departments
Groundwater Management Plan	GW2	Relevant water authorities
Code of Conduct for the Project workforce	SC2	Local councils
Employment initiatives plan	SC3	Local councils
Surface Water Management Plan	SW2	Relevant catchment management authorities
Operational emergency flood response management	SW6	Local councils
Traffic Management Plans	T1	Responsible road authorities
Approach for dilapidation surveys, road condition monitoring and rectification/restoration	T2	Responsible road authorities

Where an EPR requires direct engagement with a landholder or member(s) of the community, the landholder or community member(s) will have the option of the consultation being facilitated by the Independent Facilitator engaged by Ausnet under Section 29.5.

The extent and method of consultation will be documented (as a method to demonstrate compliance with the EPRs), communicated and available to stakeholders for each EPR, where consultation requirements exist. This method allows for feedback on how matters raised during consultation have been considered and, where appropriate and reasonable, addressed by AusNet or contractors.

The Principal Contractor will develop a Communications and Stakeholder Engagement Management Plan to be implemented during construction. AusNet will retain the power to lead consultation and stakeholder engagement. During operation, AusNet's existing communications and stakeholder engagement system (including complaints management system) that apply to all of AusNet's transmission network assets will be adopted.

All stakeholder engagement is to be undertaken cognisant with the Essential Services Commission Land Access Code of Practice. This Code of Practice regulates how transmission companies access land, including for this Project. It seeks to achieve a balance between the statutory right for licensed electricity corporations to access private lands and the rights of landholders affected by that exercise of power.

The Code of Practice outlines the obligations for electricity transmission companies prior to and during land access under Section 93 of the *Electricity Industry Act 2000,* outlining how electricity transmission companies should exercise their powers to access land. It also outlines the expectations of landholders and parties interested in land as critical partners and stakeholders in the delivery of major energy projects and the provision of essential transmission services.

29.9.2 Recommended Environmental Performance Requirements

Recommended EPRs are presented in Table 29.10. These EPRs will be finalised in response to the relevant matters and recommendations contained in the Minister for Planning's Assessment of the EES.

Bushfire is not addressed in the EPRs as there is a condition included in the draft Incorporated Document that defines the requirements. This is provided in Table 29.10.

The Project will be delivered in accordance with the final Environmental Management Framework including the EPRs approved by the Minister for Planning. Compliance with EPRs may be undertaken in stages as the Project may be completed in stages, as outlined in the draft Incorporated Document.

The recommended EPRs cover the following disciplines:

- Environmental management/general
- Aboriginal cultural heritage
- Agriculture and forestry
- Air quality
- Aviation
- Biodiversity
- Climate change
- Contamination and soil management
- Economics and business continuity
- Electric and magnetic fields (EMF) and Electromagnetic interference (EMI)
- Geology and soils
- Groundwater
- Historical heritage
- Land use and planning
- Landscape and visual
- Noise and vibration
- Social
- Surface water
- Sustainability and greenhouse gas
- Transport.

In relation to Table 29.10, which details the Project's EPRs, the following applies:

- For the column 'Project component': 'All' means the EPR applies to all elements of the Project that are applicable to the Project stage for that EPR

- For the column 'Project stage': There are four stages over the life of the Project: design, construction, operation and decommissioning. EPRs might apply to one stage only or across multiple stages.

Table 29.10 Environmental Performance Requirements

EPR Code	Requirement	Project Component	Project Stage
General			
EM1	**Deliver the Project in general accordance with an Environmental Management System** 1. Develop, prior to the commencement of construction, an Environmental Management System (EMS) to manage and improve environmental performance and be implemented through the construction, operation and decommissioning of the Project, and that is certified to AS/NZS ISO 14001:2016 *Environmental Management Systems – requirements with guidance for use*.	All	Construction, Operation, Decommissioning
EM2	**Develop and implement a Construction Environmental Management Plan** 1. Develop, prior to the commencement of construction, a Construction Environmental Management Plan (CEMP) with associated subplans as required by relevant EPRs in accordance with the Environmental Management Framework to be implemented during construction to manage the environmental impacts associated with construction in accordance with the mitigation hierarchy. 2. The CEMP must be developed in consultation with relevant stakeholders as required by relevant EPRs, reviewed by AusNet, and reviewed and verified by the Independent Environmental Auditor (IEA) for compliance with the EPRs prior to the commencement of construction. 3. The CEMP subplans must address applicable EPRs including those relevant to surface water, groundwater, geology and soils, contaminated land, biodiversity, air, noise, historical heritage, bushfire protocols, weed and pest management. 4. The CEMP and its subplans must comply with the EPRs and relevant environmental legislation, and performance must be reported to AusNet and relevant government agencies as appropriate.	All	Construction
EM3	**Develop and implement a Property Access and Management Plan** 1. Develop, prior to the commencement of construction, an overarching Property Access and Management Plan (PAMP) to be implemented during construction to minimise impacts, so far as reasonably practicable, to landholders due to land access and occupation required for construction of the Project~~, so far as reasonably practicable~~. 2. The PAMP must detail the process and procedures to be followed to access landholders' property for construction of the Project and include process and requirements regarding the following matters: a. That each landholder will have a single point of contact (i.e., case-manager) with the Project for two-way communications. b. Notification procedures to the landholders of Project approvals, construction activities and associated access to the property including provision of a plan showing the indicative positioning and design of temporary and permanent access roads (i.e., any access track, road or path) required to facilitate the Project, including the points of entry. c. Notification to the landholder of the final location of all Project activities to occur on their property including tower locations, temporary fencing, portable toilets and removal of any vegetation. d. Biosecurity requirements including an obligation to:	All	Construction

EPR Code	Requirement	Project Component	Project Stage
	i. Comply with requirements of the Biosecurity Management Plan, including record keeping requirements, as outlined in EPR EM8. ii. Maintain a record of properties that have existing biosecurity risks, issues (e.g., disease, weeds, or contaminant) or management plan(s), and which include any additional matters that must be met, over and above those within the PAMP. e. Dispute resolution procedures in relation to biosecurity requirements. f. Arrangements for moving livestock away from construction activities and agistment where necessary. g. Process for completing and providing to landholders pre-condition baseline assessment report prior to the commencement of any activities on site. The baseline assessments report should include details of existing land conditions (including soil, landform, vegetation, infrastructure, etc) within the proposed transmission line easement, any proposed permanent access roads/areas, and any proposed temporary construction areas and proposed temporary access tracks for rehabilitation reference. h. An overview of the protocols and mitigation measures related to: i. Fire management ii. Livestock and farming operations, including animal health and safety iii. Soil management and drainage iv. Reinstatement and rehabilitation of land after works, and inspections to confirm rehabilitation and reinstatement has been achieved. v. Notification, management and documenting of incidents. 3. In the event of an inconsistency between the PAMP and a SPAR (EPR EM4), the SPAR will prevail at the property to which it relates.		
EM4	**Maintain a record of Specific Property Access Requirements (SPAR) and implement during construction and operation** 1. Develop and maintain a record of any specific property access requirements (SPAR) agreed with landholders to avoid and minimise impacts to the property and its operations. 2. Each SPAR must be implemented when undertaking Project activities at the property to which it relates and, to the extent there is an inconsistency, will prevail over any general plan prepared under an EPR.	All	Construction, Operation
EM5	**Develop and implement a Communications and Stakeholder Engagement Management Plan** 1. ~~Develop, p~~Prior to commencement of construction, develop ~~in consultation with relevant councils,~~ a Communications and Stakeholder Engagement Management Plan (CSEMP) in consultation with relevant councils, to be implemented during construction to guide communication and engagement activities during construction to enable timely and accurate provision of information and address consultation matters required by other EPRs. 2. The CSEMP must be consistent with the International Association for Public Participation (IAP2) core values and outline: a. Engagement principles and objectives~~;~~	All	Construction

EPR Code	Requirement	Project Component	Project Stage
	b. Project stakeholders and their likely interest in the Project, including (but not limited to) landholders, residents of local and regional communities, business owners, business and industry associations, aerodromes, road users, visitors, local Councils, community groups and community facility managers; c. Clearly identify engagement opportunities in relation to stakeholder interests in the Project and EPRs; d. The role of the Independent Facilitator(s) engaged by Ausnet under Section 29.5; e. Communication and engagement tools that provide early and ongoing information and notification about details and timing of proposed works to local communities and stakeholders; f. Process and procedure for recording, managing, and resolving complaints received regarding the Project, in accordance with the Complaints Management System (EPR EM7); g. Process and procedure for consulting with landholders ~~that agree to engage~~ on specific property access requirements (EPR EM4); h. Procedures to access independent and confidential mental health support services available to landholders and surrounding landholders under EPR EM14; i. Procedures for regular review, monitoring, reporting, evaluating, and updating the CSEMP, including: i. Surveying and direct sampling of community and stakeholder views on the effectiveness and responsiveness of communication and engagement ii. Updating the CSEMP in response to continued community complaints about environmental and social issues. 3. The CSEMP will be made publicly available on the Project website (EPR EM 12).		
EM6	**Develop and implement a Construction Emergency Management Plan** 1. Develop, prior to commencement of construction, an emergency management plan to be implemented during construction that includes procedures for emergency management to minimise, as far as reasonably practicable, risks to construction crews and minimise risks to any construction site equipment or Project infrastructure. 2. The emergency management plan must be developed in consultation with relevant emergency service authorities and include: a. Hazard identification and assessment b. Communication systems c. Applicable training and competency requirements for all construction personnel d. Procedures for the management of chemicals, fuels and hazardous substances and contingency measures if contamination is encountered and requires disposal e. Measures to manage bushfire risk, including: i. How fire weather conditions and bushfire emergency warnings will be monitored and responded to ii. Evacuation triggers, planned evacuation routes, assembly locations and locations to which crews are to evacuate in the event it is required	All	Construction

EPR Code	Requirement	Project Component	Project Stage
	iii. What do in case of fire ignition on- site, including emergency notifications f. Measures to manage flood risk (including consideration of scheduling works) g. Triggers and processes for advising neighbouring businesses about emergencies h. Post-incident follow-up process.		
EM7	**Develop and implement a Complaints Management System** 1. Develop, prior to commencement of construction, a process for recording, managing, and resolving complaints received from affected stakeholders as part of the Communications and Stakeholder Engagement Management Plan (EPR EM5) to be implemented during construction. 2. The complaints management arrangements must be consistent with Australian Standard AS 10002: 2022 Guidelines for Complaints Management in Organisations and the Essential Services Commission Land Access Code of Practice and include processes to cover the following matters: a. Recording of complaints regarding environmental performance. b. Investigation processes and responsibilities, including: i. target timeframes for responding to and resolving complaints. ii. requirements for reporting back to complainants where it is not possible to reach a resolution within the required timeframes. iii. a process for the Independent Environmental Auditor to review complaints that relate to potential non-compliance with EPRs (EPR EM9). c. Engagement with the Australian Energy Infrastructure Commissioner as needed to support and advise in addressing community concerns. d. Reporting and escalation requirements. e. Closing out the complaint.	All	Construction

EPR Code	Requirement	Project Component	Project Stage
EM8	**Develop and implement a Biosecurity Management Plan** 1. Develop, prior to the commencement of construction and in consultation with DEECA (Agriculture Victoria), ~~a~~an overarching Biosecurity Management Plan as a subplan of the CEMP (EPR EM2) to be implemented during construction and operation to avoid and minimise impacts on biodiversity values, land use (including agriculture and forestry) and landholders. 2. The Biosecurity Management Plan must detail the hygiene requirements to manage pest animals and approach to the management of weeds, and harmful pathogens within the Project area and for individual properties that have property specific biosecurity issues. The plan must include, the following minimum requirements: a. Process and requirement for vehicle, plant and equipment washdown b. Process for personnel entering each property c. Process for identification of pests, animal/plant diseases and weeds on individual properties including areas of high biodiversity risk (e.g., localised occurrences of agricultural pathogens, state-prohibited noxious weeds, high-sensitivity environments such as wetlands) d. Process for recording and implementing landholders individual biosecurity plans and requirements, including the process of informing the landholders of the implementation of those plans and requirements. e. Prevention activities such as purchasing of weed/ -pathogen free materials, and providing areas for soil removal and sanitising of footwear, vehicles, plant and equipment. f. Contingency measures for controlling the introduction and/or spread of declared noxious and environmental weeds to, within and from the Project Area. g. Record management of washdown and decontamination. h. Process for biosecurity breach detection, compliance, reporting and response. i. Monitoring requirements for the presence of high-threat pest species. j. Provision of biosecurity records in relation to an entry onto land upon request from the relevant landholder.	All	Design, Construction and Operation
EM9	**Audit and report on environmental compliance** 1. Prior to the commencement of construction, appoint an Independent Environmental Auditor to: a. Review the Construction Environmental Management Plan (CEMP) (EPR EM2), Communications and Stakeholder Management Plan (CSEMP) (EPR EM5) and other plans required by the EPRs during construction (and operation where specified) to verify compliance with the Environmental Management Framework and the EPRs prior to the commencement of construction. b. Audit compliance with and implementation of the CEMP, CSEMP and other plans required by the EPRs during construction. c. Undertake routine environmental performance audits of active Project work sites. d. Audit the Project's compliance with environmental duties under the *Environment Protection Act 2017*, including frequency of evaluation, monitoring of compliance, reporting of compliance and non-compliances and further actions taken.	All	Construction

EPR Code	Requirement	Project Component	Project Stage
	e. Audit the Project's compliance against relevant environmental approvals and permits. f. Verify there are processes in place to identify opportunities for continual improvement in environmental management, performance, legislative and policy compliance. g. Review complaints where they are relevant to potential non-compliance with EPRs. 2. The Independent Environmental Auditor will be comprised of a body of practitioners with appropriate qualifications and expertise to allow the roles specified for the Independent Environmental Auditor to be properly carried out. 3. Summary reports of the audits must be provided to the Minister for Planning on a six-monthly basis and once each summary report is accepted by the Minister for Planning, it must be made publicly available (EPR EM 12).		
EM10	**Develop and implement a Residential Mitigation and Support Strategy** 1. Develop, prior to the commencement of construction, a 'Residential Mitigation and Support Strategy' to be implemented during construction and operation to avoid and minimise impacts to landholders who are directly affected by the Project as a result of the transmission line easement being placed on their property, to the extent reasonably practicable. 2. The strategy must be developed in accordance with the Communications and Stakeholder Engagement Management Plan (EPR EM5). 3. The strategy must define the process and requirements for: a. Consulting with landholders ~~that agree to engage with the Project,~~ to discuss the specific impacts that the Project may have on their dwelling or lifestyle. At a minimum, this will consider tangible and intangible values, activities and land uses that may be affected as a result of dust, noise and traffic generated by construction of the Project, or by the physical presence of Project infrastructure during operation of the Project. b. ~~Provided the landholder agrees to engage with the Project, i~~Identifying~~, offering~~ and implementing any practicable mitigation measures that could be applied to lessen the impacts of the Project on their dwelling and lifestyle. This includes but is not limited to measures that seek to, where practicable: i. Provide ~~for an offer to be made to the landholder for~~ landscape screening~~, including the costs to monitor and maintain any landscape screening treatment for a period of 2 years,~~ to lessen the visual impact of the Project on landholders' dwellings and lifestyles (EPR LV2). ii. Avoid and minimise air quality impacts on landholders' dwellings and lifestyles in accordance with the Air Quality Management Plan (EPR AQ1). iii. Avoid and minimise noise and vibration impacts on landholders' dwellings and lifestyles in accordance with the Construction Noise and Vibration Management Plan (EPR NV1) and in accordance with EPR NV3. iv. Avoid and minimise traffic impacts on landholders' dwellings and lifestyles in accordance with the Traffic Management Plans (EPR T1). v. Maintain access to identified tangible and intangible values, activities and land uses, including if necessary establishing alternative temporary access. vi. Provide for reinstatement and rehabilitation of construction areas and temporary access tracks.	All	Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
	vii. Provide early and ongoing information and notification about details and timing of proposed works in proximity to the property (as per EM5). c. Documenting the outcomes for individual landholders and providing~~e~~ the landholder with ~~the information and~~ implementation steps. d. Notifying landholders of construction timetable and changes to traffic conditions and duration of impact to assist landholder planning. e. Complaint response procedures in accordance with EPR EM7 (Complaints Management System). f. The implications of commencement of compulsory acquisition pursuant to the *Land Acquisition and Compensation Act 1986*. 4. Prepare~~, provide to landholders~~ and implement~~,~~ plans for affected landholders in accordance with the strategy, and provide landholders with a copy of their individual plans. 5. Implement the mitigation measures outlined in the plans within 12 months following completion of construction of the towers which are visible from the property and/or other construction activities that directly affect the property, unless otherwise agreed with the relevant landholder. 6. ~~The Project will provide for engagement~~ Continue to engage with landholders for ~~12 months~~ 2 years following completion of construction of the towers which are visible from the property and/or other construction activities that directly affect the property. 7. ~~Mitigation measures agreed with the landowner will be implemented within that time unless otherwise agreed with the relevant landholder.~~		
EM11	**Develop and implement a Decommissioning Management Plan** 1. Develop, prior to commencement of decommissioning, a Decommissioning Management Plan detailing mitigation measures required to be implemented during decommissioning to manage the environmental impacts associated with decommissioning and seek to minimise the risk of harm to human health or the environment of all activities associated with decommissioning. 2. Management and mitigation measures shall be consistent with environmental management strategies, practices, and technologies current at the time and shall include, but not be limited to, measures for communications and stakeholder engagement, environmental protection measures, waste management and recycling, emergency response and measures to minimise disturbance to agriculture, recreation and other enterprises. 3. The Decommissioning Management Plan is to be developed in consultation with landholders, Traditional Owner groups, relevant stakeholders and regulator/s. The plan must meet the relevant requirements of legislation and guidelines at the time of decommissioning and be approved by the Minister for Planning.	All	Decommissioning
EM12	**Publication of Project information** 1. In addition to the approved plans and documents that are required to be made publicly available under clause 4.14 of the draft Incorporated Document, the following information will be made publicly available on the Project website for the period of construction and a minimum of two years after commencement of operation of the Project:	All	Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
	a. Following approval of the Project development plans by the Minister for Planning under clause 4.5.1 of the Incorporated Document, an interactive web map that shows the location of key Project infrastructure, including the transmission towers. This web map will be regularly updated as required to reflect i. any amendments made to the approved development plans; ii. after construction, 'as built' locations of the relevant key infrastructure. b. The private domain landscape screening program developed in accordance with EPR LV2. c. The six-monthly summary reports of the audits that have been accepted by the Minister for Planning in accordance with EPR EM9. d. The Communications and Stakeholder Engagement Management Plan (EPR EM5).		
EM13	**Training and awareness** 1. All persons that undertake direct community engagement activities should be trained to be aware of potential psychological and wellbeing stress and be able to provide information regarding access to all available resources. This training must be provided prior to construction, annually during construction and for a period of 2 years post construction. 2. All persons that undertake direct community engagement activities should undertake anti-racism training prior to construction and every 12 months for a period of 2 years post construction. 3. All persons that undertake direct community engagement activities should have mandatory cultural awareness training delivered by Traditional Owner groups, or providers endorsed by Traditional Owner groups, on whose country works are taking place. This training should be provided at commencement of works on country (and every 12 months while construction works are occurring on the respective country of each Traditional Owner group).	All	Design, Construction, Operation
EM14	**Provision of mental health support services** Provide mental health support services to the community that are independent, confidential and free throughout the construction of the Project and for a period of 2 years post construction to manage increased levels of stress that may remain in the community post construction. Liaise with the councils, local medical services and local community groups to ensure they are aware of the mental health services provided under this EPR EM14 and know how to refer people to the services.	All	Design, Construction, Operation
EM15	**Develop and implement an ongoing Traditional Owner Engagement and Communications Plan** 1. Prior to commencement of construction on the country of respective Traditional Owner groups (as defined in EPR ACH2), develop a Traditional Owner Engagement and Communications Plan(s) in consultation with the relevant Traditional Owner groups. The plan(s) will be developed consistent with the Leading Practice Principles: First Nations and Renewable Energy Projects guidelines (Clean Energy Council and KPMG, 2024) and must be implemented during construction. 2. This Plan may include, but is not limited to:	All	Construction

EPR Code	Requirement	Project Component	Project Stage
	a. describing engagement approach determined with Traditional Owner groups on how best to support their participation in ACH2, ACH3, BD11, EC2 and SC3. b. information about how regular project updates will be provided to Traditional Owner groups. c. process for identifying opportunities for improvement and making updates to the Plan.		
EM16	**Communication and engagement on matters of concern to the community** 1. Develop, prior to construction commencing, a plan to be implemented during and for a period up to 2 years post-construction, to provide timely and accurate information, and to dispel misinformation (if necessary) on ~~EES~~ matters of concern to the community in relation to the Project and its impacts, to minimise the potential for their concerns to negatively impact on their psychological health and wellbeing. 2. The plan will be developed in accordance with the Communications and Stakeholder Engagement Management Plan (EPR EM5) and will outline communication and engagement tools to: a. provide information in plain English on the technical assessments in the EES on matters which are of concern to the community; and b. explain how the technical matters of concern to the community will be managed. 3. The plan will also provide opportunities for community members to have one on one discussions about the Project and EES technical assessments of concern with the Project team.	All	Construction, Operation
Aboriginal cultural heritage			
ACH1	**Comply with Cultural Heritage Management Plans** 1. Implement and comply with Cultural Heritage Management Plans (CHMPs) sponsored by AusNet and approved for the Project under the *Aboriginal Heritage Act 2006*.	All	Design, Construction, Operation, Decommissioning
ACH2	**Negotiate and implement Cultural Values Assessment recommendations** 1. Provide support for each of the relevant Registered Aboriginal Parties (RAPs) ~~and Traditional Owner groups~~, being Barengi Gadjin Land Council Aboriginal Corporation, Eastern Maar Aboriginal Corporation, Dja Dja Wurrung Clans Aboriginal Corporation, Wadawurrung Traditional Owners Aboriginal Corporation, and Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation (together, the Traditional Owner groups) to undertake an updated Cultural Values Assessment unless otherwise agreed with the relevant Traditional Owner. The updated Cultural Values Assessment will be prepared prior to or during construction or within other timeframes negotiated with Traditional Owner groups. Traditional Owner groups must be allowed access to project land that may be required to undertake the updated Cultural Values Assessments, subject to reasonable conditions. 2. AusNet must engage with each of the ~~relevant Traditional Owner groups~~RAPs consistent with the engagement approach outlined in the Traditional Owner Engagement and Communications Plan (EM15) to address recommendations, where agreed and practicable, arising from each ~~Traditional Owner group's~~ Cultural Values Assessment to avoid or minimise impacts on intangible cultural heritage values from the Project.	All	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
ACH3	~~AusNet commits to w~~W**ork**~~ing~~ **with Traditional Owner groups in respect of intangible values and cultural knowledge** 1. Provide technical and administrative support at the request of Traditional Owner groups proposing to submit applications for intangible values registrations in accordance with section 79C of the Aboriginal Heritage Act 2006 in relation to intangible cultural heritage values identified through the Cultural Values Assessment process for the Project. 2. At the request of Traditional Owner groups, recognise cultural knowledge of places identified that contribute to intangible values. This includes opportunities for the interpretation, commemoration and celebration of significant associations with a place, as determined in consultation with the relevant Traditional Owner groups to be culturally appropriate.	All	Design, Construction, Operation, Decommissioning
Agriculture and forestry			
AF1	**Develop and implement an Agriculture and Forestry Business Mitigation and Support Strategy** 1. Develop, prior to the commencement of construction, an Agriculture and Forestry Business Mitigation and Support Strategy to be implemented during construction and operation to avoid, minimise and mitigate impacts to agriculture and forestry (such as direct disruptions and disruption to farm and forestry businesses) from the Project, to the extent reasonably practicable. The strategy must be developed in accordance with the Communications and Stakeholder Engagement Management Plan (EPR EM5). 2. The strategy must define the process and requirements for: a. Consulting with landholders to discuss their individual business and specific impacts that their business may experience due to the Project. b. Provided the landholder agrees to engage with the Project, identifying, offering and implementing any practicable mitigation measures that could be applied to minimise the impacts of the Project on the individual business (both infrastructure and day to day operations). This includes but is not limited to measures that seek to, where practicable: i. Maintain access for farm operations ii. Maintain water supply for livestock troughs or relocate and re-establish at an agreed location iii. Avoid the disturbance of farm assets such as sheds or relocate and re-establish assets in an agreed location iv. Avoid irrigation systems or if not practicable re-design the system and replace it to enable irrigation of the affected paddock v. Maintain fences and gates or relocate and re-establish to maintain workable paddocks vi. Provide for reinstatement and rehabilitation of construction areas and access tracks c. Documenting the above discussions (a and b), agreed mitigation measures and implementation timeframes for individual properties. This document will be provided to the landholder.	All	Design, Construction and~~,~~ Operation

EPR Code	Requirement	Project Component	Project Stage
	d. If relevant and requested by the business, the appointment of agricultural or forestry consultant(s) with skills and qualifications relevant to the affected business, to advise the business on mitigation of specific property impacts (e.g., redesign of irrigation systems or property specific biosecurity risks). e. Providing information to the land title holder as to whether disruptions (e.g., impacts on farm or forestry business infrastructure) will be rectified, rehabilitated or compensated, either under the Options for Easement agreement, or in accordance with the requirements of the *Land Acquisition and Compensation Act 1986*. f. Documenting areas on a property that should be avoided where reasonably possible and to record and implement any specific property biosecurity requirements as required. g. Notifying landholders of construction timetable to assist landholder planning. h. Complaint response procedures in accordance with EPR EM7 (Complaints Management System). i. Consulting with neighbouring landholders who have been identified as being indirectly affected and identifying reasonable mitigation measures which could be offered. j. The implications of commencement of compulsory acquisition pursuant to the *Land Acquisition and Compensation Act 1986*. k. Defining a proactive process to identify and obtain, where required, safety assessments and permits relevant to ongoing farm activities affected by the Project, with the objective of ensuring approvals are timely, tailored to farm needs, and minimise additional cost and complexity for landholders. 3. The Project will provide for engagement with businesses for 24 months following completion of construction of the towers on their property and will implement agreed mitigation measures within that time unless otherwise agreed with the relevant business.		
Air quality			
AQ1	**Develop and implement an Air Quality Management Plan** 1. Develop, prior to construction commencing, an Air Quality Management Plan as part of the Construction Environment Management Plan (CEMP) (EPR EM2) to be implemented and maintained during construction to minimise air quality impacts during construction at surrounding sensitive receptors. 2. The Air Quality Management Plan must: a. Identify the main sources of dust and airborne pollutants, and the location of sensitive land uses. b. Include a procedure for how the Project will control and where necessary monitor the emission of dust, exhaust emissions, fumes, odour and other pollution into the atmosphere during construction in accordance with relevant statutes, policies and guidelines to the extent reasonably practicable, including EPA Publication 1834.1: the Civil Construction, Building and Demolition Guide. c. Outline a process for regular review and update of The Air Quality Management Plan and assess the effectiveness of controls implemented. Reviews of the plan would be undertaken when there are changes in design, conditions, monitoring results or as a result of investigating complaints:	All	Construction

EPR Code	Requirement	Project Component	Project Stage
	d. Provide a process to address complaints related to air quality and identify mitigation measures. The process must follow the procedure required by EPR EM7 (Complaints Management System) but include the following additional details: i. Follow-up with the potentially affected stakeholder(s) and capture all details. ii. Review the results of air quality and meteorological monitoring and details of Project activities for any non-compliance or complaints received. A targeted trigger monitoring criterion with 1-hour averaged PM10 above 80 ug/m3 provides an indication when air quality conditions are poor, and that the 24-hr averaged 50 ug/m3 PM10 concentration objective would be exceeded to inform onsite management and controls as required. iii. Identify Project contributions, including key activities, as well as contributions from other surrounding projects that could be leading to cumulative effects. iv. Review associated controls for Project activities, and where necessary modifying these controls or the intensity of activities to address the measured/reported issue. v. Provide feedback on action taken to the affected stakeholder(s) and confirm the complaint is closed out. 3. Monitors are required to be installed at or near works associated with the existing Bulgana Terminal Station, the new 500kV terminal station near Bulgana, Sydenham Terminal Station connection works and all laydown areas to reflect long term prevailing wind conditions and specific areas where sensitive receptors are located for the duration of construction works. The data collected would be used for compliance and management purposes. Additionally, dust monitoring is also to be undertaken at the following locations during construction: i. Gisborne-Melton Road, Toolern Vale immediately south of the Proposed Route ii. Bulmans Road, Harkness immediately south of the Proposed Route iii. Around the intersection of Diggers Rest-Coimadai Road and Long Forest Road, Long Forest iv. Lerderderg Gorge Road, Darley immediately north of the Proposed Route v. Swans Road, Darley, immediately north of the Proposed Route vi. Scenic Court, Gordon immediately south of the Proposed Route vii. Townsing Road, Amphitheatre between towers F6148DL and F6149DL viii. Baker Lane, Glenlofty immediately to the north of the Proposed Route This monitoring is to be undertaken prior to construction to establish a baseline and for the duration that key dust-generating Project construction activities (i.e., site clearing, earthworks, use of temporary construction areas and sustained use of unsealed haul roads) take place within 500 metres of the locations listed above.		
AQ2	**Implement air quality management and mitigation measures for operation** 1. Implement mitigation measures to avoid the generation of off-site visible dust during specific operational activities (i.e., dust from vehicles, plant and equipment used during scheduled maintenance activities or routine vegetation management required within the easement).	All	Operation

EPR Code	Requirement	Project Component	Project Stage
Aviation			
AV1	**Provide notification to Airservices Australia** 1. The Project must provide relevant Project details to Airservices Australia so that pilots, including operators of any fire response aircraft, are aware of its existence, location and features of the Project that may pose a hazard to aircraft operations. 2. The information must include relevant details of the Project plant, equipment and infrastructure, and meet the requirements (detail and frequency) of Airservices Australia for the promulgation of an Aeronautical Information Circular (AIC) and where required a Notice to Airmen (NOTAM) or an Aeronautical Information Publication Supplement (AIP SUP) to keep the aviation industry informed of progress throughout construction. 3. This information is to be reported in accordance with CASA Advisory Circular AC139.E-05 Obstacles (including wind farms) outside the vicinity of a CASA certified aerodrome and AC139.E-01 Reporting of tall structures.	Transmission towers, tall plant and equipment	Construction, Operation
AV2	**Mark transmission line towers and associated catenary around Melton Uncertified Aerodrome (YMEL)** 1. Towers and associated catenary are to be marked with standard obstacle markings as per Australian Standard AS 3891.1:2021 and AS 3891.2 to make them more visible to pilots flying. Towers near the Melton Uncertified Aerodrome (YMEL) are to be marked, including: a. F4458DL b. F4459SL-A c. F4460SL-A d. F4461SL-A e. F4462SL-A f. F4463SL-A g. F4464SL-A h. F4459SL-B i. F4460SL-B j. F4461SL-B k. F4462SL-B l. F4463SL-B m. F4464SL-B n. F4587DL o. F4588DL p. F4589DL q. F4590DL r. F4592DL	Transmission towers	Design, Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
	s. F4593DL t. F4594DL u. F4595DL.		
Biodiversity and habitat			
BD1	**Complete ecological surveys and finalise design** 1. Prior to the finalisation of the detailed design for an area, complete ecological survey of the area if yet to be surveyed (additional surveys) and identify native vegetation and threatened species habitat that may be impacted by the Project. a. Surveys must be completed in areas in which vegetation removal is required that have not been surveyed due to access limitations. b. The additional surveys must include, to the extent necessary, where impacts cannot be avoided or surveys not already completed: i. mapping of native vegetation (including threatened ecological communities (TECs)); ii. identification of threatened flora and fauna habitat; and iii. targeted survey for threatened flora and fauna (or assume presence in suitable habitat for mobile species and species with a limited seasonal survey period). 2. Prior to the finalisation of the detailed design for an area, identify the tree protection zones of all native trees to be retained in accordance with the Assessor's Handbook (DEECA 2025). Where a native tree would be deemed to be lost due to encroachment on its notional root zone but an arborist report confirms, in accordance with the Assessor's Handbook (DEECA 2025), that the tree is expected to survive, the tree protection zone must be in accordance with the arborist report. 3. Prior to the finalisation of the detailed design for an area, refine the extent of vegetation identified to be removed in the Easement Corridor by: a. identifying any areas of disturbance to enable removal of the vegetation identified in Vegetation Clearance Risk Footprint in the Easement Corridor; and b. undertaking further design to identify, to the extent practicable, no go zones within the Easement Corridor – being the native vegetation and habitat that can be avoided and that does not need to be removed within the Easement Corridor and is to be retained. 4. Prior to the finalisation of the detailed design for an area, mapping is to be updated in Appendix O of **Technical Report A: Biodiversity Impact Assessment** to include the outcomes of the additional survey, the no go zones, updated Construction Footprint, the retention, supported by an arborist report, of any trees otherwise deemed lost due to encroachment into their notional root zones, in accordance with the Assessor's Handbook (DEECA 2025), ~~and~~ tree protection zones and any areas in which a partial or minimised clearance approach will be implemented (depending on the outcome of the further investigations required under EPR BD10).	All	Design

EPR Code	Requirement	Project Component	Project Stage
	5. When finalising the detailed design for an area the updated mapping must be considered and infrastructure moved on the basis of the new information to avoid native vegetation (including tree protection zones), TECs, wetlands and threatened taxa habitat to the extent practicable.		
BD2	**Develop and implement a WRL Construction Vegetation Management Plan** 1. Develop, prior to commencement of construction, a WRL Construction Vegetation Management Plan in consultation with DEECA and DCCEEW and implemented during construction to protect and monitor native vegetation (including TECs) and other biodiversity values in the areas where native vegetation is to be retained. The WRL Construction Vegetation Management Plan will be a sub plan to the CEMP. 2. The WRL Construction Vegetation Management Plan must include but not be limited to: a. Designating and implementing controls to prevent unauthorised access or disturbance to the no go zones shown on the updated Appendix O maps b. Implementing controls to protect tree protection zones in accordance with AS4970:2025 Protection of Trees on Development Sites c. Identification of areas in which a partial or minimised clearance approach will be implemented (depending on the outcome of the further investigations required under EPR BD10) d. Measures to ensure that w~~W~~ithin the areas identified for p~~P~~artial or minimised c~~C~~learance and areas identified in the understorey retention plan (EPR DB9), understorey vegetation ~~is to~~ will be maintained and clearing will be limited to canopy trees only using low impact tree removal methods based on arborist advice and with minimal disturbance to the understorey including through ground disturbance e. A hollow replacement strategy that includes identification of tree hollows and requirements for removal and areas of re-establishment in adjoining habitat (e.g., strapped onto suitable trees where available) where practicable and subject to landholder agreement. In particular, consideration of tree hollows must be given in the following areas: i. impacted forest habitat located at Lexton, Lerderderg and Haydens Hill, hollows with an opening greater than 20cm diameter (to support owl species, Gang-gang Cockatoo (EN, en) and potentially Southern Greater Glider (EN, en) at Haydens Hill) ii. impacted woodland habitat located at Lexton and Lerderderg, hollows with an opening greater than 5cm diameter (to support the smaller arboreal fauna group, potentially Brush-tailed Phascogale (vu), that inhabits these areas) f. Measures to maximise reuse of cleared native vegetation such as logs, salvaged hollows and other coarse woody debris for habitat in suitable areas (i.e. vegetated areas where practicable), subject to landholder consent g. ~~In accordance with the understorey retention plan required by EPR BD9, I~~implement tailored construction methods and measures ~~to~~in areas identified for partial or minimised clearance (EPR BD10) and areas identified in the understorey retention plan (EPR BD9) to: i. minimise removal of native vegetation in patches of native vegetation where full removal is not required,; and	All	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	ii. minimise ground disturbance in patches of native vegetation where works are required h. Appropriate measures to avoid and minimise the use of heavy machinery and ground disturbance within identified habitat for Brittle Greenhood (cr) on the maps in Appendix O.3 of Technical Report A: Biodiversity Impact Assessment, as updated in accordance with EPR BD1. i. Requirements for re-establishment of areas of native vegetation removed during construction works in areas that are not required to be maintained clear of native vegetation during operation of the transmission line (e.g. temporary access tracks). In establishing requirements and in consultation with landholders, regard should be had to the diversity of species and use of locally indigenous species for revegetation. j. Procedures and methods for briefing all contractors and sub-contractors on: i. flora that is identified as culturally significant by Traditional Owner groups. ii. requirements for the protection of flora and fauna habitat, and response procedures if unexpected threatened species are identified. j. Additional measures to mitigate impacts on Melbourne Yellow Gum if the extent of clearing required in the area to the south of the Wombat-Lerderderg National Park, from the Korkuperrimul Creek riparian zone to Gisborne Road, exceeds the extent of clearing assumed in Technical Report A: Biodiversity Impact Assessment and Biodiversity Report 1 on Ecological Surveys Required, Jacobs, 4 September 2025. Any such measures are to be developed in consultation with DEECA. Impacts that cannot be avoided will require offsets. 3. The WRL Construction Vegetation Management Plan must include measures to minimise impacts to threatened flora, with a particular focus on ~~in~~ areas identified as being habitat or potential habitat for the following threatened flora: a. Matted Flax-lily (*Dianella amoena*) (EN, cr) b. Small Golden Moth Orchid (*Diuris basaltica*) (EN, cr) c. Swamp Fireweed (*Senecio psilocarpus*) (VU) d. Bacchus Marsh Wattle (*Acacia rostriformis*) (vu) e. Cane Spear-grass (*Austrostipa breviglumis*) (en) f. Melbourne Yellow-gum (*Eucalyptus leucoxylon subsp. connata*) (en) g. Yarra Gum (*Eucalyptus yarraensis*) (cr) h. Brittle Greenhood (*Pterostylis truncata*) (cr) i. Fragrant Saltbush (*Rhagodia parabolica*) (vu) j. Floodplain Fireweed (*Senecio campylocarpus*) (en) k. Glaucous Flax-lily (*Dianella longifolia var. grandis s.l.*) (cr) l. Brooker's Gum (*Eucalyptus brookeriana* (en) m. Buloke (Allocasuarina luehmannii) (cr) n. Buloke Mistletoe (Amyema linophylla subsp. orientalis) (cr). o. Any other threatened indigenous flora identified during the completion of the field surveys or the construction phase of the Project.		

EPR Code	Requirement	Project Component	Project Stage
	4. The threatened flora measures must address or satisfy as a minimum the following requirements: a. A seasonal survey of identified potential threatened flora habitat where survey has not been completed under BD1 for seasonal species b. Identification on the relevant maps prepared under EPR BD1 for confirmed habitat or potential habitat for the threatened flora listed above c. A process to be followed to avoid as far as practicable any new occurrences of threatened flora which are identified during surveys required under BD1 and BD2(4a) d. Details of species awareness materials to be presented to construction personnel at Project induction and toolbox meetings e. For Brittle Greenhood (cr) (between towers F4515DL and F4374DL S), use of heavy machinery is to be avoided where practicable, and ground disturbance is to be minimised for all construction works including tree removal. Low impact techniques should be selected and implemented for any removal of overstorey vegetation based on arborist advice. f. Collect seeds from Melbourne Yellow-gums within the Project Area and liaise with and support Moorabool Shire Council, Melbourne Water, Traditional Owner groups and local Landcare groups to develop and implement a program for growing Melbourne Yellow-gums for future revegetation projects within a similar environmental setting to the source seeds. g. Collect seeds from Bacchus Marsh Wattle within the Project Area and use in revegetation and remediation for the Project in appropriate areas, subject to landholder agreement and compliance with the Electricity Safety Act and Regulations. h. Collect seeds from the critically endangered Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia TEC within the Project Area and use in revegetation and remediation for the Project in appropriate areas, subject to landholder agreement and compliance with the Electricity Safety Act and Regulations. i. Liaise with local Landcare groups to provide the opportunity for seed collection from other threatened species trees that are to be removed, including Yarra Gum. j. Liaise with local Landcare groups and Traditional Owner groups to support future revegetation project opportunities. 5. The WRL Construction Vegetation Management Plan must define post construction monitoring requirements and time frame required to confirm compliance with management plans, including: a. the condition and extent of native vegetation, including TECs, and threatened flora b. works associated with revegetation and remediation c. weed management.		
BD3	**Develop and implement a Fauna Management Plan**	All	Construction

EPR Code	Requirement	Project Component	Project Stage
	1. Develop, prior to the commencement of construction, a Fauna Management Plan in consultation with DEECA to avoid and minimise impacts to native fauna and implemented during construction. The Fauna Management Plan must be a sub plan to the CEMP and include as a minimum the following requirements: a. To undertake pre-clearing inspections and supervise habitat removal by a qualified and experience ecologist or wildlife handler. Any fauna protected under the *Wildlife Act 1975* that is disturbed in the process must be safely relocated to the nearest suitable habitat outside the Construction Footprint. b. Measures to avoid entrapment of fauna in excavations (e.g., by ensuring excavations are not left open overnight or installing temporary fencing to prevent fauna access and undertaking daily inspections of excavations before starting works for the day) where practicable c. Fauna that may be displaced due to habitat removal or encountered on site during construction works, must be managed in compliance with the *Wildlife Act 1975*. d. Measures to map active eagle (such as Wedge-tailed Eagle, White bellied Sea Eagle) nest locations in suitable breeding habitat- forested areas with large trees and measures to minimise impacts such as applying spatial or temporal buffers to works in proximity to active nests during breeding season. Undertake consultation with Councils and Landcare Groups to incorporate local knowledge in the mapping of nest locations. e. Identify opportunities where nest box and artificial hollows could be installed where hollow salvage is not practicable, or in areas that could benefit from the addition of them, subject to landholders providing consent for placement on their land, and requirements to deploy nest boxes and artificial hollows in specified circumstances. f. Installation of signage along access tracks through habitat for threatened fauna to raise awareness of wildlife crossings, implementation of measures such as reduced vehicle speeds along access tracks to minimise the risk of collisions with wildlife, and protocols in relation to vehicle strike of wildlife, including reporting requirements.		
BD4	**Develop and implement Threatened Fauna Management Plans** 1. ~~Develop, prior~~ Prior to the commencement of construction, develop Threatened Fauna Management Plans~~,~~ in consultation with DEECA and DCCEEW where relevant, to be implemented during construction to minimise potential impacts to identified or potential habitat for threatened fauna species. The plans must be prepared for the following species: a. Brown Toadlet (*Pseudophryne bibronii*) (en) b. Western Burrowing Crayfish (*Engaeus merosetosus*) (en) c. Growling Grass Frog (*Litoria raniformis*) (VU, vu) d. Swift Parrot (*Lathamus discolor*) (CR, cr) e. Barking Owl (*Ninox connivens*) (cr) f. Powerful Owl (*Ninox strenua*) (vu) g. Masked Owl (*Tyto novaehollandiae*) (cr) h. Golden Sun Moth (*Synemon plana*) (VU, vu) i. Fat-tailed Dunnart (*Sminthopsis crassicaudata*) (vu)	All - within or adjacent threatened flora habitat	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	j. Brush-tailed Phascogale (*Phascogale tapoatafa*) (vu) k. Southern Greater Glider (*Petauroides volans*) (EN, en) l. Platypus (*Ornithorhynchus anatinus*) (vu) m. Tussock Skink (*Pseudemoia pagenstecheri*) (en) n. Striped Legless Lizard (*Delma impar*) (VU, en) o. Victorian Grassland Earless Dragon (*Tympanocryptis pinguicolla*) (CR, cr). p. Any other threatened indigenous fauna identified during the completion of the field surveys or the construction phase of the Project. 2. The threatened fauna management plans must include requirements for: a. Identification on the relevant maps prepared under EPR BD1 for confirmed habitat or potential habitat for the threatened fauna listed above b. Avoiding construction activities in identified habitat for threatened fauna if occupied during breeding season to the extent practicable, (in particular for: Brush-tailed Phascogale; Growling Grass Frog (VU, vu); Powerful Owl (vu); Barking Owl (cr)) c. Use of construction control measures to minimise impacts on confirmed or potential habitat for threatened fauna, where practicable d. ~~In accordance with the understorey retention plan required by EPR BD9, r~~Retention of ~~groundstorey and~~understorey and shrub layer in the easement in accordance with the understorey retention plan required by EPR BD9, particularly in areas of habitat for woodland birds, Brown Toadlet (en) and Brush-tailed Phascogale (vu) e. Subject to landholder consent and compliance with the Electricity Safety Act and Regulations, identification of opportunities, in areas of habitat for threatened species, to increase cover particularly in areas of habitat for woodland birds, Brown Toadlet (en) and Brush-tailed Phascogale (vu) f. Apply recommendations from the Growling Grass Frog Crossing Design Standards (DELWP, 2017b) where required access tracks cross or impact on mapped aquatic habitat for the species. g. Identification and installation of measures to support movement for Brush-tailed Phascogale (vu) and Southern Greater Glider (EN, en) in identified habitat that is fragmented by the Project Area. This is likely to require rope bridges (near Lexton between F6120DL and F6123DL, Darley between F4649DL and F4387DL, Djerriwarrh Creek between F4608DL and F4609DL) and glider poles (at Haydens Hill between F4399DL and F4404DL) across the transmission line easement at approximately 50m intervals where retained canopy vegetation is available on both sides of the clearing. The height of glider poles shall be established in accordance with the Electricity Safety Regulations and subject to landholder discussion and agreement of placement. h. Define reporting and post construction monitoring requirements and time frames to: i. confirm compliance with management plans to demonstrate impacts have been managed; and ii. determine effectiveness of installed habitat (e.g. salvaged hollows, artificial hollows, nest boxes) and connectivity measures (e.g. glider poles and rope-bridges).		

EPR Code	Requirement	Project Component	Project Stage
	i. Preparation of species awareness materials on threatened fauna to be presented to construction personnel at Project induction and toolbox meetings and response procedures if threatened fauna encountered during construction activities j. Avoidance of direct instream impacts and minimisation of indirect impacts to the waterway which is platypus habitat, where the route crosses Birch Creek at Bullarook Streamside Reserve, Smeaton.		
BD5	**Develop and implement a Collision Risk Management Plan** 1. Develop, prior to the commencement of construction, a Collision Risk Management Plan, in consultation with DEECA, to be implemented during construction and operation to minimise the potential for bird and bat collisions with transmission line infrastructure. The plan should: a. Identify key collision risk areas for the Project, focussing on areas of high bird utilisation, habitat for species identified as high risk or in proximity to key habitat features (wetlands, riparian corridors, movement corridors). b. Describe mitigation measures to be implemented for key collision risk areas during construction and operation of the Project (e.g. larger wire diameters or vertical line marking such as bird flappers or diverters). c. Describe a carcass monitoring plan (post construction) to assess success of mitigation measures applied and to identify any further areas of collision concern, that require mitigation measures to be applied. Data collected will be published annually and reviewed periodically, taking into account the effects of climatic variability on bird and bat movements ~~annually~~ to confirm the ongoing requirements for carcass monitoring.	Transmission line (towers, conductors, easement) – within identified key collision risk areas (see Figure 8.1 in **Technical Report A: Biodiversity Impact Assessment**)	Design, Construction, Operation
BD6	**Develop and implement measures to manage riparian and aquatic habitat** 1. Develop, prior to commencement of construction, measures to avoid and minimise, to the extent reasonably practicable, short and long-term adverse impacts on riparian, riverbed and aquatic habitat, and aquatic fauna connectivity to be implemented during construction activities. The measures must be developed in consultation with the relevant catchment management authorities, and be documented in the CEMP. Measures should include as a minimum but not limited to: a. ~~In accordance with the understorey retention plan required by EPR BD9, r~~Retention of understorey and ground cover vegetation in the riparian area in accordance with the understorey retention plan required by EPR BD9 and/or the partial or minimised risk clearance approach adopted for areas identified in EPR BD10(c) and (d); b. Where practicable, retention of tree stumps to maintain bank stability and of in-stream habitat features such as woody snags; c. Identifying areas of revegetation and locations where fencing will enhance the success of the revegetation (in consultation with landholders and any Traditional Owner groups with land or waterway management responsibilities); d. Standard erosion and sediment control measures as outlined in EPA Victoria construction guidelines (Publications 275, 1820.1 and 1834.1) along waterways during the construction period. e. Re-e~~E~~stablishment of native vegetation in any riparian areas disturbed during construction that are not otherwise required to be cleared for the operation of the Project.	All - within DEECA mapped wetlands or within CMA-specified buffers to waterways	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
BD7	**Develop and implement a WRL Operational Vegetation and Habitat Management Plan** 1. Develop, prior to the commencement of operation of the Project, a WRL Operational Vegetation and Habitat Management Plan in consultation with DEECA that sets out the requirements and methods for protection of native vegetation and flora and fauna habitat to be implemented during operations and in accordance with the Electricity Safety Act and Regulations including the Code of Practice for Electric Line Clearance as amended from time to time. 2. The plan should include, as a minimum, practices and processes to achieve ongoing compliance with the Act and Regulations and provide for the following, to the extent reasonably practicable: a. Retention of trees up to 4m in height w~~W~~ithin areas of higher biodiversity value identified in EPR BD10(1), subject to the outcome of the investigations required under EPR BD10. ~~and in the area for partial clearance (south of Lerderderg State Park intermittently between towers F4384DL andF62DL; south of Heyden's Hill between towers F4403DL and F4402DL and south-west of Lexton between towers F6122DL and F6121DL), clearing of native vegetation must be limited to trees exceeding 4m in height with minimal disturbance to the understorey in undertaking clearance~~. ~~b. Clearing of native vegetation must be limited to works required for maintenance of the easement to meet compliance with the Code:~~ ~~c. between tower spans F4387-F4386-F4385, located between Lerderderg State Park and Darley.~~ d. ~~subject to the outcomes of the work required by EPR BD10, between tower spans F6120DL-F6121DL-F6122DL-F6123DL, around Lexton Bushland.~~ e. Retention of all vegetation in the Darley area referred to in EPR BD10(1)(a) other than that which needs to be removed in order to provide a clearance distance of 8.4 metres from the transmission lines, subject to the outcome of the investigations required under EPR BD10. f. Limiting native vegetation trimming or removal in all other areas to the minimum required for maintenance of the easement to meet compliance with the Code. g. Appropriate measures to manage vegetation removal w~~W~~ithin areas identified on the understorey retention plan prepared in accordance with EPR BD9 and~~, appropriate management of clearance of native vegetation~~. h. w~~W~~ithin identified habitat for Brittle Greenhood (cr) ~~(between towers F4515DL and F4374DL S)~~ on the ~~(refer to~~ maps in Appendix O.3 of **Technical Report A: Biodiversity Impact Assessment**, as updated in accordance with EPR BD1~~), use of heavy machinery is to be avoided where practicable, and ground disturbance is to be minimised~~. Measures should include avoiding and minimising the use of heavy machinery and ground disturbance, and low impact techniques for any removal of overstorey vegetation based on arborist advice. i. ~~Implementation of a~~Appropriate measures to manage the risk of the spread and treat the introduction of pest animals, weeds and pathogens from ongoing maintenance works in the easement j. Processes to manage any spread of weeds and pathogens resulting from ongoing maintenance works within easement	Transmission line (easement)	Operation
BD8	**Complete ecological surveys and finalise design for TEC – White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland (WBYB)**	All	Design

EPR Code	Requirement	Project Component	Project Stage
	1. Prior to the finalisation of the detailed design for an area, complete survey for areas yet to be surveyed and where impacts to WBYB threatened ecological community (TEC) cannot be avoided. 2. Undertake design refinements and establish no go zones to avoid or minimise impacts to WBYB TEC so that impacts do not exceed the area of removal as assessed within **Technical Report A: Biodiversity Impact Assessment**. When finalising the detailed design update mapping in accordance with Biodiversity Report 1 on Ecological Surveys Required, Jacobs, 4 September 2025~~BD-1~~. Impacts that cannot be avoided will require offsets under the EPBC Act.		
BD9	**Understorey retention plan** 1. Prior to commencement of construction, prepare an understorey retention plan in consultation with DEECA to avoid and minimise impact on understorey and achieve compliance with the Electricity Safety Act and Regulations including the Code of Practice for Electric Line Clearance. 2. The plan must specify: a. the areas where, consistent with EPRs BD2(2)(c), ~~BD2(2)(f),~~ BD4(2)(d), BD6(1)(a) and BD9, full removal of native vegetation is not required, and understorey will be retained; b. the extent of retention of understorey that will be retained in each area; and c. the measures that will be implemented to ensure retention of that understorey, including low impact tree removal methods in these areas based on arborist advice and minimisation of disturbance to the ground and understorey species during canopy tree removal. 3. The plan must be prepared having regard to: a. ~~-~~biodiversity value (particularly in ~~the context of the EPR requirements listed above~~areas referred to in EPR BD9(2) and in EPR BD10) and b. constructability considerations ~~and must be consistent with~~ c. compliance with the Electricity Safety Act and Regulations including the Code of Practice for Electric Line Clearance. 4. If the plan identifies further areas where partial clearance can be implemented, the mapping in Appendix O of **Technical Report A: Biodiversity Impact Assessment** will be updated.	Transmission line (easement)	Design, Construction
BD10	**Partial or minimised clearance approach ~~Further avoidance and minimisation at~~ in areas of higher biodiversity value** 1. Prior to the finalisation of the detailed design ~~in the~~ for areas of higher biodiversity value, investigate ways to further avoid and minimise vegetation clearance by adopting a partial or minimised risk vegetation clearance approach, potentially in combination with raised tower heights. This should include: a. the area in and around Darley to the south of the Wombat-Lerderderg National Park, from the Korkuperrimul Creek riparian zone to Gisborne Road; b. ~~area of~~ the Lexton Bushland Reserve area between towers F6120DL and F6123DL; c. the Bullarook Streamside Reserve and Birch Creek riparian zone; d. the Kororoit Creek riparian zone e. any other areas identified through the further survey work required under EPR BD1 as having higher biodiversity value.		Construction

EPR Code	Requirement	Project Component	Project Stage
	2. The further investigations must consider: a. ~~assess~~ native vegetation avoidance, fire risk, cost, feasibility and constructability of increased tower heights ~~between towers spans F6120DL and F6123DL (Lexton Bushland) and towers spans F22DL and F3007DL (Kororoit Creek);~~; b. ~~assess~~ visual impact of any tower height exceeding 80m; c. ~~identify the~~ vegetation removal required to ensure compliance with the Electricity Safety Act and Regulations; d. identification of further no go zones within the Easement Corridor in accordance with EPR BD1(3)(b), to the extent reasonably practicable. 3. ~~identify, having regard to the above assessment, to the extent reasonably practicable, further no go zones within the Easement Corridor and u~~Update mapping in Appendix O of Technical Report A: Biodiversity Impact Assessment in accordance with the outcomes of the further investigations.		
BD11	**Culturally significant species and materials salvage plan** 1. Prior to the commencement of construction on the country of Traditional Owner groups (as defined in EPR ACH2), prepare a culturally significant materials salvage plan in consultation with the Traditional Owners, unless otherwise agreed with the Traditional Owners. The plan must be implemented during construction. 2. The plan must specify opportunities for Traditional Owner to survey for and salvage seed ~~collection~~, timber ~~salvage~~, ~~and~~ flora and fauna ~~salvage~~ and other culturally significant material within construction areas that are on Crown land. 3. The plan must be prepared having regard to Traditional Owner preferences for access for survey, collection and salvage and any limitations on access including: a. the overriding obligation to comply with the Environmental Management Framework and any approvals; b. construction requirements including timing constraints for the commencement of works, ground conditions, weather and occupational health and safety matters; and c. any need to obtain other approvals for collection or salvage. 4. The plan must include procedures for informing construction personnel of species that have been identified by Traditional Owners as having cultural significance. 5. The plan must be consistent with the engagement approach outlined in the Traditional Owner Engagement and Communications Plan (EM15).		Construction
BD12	**Biolink impact mitigation plan** 1. Develop and implement a plan to mitigate impacts on biolinks, including: a. Retention of understorey vegetation in the easement corridor to the extent practicable, having regard to operational clearance requirements. b. Provision of funding to support revegetation within impacted biolinks but outside the areas subject to operational clearance requirements.		Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	c. Provision of funding to support affected landholders to replace biolink vegetation within their properties that will be lost or significant modified (e.g. overstorey removal) due to the Project.		

EPR Code	Requirement	Project Component	Project Stage
Climate change			
CC1	**Undertake a climate change risk assessment** 1. Undertake a climate change risk assessment for the Project during its detailed design stage to consider risks climate change related hazards may pose to Project infrastructure. This assessment must: a. Consider risks to Project infrastructure that arise from climate change. b. Consider how existing risks to surrounding communities, land uses, properties and environments that arise from climate change may change as a result of the Project. c. Develop practicable adaptation measures, if necessary, to address priority risks and provide assurance that the Project will satisfy performance expectations as critical electricity supply infrastructure over its planned operating life under projected climate change.	All	Design
CC2	**Review climate change risk** 1. Five-yearly reviews of the best available climate change science relating to key climate-related hazards for Project infrastructure will be used to update the climate change risk assessment for the Project (EPR CC1). Where new information suggests the climate-related hazard context for the Project has materially changed or is projected to change materially from that considered in the initial climate change risk assessment, additional measures (or climate adaptations) may be identified to provide assurance that Project infrastructure will satisfy performance expectations as critical electricity supply infrastructure under climate change. Those measures would be implemented through on-going asset management.	All	Operation
Contaminated land			
CL1	**Minimise contaminated land impacts through investigation and design** 1. Prior to the commencement of construction, undertake assessments consistent with Schedule A – Recommended general process for assessment of site contamination of the NEPM 2013 in areas of planned ground disturbance prior to any earthworks to inform detailed design and preparation of the Construction Environmental Management Plan (CEMP) (EPR EM2). As part of the General Environmental Duty, these assessments must include but not be limited to consideration of the following: a. Potential mobilisation of groundwater contamination towards the Proposed Route should dewatering be required as part of the construction. b. Potential implications of chemically aggressive ground conditions, Acid Sulfate Soils (ASS) and Acid Sulfate Rock (ASR) on the selection of construction materials and durability. c. Characterisation of all excavated soil in accordance with waste management requirements in EPA Publication 702.2 Soil sampling for waste soils.	Access tracks, Transmission towers, Terminal stations, Laydown and hardstand areas, Distribution line crossovers	Design

EPR Code	Requirement	Project Component	Project Stage
CL2	**Develop and implement contaminated land management and mitigation measures for construction** 1. Develop, prior to the commencement of construction and as part of the Construction Environmental Management Plan (CEMP) (EPR EM2), management and mitigation measures to be implemented during construction for contaminated land consistent with the EPA, WorkSafe Victoria, and any other relevant regulatory requirements. The contaminated land section of the CEMP must include (but is not limited to) the following: a. Summary of applicable regulatory requirements. b. Description of roles and responsibilities. c. Management measures to address potential risks associated with excavation of impacted soils, extraction of impacted groundwater, open excavations and stockpiles. d. Odour management measures (in accordance with EPA Victoria requirements) during the excavation, stockpiling and transportation of contaminated material. e. Management measures for storage and use of chemicals, fuels and hazardous materials during construction. f. A process for the assessment of suitability of any imported material. g. Procedures for the identification of issues and appropriate management measures for residual risks of construction spoil that will become a waste and require management through construction (EPA Publication 1834.1: Civil Construction, Building and Demolition Guide). h. Processes for preparation of a Remedial Options Assessment (if unacceptable residual risks are identified or as required for re-use of Project spoil (EPR CL3)) and further, if required, prepare a Remedial Action Plan and remedial designs. i. Measures to prevent contamination of areas used for temporary construction works and to remediate any contamination caused by temporary construction activities in consultation with the relevant land manager. j. Contingency and Unexpected Finds Plan should unexpected, contaminated soil or groundwater be identified during earthworks. k. Procedures for notification of landholders of spills that could result in contamination or contamination encountered or caused during construction.	Access tracks, Transmission towers, Terminal stations, Laydown and hardstand areas, Distribution line crossovers	Construction
CL3	**Develop and implement a Spoil Management Plan** 1. Develop, prior to commencement of construction and as part of the Construction Environmental Management Plan (EPR EM2), a Spoil Management Plan (SMP) to be implemented during construction to manage the environmental impacts associated with construction spoil. The SMP must include (but not limited to) the following: a. Summary of applicable regulatory requirements. b. Description of roles and responsibilities. c. Characterisation approach for the spoil for off-site disposal or re-use, if required. d. Consideration of major projects in the region to minimise cumulative impacts associated with spoil management. e. Identification of suitable sites for disposal of any waste in consultation with local councils.	Access tracks, Transmission towers, Terminal stations, Laydown and hardstand areas, Distribution line crossovers	Construction

EPR Code	Requirement	Project Component	Project Stage
	f. Identification of reuse options for all categories of spoil expected to be generated through construction. g. Management of hazardous substances. h. Monitoring and reporting requirements. i. Sub-plans as appropriate, including but not limited to an ASS and ASR Management Sub-Plan. The Acid Sulfate Soil (ASS) and Acid Sulfate Rock (ASR) Management Sub-Plan will include but not be limited to: i. Undertaking ASS and ASR investigations prior to commencement of construction. ii. Identification of locations and extent of any potential ASS/ASR. iii. Stockpile management including lining, covering and runoff collection to prevent oxidation and release of acid to the environment, and impact to human health. iv. Identification of suitable sites for re-use management or disposal of ASS and ASR. j. The ASS and ASR Management Sub-Plan will be prepared in accordance with General Environmental Duty, *Environment Protection Act 2017* and subordinate legislation, EPA Publication 655.1: Acid Sulfate Soil and Rock, and the Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils k. Management measures for sustainable handling and transport of spoil for the protection of human health and the environment. l. Environmental management plans for temporary stockpile areas and stockpile activities. m. Details of appropriate lawful places for the receipt of waste and permit requirements.		
Economic			
EC1	**Develop and implement a Business Mitigation and Support Strategy for directly affected businesses** 1. Develop, prior to the commencement of construction, an overarching 'Business Mitigation and Support Strategy' for directly affected businesses to be implemented during construction to avoid and minimise impacts on businesses that would not be supported under EPR AF1 but which could be directly affected by the Project, as a result of the transmission line easement being placed on land associated with the business, to the extent reasonably practicable. 2. The strategy must be developed in accordance with the Communications and Stakeholder Engagement Management Plan (EPR EM5). 3. The strategy must be developed having regard to the Victorian Small Business Engagement Guidelines (produced by the Victorian Small Business Commission). 4. The Strategy must ~~, to~~ define the process and requirements for ~~businesses that agree to engage with the Project~~: a. Consulting with business owners, to discuss their business and the specific impacts that their business may experience. As a minimum, this will consider business operations and services that may be affected or require alteration as a result of dust, noise and traffic generated by construction of the Project, or by the physical presence of Project infrastructure, including visual and landscape impacts during operation of the Project. b. Identifying, offering and implementing any practicable mitigation measures that could be applied to lessen the impacts of the Project on the business (both infrastructure and day to day operations). This includes but is not limited to measures that seek to, where practicable:	All	Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
	i. Establish landscape screening to avoid and minimise the visual impact of the Project. ii. Reconfigure, relocate or re-orientate any existing business assets that have views to the Project to avoid and minimise the visual impact. iii. Increase marketing and promotional activities to encourage patronage. iv. Avoid and minimise air quality impacts on business operations in accordance with the Air Quality Management Plan (EPR AQ1). v. Avoid and minimise noise and vibration impacts on business operations in accordance with the Construction Noise and Vibration Management Plan (EPR NV1) and in accordance with EPR NV3. vi. Avoid and minimise traffic impacts on business operations in accordance with the Traffic Management Plans (EPR T1). vii. Maintain access for business operations, including if necessary establishing alternative temporary access and signage. viii. Avoid impacts on business assets or relocate and re-establish assets in an agreed location. ix. Provide for reinstatement and rehabilitation of construction areas and temporary access tracks. x. Provide early and ongoing information and notification about details and timing of proposed works in proximity to the business (as per EM5). xi. If requested by the business and it would assist in the identification of practicable mitigation measures, provide a consultant(s) with skills and qualifications relevant to the affected business to advise on mitigation of specific impacts. c. Documenting the outcomes for individual businesses and provide the business with the information and implementation steps. d. The information which must be provided to the land title holder as to whether disturbance would be rectified, rehabilitated or compensated, either under the Options for Easement agreement, or in accordance with the requirements of the *Land Acquisition and Compensation Act 1986.* e. Notification of construction timetable and changes to traffic conditions and duration of impact to assist landholder business planning f. Complaint response procedures in accordance with EPR EM7 (Complaints Management System). g. The implications of commencement of compulsory acquisition pursuant to the *Land Acquisition and Compensation Act 1986*. 5. Prepare, provide to business owners and implement plans for affected businesses in accordance with the strategy. 6. The Project will provide for engagement with business owners for 12 months following completion of construction activities that directly affect the business and will implement agreed mitigation measures within that time unless otherwise agreed with the relevant business owner.		
EC2	**Develop and implement initiatives for procurement of goods and services from local communities social enterprises, relevant Traditional Owner groups, their enterprises, and Aboriginal-owned businesses**	All	Construction Operation

EPR Code	Requirement	Project Component	Project Stage
	1. Develop, prior to the commencement of construction, a plan to increase positive social and economic impacts during construction and operation through the procurement of goods and services from local communities, social enterprises and relevant Traditional Owner groups, their enterprises, Aboriginal-owned businesses. 2. The plan must be developed in accordance with the Communications and Stakeholder Engagement Management Plan (EPR EM5) and the Traditional Owner Engagement and Communications Plan (EM15) and include: a. initiatives and commitments to prioritise to the extent practicable the procurement of goods and services from: i. Local businesses, particularly within the local government areas intersected by the Project and small to medium enterprises ii. Sustainable social enterprises; iii. relevant Traditional Owner groups, their enterprises, Aboriginal-owned businesses b. targets and commitments with associated responsibilities c. mechanisms for businesses that meet a criterion in items 2a) to register their capabilities and interest in working with the Project, to be widely shared within the local government areas intersected by the Project. d. identify appropriate and effective communication strategies for promoting opportunities e. Provide targeted and coordinated support to build the capacity of social enterprises, relevant Traditional Owner groups and Aboriginal-owned businesses to tender for work packages including opportunities to work on country on Crown Land.		
EC3	**Develop and implement a Business Mitigation and Support Strategy for eligible businesses within 2km** 1. Develop, prior to the commencement of construction, and implement a 'Business Mitigation and Support Strategy' to be implemented during construction to avoid and minimise, to the extent reasonably practicable, impacts from the Project to existing businesses that would not be supported under EPR EC1 but which: a. are within 2km of the Project; and b. rely on the existing character of the natural landscape to attract customers, The 'Business Mitigation and Support Strategy' must be open to businesses that operate from Melton Aerodrome. 2. The strategy must be developed in accordance with the Communications and Stakeholder Engagement Management Plan (EPR EM5) and having regard to the Victorian Small Business Engagement Guidelines (produced by the Victorian Small Business Commission. 3. The strategy must set out the eligibility requirements referred to in point 1 above and include actions that will be undertaken to avoid and minimise business operation and amenity impacts to eligible businesses that choose to participate. The strategy should define the process and requirements for: a. Consulting with business owners that agree to engage with the Project to discuss their business and the specific impacts that their business may experience. As a minimum, this will consider business operations and services that may be affected or require alteration as a result of dust, noise and traffic generated by construction of the Project, or by the physical presence of Project infrastructure during operation of the Project. b. Provided the business owner agrees to engage with the Project, identifying, offering and implementing any practicable mitigation measures that could be applied to lessen the impacts of the Project on the business (both	All	Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
	infrastructure and day to day operations), or that may otherwise support the business. This includes but is not limited to measures that seek to, where practicable: i. Establish landscape screening to avoid and minimise the visual impact of the Project. ii. Reconfigure, relocate or re-orientate any existing business assets (for example, pergolas or decking) that have views to the Project to avoid and minimise the visual impact. iii. Increase marketing and promotional activities to encourage patronage. iv. Provide early and ongoing information and notification about details and timing of proposed works in proximity to the business (as per EPR EM5) c. Documenting the outcomes for individual businesses and provide the business with the information and implementation steps. d. Offering and implementing any agreed mitigation measures. e. Complaint response procedures in accordance with EPR EM7 (Complaints Management System). 4. The Project will provide for engagement with business owners for 12 months following completion of construction of the towers which are visible from the business and will implement agreed mitigation measures within that time unless otherwise agreed with the relevant business owner.		
EC4	**Develop and implement a Tourism Mitigation and Support Strategy** 1. Within 12 months of completing construction of the Project, develop a 'Tourism Mitigation and Support Strategy' in consultation with relevant industry peak bodies, local councils and Victorian Government departments to develop reasonable and practicable measures with the aim of promoting tourism in the municipalities within which the Project is located. 2. In consultation with the relevant government department, determine how the strategy will be implemented.	All	Operation
EMI and EMF			
EL1	**Undertake an Electric and Magnetic Field and Electromagnetic Interference Assessment** 1. Design and construct the Project to reduce electric and magnetic fields (EMF) and electromagnetic interference (EMI) from the Project infrastructure to below the reference levels and limits for the Project, or as low as reasonably practicable to avoid and minimise impacts. 2. The applicable reference levels and limits are defined in **Technical Report L: EMI and EMF Impact Assessment**. The design must be informed by a Project wide EMI and EMF verification assessment for all the proposed infrastructure at the detailed design stage, identifying existing sensitive receptors and committed future developments within the study area. 3. Prior to the commencement of the relevant construction works, the assessment must be documented in a management plan for implementation and includes, but is not limited to: a. Outcomes of the Project wide EMI and EMF verification assessment at the detailed design stage and details of the areas assessed. b. The location of all sensitive receptors that may be impacted by the infrastructure. c. Where at-receiver mitigation measures to sensitive receptors are required to avoid or minimise adverse impacts.	All	Design, Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
	d. If mitigation measures are identified as per Item 3(c) (e.g. point-to-point communication links), identify what the mitigation works are, and timeline for implementation. e. A pre- and post-construction testing strategy to verify design calculations, impacts on sensitive equipment and the efficacy of any specified mitigation measures. f. Remedial action to be investigated if EMI and EMF limits are not met during the construction, testing, and commissioning.		
Geology and soils			
GSL1	**Develop and implement a pre-construction Site Investigation Plan to inform detailed design** 1. Develop, prior to the commencement of construction, a pre-construction Site Investigation Plan for geotechnical and soil site investigations to be completed to inform detailed design. The plan must be developed in accordance with AS 1726-2017 and include the locations, number, and type of geotechnical and soil site investigations to determine the sub-surface conditions and soil/rock characteristics, and to characterise and assess the nature of the soils, including compressible, reactive, ~~erosive~~ erodible/dispersive and saline soils. 2. Detailed design of the Project must consider the findings of the geotechnical and soil site investigations, with design measures to be incorporated as far as reasonably practicable to reduce the potential for erosion and sedimentation (including considering appropriate surface drainage and existing topography of land), and impact to geologically significant sites. Detailed design must consider: a. Earthworks design must be undertaken in accordance with AS 3798-2007. b. Landslide risk and slope stability must be assessed in accordance with AGS Practice Note Guidelines (AGS, 2007c). Mitigation measures and practices must be developed with reference to AGS GeoGuide LR8 (AGS, 2007e). c. Foundation design must be undertaken in accordance with AS/NZS 7000-2016 with reference to the handbook HB331:2020, AS2159-2009 and AS5100.3:2017 as applicable.	Transmission tower and terminal station foundations, Permanent earthworks and slope design, Permanent erosion control measures, Permanent access track design, Temporary works required for construction.	Design
GSL2	**Develop and implement a Sediment and Erosion Control Management Plan** 1. Develop and implement a Sediment and Erosion Control Management Plan as part of the Construction Environmental Management Plan (CEMP) (EPR EM2). 2. The Sediment and Erosion Control Management Plan must incorporate drainage, erosion and sediment control measures and stockpile management from industry guidelines, including IECAA Best Practice Erosion and Sediment Control, 2008 and EPA Victoria Publication No. 1834.1: Civil construction, building and demolition guide. It must include measures to: a. Minimise clearance of vegetation and retain existing vegetation wherever possible, particularly along drainage lines and waterways, steep slopes and areas with unstable soils. b. Stabilise exposed soil where applicable with the appropriate structural materials and media for the construction activities (e.g., stabilisation matting, rock armour or vegetation). c. Manage vehicle movement to designated roads and access areas, and use dust-suppression measures where practicable.	Temporary earthworks during construction	Construction

EPR Code	Requirement	Project Component	Project Stage
	d. Where required, reinstate vegetation as soon as works in an area have finished (staged reinstatement). Maintain erosion controls until vegetation is established (as per EPR GSL3). e. Install sediment control measures around stockpiles to contain sediment f. If required, treat in situ and site won dispersive or reactive soils prior to construction to improve the performance. g. Any imported material should be tested for dispersive/reactive soil behaviour prior to use in construction in accordance with AS 3798-2007 and the Project earthwork specification. h. Maintain existing erosion management controls within existing biodiversity corridors and reinstate if damaged. i. Avoid and minimise compaction of soils.		
GSL3	**Identify and remediate erosion and land stability issues** 1. Develop and implement an inspection and maintenance schedule as part of the Construction Environmental Management Plan (CEMP) (EPR EM2) and AusNet's operational procedures to inform adaptive management and/or measures to maintain integrity of infrastructure during and post construction. The schedule will include: a. Minimum ongoing inspection and monitoring requirements, including frequency, timing and locations. b. Requirements for ongoing maintenance of permanent erosion control measures (e.g., vegetation). c. Remediation requirements for areas that have experienced unexpected disturbance that have not been controlled appropriately with other measures.	All Project components, particularly those located in identified erosion prone areas, existing landslides or slopes susceptible to landslides.	Construction, Operation
GSL4	**Maintain current public access to geologically significant sites** 1. Develop and implement access controls and measures as part of the Construction Environmental Management Plan (CEMP) (EPR EM2) and AusNet's operational procedures to maintain safe access (where sites are currently accessible by the general public) to geologically significant sites during construction and operation. 2. Geologically significant sites include the following locations: a. Bulgana to Lexton: i. Landsborough Fault road cutting (BL120) ii. Mount Direction Roof Pendant Remnant, (BL123). b. Lexton to Ballan: i. Mount Beckworth (BL39) ii. Hepburn Lagoon (BL45) iii. Potential eruption point near Mount Gap (SLO), eruption point near Mount Prospect (SLO), eruption point near Newlyn Reservoir (SLO)[1] iv. Eruption point near Mount Bolton (SLO)[1] adjacent to the study area and eruption point near Birch Hill (SLO)[1] within the study area. c. Ballan to Melton West: i. Lerderderg River Morven Terrace (ML294), Lerderderg River Permian sequence (ML201), Lerderderg Valley Alluvial Fan (ML291)	All	Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
	ii. Pykes Hill (ML278) iii. Lake Merrimu road cutting (ML113) iv. Steep hills west of Bacchus Marsh (SLO)[1]. d. Melton West to Sydenham: i. Mount Kororoit (ML66) ii. Eruption point near Mount Kororoit (SLO)*. e. Distribution line crossovers: i. Landsborough Fault road cutting (BL120) ii. Lerderderg River Permian sequence (ML201) and Lerderderg River Morven Terrace (ML294) iii. Mount Kororoit (ML66) iv. Eruption point, near Newlyn Reservoir (SLO)[1] v. Steep hills west of Bacchus Marsh (SLO)[1] vi. Eruption point near Mount Kororoit (SLO)[1]. Note: * indicates that Sites are not identified as geologically significant sites however they are covered by a SLO.		
Groundwater			
GW1	**Site works to reduce the potential of direct physical impact to groundwater receptors** 1. Prior to commencement of construction, apply buffers around known and identified groundwater receptors (where practicable) to minimise potential for direct physical impact of construction. These buffers are to apply to the construction of transmission towers, Powercor distribution line crossovers and below ground works at terminal stations. The buffer distances to be applied to groundwater receptors are as follows, noting they are for physical distancing only and do not consider dewatering impacts: a. Bores (i.e., all extractive bores and excluding bores for monitoring specific purposes): 100m b. SOBN bores: 100m c. Aquatic groundwater dependant ecosystems: 50m or related waterway buffer identified in EPR SW1. 2. If planned works for transmission towers, Powercor distribution line crossovers and below ground works at terminal stations, are located within the buffers specified in item 1): a. Consult with the landholder and undertake a site walkover to inspect or identify groundwater bores or areas where sub-surface infrastructure is present (such as supply mains) within and adjacent the construction footprint. i. If additional bores or potential GDEs are discovered, these must be discussed with the landholder and the relevant water authority and considered against the nominated physical distancing buffers listed above in item 1. ii. If sub-surface infrastructure is identified (such as drains, mains), potential for physical impact must be discussed with the landholder.	Transmission towers, Terminal stations, Powercor distribution line crossovers	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	b. Conduct a site-specific groundwater risk assessment to evaluate potential for physical impact c. If potential impacts are identified, prepare and implement site-specific monitoring and mitigation strategies if necessary. These requirements must be incorporated into the Groundwater Management Plan as required by EPR GW2.		
GW2	**Develop and implement a Groundwater Management Plan** 1. Develop, prior to commencement of Project construction and as part of the Construction Environmental Management Plan (CEMP) (EPR EM2), a Groundwater Management Plan in consultation with relevant water authorities to be implemented and maintained during construction that details the specific controls that would avoid or minimise risks to the environmental value of groundwater. 2. The Groundwater Management Plan must include the following, as a minimum: a. Controls outlined in EPA Publication1834.1 Civil construction, building and demolition guide (EPA, 2023), as relevant to erosion, sediment, contaminated land and contaminated groundwater, chemicals and waste. This includes controls for management measures of the collection, containment and transport of groundwater or slurry discharged or displacement displaced from below ground construction. Groundwater displaced to the surface will be "waste" as defined by the *Environment Protection Act 2017*. Wastes will be classified, managed, and disposed in accordance with EPA Publication 1827.2: Waste classification assessment protocol (EPA, 2021a), EPA Publication 1968.1: Guide to classifying industrial waste (EPA, 2021b), and EPA Publication 1828.3: Waste disposal categories-characteristics and thresholds (EPA, 2024). Waste will be managed in accordance with the Environment Protection Regulations 2021. These measures should be implemented to prevent any waste reaching waterways, as well as ensuring open holes are bunded to prevent preferential pathways during construction (refer to EPR CL3). b. Controls outlined in EPA Publication 1698 Liquid handling and storage guidelines (EPA, 2018a) and EPA Publication 1700 Preventing liquid leaks and spills from entering the environment (EPA, 2018b). This includes controls such as using secondary containment (bunded) areas to store or transfer liquids, safe pouring and decanting methods, and spill kits to prevent migration of liquid. These measures should be implemented to prevent any onsite spills reaching the watertable. c. Controls as described in EPA Publication 655.1: Acid sulfate soil and rock, for management of acid sulfate soils (EPA, 2009). d. Provision of access arrangements to DEECA in the event that State Observation Bore Network bores are located within a fenced construction area. e. Protocols in the event of dewatering for towers and terminal stations. The dewatering protocols must include, but not be limited to: i. Review of geotechnical survey data to determine sub-surface conditions. ii. Estimation of drawdown and cone of depression based on planned dewatering duration and conditions encountered. iii. Estimation of extraction volume. If the activity is within a Groundwater Management Area, the volume should be communicated to the relevant Water Authority.	Transmission towers, Terminal stations, Powercor distribution line crossovers	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	iv. Identification of receptors (GDEs, waterways, users) or sensitive sites (acid sulfate soils, contamination sources as identified through EPR CL1) within the expected cone of depression. If potential for impact to receptors is identified, consider the proposed construction method and timing to minimise or eliminate impacts. v. If there is high uncertainty, high risk, or if impacts cannot be mitigated through design, construction methodology, and timing, install a groundwater bore and undertake investigations to determine groundwater level, groundwater quality and hydraulic conductivity. vi. Design and implement a field monitoring program before, during and after dewatering to monitor and manage impacts. vii. Develop site-specific mitigation strategies to mitigate potential impacts. viii. Groundwater inflow management planning. ix. Groundwater discharge options assessment and management planning.		
Historical heritage			
HH1	**Design and construct to avoid and minimise impacts on heritage** 1. Undertake design and construction planning to avoid, and where avoidance is not possible, minimise impacts so far as reasonably practicable on the known heritage values of heritage places in consultation with the landholder and relevant statutory authority. 2. Prior to commencement of works that have the potential to (directly or indirectly) impact any heritage places, structures or features, develop and implement measures to protect heritage places, structures or features ~~as appropriate~~ from physical impact during the construction works. Such measures may include, but not be limited to, the erection of physical barriers, the implementation of marked exclusion zones and or the monitoring of the place during works. These mitigation measures are to be developed and implemented, in consultation with the landholder and relevant statutory authority, in a manner that is responsive to the specific circumstances of the heritage place the nature of the Project works occurring there.	All	Design, Construction
HH2	**Undertake archival place recording** 1. Prior to commencement of works involving the demolition or modification of non-archaeological heritage places (including trees), undertake archival place recording of these places and their settings to create a permanent record for future study and research, to be submitted to the relevant statutory authority. 2. The means by which the recording is to be undertaken will be determined by the type and nature of the place but must include the measurement of the place and archival photographic recording as the primary means of recording and documentation. Other means to augment and support the place recording should also be considered and applied where possible. These may include, but not be limited to, techniques such as aerial (drone) photography, photogrammetry, 3D scanning, LiDAR, rectified photography and site survey. The relevant statutory authority should be consulted in relation to appropriate measures. 3. Archival photographic recording must be undertaken in accordance with Heritage Victoria's specification for the archival photographic recording of heritage places or alternative applicable Heritage Victoria guidelines.	All	Construction

EPR Code	Requirement	Project Component	Project Stage
HH3	**Manage historical archaeological sites** 1. As required by the *Heritage Act 2017*, apply for consents for Victorian Heritage Inventory (VHI) sites and permits for Victorian Heritage Register (VHR) places where direct impacts are proposed. 2. Prepare documentation required to comply with consents and permits obtained for the Project, which may include an Archaeological Management Plan detailing measures to avoid, minimise, mitigate and manage disturbance of archaeological sites and values affected by the Project. The Archaeological Management Plan may include requirements for background historical research, excavation methodology, research design, reporting and artefact management, artefact conservation, and analysis. 3. Undertake archaeological investigations in accordance with the *Guidelines for investigating historical archaeological artefacts and sites* (Heritage Victoria, 2015) and any conditions of consents or permits obtained for the Project.	All	Construction
HH4	**Avoid and minimise impacts to historical heritage during construction** 1. To avoid and minimise impacts to historical heritage during construction, the Construction Environmental Management Plan (CEMP) (EPR EM2) must include: a. An unexpected finds protocol that specifies measures to manage unidentified historical archaeological sites and values discovered during construction. The management protocol must be consistent with the requirements of the *Heritage Act 2017* and include procedures for ceasing work if human remains or archaeological sites, values or objects are discovered, notifying Heritage Victoria of the find, obtaining consent to deal with the find, and dealing with the find in accordance with the consent. b. Measures to manage historical heritage impacts including physical barrier protection and/or exclusion zones ~~to manage unplanned effects~~. c. Details around training and awareness in relation to historical heritage places and obligations (e.g., Project induction, toolbox talks and staff inductions).	All	Construction
HH5	**Existing conditions survey, monitoring and remediation works** 1. Prior to commencement of works that could cause physical damage or change to historical built heritage places ~~and may cause a change to the place during Project construction~~, an existing conditions survey must be undertaken to create a record of its condition. Change in this context means alteration, damage, deterioration, structural weakening, destabilisation or the loss of the place. The recording is to be undertaken in the same way as described in EPR HH2. 2. During construction undertake monitoring of the historical built heritage places that may be subject to the impacts as outlined in ~~point~~ HH5(1). Where ~~the Project identifies that the~~ construction of the Project is causing a change to a historical built heritage place, measures must be taken in accordance with EPR HH1 to minimise impacts ~~to~~ so far as reasonably practicable to prevent further change from occurring. 3. ~~Where the Project has identified a~~ Any change to a historical heritage place ~~has been~~ as a consequence of the construction of the Project, ~~the change~~ must be mitigated through repair, remediation or reinstatement to address the change, as informed by the existing conditions survey. The extent and nature of the mitigation should be commensurate to the degree and nature of the change. Any repair, remediation or reinstatement works should be		Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	undertaken by an appropriately skilled and experienced practitioner. The relevant statutory authority and/or landholder must be consulted in relation to the proposed repair, remediation or reinstatement works.		
Land use and planning			
LU1	**Minimise land use impacts during construction** 1. Develop, prior to commencement of construction, a plan to be implemented in construction to minimise the construction footprint so far as reasonably practicable. The plan must be informed by consultation with landholders, the Property Access and Management Plan (PAMP) (EPR EM3), Specific Property Access Requirements (SPAR) (EPR EM4) and the Agriculture and Forestry Business Mitigation and Support Strategy (AF1) or Business Mitigation and Support Strategy for directly affected businesses (EC1) as relevant. 2. The plan must consider, but not be limited to: a. Use of existing roads and tracks for access where reasonably practicable b. Avoiding areas of vegetation and cultural heritage sensitivity c. Existing terrain and reducing areas of excavation where reasonably practicable 3. In scheduling construction, consider farming activities on the land and, wherever reasonably practicable, avoid busy periods, including harvest times. 4. In scheduling construction, consider community and sporting events at MacPherson Park, and wherever reasonably practicable, avoid busy periods and key events to minimise impacts on park users.	Towers, Access tracks, Stringing pads, Easement	Design, Construction
LU2	**Minimise land use impacts through design** 1. Develop the Project design to avoid and minimise impacts to approved dwellings not yet constructed and other infrastructure as follows: a. Avoid and minimise impacts to approved, but yet to be constructed dwellings located within the Proposed Route, or compensate the affected land title holders to modify their approved planning permit (approved prior to AusNet issuing the Proposed Route) for an alternative dwelling location outside of the Proposed Route. b. Avoid and minimise impacts, so far as reasonably practicable, to transport, utility and service infrastructure in consultation with the asset owners and managers.	Towers, Easement	Design

EPR Code	Requirement	Project Component	Project Stage
Landscape and visual			
LV1	**Minimise visual impacts – Public domain** 1. During detailed design, develop a process for consulting with the relevant landholders and/or land managers for Merrimu Reservoir and War Memorial, Bald Hill Activation Area and Bolwarrah Weir to: a. Confirm sensitive viewpoints, based on the detailed design that are significantly impacted by the Project from a landscape and visual perspective at Merrimu Reservoir and War Memorial, Bald Hill Activation Area and Bolwarrah Weir; and b. Determine appropriate measures (if any) for mitigating visual impacts with a particular focus on the matters outlined in items 2, 3 and 4 of this EPR (LV1). 2. Merrimu Reservoir and War Memorial engagement must include offer of the following, at a minimum, for the relevant landholder and/or land manager's consideration: a. Landscape screening to filter views towards the Project when facing east from the existing barbecue and picnic facilities at Merrimu Reservoir. b. The development of new public amenities to replace or replicate existing assets in a suitable location within Merrimu Reservoir, which are oriented away from the Project. c. Reconfiguration and/or redesign of the Merrimu Reservoir War Memorial so that views are oriented away from the Project when the parade ground and ceremonial areas are in use. 3. Bald Hill Activation Area engagement must include offer of the following, at a minimum, for the relevant landholder and/or land manager's consideration: a. Landscape screening be installed to filter views towards the Project from the six sculpture locations along the proposed sculpture trail and at the entrance from Swans Road. b. Landscape screening will include selective screen planting to be designed and installed to partially screen individual towers. 4. Bolwarrah Weir engagement must include offer of the following, at a minimum, for the relevant landholder and/or land manager's consideration: a. Landscape screening to minimise visual impacts from the existing picnic tables and chairs at the Bolwarrah Weir. 5. ~~Provided the required access and authorisations are granted by the relevant landholders and/or land managers, the measures referred to in 1b) of~~Mitigations agreed under this EPR~~,~~ must be implemented, at the proponent's cost, within 24 months of the completion of construction of the Project. 6. The Proponent must maintain ~~To the extent that the measures referred to in 1b) of this EPR LV1 require~~ planting ~~to be~~ undertaken under this EPR ~~, ongoing maintenance will be the responsibility of the proponent~~ for a period of ~~24 months~~ 5 years from the time of planting, after which time maintenance will become the responsibility of the relevant landholders and/or land managers.	Transmission line	Design, Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
LV2	**Minimise visual impacts – Private domain landscape screening program** 1. Prior to the commencement of operation, develop a program that provides offers for landscape screening to eligible land title holders (refer Item 2 (b) of this EPR LV2) to minimise visual impacts. 2. The program must: a. Set out the process for informing and making offers for landscape screening, including the timeframe within which offers must be made by the proponent and accepted by the eligible land title holder; and b. Set out the methodology for determining eligibility to participate in the program. Eligible land title holders will include those that meet the following criteria: ~~i. They have elected to participate in the program; and~~ i. The dwelling must be located within 2km of the approved route, and on a property not directly affected by the Project; and ii. Project towers must be visible from habitable rooms within the dwelling or attached areas of private open space within the curtilage of the dwelling 3. Offers to eligible land title holders must: c. ~~Provide for an offer to be made to eligible land title holders, including~~ include the costs to supply, install, monitor and maintain any landscape screening treatment for a period of 2 years d. ~~Provide for the offer to~~ be made by the proponent to the eligible land title holder within 12 months of the completion of construction of the closest tower to that eligible land title holder's dwelling ~~which is visible from habitable rooms within the dwelling or attached areas of private open space within the curtilage of the dwelling~~. 4. Development of the landscape screening program must be informed by a suitably qualified bushfire risk consultant.	Transmission line	Design, Construction, Operation
Noise and vibration			
NV1	**Develop and implement a Construction Noise and Vibration Management Plan** 1. As part of the Construction Environmental Management Plan (CEMP) (EPR EM2), develop a Construction Noise and Vibration Management Plan (CNVMP) to avoid and minimise, so far as reasonably practicable, noise and vibration impacts at sensitive receivers. 2. The CNVMP must comply with the *Environment Protection Act 2017* and subordinate legislation, including the general environmental duty, and with reference to the Civil construction, building and demolition guide (EPA Publication 1834.1, as amended from time to time) and Construction – guide to preventing harm to people and the environment (EPA Publication 1820.1, as amended from time to time). 3. The CNVMP must be informed by noise and vibration modelling of Project works. 4. The CNVMP must include: a. Identification of noise and vibration sensitive receivers, including consideration of sensitive receivers that may be more sensitive during Normal Working Hours such as shift workers or agricultural operations or community events that are more sensitive at specific times of year.	All	Construction

EPR Code	Requirement	Project Component	Project Stage
	b. Construction noise and vibration reference levels and criteria as per EPRs NV2 and NV3. c. Details of relevant construction activities and an indicative schedule for construction works, including identification of the activities that have the potential to generate noise and/or vibration impacts at sensitive receivers. d. A noise and vibration risk assessment for operation of laydown areas. e. How the risks of construction noise and vibration will be minimised, including but not limited to: i. Where noise and vibration modelling of the demonstrates a potential exceedance of reference levels ii. Where cumulative noise and vibration from Project works and from other developments occurring during construction could exceed reference levels iii. Where the environmental values for ambient sound defined in the Environment Reference Standard are at risk. f. Management actions and mitigation measures to reduce noise and vibration impacts so far as reasonably practicable. g. Roles and responsibilities. h. Community notification procedures in accordance with EPR EM5 (Communications and Stakeholder Engagement Management Plan). i. Complaint response procedures in accordance with EPR EM7 (Complaints Management System). j. A program for monitoring and inspections to: i. Validate construction noise and vibration predictions. ii. Assess the effectiveness of management measures iii. Assess whether noise and vibration emissions are being minimised so far as reasonably practicable iv. Verify noise predictions for Unavoidable Works and Managed-Impact Works. k. Processes for reviewing and updating the modelling, plan and implemented controls in response to Project changes, changes to conditions, monitoring results or enquiries/complaints. 5. The CNVMP must identify Unavoidable Works (refer to EPR NV2) that would be undertaken, including their location, timing and duration. The CNVMP must either include a clear rationale for defining works or a list of the type of planned works that constitute Unavoidable Works and response strategies to mitigate the impacts of these Unavoidable Works, consistent with EPA Publication 1834.1 (as amended from time to time). Note that, in the context of this EPR, noise and vibration reference levels are not compliance levels that if met will discharge the requirements of the general environmental duty. Reference levels represent levels above which harm to human health and the environment is more likely to occur. At all times, the contractor must first eliminate risks of harm so far as reasonably practicable, then reduce risks of harm so far as reasonably practicable. If exceedance of reference levels occurs after all reasonably practicable measures have been implemented, then management actions must be implemented in accordance with the CNVMP.		
NV2	**Minimise construction outside of Normal Working Hours**	All	Construction

<table>
<tr><th>EPR Code</th><th>Requirement</th><th>Project Component</th><th>Project Stage</th></tr>
<tr><td></td><td>1. Schedule works during Normal Working Hours between the hours of 7am – 6pm Monday to Friday (excluding public holidays), and 7am – 1pm Saturdays to minimise noise impacts.
2. Works must be scheduled during Normal Working Hours unless the works meet the following requirements:
a. Construction noise levels are predicted not to exceed the noise requirements specified in Table 4.3 of the Civil construction, building and demolition guide (EPA Publication 1834.1 as amended from time to time), construction vibration levels are predicted to comply with the relevant vibration reference level specified in BS6472-1:2008 (NV3), and works are undertaken in accordance with management measures set out in the CNVMP developed under EPR NV1; or
b. The proposed scope of Unavoidable Works or Managed-Impact Works, as defined in the CNVMP, are reviewed and verified by the Independent Environmental Auditor to meet the definition of Unavoidable Works or Managed-Impact Works as outlined in EPA Publication 1834.1 (as amended from time to time), and noise and vibration emissions (and their impacts) are proposed to be managed so far as reasonably practicable.
3. Notification of any Unavoidable Works must be provided to potentially affected landholders and made available on the Project website where the Weekend/Evening or Night reference levels specified in EPA Publication 1834.1 (as amended from time to time) are predicted to be exceeded.
4. Noise and vibration monitoring must be carried out at the commencement of Unavoidable Works and Managed-Impact Works to confirm predicted levels and that appropriate management measures are implemented in accordance with the Construction Noise and Vibration Management Plan (CNVMP) developed under EPR NV1 as verified by the Independent Environmental Auditor (IEA).
5. The above requirements do not apply to emergency works to avoid the loss of life, damage to property, or to prevent environmental harm. The CNVMP must set out a process for responding to emergency works and informing EPA Victoria and relevant regulators about these works.</td><td></td><td></td></tr>
<tr><td>NV3</td><td>Minimise construction vibration impacts on amenity
1. Develop and implement measures to minimise impact to human comfort in occupied buildings from continuous vibration if target levels are exceeded.
2. Implement management actions if the following guideline target levels for continuous vibration from construction activities are not achieved (levels are calculated as lower range of ‘adverse comment possible’ from the British Standard BS6472-1:2008).
<table><tr><th>Location</th><th>Guideline target (VDV m/s$^{1.75}$)</th></tr><tr><td>Residential (Night – 10pm to 7 am)</td><td>0.2</td></tr><tr><td>Residential (Day – 7am to 10 pm)</td><td>0.4</td></tr><tr><td>Commercial offices, 7am to 10 pm</td><td>0.8</td></tr><tr><td>Workshops, 7am to 10 pm</td><td>1.6</td></tr></table>3. Notes:
a. The reference levels are non-mandatory; they are goals that should be sought to be achieved through the application of practicable mitigation measures. If exceeded, then management actions will be required.</td><td>All</td><td>Construction</td></tr>
</table>

EPR Code	Requirement	Project Component	Project Stage
	b. The Vibration Dose Values (VDV) may be converted to Peak Particle Velocity (PPV) levels within the Construction Noise and Vibration Management Plan (CNVMP). The methodology to convert VDV to PPV must be verified by the Independent Environmental Auditor (IEA).		
NV4	**Design operational noise sources to minimise noise so far as reasonably practicable** 1. Design and operate the Project to avoid and minimise impacts due to noise emissions as follows: a. Design and operate the new 500kV terminal station near Bulgana, connection to Sydenham terminal station and new transmission infrastructure elements that are subject to Part 5.3, Division 3 (Unreasonable and aggravated noise from commercial, industrial and trade premises) of the Environment Protection Regulations 2021 to: i. Minimise the risk of harm from noise associated with the Project so far as reasonably practicable, ii. Prevent unreasonable noise by ensuring the risk of sporadic noise and low frequency noise is eliminated or managed to the extent reasonably practicable, and iii. Not exceed the noise limits set by the Environment Protection Regulations 2021, to the extent reasonably practicable. b. Noise predictions and analysis for the purposes of this EPR must be conducted in accordance with the Noise Protocol (EPA Publication 1826.4 as amended from time to time), Measuring and analysing industry noise and music noise (Technical Guide: EPA Publication 1997 as amended from time to time) and, where relevant, the Noise guideline – assessing low frequency noise (EPA Publication 1996 as amended from time to time).	All	Design
NV5	**Undertake commissioning noise monitoring of terminal stations** 1. Within six months of completing construction, appoint a suitably qualified acoustic consultant to undertake commissioning noise measurements of the new 500kV terminal station near Bulgana and connection to Sydenham terminal station, following completion of the Project works, to assess levels with respect to the EPRs and to identify and implement contingency measures if the requirements in the EPRs are not met.	Terminal stations	Operation
NV6	**Minimise the impact of noise from maintenance activities** 1. Develop and implement measures to avoid and minimise noise emissions during operation as follows: a. Prior to commencing maintenance activities, prepare and implement measures to undertake the activities to avoid or, where not possible to avoid, minimise noise so far as reasonably practicable. b. Restrict inspections and maintenance to the hours of 7am to 6pm Monday to Saturday and 9am to 6pm on Sunday and public holidays where reasonably practicable.	All	Operation
Social			
SC1	**Avoid and minimise potential negative social impacts of the Project construction workforce** 1. Subject to item 2 below, each Operational Management Plan for workforce accommodation facilities required by the draft Incorporated Document condition 4.13.6 must include the following to avoid and minimise potential negative social impacts of the Project construction workforce on surrounding communities:	Workforce	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	a. A commitment that at least 95% of all construction workers working on the Project who cannot commute safely to work from their current residence will be required to reside within the workforce accommodation facilities, while on a rostered shift and return to their permanent place of residence on rostered breaks, unless: (i) the fatigue management policy dictates a worker should not drive back to a workforce accommodation facility for the night or day, or a specific health and safety issue occurs which means that a worker is unable to stay in a workforce accommodation facility; or (ii) otherwise agreed with the relevant councils. b. The management protocol for worker access to settlements in proximity to the workforce accommodation facilities must limit visits to essential trips, unless otherwise agreed with the relevant councils. c. A commitment to service the workforce accommodation facilities with medical services and to have nominated medical professionals available on call and via programmed visits, to attend to the medical needs of workers. 2. Despite item 1(a) and item 1(b) above, alternative arrangements may be agreed with the relevant councils and reflected in the relevant Operational Management Plan so as to increase potential positive socioeconomic outcomes of the Project construction stage, while avoiding and minimising to the extent practicable potential negative social impacts. This includes but is not limited to measures that seek to: a. Utilise existing available accommodation in the areas surrounding the Project without resulting in negative effects on housing availability or affordability for local communities, or on the availability of tourist accommodation. b. Allow non-essential trips to larger towns and urban centres under specific circumstances, while avoiding non-essential trips to smaller townships.		
SC2	**Develop and implement a Code of Conduct to avoid and minimise potential social impacts of the construction workforce** 1. Develop, prior to construction commencing, a Code of Conduct to be implemented during construction, for the Project workforce in consultation with local councils to avoid and minimise the potential for negative social impacts of the construction workforce on local communities. 2. The Code of Conduct must set out AusNet's expectations of staff when interacting with members of the local community, and utilising local road networks. 3. The Code of Conduct must address matters relating to dress standards, residential (non-construction) noise and alcohol consumption. 4. The Code of Conduct must stipulate the protocols for worker access to settlements as per EPR SC1. 5. Compliance with the Code of Conduct must be required of all staff and non-compliances investigated and responded to in accordance with misconduct and disciplinary action protocols defined in the Code of Conduct.	Workforce	Design, Construction
SC3	**Develop and implement initiatives to maximise employment opportunities for local communities, relevant Traditional Owner groups, First Nations people and vulnerable and disadvantaged groups** 1. Develop, prior to construction commencing, in consultation with relevant councils, a plan to be implemented in construction to maximise potential benefits of the Project with regard to employment opportunities for local	Workforce	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	communities, First Nations people and vulnerable and disadvantaged groups. Traditional Owner groups must be consulted on aspects of the plan related to First Nations people. 2. The local employment initiatives must: a. Aim to recruit as many as possible of the required employees for the Project from within local communities. b. Include strategies focused on employment of First Nations people, apprentices, trainees, people with disability and women. c. Support local workforce growth by hiring regional Victorian workers, particularly those under 25. 3. The plan must include: a. targets and commitments to deliver training and upskilling, including through apprenticeships, traineeships, and cadetships b. mechanisms for jobseekers to register their capabilities and interest in working with the Project, to be widely shared within the local government areas intersected by the Project.		
SC4	**Community partnerships and investments to leave a positive legacy for communities hosting the Project** Prior to and during construction, AusNet will identify, develop and implement community partnerships and investments to leave a positive legacy for communities that host the Project. AusNet will focus investigations for investment towards initiatives that address local issues of concern, such as telecommunications and housing.	All	Design, Construction
SC5	**Co-designed Community Benefit Fund that directs funds to areas determined by the community** 1. Prior to the commencement of construction, establish a co-designed community benefit fund for the communities that host the Project to decide where funding should be directed. The community benefit fund will: a. be funded by the Proponent; b. be codesigned with ~~the community for the matters which can be decided by the community, who will be represented by~~ a group of community members who will provide input to: i. formulate the principles and purpose of the fund~~;~~ ii. establish funding criteria and requirements for project delivery and progress reporting; and iii. make decisions regarding allocation of funds and delivery timelines; c. be convened by a facilitator independent of the Proponent; and d. be administered by the Proponent in accordance with the outcome of the design process.	All	Construction, Operation
Surface water			
SW1	**Site works to reduce potential for surface water impact** 1. Develop and implement works to avoid and minimise the potential impact to surface water. Prior to the commencement of construction, plans must be developed and implemented for the siting of access tracks, transmission towers and/or terminal stations which show that works will be:	Access tracks, Transmission towers, Terminal stations	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	a. Located outside of the floodplain (as defined by the 1% Annual Exceedance Probability (AEP) flood extent) where possible. If siting of towers within the floodplain cannot be avoided, further flood protection measures be considered in design. b. Where practicable, located at a setback distance of 30m from all designated waterways and water bodies in areas managed by the Wimmera CMA, North Central CMA, Glenelg Hopkins CMA or Corangamite CMA c. Where practicable, located to achieve minimum set back distance determined in consultation with Melbourne Water and based on distances specified in "Waterway Corridors, Guidelines for greenfield development areas within the Port Phillip and Westernport Region" (Melbourne Water, 2013) as follows: i. 20m for first or second order waterways ii. 30m for third order waterways iii. 50m for fourth order or higher waterways. Note: stream orders are as defined by the Strahler stream ordering system (Strahler, AN 1953). 2. If proposed access tracks, transmission towers and/or terminal stations are located within the setback distance nominated in items 1a), 1b) or 1c), the Principal Contractor is to undertake a site-specific assessment to determine potential impacts and adopt site-specific monitoring and mitigation strategies. Such requirements are to be embedded into the Surface Water Management Plan (SWMP) (EPR SW2).		
SW2	**Develop and implement a Surface Water Management Plan** 1. Develop, prior to construction commencing and in consultation with the relevant CMAs and local councils, a Surface Water Management Plan (SWMP) to be implemented during construction as part of the CEMP (EPR EM2) to minimise the risk of harm to environmental values of surface water from pollution or waste associated with the construction of the Project; protect waterways and surface water users and maintain floodplain function so far as reasonably practicable. 2. To inform the development of the SWMP, the Principal Contractor is to conduct site walkovers as part of construction site preparation for transmission towers and terminal stations. Site walkovers shall inspect adjacent waterways; confirm the location of all potential surface waters or surface water users within and adjacent to the construction footprint; and determine the potential for direct impacts. This shall include local and ephemeral drainage paths and potential flow or water quality impacts to farm dams or other extractive uses. 3. The SWMP will include management and mitigation measures for: a. Operation of temporary laydown areas, including: i. Minimising impacts of vegetation clearance and construction of access tracks, and associated stormwater runoff from exposed or disturbed soil ii. Management of site drainage, stormwater runoff, liquid storage and spill control, supply of potable water and non-potable water, and details on greywater and sewage generated onsite. b. Minimising the potential for erosion and sedimentation, in general accordance with relevant EPA Publications including publications 1820.1 (Construction – Guide to preventing harm to people and the environment); 1894 (Managing soil disturbance); and 1893 (Erosion, sediment and dust: treatment train)	All	Construction

EPR Code	Requirement	Project Component	Project Stage
	c. Prevention of leaks and spills from entering local waterways, drainage lines or the stormwater network, in general accordance with relevant EPA Publications including publications 1700 (Preventing liquid leaks and spills from entering the environment) and 1698 (Liquid storage and handling guidelines). d. Minimising stormwater runoff, in general accordance with EPA Publication 1834.1 (Civil construction, building and demolition guide) and Urban Stormwater Best Practice Environmental Management Guidelines. e. Minimising disturbance of waterway bed or banks or alteration of flow regime, in general accordance with EPA Publication 1896 (Working within or adjacent to waterways). 4. The SWMP must also set out the requirements and methods for: a. Maintaining the key hydrologic and hydraulic functionality and reliability of existing flow paths, drainage lines and floodplain storage wherever possible. b. Siting and construction of Project infrastructure to avoid diversion or blockage of flows to farm dams and extractive users both during and after construction. This includes highly localised flows and ephemeral drainage lines.		
SW3	**Monitor water quality** 1. As part of the Surface Water Management Plan (EPR SW2), develop and implement a surface water quality monitoring program prior to and during construction for designated waterways likely to be directly impacted by Project activities. The monitoring program is to be developed in consultation with relevant CMAs and Melbourne Water to: a. Establish the baseline condition of designated waterways within or immediately adjacent to the construction footprint that could be directly impacted by construction activities. This includes waterways crossed by access tracks and waterways that have tower footings located within the minimum set back distance (as defined EPR SW1) b. Monitor water quality prior to construction commencing (subject to flow conditions in seasonal waterways) to establish baseline ambient water quality conditions both upstream and downstream of potential point of impact (i.e., track crossing or tower footing). c. Monitor water quality during construction to detect impacts to water quality and take actions to address impacts d. Monitor water quality following completion of construction to establish return to pre-construction water quality conditions both upstream and downstream (allowing for natural and seasonal variability). 2. The monitoring program must: a. Be consistent with recommendations for surface water monitoring provided in EPA Publication IWRG701 (Sampling and analysis of waters, wastewaters, soils and wastes and the Australian and New Zealand Guidelines for Fresh and Marine Water Quality). b. Specify locations, parameters, and frequency of monitoring. c. Take into account the timing of construction works so that monitoring programs are reflective of site activities. 3. Measures for addressing any water quality impacts attributed to the Project must be outlined in the Surface Water Management Plan (EPR SW2).	All	Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
SW4	**Minimise risks from changes to flood levels, surface flows and velocities** 1. Undertake a flood assessment for the Project during its detailed design phase to inform development of design and construction methods to avoid and minimise impact to flood levels, surface flows and velocities. The flood assessment is to be undertaken in accordance with the Guidelines for Development in Flood Affected Areas (DELWP, 2019) and the requirements of the relevant CMAs. a. The assessment must identify potential flood risks and mitigate these through appropriate design considerations by addressing the following criteria supported by flood modelling where possible: i. Flood safety: Refer to EPR SW6 for including flooding into the emergency response plan. ii. Flood damages: As terminal stations are considered critical infrastructure, all electrical plant equipment at the proposed new 500kV terminal station near Bulgana must be set at a threshold level based on an appropriate freeboard allowance above the 1% AEP flood level including consideration of climate change and in consultation with the relevant referral authority. iii. Flood impacts: Flood impact assessment, including impacts on adjacent landholders and users, and on waterway and floodplain function within the floodplain (as defined by the 1% AEP flood extent), including in ephemeral waterways. iv. The adopted flood and climate change conditions must be revisited at 5-yearly intervals in line with EPR CC2. If material changes have occurred in climate conditions and associated flood risks, relative to those forecast and/or assumed at design stage, then additional flood risk assessments are to be carried out. 2. Design for, and implement measures for the management of stormwater runoff from impervious surfaces to minimise the risk of harm to surface water environments, so far as reasonably practicable	Access Tracks, Transmission Towers, Expanded Bulgana Terminal Station, New 500kV terminal station near Bulgana, Laydown Areas	Design, Operation
SW5	**Manage stormwater runoff to reduce potential for surface water impact** 1. Conduct periodic inspections of terminal stations, cleared easement areas and permanent AusNet access tracks located within minimum waterway set back distances or at waterway crossings, to maintain conditions to minimise impacts of stormwater runoff on waterways.	Terminal stations, Cleared easement areas, Access tracks	Operation
SW6	**Operational emergency flood response management** 1. Prior to the commencement of operation, develop a flood response management plan for the Project in consultation with councils and implement during operation. The plan will be consistent with AusNet's existing procedures and include relevant flood response actions, clear roles and responsibilities, and consideration of available Municipal Flood Emergency Plans and Local Flood Guides.	All	Operation
Greenhouse gas			
SG1	**Develop and implement sustainability targets and a Sustainability Management Plan** 1. Develop and implement sustainability targets and specify ratings to reduce construction and operational greenhouse gas emissions. 2. To aid in achieving the targets, the Principal Contractor must:	All	Design, Construction, Operation

EPR Code	Requirement	Project Component	Project Stage
	a. develop a Construction Sustainability Management Plan prior to the commencement of construction and implement during construction b. develop an Operational Sustainability Management Plan prior to the commencement of operation and implement during operation. 3. The plans referred to item 2 above, must contain measures to meet the sustainability targets and specified ratings and include the requirement to monitor and report on the progress of achieving the sustainability targets and implementation of the Sustainability Management Plans. At a minimum, this will include: a. Measures to minimise fuel combustion where possible. b. Adopting the waste management hierarchy in accordance with the Environment Protection Act 2017. c. Vendors must adopt technology to minimise handling of sulfur hexafluoride (SF6) during delivery and maximise the efficiency of SF6 utilisation as far as practicable when its use cannot be avoided. d. Measures to track and manage sulfur hexafluoride (SF6) utilisation, including a leak detection and repair (LDAR) strategy to effectively detect and rapidly manage any SF6 leaks.		
SG2	~~Consider~~ Implement **environmentally sustainable design** 1. Select and source materials in detailed design, and monitor energy and carbon use during construction, to reduce greenhouse gas emissions associated with materials and energy consumption as far as practicable. 2. Investigate, document and implement opportunities to use green power sourced from renewable energy and bio diesel where practicable. 3. Integrate sustainable design practices into the design process to minimise, to the extent practicable, greenhouse gas emissions arising from construction, operations and maintenance of the Project in line with the ratings and targets selected as part of SG1.	All	Design, Construction
Transport			
T1	**Develop and implement Traffic Management Plans** 1. Develop, prior to commencement of construction, Traffic Management Plans (TMPs) to be implemented during construction to manage risks, so that works are delivered in a manner which promotes safety on the existing and future road and rail network, and minimises and manages disruption to all transport modes due to construction traffic required for Project construction. TMPs can be prepared in stages according to locations of Project works and the roads used by construction traffic. TMPs must be prepared in consultation with the responsible road authorities pursuant to the Road Management Act 2004. Where a TMP or the TMP for the relevant stage relates to declared arterial roads, it is prepared to the satisfaction of the Head, Transport for Victoria (as the responsible road authority). TMPs must, as a minimum: a. Be consistent with Clause 3 of Schedule 7 to the *Road Management Act 2004* and be developed in accordance with the Code of Practice for Worksite Safety – Traffic Management and Australian Standard AS1742.3: Manual of uniform traffic control devices, Part 3: Traffic control for works on roads.	All	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	b. Confirm routes for construction haulage and construction vehicles (including Oversize and Overmass (OSOM) vehicles) travelling to and from the Project laydowns and Construction Sites, including the number and types of vehicles, confirmation of access point locations and identify whether new or altered access arrangements are required to state-managed road or rail networks or land in a PAO if the purpose of acquisition is for transport purposes, recognising sensitive receptors (including school traffic, active transport users and public transport users) and minimising the use of local roads where practicable. c. Include mitigation measures to avoid and minimise road safety impacts as a result of the Project. d. Include mitigation measures as required to avoid and minimise disruption to transport network users including traffic, public transport, school traffic and buses, freight, pedestrian and bicycle movements as a result of the Project. 2. In developing Project TMPs, the Principal Contractor must: a. Consider and coordinate with other TMPs developed for the Project and TMPs developed for other works potentially impacting transport routes in the same area. b. Prepare function layout plans and swept path analysis for movements of all OSOM vehicles along proposed construction haulage and construction vehicle routes that are state-managed roads. c. Consult with all relevant road authorities including the Department of Transport and Planning, Public Transport Victoria, VicTrack, National Heavy Vehicle Regulator, emergency services, and local Councils. This will include the exchange of information and discussion of issues and feedback for haulage routes (including OSOM vehicles), road modifications/upgrades (as identified in pre-construction dilapidation surveys required by EPR T2), alternate/detour routes, access points and local access routes, and optimisation of works method and staging. This may also include engagement regarding sensitive, high-risk locations with stakeholders about the need for any additional measures. d. Use Austroads Guide to Temporary Traffic Management Part 10 - Supporting Guidance, undertake independent Road Safety Audits (RSA) of all TMPs prior to their implementation to confirm that Project construction activities comply with all relevant road and transport authority requirements with respect to transport network user safety. Mitigation measures recommended by the RSA will be considered in the TMPs. e. Obtain approval from the relevant road authorities for each TMP including the Department of Transport and Planning, National Heavy Vehicle Regulator, and relevant local Councils, and advise on likely implementation timing.		
T2	**Undertake dilapidation surveys, road condition monitoring and rectification/restoration** 1. Based on the location of construction works and the council-managed roads, including bridges and culverts, to be used for construction haulage and heavy vehicles identified in the TMPs required by EPR T1(1b), the Principal Contractor must undertake dilapidation surveys, road condition monitoring and rectification/restoration in accordance with this EPR T2. These activities must be undertaken for construction haulage and heavy vehicle routes at the following frequency: a. Dilapidation survey and upgrade/rectification: Prior to commencement of construction works at each location. Dilapidation surveys will document the existing road condition and be used to determine any upgrades and	Access tracks, Transmission towers, Terminal stations, Stringing pads, Laydown areas	Design, Construction

EPR Code	Requirement	Project Component	Project Stage
	rectifications required prior to use by Project haulage and heavy vehicles. Roads identified for upgrade works must be upgraded ahead of construction stage works commencing. b. Road condition monitoring and rectification: Monitoring, reporting and rectification by the Principal Contractor throughout the construction period, to identify when damage occurs due to Project haulage and heavy vehicles, and any maintenance/rectification required. c. Dilapidation survey and restoration: Once construction works at each location are complete, dilapidation surveys will determine restoration required as per Item 3. 2. The aApproach adopted for Items 1a), 1b) and 1c) above to be developed to the satisfaction of the relevant responsible authority. 3. In accordance with Clause 12 of Schedule 7 to the *Road Management Act 2004*, any council managed road, including bridges and culverts, that experiences damage or degradation due to Project construction traffic must be restored to the previous condition as recorded in the pre-construction dilapidation surveys. Any such works will be done by the Principal Contractor in accordance with necessary approvals and to the satisfaction of the relevant council. A plan will be developed for restoration works to the satisfaction of the relevant councils, to be implemented at the end of the construction period for relevant locations. Road restoration works are to be informed by dilapidation surveys as described in Item 1a). 4. Road condition monitoring and outcomes during Project construction must be shared with local council and relevant transportation authorities. 5. Traffic Management Plans (EPR T1) must be prepared and implemented to undertake any works to rectify/restore any Project damage or degradation at specific locations found through Item 1a), 1b) and 1c).		

29.9.3 Other recommended requirements

The draft Incorporated Document captures requirements related to management of bushfire risk and of the temporary workforce accommodation facilities. These requirements were identified by the impact assessments in the EES technical reports and have informed the development of conditions in the draft Incorporated Document. These requirements are not EPRs however are related to the avoidance, minimisation and management of potential Project impacts and would be required to be achieved to comply with Project primary approval. These requirements are provided for reference in Table 29.11.

Table 29.11 Other environmental management requirements captured as conditions of the draft Incorporated Document [incorporate any updates required as a result of the IAC's recommended changes to the Incorporated Document]

Draft Incorporated Document condition	Requirement
Bushfire management	
Draft Incorporated Document condition 4.11.1	4.11.1 Before development starts, a Construction Bushfire Management Plan must be prepared in consultation with the relevant fire authority and approved and endorsed by the Minister for Planning. The Construction Bushfire Management Plan must address the following:

Draft Incorporated Document condition	Requirement
	a. Controls on hot works, flammable liquid storage, vehicle use and other activities that could result in fire ignition, including additional controls during the declared fire danger period, Total Fire Ban days and any days of Catastrophic fire weather conditions. b. Securing Country Fire Authority permits for any essential hot works on Total Fire Ban days. c. Management of stores of fuel or other flammable materials. d. Separation of any offices, lunch rooms and other buildings in which people will congregate in laydown areas from bushfire fuels, resulting in no more than BAL-12.5 exposure. e. Construction of occupiable buildings at the terminal station sites to have a minimum of BAL 12.5 construction. f. Provision of mains and/or static water supply and hoses at laydown areas. g. Provision of vehicle-based fire water supply, pumps and hoses at all transmission line construction sites during declared fire danger periods. h. Coordination with Councils and relevant fire authority to develop conditions under which municipal fire control lines and strategic fire access routes are used by construction traffic during the declared fire danger period and periods of elevated fire weather. i. Communication of forecast fire weather conditions to the construction workforce j. Removal of vegetation residue from clearing of vegetation for the Project k. Applicable bushfire-related training and competency requirements for construction personnel. l. Procedures for on-going management of vegetation within the terminal station sites to maintain those sites as low threat vegetation as per AS3959:2018 Construction of buildings in bushfire prone areas.
Draft Incorporated Document condition 4.11.2	4.11.2 Prior to commencement of construction, all relevant fire authorities must be notified (for dissemination to incident control personnel) that the infrastructure is not electrically active during the construction phase. These agencies must also be notified prior to the activation of the Project, of the date that the infrastructure should be assumed to be electrically active. The second notification must be accompanied by the provision of spatial data on the locations of transmission towers, conductors, new components of the Bulgana and Sydenham terminal stations and the new terminal station near Bulgana.
Temporary workforce accommodation facilities	

Draft Incorporated Document condition 4.13.2	4.13.2 Before development of a temporary workforce accommodation facility starts, a Temporary Workforce Accommodation Plan (TWAP) must be prepared for the facility in consultation with the relevant council and abutting neighbours and approved and endorsed by the Minister for Planning. The TWAP(s) must include the following as relevant: a. Fully dimensioned site plans and elevations for each accommodation site including: i. The boundaries and dimensions of the site. ii. The location of all on-site native vegetation and identification if it is to be removed or retained iii. The siting and layout of all buildings and works and a description of all facilities provided. iv. Elevation plans showing all buildings and works. v. Allowance for a perimeter road that has a minimum width of 4 metres and is constructed to an all-weather use standard. vi. Adjoining roads. vii. The location and use of buildings and works on adjoining land. viii. Relevant ground levels. ix. All proposed driveways, car parking and loading areas. x. Proposed landscape areas including perimeter fencing details, external lighting, drainage and stormwater treatment measures. xi. All external storage and waste treatment areas. xii. Demonstration that the demountable accommodation units (sleeping areas) are not sited within 35 metres of adjacent bushfire hazards. xiii. Demonstration that ancillary buildings are not sited within 19 metres of adjacent bushfire hazards. xiv. Any emergency management design features and facilities required as result of condition 4.13.3. xv. Annotation on the site plan for the Lexton facility stating that the temporary workforce accommodation buildings will have a minimum of BAL 29 construction xvi. Annotation on the site plan for the Ballan facility stating that the temporary workforce accommodation buildings will have a minimum of BAL12.5 construction b. The estimated duration of operation of each accommodation site. c. Demonstration that the building locations for accommodation on the site are appropriate having regard to: i. Access, roads and on-site parking. ii. Whether the land is flood prone, at risk of bushfire, or has any particular environmental sensitivity, and that the works will be suitably managed to address any risk. iii. Building-to-building fire spread. iv. Waste collection and storage. v. Access to water, electricity and sewerage infrastructure. vi. Drainage and stormwater management. d. Where an accommodation facility requires new or altered access to a declared arterial road, demonstration that the access plans, including functional layout plans, and details of any required mitigation works have been prepared to the satisfaction of the Head, Transport for Victoria.

Draft Incorporated Document condition	Requirement
Draft Incorporated Document condition 4.13.3	4.13.3 Before development of any Temporary Workforce Accommodation starts, a Construction Bushfire Management Plan must be prepared in consultation with the relevant fire authority that addresses the requirements at Clause 4.11.1 where relevant to the temporary workforce accommodation.
Draft Incorporated Document condition 4.13.4	4.13.4 Before use of the temporary Workforce Accommodation sites start, an Emergency Management Plan must be prepared in consultation with the relevant Fire Authority and the relevant councils, and approved and endorsed by the Minister for Planning. The Emergency Management Plan must include the following information: a. Procedures for how to deal with fire in buildings, bushfire, and medical emergencies. b. A Bushfire Preparedness and Response Plan addressing the following matters: i. Actions for days with elevated fire danger ii. Monitoring of and response to fire emergency warnings iii. Water and power supply iv. Evacuation and/or shelter in place instructions v. Location of assembly areas vi. Fire response roles, responsibilities and competency requirements vii. Access to and use of fire water supplies, hoses and other fire response equipment viii. Implementation of the preparedness and response plan c. Provide for the procedures outlined in the Bushfire Preparedness and Response Plan as well as Site Plan to be on prominent display in the Workforce Accommodation buildings.
Draft Incorporated Document condition 4.13.5	4.13.5 Prior to commencement of any works associated with the Temporary Workforce Accommodation, a Construction Environmental Management Plan (CEMP) must be submitted and approved and endorsed by the Minister for Planning. The CEMP must include the following: a. Procedures to identify, manage and monitor environmental risks specific to the construction activities including air quality, biosecurity, ground water, contaminated land and spoil management, waste, noise, sediment and erosion, surface water, light spill and unexpected finds protocol. b. Measures to protect native vegetation that is to be retained. c. Procedures to manage construction activities in accordance with the relevant EPA Publications. d. The person(s) responsible for implementation and compliance of each of the CEMP requirements, including details of a site contact or site manager. e. A process for inspections and monitoring, auditing, and reporting.

Draft Incorporated Document condition	Requirement
Draft Incorporated Document condition 4.13.6	4.13.6 Before use of the temporary Workforce Accommodation sites starts an Operational Management Plan (OMP) must be prepared in consultation with the relevant council, and must be approved and endorsed by the Minister for Planning. The OMP must include: a. Procedures for on-going management of vegetation with the sites to maintain it as low threat vegetation as per AS3959:2018 Construction of buildings in bushfire prone areas. b. Details of staffing and management arrangements. c. Information about the manner in which workers will be transported from the Workforce Accommodation facilities to the relevant worksite, including working hours, rostering and rotations. d. A protocol for managing worker access to settlements in proximity to Workforce Accommodation facilities. e. Information about the arrangements for medical services to be available on-call and via programmed visits, to attend to the medical needs of workers if required. f. Complaint management procedures.
Draft Incorporated Document condition 4.13.8	4.13.8 Following completion of construction of the Project, a decommissioning plan for Workforce Accommodation sites must be approved and endorsed by the Minister for Planning. Decommissioning and rehabilitation must be undertaken in compliance with the approved plan.

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Appendix F Procedural issues

i) VicGrid participation in the Hearing

The IAC received a number of objections to VicGrid (S434) participating in the Hearing process, including on the basis that it may prejudice submitters and unduly influence the IAC in favour of the government's policy agenda.

The IAC determined to accept VicGrid's request to be heard on the basis that:

- the Terms of Reference require the IAC to review and consider all submissions and evidence provided to the IAC by (among others) state agencies
- the Terms of Reference require the IAC to report its findings on whether acceptable environmental outcomes can be achieved, having regard to legislation and policy (among other things)
- the Terms of Reference require the IAC to review and provide advice on the draft PSA, which requires the IAC to:
  - assess the Project and its impacts (positive and negative) against the planning policy framework and adopted government policy
  - balance competing policy objectives and determine whether the draft PSA delivers net community benefit
- the IAC was satisfied VicGrid's submission would assist it in understanding the policy context for the Project, and undertaking a net community benefit analysis.

ii) Updated biodiversity information

On 5 September 2025, the Proponent uploaded the following information on the Western Renewables Link website:

- BD1 Report
- an updated version of the Offset Management Strategy.

PPV notified all submitters of this updated information on 9 September 2025.

Several submitters raised concerns about this material not being available during the exhibition period and associated procedural fairness issues. There was also confusion about the status of this material, noting that the Western Renewables Link website stated that parties should not make submissions in relation to this material, but rather on the exhibited EES material.

The IAC considered the additional biodiversity material, as the material is directly relevant to the matters addressed in the EES that the IAC is required to consider and report on. See Chapter 4.

Parties were able to make submissions and present evidence about the additional biodiversity material. The IAC was satisfied parties had sufficient time to read and understand the material before they presented their evidence and submissions.

iii) Independent peer reviews and updated construction program advice

At the commencement of the exhibition period on 30 June 2025, the Proponent uploaded the following information to the Western Renewables Link website:

- independent peer reviews in:
  - agriculture and forestry
  - aviation
  - biodiversity
  - bushfire
  - electromagnetic interference (EMI) and electromagnetic fields (EMF)
  - historical heritage
  - landscape and visual
  - land use and planning
- updated construction program material consisting of:
  - a document titled 'EES-Program-change-Technical-Specialists-Brief'
  - 20 program change advice documents authored by technical specialists who contributed to the EES.

Several submitters raised concerns about this additional material and associated procedural fairness issues. Some submitters queried the status of the material, and whether the authors of the peer reviews should be available for cross examination.

The IAC was required under its Terms of Reference to consider the peer reviews and the change advice documents, as they formed part of the exhibited documents.

Parties were able to make submissions and present evidence on the peer reviews and the program change documents, and cross examine the authors of the peer review that were called by the Proponent

- Mr Milner (Planning)
- Mr Schutt (landscape)
- Mr Lane (biodiversity)
- Mr Potter and Mr Taylor (bushfire).

The IAC did not consider it was necessary to direct the authors of the remaining peer reviews to be available for cross examination. The IAC advised the Proponent and parties at the Directions Hearing that peer reviews that were not fully tested through the Hearing process may be afforded less weight by the IAC.