Western Renewables Link

Minister's assessment under the Environment Effects Act 1978

July 2026

Acknowledgement of Country

We proudly acknowledge the First Peoples of Victoria. We acknowledge their ongoing strength in practising the worlds' oldest living culture. We acknowledge the Traditional Owners' lands, waters and skies on which we live and work. We also pay our respect to their Elders past and present.

Description of artwork

Aaron Duggan (Gunaikurnai) 'Movements Between the Five Clans' 2019, acrylic on canvas

'The tracks are going between the five clans of the Gunaikurnai and the hands are the symbols of my spirit travelling around the campsites.'

This artwork was created through programs provided by the Torch. The Torch provides art, cultural and arts industry support to Indigenous offenders and ex-offenders in Victoria. The Torch aims to reduce the rate of re-offending by encouraging the exploration of identity and culture through art programs to define new pathways upon release.

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Abbreviations

AOD	Area of Disturbance
AEP	Annual exceedance probability
AEMO	Australian Energy Market Operator
AHD	Australian height datum
BIA	Biodiversity Impact Assessment
BCS	Bioregional conservation status
BMO	Bushfire Management Overlay
BMSS	Business Mitigation and Support Strategy
BPG	Barunah Park Geelong Pty Ltd
CASA	Civil Aviation Safety Authority
CEMP	Construction Environment Management Plan
CFA	Country Fire Authority
CGE	Computable general equilibrium
CHMP	Cultural heritage management plan
CVA	Cultural values assessment
DDO	Design and Development Overlay
DEECA	Department of Energy, Environment and Climate Action
DELWP	Department of Land, Water and Planning
DTP	Department of Transport and Planning
EES	Environment effects statement
EIA	Economic impact assessment
EMI	Electromagnetic interference
EMF	Environmental management framework
EP Act	*Environment Protection Act 2017* (Vic)
EPA	Environment Protection Authority
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
EP Regs	Environment Protection Regulations 2021
EPRs	Environmental performance requirements
ERS	Environmental Reference Standard
ESC	Essential Services Commission
EVCs	Ecological Vegetation Classes
FFG Act	*Flora and Fauna Guarantee Act 1988* (Vic)
FFMV	Forest Fire Management Victoria

FP-SR	First People – State Relations
GBGW	Grey Box Grassy Woodlands and Derived Native Grasslands of South-eastern Australia
GC	Government combined
GED	General Environmental Duty
GVAP	Gross value of agricultural production
HVAC	High voltage alternating current
HVDC	High voltage direct current
IAC	Inquiry and Advisory Committee
IEA	Independent Environmental Auditor
ISP	Integrated Systems Plan
LAC Act	*Land Acquisition and Compensation Act 1986*
LOS	Level of service
MNES	Matters of national environmental significance
NEM	National Electricity Market
NEVA	*National Electricity (Victoria) Act 2005*
NTGVVP	Natural Temperate Grassland of the Victorian Volcanic Plain
OEMP	Operations Environmental Management Plan
OLS	Obstacle limitation surface
OSOM	Oversize and overmass vehicles
PAMP	Property Access and Management Plan
P&E Act	*Planning and Environment Act 1987* (Vic)
PSA	Planning Scheme Amendment
RAP	Registered Aboriginal Party
RCS	Rural Conservation Zone
REZs	Renewable energy zone(s)
RET	Renewable energy target
RIT-T	Regulatory Investment Test for Transmission
RLZ	Rural Living Zone
SPAR	Specific Property Access Requirements
SCO	Specific Controls Overlay
SLO	Significant Landscape Overlay
SWVLAS	South West Victoria Landscape Assessment Study – Landscape Character of South West Victoria
TEC	Threatened ecology community
TO	Traditional Owner
TN	Technical note

TRG	Technical reference group
UNESCO	United Nations Educational, Scientific and Cultural Organisation
VAPR	Victorian annual planning report
VHI	Victorian Heritage Inventory
VHR	Victorian Heritage Register
VPPs	Victoria Planning Provisions
WRL	Western Renewables Link
WYRGGW	White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland

Executive Summary

AusNet Transmission Group Pty Ltd (AusNet) proposes to construct and operate a new overhead double circuit 500kV transmission line, approximately 190 km in length from near Bulgana in Victoria's west, to the Sydenham Terminal Station in Melbourne's north-west. The project is known as Western Renewables Link (WRL) and is being progressed to upgrade the transmission network to enable access to renewable energy generation in western Victoria and support the state's clean energy transition.

On 4 August 2020, the former Minister for Planning decided under the *Environment Effects Act 1978*, that an environment effects statement (EES) was required for the project due to a range of potentially significant effects of the project, which was then named the Western Victoria Transmission Network Project. The EES was required to provide an integrated, robust and transparent process to assess the project's effects. In August 2023, following re-referral of a form of the project without the Sydenham Terminal Station the Minister determined that the new form of the project required an EES.

The EES was exhibited for public comment from 30 June to 25 August 2025, receiving 534 written submissions. Following exhibition, an Inquiry and Advisory Committee (IAC) was appointed to consider the EES, draft planning scheme amendment (PSA) and submissions received on the exhibited documents. The IAC held a public hearing over 53 sitting days to assess the project's environmental effects and draft PSA. I received the IAC's report on 8 May 2026.

I have been greatly assisted in this assessment by the efforts of the IAC, its report, the various parties who made submissions to the IAC and gave evidence in its hearings, and the work of my department.

The transition to renewables in Victoria necessitates significant upgrades to our transmission network. A key objective of the project is to maintain the security and reliability of the transmission network by increasing electricity transmission capacity in western Victoria to enable access to the range of existing and proposed renewable generation projects in western Victoria. It is my assessment that the project is of critical importance to the development of a secure and reliable transmission network, in particular one that sustainably supports the transition to clean and reliable energy that meets Victoria's growing energy needs. However, a project of this scale also comes with the potential to generate significant environmental effects.

Construction of the project though the areas that it needs to traverse will require clearing a significant amount of native vegetation which will result in associated impacts on threatened flora and fauna species. Operation of the project will also generate some likely significant impacts on public and private viewpoints and landscape values in a selection of areas located in proximity to the proposed route, including Darley. Landholders most affected by changes in visual amenity have the potential to experience notable social impacts, particularly where they place great value on the views and lifestyle afforded by their properties and locality, such as in Darley. Bushfire risks also require careful management, particularly in the north of Darley where access and egress routes are already very limited and fuel loads in the surrounding area are high.

While the EES applied measures to avoid, minimise and in some cases, offset impacts and the IAC report and this assessment have recommended further such measures, some significant impacts are still expected on landscape and visual, biodiversity and social values. The assessment finds that the project would give rise to a small incremental increase to the existing bushfire risk profile in areas traversed by the proposed route, but notes that the bushfire risk in areas such as north Darley is already high.

The IAC considered that the cumulative impacts in Darley were unacceptable while some individual impacts in Darley were either likely to be, or could be considered to be, unacceptable. The IAC recommended that AusNet should further investigate alternatives that avoid or better mitigate impacts in this area. As outlined in this assessment, on balance while I consider that these impacts are significant, they are acceptable. These impacts will be further addressed through the effective implementation of the final Environmental Management Framework (EMF) and Environmental Performance Requirements (EPRs). However, I support the intent of the IAC's recommendation to explore any feasible options in the Darley area that reduce likely

significant effects and improve environmental outcomes, while achieving the objectives of the project. To this end, my assessment recommends a new condition of the Incorporated Document to further investigate what opportunities might exist to better manage and further reduce environmental risks in the Darley area, particularly relating to landscape and visual, bushfire, biodiversity and social values. While this work is not essential to arrive at conclusions on the acceptability of likely effects, this work could improve outcomes for an area of the project for which there are clear challenges to balance impacts and project outcomes.

The effects of the project on other values- agriculture and forestry, economic, heritage, land use, air quality, aviation, contaminated land, electromagnetic interference and electric and magnetic fields, geology and soils, greenhouse gas and climate change, groundwater, noise and vibration, surface water and transport - are acceptable, subject to the implementation of the EPRs as recommended by the IAC and as refined through my assessment.

The primary approval to be informed by the EES is a PSA, which would introduce controls to facilitate the use and development of the project and provide for an EMF amongst other things, to do so. My assessment of the PSA under the *Planning and Environment Act 1987* will not occur until after this assessment under the Environment Effects Act is complete.

The project is a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) due to potential significant impacts on matters of national environmental significance (MNES). The EES is an accredited state assessment process under the Bilateral agreement made under section 45 of the EPBC Act relating to environmental assessment (Bilateral (assessment) Agreement) between the State and the Commonwealth. Therefore, this assessment will also inform the EPBC Act decision to be made by the Commonwealth Minister for the Environment and Water about whether, and under what conditions, the project is to be approved.

On balance, I consider the residual impacts on MNES will be acceptable with implementation of the appropriate environmental management and offsetting, as outlined in this assessment. I support amendments to mitigation measures as recommended by the IAC and have provided further recommendations in my assessment to assist in achieving acceptable outcomes for MNES. The project is likely to have a significant impact on Grey Box (Eucalyptus microcarpa) Grassy Woodlands 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, Golden Sun Moth, Swift Parrot, Southern Greater Glider and the Victorian Grassland Earless Dragon. While residual impacts on MNES may be able to be further reduced during the detailed design process, unavoidable significant impacts will need to be offset in accordance with the EPBC Act Environmental Offsets Policy.

Decision-makers need to consider this assessment before deciding whether and how the project should proceed. As a matter of good practice, I also expect decision-makers to write to me to advise how my assessment was considered and applied.

1. Introduction

In light of the potential for significant environmental effects, on 4 August 2020 the Minister for Planning determined under the *Environment Effects Act 1978* (Vic) (Environment Effects Act) that AusNet Transmission Group Pty. Ltd. (AusNet; the proponent) needed to prepare an environment effects statement (EES) for the proposed Western Victoria Transmission Network Project (now known as the Western Renewables Link project; the project). Following a re-referral of the project in 2023 which removed the Sydenham Terminal Station from the project, on 22 August 2023 the Minister determined that the updated form of the project required an EES.

AusNet prepared an EES, which was publicly exhibited for 40 business days from 30 June to 25 August 2025.

On 17 July 2025, following consent of the Governor in Council and in accordance with terms of reference dated 25 June 2025, an Inquiry and Advisory Committee (IAC) was appointed, to consider the EES, draft planning scheme amendment (PSA) and submissions received on the exhibited documents. Planning Panels Victoria received 534 submissions on the exhibited EES and draft PSA. The IAC held a public hearing over 53 sitting days between 27 October 2025 and 3 March 2026. The IAC tabled a total of 703 documents. The IAC provided its report to me on 8 May 2026. The report, along with the EES, its supporting technical reports, public submissions, tabled documents and relevant legislation, policy and guidelines have informed my assessment of the environmental effects of the project under the Environment Effects Act.

I thank the IAC for its considered report and advice. I also thank everyone who invested their time to make submissions and participate in the public hearing and the EES process. I have considered all the matters relevant to the assessment of the project under the Environment Effects Act.

1.1. Purpose of this document

This document constitutes my assessment of the environmental effects of the project under the Environment Effects Act. This assessment represents the final step in the EES process and provides comprehensive advice to decision-makers and the proponent on the likely environmental effects of the project, their significance and acceptability, and recommendations on how the effects should be addressed in relevant statutory decisions and the delivery of the project. This assessment will inform the relevant statutory decision-makers, under Victorian law for the project.

The EES process is also an accredited state assessment process under the *Bilateral agreement made under the section 45 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) relating to environmental assessment* (Bilateral (assessment) Agreement) between the State and the Commonwealth made under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This EES has been undertaken as an accredited state assessment. Therefore, this assessment will also inform the EPBC Act decision to be made by the Commonwealth Minister for the Environment and Water about whether, and under what conditions, the project is to be approved.

1.2. Structure of the assessment

The structure of my assessment is as follows:

- Chapter 2 provides a brief description of the project;
- Chapter 3 refers to key relevant Acts;
- Chapter 4 summarises the project's proposed planning controls, EMF and other post-approval governance arrangements;
- Chapter 5 assesses the environmental effects of the project in relation to the evaluation objectives by environmental discipline;
- Chapter 6 outlines key matters relating to the assessment and presents my conclusions, including responses to the recommendations of the IAC;

– Appendix A contains a consolidated assessment of impacts on matters of national environmental significance (MNES); and
– Appendix B contains my recommendations about the environmental performance requirements (EPRs).

2. Project description

AusNet proposes to construct and operate a new overhead double circuit 500kV transmission line, approximately 190km in length, from near Bulgana in Victoria's west to the Sydenham Terminal Station in Melbourne's north-west. The EES described the project as the:

– Construction and operation of a new overhead double circuit 500kV transmission line from a new 500kV terminal station near the existing Bulgana Terminal Station to the Sydenham Terminal Station;
– Construction and operation of a new 500kV terminal station near Bulgana;
– Expansion of the existing Bulgana Terminal Station and connection to the proposed new terminal station near Bulgana via a single circuit 220kV transmission line, comprising paired single circuit towers;
– Connection works at the Sydenham Terminal Station including the modification of a bay and a bay extension with associated infrastructure;
– Upgrade of Elaine Terminal Station, through the diversion of an existing line; and
– Protection system upgrades at connected terminal station sites.

Subject to approvals and development of detailed design through engagement with contractors, works for WRL would commence in 2026 with operations commencing in 2029.

The predominant land use across the project area is agriculture. Following construction of the project, areas that are not required for operational components of the project will be rehabilitated.

Figure 1 shows the project area and project land for the proposal being assessed via the EES.

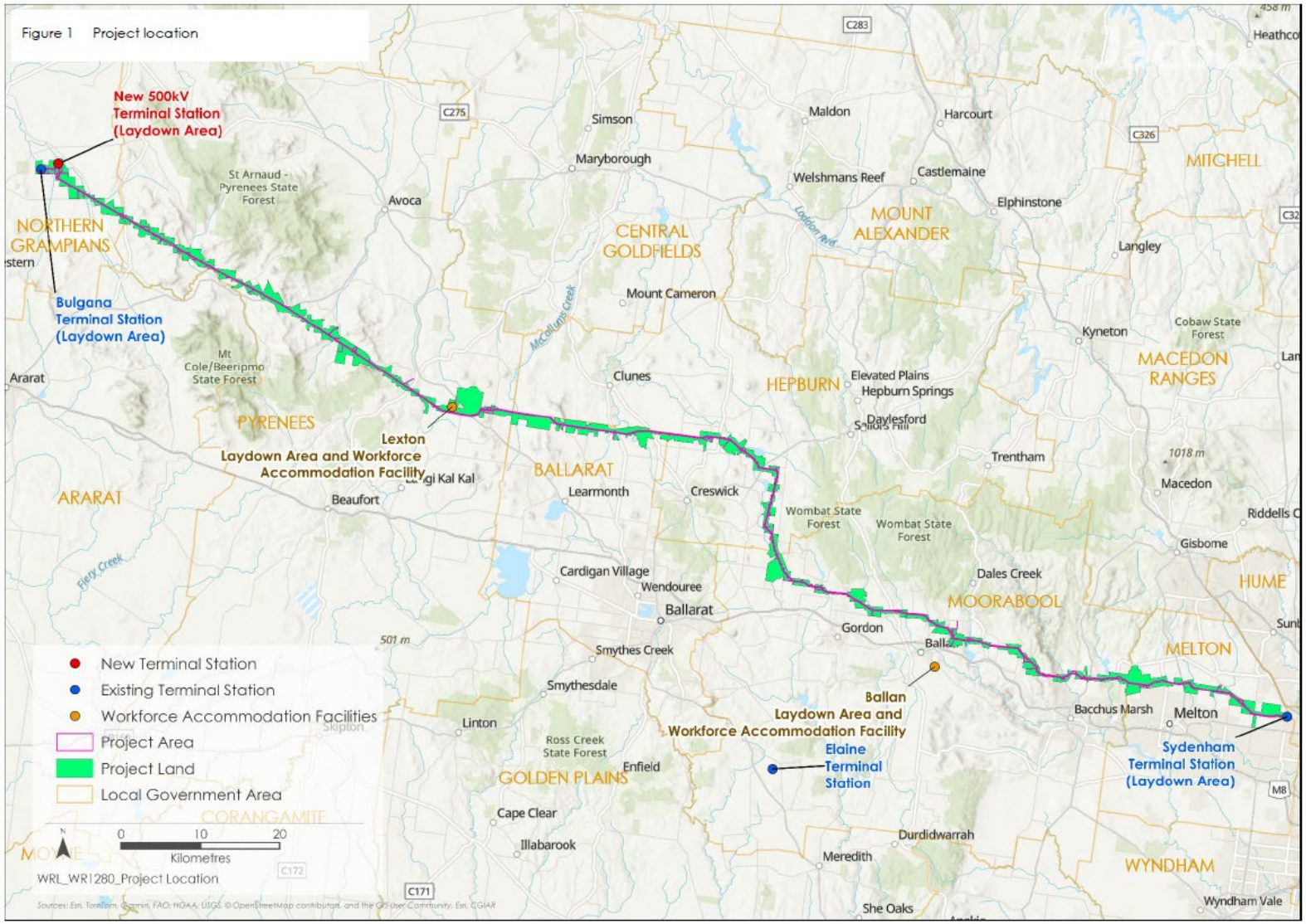


Figure 1 Project location
New 500kV Terminal Station (Laydown Area)
Bulgana Terminal Station (Laydown Area)
Lexton Laydown Area and Workforce Accommodation Facility
Ballan Laydown Area and Workforce Accommodation Facility
Elaine Terminal Station
Sydenham Terminal Station (Laydown Area)
New Terminal Station
Existing Terminal Station
Workforce Accommodation Facilities
Project Area
Project Land
Local Government Area
Kilometres
WRL_WR1280_Project Location
NORTHERN GRAMPIANS
PYRENEES
ARARAT
BALLARAT
CENTRAL GOLDFIELDS
MOUNT ALEXANDER
HEPBURN
MACEDON RANGES
MITCHELL
MOORABOOL
HUME
MELTON
WYNDHAM
GOLDEN PLAINS
CORANGAMITE
Ararat
Beaufort
Avoca
Maryborough
Simson
Maldon
Harcourt
Castlemaine
Welshmans Reef
Elphinstone
Mount Cameron
Clunes
Kyneton
Langley
Daylesford
Trentham
Macedon
Gisborne
Creswick
Learmonth
Cardigan Village
Wendouree
Ballarat
Gordon
Dales Creek
Smythes Creek
Smythesdale
Linton
Enfield
Cape Clear
Illabarook
Meredith
Durdidwarrah
Bacchus Marsh
Melton
Wyndham Vale
She Oaks
St Arnaud - Pyrenees State Forest
Mt Cole/Beeripmo State Forest
Wombat State Forest
Ross Creek State Forest
Cobaw State Forest
C275
C283
C326
C172
C171
M8

2.1. Key areas defined in the EES

EES technical studies often referred to a study area, project land, project area, project corridor, proposed route and easement.

Study area

The study area varied according to each of the EES technical studies and was based on a suitable search area for collecting data to support the assessment.

Project land

The project land is an area of approximately 21,200 hectares (ha) that encompasses all land parcels that could be used for the purpose of temporary construction and permanent operational project components. The project land corresponds with the extent of the Specific Controls Overlay (SCO) proposed as part of the draft PSA.

Project area

The project area is approximately 2,200 ha and wholly contained within the project land. It encompasses all areas that would be used to support the construction and operation of the project.

Project corridor

Identified in 2021 prior to the proposed route being identified, the project corridor extended from Bulgana in western Victoria to Sydenham in Melbourne's north-west.

Proposed route

The proposed route is located within the project area and is 100 to 170 m wide. It encompasses a nominal future easement (including a buffer either side) and the terminal station areas.

Easement

The project will acquire an easement to provide access for construction, operation and maintenance purposes (subject to approval) on freehold land. The easement width for much of the transmission line will be between 70 to 100m wide. On Crown land the authority to access, construct and operate the transmission line will be identified on a parcel-by-parcel basis.

Future activities in the easement are subject to restrictions to protect the integrity of the infrastructure. The EES outlined activities that are permitted, conditional and not permitted within the 500kV easement. For example, ground-growing crops are allowed within the easement without an AusNet safety assessment or permit if at least 5m away from a tower and earth movement change is less than 300mm in depth. In contrast, large water spray irrigators of the gun type are not allowed to operate in the easement due to safety risks and potential for damage to electricity infrastructure.

The project is described in more detail in Chapter 5 of the EES.

3. Statutory processes

This section refers to key legislation and statutory requirements relevant to the project. AusNet require a variety of statutory approvals under Victorian and Commonwealth law before it can proceed with the project. My assessment under the Environment Effects Act will inform relevant statutory decision-makers under the Planning and Environment Act 1987 (P&E Act), the Aboriginal Heritage Act 2006 (Aboriginal Heritage Act), as well as under some other relevant legislation. The project is also a controlled action requiring assessment and approval under the EPBC Act, which is informed by the accredited EES process.

3.1. Environment Effects Act 1978

The Environment Effects Act provides for assessment of proposed projects that are capable of having a significant effect on the environment. Following referral of a project to the Minister under section 8, the Minister decides if an EES is to be completed. When an EES is required, section 8C stipulates that a project and relevant approval decisions may not proceed until the Minister's assessment has been considered by the relevant decision-makers.

The steps in the EES process are set out within the *Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978* (eighth edition, 2023), made by the Minister under section 10 of the Environment Effects Act (the Ministerial Guidelines).

In light of the potential for significant environmental effects, on 4 August 2020 the Minister for Planning determined that an EES was needed for the proposed Western Victoria Transmission Network Project. The Minister issued procedures and requirements for the EES, under section 8B(5) of the Environment Effects Act, consistent with the Ministerial Guidelines.

The department convened a Technical Reference Group (TRG) for the project to provide advice to AusNet and the department on the preparation of the EES. Draft scoping requirements for the EES were exhibited for public comment in November 2020. After considering public submissions on the draft scoping requirements, final scoping requirements were issued in December 2020, specifying the range of matters to be addressed in the EES.

On 11 August 2023, AusNet referred a new form of the proposed project, named the Western Renewables Link. This form of the project did not encompass the construction of a new terminal station north of the existing Sydenham Terminal Station. On 22 August 2023 the Minister for Planning determined that an EES was required for this new form of the project.

The 22 August decision was accompanied by new procedures and requirements for the EES issued under section 8B(5) of the Environment Effects Act, as well as updated final scoping requirements.

The EES was prepared by AusNet and placed on public exhibition from 30 June to 25 August 2025. A draft PSA for the project was exhibited with the EES. The EES attracted 534 submissions, 13 of which were from state and local government bodies.

On 17 July 2025, an inquiry was appointed under section 9(1) of the Environment Effects Act to inquire into the environmental effects of the proposal and review submissions, in accordance with terms of reference approved on 25 June 2025.

The members of the inquiry were also appointed as an advisory committee under Part 7, section 151(1) of the P&E Act to consider the draft PSA. Planning Panels Victoria collected all the submissions made in response to the exhibited EES and the draft PSA, for consideration by the IAC.

The IAC held a Directions Hearing on 15 September 2025, followed by a public hearing, that ran from 27 October 2025 to 3 March 2026. The IAC provided its report on 8 May 2026.

The IAC report - along with along with the EES, its supporting technical reports, public submissions, tabled documents and relevant legislation, policy and guidelines - has informed the preparation of this assessment of the environmental effects under the Environment Effects Act.

This assessment is the final step in this EES process under the Environment Effects Act and has been carried out in accordance with the Ministerial Guidelines. Decision-makers need to consider this assessment before deciding whether and how the proposal should proceed. This assessment will inform approval decisions under the Victorian and Commonwealth legislation outlined below.

3.2. Victorian statutory approvals

The primary Victorian statutory approvals required for this project to proceed are:

- approved cultural heritage management plans (CHMPs) under the Aboriginal Heritage Act; and
- planning approval, in the form of a PSA under the P&E Act.

Planning and Environment Act

Approval under the P&E Act will be required for the project. This is being sought via amendments to six planning schemes: Northern Grampians, Pyrenees, Hepburn, Ballarat, Moorabool and Melton planning schemes. AusNet is seeking approval of the amendments via a GC (government combined) PSA, which would allow for the simultaneous amendment of more than one planning scheme by the Minister for Planning. The proposed PSA would apply the SCO to the project land in each of the relevant municipal districts and insert an Incorporated Document into each of the six planning schemes. The proposed Incorporated Document would allow the use and development of land in the SCO for the project to be undertaken in accordance with specific conditions.

The draft PSA was included with the exhibited EES as Attachment III. This provided the opportunity for the community and other stakeholders to comment on the draft planning controls. The IAC considered the draft PSA within their report.

Aboriginal Heritage Act

The Aboriginal Heritage Act stipulates that an approved CHMP must be prepared for works for which an EES is required. The project is situated on lands for which Barengi Gadjin Land Council Aboriginal Corporation, Eastern Maar Aboriginal Corporation, Dja Dja Wurrung Clans Aboriginal Corporation, Wadawurrung Traditional Owners Corporation and Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation are Registered Aboriginal Parties (RAP) under the Aboriginal Heritage Act.

Nine draft CHMPs (no. 17313, 17321, 17212, 17311, 18101, 18108, 20436, 18111 and 20459) have been prepared for the project. The CHMPs will be evaluated by the relevant RAPs, or by the Secretary to the Department of Premier and Cabinet where there was no RAP in place at the time the notice of intent to prepare a CHMP was submitted.

3.3. Other Victorian statutory approvals

The project also requires a range of other consents and permits under other legislation including:

- consent to undertake works on or across a waterway under the *Water Act 1989*;
- a permit to remove listed flora and fauna from public land under the *Flora and Fauna Guarantee Act 1988*;
- a permit to take or handle wildlife under the *Wildlife Act 1975*;
- a permit for impact to places on the Victorian Heritage Register (VHR) or Victorian Heritage Inventory (VHI) under the *Heritage Act 2017*;
- a permit to work in proximity to a railway reserve under the *Rail Management Act 1996*;

- consent for the bespoke clearance approach in Darley under the *Electricity Safety Act 1998* and associated regulations, if required;
- a permit to transport materials via heavy vehicles under the *Heavy Vehicle National Law Application Act 2013*; and
- consent to undertake works on roads under the *Road Management Act 2004*.

Easement agreements

As described in Section 2.1 of this assessment, the project will require easements to provide access for construction, operation and maintenance of the project on freehold land. AusNet has negotiated an 'Option for Easement' agreement with some landowners that would have an easement on their property. This is a voluntary, legally binding agreement (in the form of a deed) that grants AusNet the right to acquire an easement over the landowner's land on agreed terms, including compensation and payments, within a set period. The landowner would continue to have ownership and use of the land that is the subject of the easement, in accordance with the easement terms. These terms include limits on the construction of buildings and activities under transmission lines.

AusNet offers payment to landowners who enter the process of review and acceptance of an Option for Easement agreement. Payments are to be distributed prior to and after the Option for Easement is 'exercised', i.e., once the project receives the required approvals and proceeds to construction.

All landholders who sign an Option for Easement deed before the PSA for the project has been approved will be eligible for AusNet's Voluntary Hosting Benefit. This is a property-specific payment based on the area of the easement. Ausnet will distribute payment of this benefit should the project be approved. Early partial payment of the Voluntary Hosting Benefit was provided to landholders who signed a Land Access Consent prior to 30 June 2025 and to landholders who signed an Option for Easement prior to 1 December 2025. These early payments will be retained by landholders even if the project does not proceed.

Where an Option for Easement has not been agreed with a landowner, and if the project obtains the required approvals for it to proceed, AusNet will seek approval from the Governor in Council to compulsorily acquire an easement over private land in accordance with the *Electricity Industry Act 2000*. Landowners whose land is compulsorily acquired for the project will be compensated in accordance with the provisions of the *Land Acquisition and Compensation Act 1986* (LAC Act) through a one-off upfront payment.

In addition, the Victorian Government has committed to pay all landholders who host new electricity transmission infrastructure benefits of $200,000 per kilometre of typical easement area of hosted transmission, paid in annual instalments of $8,000 a year over 25 years, indexed to inflation.

On Crown land, tenure will need to be secured for construction, operation and maintenance works associated with the project. As outlined by the IAC, this is often achieved through a lease, licence or consent to occupy and conduct activities on land and secured by entering into agreements with the relevant government agency or Crown land administrator. Carriageway easements will also be secured for permanent access tracks that are outside the transmission line easement.

3.4. Commonwealth statutory approval

In July 2020, AusNet referred the proposed project to the Commonwealth Government (referral 2020/8741) for a determination on whether the project was a controlled action requiring assessment and approval under the EPBC Act.

On 2 September 2020, the project was determined to be a controlled action requiring assessment and approval under the EPBC Act because of its likely significant impacts on MNES: listed threatened species and communities (sections 18 and 18A). The project's impacts on MNES are to be assessed via an accredited state

assessment process, under the Bilateral (assessment) Agreement made between the Australian and Victorian governments under section 45 of the EPBC Act.

A variation to the EPBC Act referral 2020/8741 was requested by AusNet under section 156A of the EPBC Act to align the original project scope with the final proposal assessed in the EES. The variation request was accepted under section 156B of the EPBC Act on 13 November 2024.

Decisions about whether, and under what conditions, to approve the project under the EPBC Act are to be made after consideration of this assessment, which concludes the accredited state process. Appendix B consolidates information on MNES.

4. Environmental assessment and management framework

This section examines the proposed environmental management and planning control regime that has informed my assessment.

4.1. Management of environmental effects

The project will generate both positive and negative environmental effects. A sound regulatory framework and environmental management regime is needed to ensure that adverse effects of the project are effectively mitigated and managed. I have considered key elements of that regime when assessing the project's environmental effects.

This section describes the regulatory framework and environmental management regime including planning controls and environmental governance arrangements proposed for the project and my findings in relation to these. The EES proposed an environmental management regime to be given statutory effect through the Incorporated Document.

Planning Scheme Amendment

The key approval for the project is a PSA, which would introduce controls to facilitate the use and development of the project.

A draft PSA (Amendment GC209 to the Northern Grampians, Pyrenees, Ballarat, Hepburn, Moorabool and Melton Planning Schemes) was prepared by AusNet and included in Attachment 3 of the exhibited EES. The draft PSA seeks to:

- facilitate the delivery of the project in a timely, coordinated and consistent manner;
- establish a framework to manage environmental impacts during construction and operation; and
- make the Minister for Planning the responsible authority for the administration and enforcement of the project.

AusNet's draft PSA would in summary:

- Apply a Specific Controls Overlay (SCO8) to the Project Land through Clause 45.12 in each of the six planning schemes;
- Insert a Project specific Incorporated Document into each of the six planning schemes;
- Rezone the land supporting the existing Bulgana Terminal Station and the proposed new 500KV terminal station near Bulgana from Farming Zone to Special Use Zone, by amending relevant zone maps and inserting a new Schedule 3 – Terminal Stations to Clause 37.01 (Special Use Zone) of the Northern Grampians Planning Scheme;
- Insert a new Schedule 2 to Clause 37.01 (SUZ) of the Melton Planning Scheme that applies to the Sydenham Terminal Station so that the zoning of all terminal stations across the project is consistent;

- Amend the Schedule to Clause 66.06 (Notice of permit applications under local provisions) to require notice to be given to AusNet Transmission Group Pty Ltd in relation to any application for a planning permit on the land subject to the Specific Controls Overlay (SCO8); and
- Use the provisions of Clause 72.01 to make the Minister for Planning the responsible authority for administering and enforcing the Northern Grampians, Pyrenees, Ballarat, Hepburn, Moorabool and Melton Planning Schemes as they apply to the use and development of land for the Project.

Amending the planning schemes to insert an SCO and an Incorporated Document allows AusNet to address a range of planning provisions in the six local planning schemes, without the need for a series of individual planning permits, provided the conditions in the Incorporated Document are met.

The draft PSA includes controls which give effect to the environmental mitigation measures to be implemented, including the approval and endorsement of the EMF under the draft Incorporated Document. The IAC was appointed under section 9(1) of the Environment Effects Act (as an inquiry) to inquire into the environmental effects of the proposed works, and also under section 151(1) of the P&E Act (as an advisory committee) to provide me with advice as to the content and structure of the draft PSA.

The IAC reviewed the draft PSA and was satisfied that the use of the SCO with the Incorporated Document is an appropriate use of the Victorian Planning Provisions (VPPs) (section 17.1 (iv) of the IAC report). They were also satisfied the preparation and exhibition of the draft PSA have been consistent with the requirements of the P&E Act and there are no statutory impediments to it being approved.

The IAC also generally supported the proposed changes made to the Incorporated Document by the proponent during the hearing process and has recommended further changes based on the matters discussed throughout its report.

I agree with the IAC that the draft PSA will provide a suitable framework for managing the use and development of the Project and am generally satisfied with the content of the draft PSA, subject to the recommendations contained in this assessment.

Incorporated Document

The Incorporated Document in the draft PSA includes specific conditions which require plans and documents to be endorsed by the Minister for Planning at different specified times, but predominantly before the main construction works commence. Some of the conditions include the requirement to consult with other agencies during its preparation. The conditions included in the Incorporated Document are summarised as follows:

- Approval of development plans and elevations showing the transmission line route, location of towers and terminal stations, height of lines above road surfaces, location of access tracks, and all materials and finishes for the terminal stations and transmission towers;
- Approval of micro-siting plans (if micro-siting is needed);
- Approval of the EMF;
- Preparation of information and an avoid and minimise statement for the final amount of native vegetation to be removed, to be prepared to the satisfaction of the Secretary to DEECA;
- Procurement of native vegetation offsets;
- Approval of a Bushfire Management Plan; and
- Approval of Temporary Workforce Accommodation Plans including the approval of plans and elevations for the workforce facilities, a traffic management plan, a construction bushfire management plan, an emergency management plan, a construction environmental management plan and an operational management plan.

The draft Incorporated Document allows preparatory works to commence prior to the satisfaction of the above conditions. This is consistent with the approval requirements of other large linear projects in Victoria.

IAC recommended Incorporated Document changes

The IAC provided a draft Incorporated Document which included its recommended changes as well as changes proposed by various submitters (which the IAC agreed were beneficial). These changes are summarised as follows:

- 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 4.5.3 (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 and assess 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 the consultation with the landowner and neighbouring landowners who may be impacted by a proposed change and any implications for agricultural productivity and general amenity.
- Amend clause 4.10 (Native Vegetation) to include a requirement for offsets to be sourced locally to the extent reasonably practicable.
- 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.
- 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.
- 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; and
  - 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.
- 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; and
  - 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.

– Amend clause 4.13 (Temporary Workforce Accommodation Facilities) to add a requirement to clause 4.13.2 (c) to consider sewage and greywater management.

In principle the proposed conditions from the IAC are generally acceptable. My consideration of the PSA under the P&E Act is yet to occur and will not proceed until this assessment is considered. The final content of the PSA and Incorporated Document will need to be resolved in light of this assessment and considered for approval in due course. I recommend AusNet investigate feasible options to reduce the environmental risks in the Darley area. An additional condition is therefore recommended to further investigate detailed design refinements which may reduce the project's impacts related to bushfire, biodiversity, landscape, and visual and social issues. This is discussed further in Section 6 of this assessment.

Specific Controls Overlay

The SCO, if approved, would allow the land to be used and developed in accordance with the specific clauses and requirements specified in the Incorporated Document. The draft PSA proposes to apply the SCO to the planning scheme maps in the planning schemes. The IAC concluded the use and scope of the SCO is appropriate given the nature of the project. Submissions were received regarding the extent of the SCO and the constraints it would impose on landowners. The IAC did not believe the SCO would be as constraining as submissions suggested but supported the requirement in the Incorporated Document that the SCO mapping be reviewed following the project's construction.

EMF

A draft EMF was presented in Chapter 29 of the EES which described the proposed management arrangements for the project. It stated that, once approved, the EMF would outline the management arrangements for the project including by:

- Summarising key statutory approvals obtained and their compliance requirements;
- Specifying:
  - the requirements for community consultation, stakeholder engagement and communications during construction, operation and decommissioning;
  - the minimum environmental outcomes that must be achieved by the project as stipulated in the EPRs; and
  - the requirements for identification, assessment and management of environmental risks;
- Identifying:
  - the environmental management documentation (including review and approval requirements) specified by the Incorporated Document, the EPRs, and the EMF as necessary to manage the environmental risks and impacts of the project through design, construction, operation and decommissioning; and
  - the approaches to be taken to evaluating the Principal Contractor's Construction Environmental Management Plan (CEMP) and other documents in compliance with the EMF and EPRs, including monitoring, auditing and reporting processes.

Figure 4-1 below summarises the key environmental management documentation for the project. The EMF includes a commitment to deliver the project in general accordance with an Environmental Management System (EPR EM1). With the exclusion of preparatory buildings and works and construction of the temporary workforce accommodation facilities, the EMF must be submitted to and approved by the Minister for Planning prior to the commencement of development. The EMF is intended to provide the framework for managing the project's environmental effects during construction, operation and decommissioning. A CEMP and associated sub-plans will manage works and potential environmental impacts during the construction phase (EPR EM2) in accordance with the EMF. AusNet will engage an Independent Environmental Auditor to audit and report on environmental compliance during construction. This includes reviewing environmental management

documentation to confirm compliance with EMF requirements, EPRs and other relevant conditions and approvals and auditing construction works (EPR EM9). During operations, project works and impacts will be managed in accordance with the EMF and AusNet's Electrical Safety Management Scheme (ESMS). Energy Safe Victoria (ESV) will monitor and enforce compliance with the *Energy Safety Victoria Act 2005* and the Independent Environmental Auditor will conduct audits for one year after project commissioning, or until the Minister is satisfied that the audits are no longer required. During decommissioning, works and impacts will be managed in accordance with the EMF and a decommissioning management plan (EPR EM11).

The EMF provides a consolidated list of the proposed EPRs and identifies the key project approvals and compliance requirements. For this project, the EPRs will be given statutory weight through conditions of the Incorporated Document. The proponent tabled a 'Day 1', 'Day 2' and 'Day 3' version of the EMF.

The IAC recommended changes to the 'Day 3' version of the EMF including:

- Making the changes to the EMF shown in Appendix E:2 of the IAC report. This included adding a requirement for AusNet to engage an independent facilitator(s) to liaise with individual landholders and/or community members (at their option) and specifying the role and responsibilities of this facilitator(s) in relation to the project's environmental management. The independent facilitator(s) must be retained throughout construction, and for two years after construction is complete, and would liaise with individual landholders and community members at their request in relation to the implementation of any EPRs that require their direct engagement with AusNet or its contractors;
- Reviewing the EMF for consistency, clarity and to address any consequential changes resulting from other recommendations in the IAC report, including the IAC's recommendation to excise the section of the proposed route through Darley; and
- Reviewing references to AEMO and where appropriate replacing with VicGrid, in accordance with Tabled Document 690 (Executive Summary of the IAC report).

The IAC found that the proponent's 'Day 3' version of the EMF provided a sound framework for managing the project's environmental effects (section 17.2 (v) of the IAC report), subject to its detailed recommendations (shown in Appendix E:2 of the IAC report). I agree with the IAC's finding and its recommended changes to the EMF, except where I have made other recommendations in Section 5 and Appendix B of this assessment. I agree with the IAC's recommendation to review the EMF for consistency and clarity and to address consequential changes from other recommendations made in the IAC report and this assessment. However, as outlined in Section 6, as I consider that on balance, project impacts in Darley will be acceptable, I do not consider that the section of the proposed route through Darley needs to be excised.

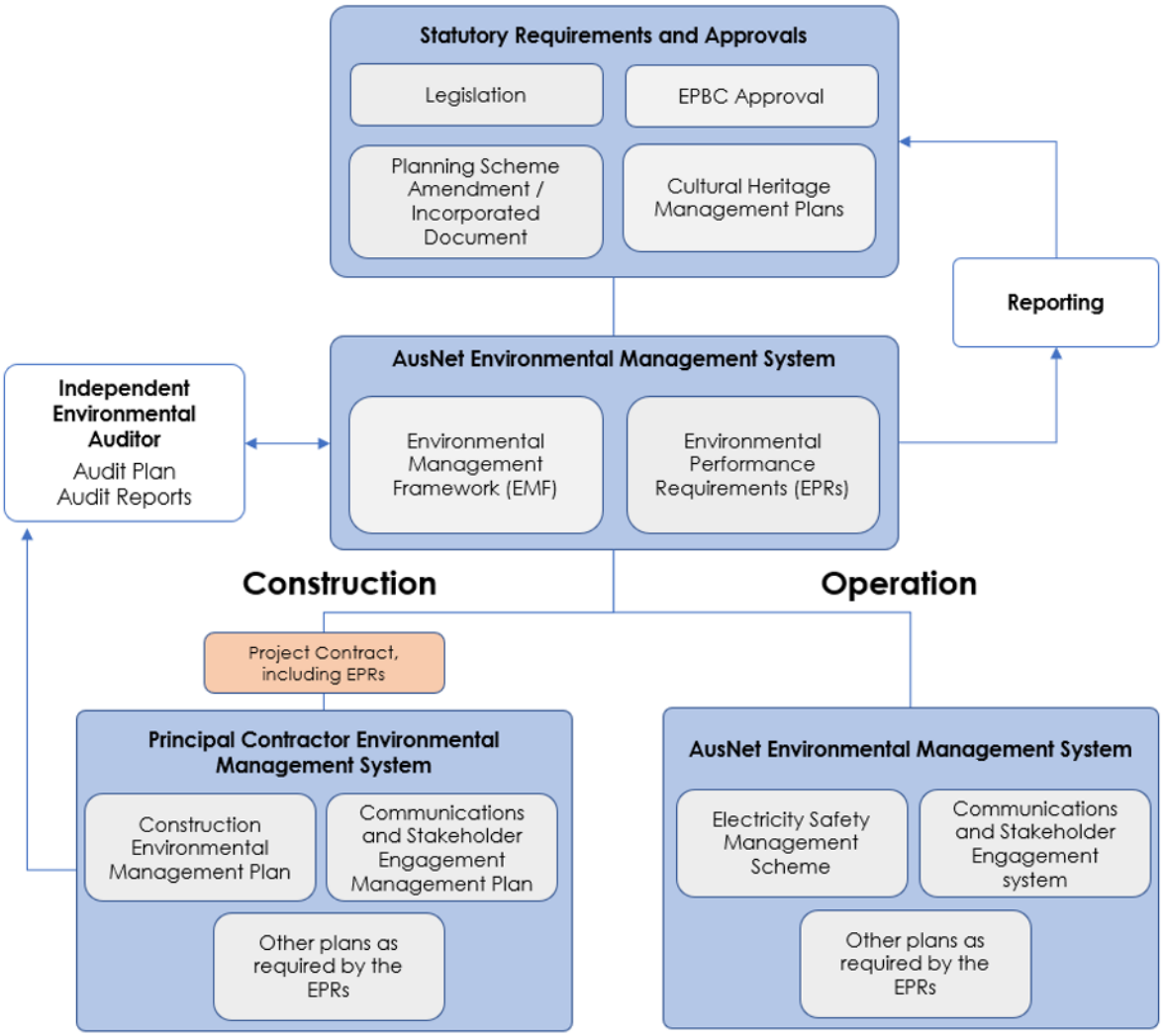


Figure 4-1: WRL Key environmental management documentation (Source EES Chapter 29)

5. Assessment of environmental effects

This section details my examination of the project's potential effects on the relevant aspects of the environment in the context of the applicable evaluation objectives, which are set out below (Table 5-1). My assessment draws on the EES, public submissions, evidence and information presented to the IAC, the IAC report and relevant legislation, policy and guidelines.

Table 5-1: Assessment evaluation objectives

Evaluation objective	Relevant section of this report
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.*	5.1
Cultural Heritage - *Avoid, or minimise where avoidance is not possible, adverse effects on Aboriginal cultural heritage and historic heritage values.*	5.6, 5.7
Landscape and visual - *Avoid, or minimise where avoidance is not possible, and manage potential adverse effects on landscape and visual amenity.*	5.3
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.*	5.2, 5.4, 5.8
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.*	5.5, 5.9
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.*	5.9

5.1. Biodiversity

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.

Assessment context

Biodiversity effects are addressed in Chapter 8, Chapter 27, and Technical Appendix A of the EES (also known as the Biodiversity Impact Assessment (BIA)) and in Chapter 8 of the IAC Report. AusNet proposed 8 EPRs to deal with biodiversity effects in the exhibited EMF (including EPR BD1, BD2, BD4, BD7 and BD10), all of which

have been the subject of recommendations or amendments by the IAC. A further three EPRs were added during the hearing by the proponent, with the IAC proposing an additional new EPR (BD12).

The key matters for the assessment of effects on biodiversity values examined by the EES and IAC are:

- Potential for significant effects and their acceptability on listed threatened ecological communities (TECs) and on threatened flora fauna species (sections 4.3, 4.5, 4.6 and 4.9 of the IAC report);
- Potential cumulative effects on listed threatened flora and fauna species and their habitats, and TEC's, from the project in combination with other projects (sections 4.3, 4.5, 4.6 and 4.9 of the IAC report);
- Direct or indirect loss of native vegetation or other habitat values due to project works or operational maintenance prescriptions (sections 4.2, 4.3, 4.5 and 4.9 of the IAC report);
- Direct or indirect loss, disturbance and/or degradation of listed or other protected species and nearby habitat that may support listed or other protected flora, fauna or ecological communities (sections 4.3, 4.5, 4.6 and 4.9 of the IAC report);
- Potential impacts on planted vegetation established through environmental programs (section 4.7 of the IAC report);
- Disruption to the movement of fauna (both day and night) between areas of habitat across the broader landscape, including risk of collisions with transmission line infrastructure (sections 4.3, 4.4 and 4.7 of the IAC report); and
- The availability of suitable offsets for the loss of native vegetation and habitat for listed threatened species under the EPBC Act and/or FFG Act (section 4.8 of the IAC report).

In this section, where I refer to a significant impact in relation to a specific MNES, i.e., EPBC listed flora, fauna and ecological communities, I am referring to an impact which is significant as defined in the *Significant Impact Guidelines 1.1 - Matters of National Environmental Significance*[1]. My full assessment of MNES is included in Appendix A. The significance of impacts on state matters are considered differently. This section considers both state and federal matters.

Existing conditions

The EES outlined that while much of the project area occurs in landscapes where historical land use has contributed to modified or reduced coverage of native vegetation and threatened species habitat, there were several areas that have significant biodiversity values.

Key locations supporting high-quality native remnants and habitats within the proposed route, as shown in Figure 6-3 and Appendix M of the BIA, include:

- Lexton bushland areas;
- Haydens Hill bushland areas; and
- Lerderderg – Long Forest bushland areas.

The EES identified a range of environmental values present within the larger project area, including many threatened flora, fauna and vegetation communities, and highlighted the range of Ecological Vegetation Classes (EVCs) and TECs identified through the investigations.

The EES estimated that there was 76,301 ha of native vegetation modelled within the study area, with 5,098 ha modelled to occur within the project land, and 559.7 ha modelled to occur within the project area. The modelling also indicated that many of the EVCs within the project area were listed as having a Bioregional Conservation Status of endangered, but it was also indicated that the native vegetation was generally expected to be of low quality.

[1] DCCEEW, 2021

The BIA included the integrated native vegetation assessment, which combined the DEECA modelled data, and the field data from the project. The BIA recorded a total of 425.94 ha of native vegetation patches within the project area, comprising 321.13 ha of field mapped vegetation and 104.81 ha of modelled vegetation.

The EES noted that the project would not impact on the Lerderderg State Park (soon to become part of the new Wombat-Lerderderg National Park), however the proposed route is in close proximity to this area.

EES survey approach

The EES outlined the approach of the project as being to use on-ground surveys and desktop information to determine the known and potential biodiversity values present within the project area. The BIA set out how the initial desktop assessment and preliminary field assessment were used in conjunction with additional information (including local knowledge and unpublished sources) to inform an understanding of biodiversity values and preliminary 'likelihood of occurrence' assessments. This provided the basis for developing requirements for additional field surveys, including targeted flora and fauna surveys.

The EES states that on ground field assessments were completed over approximately 76% of the total project area to understand the presence of native vegetation and threatened species habitat. For the remaining 24% the EES used a combination of field data and desktop assessment to determine the potential worst-case scenario, as detailed vegetation and threatened species assessments could not be undertaken. Approximately 5% of the sites were subject to only partial assessments, and the remaining 19% of area still require field survey which has not been possible to date due to access constraints.

BD1 report

During the hearing AusNet submitted the 'Report 1 on Ecological Surveys Required by EPR-BD1'[2] (referred to as the BD1 report) which outlined the additional work that had been completed for on-ground surveys since the time of the EES being completed, to meet the requirements of the proposed version of EPR BD1 in the exhibited EES. The BD1 report includes revised assessments of the impacts to biodiversity based on the results of additional field surveys undertaken between July 2024 and May 2025, and further refinement of the Project description. In light of the amendments to predicted project impacts, the offset requirements were also recalculated to meet both state and federal offset policies, and an updated draft Offset Management Strategy[3] was tabled.

The BD1 report noted that there has been an increase in the impacts from what was stated in the EES for a number of species, outlining that the increase was predominately due to the inclusion of Canopy and Notional Root Zone (NRZ) impacts associated with the vegetation clearance construction footprint, along with smaller increases associated with other components of the construction footprint.

The additional surveys completed as part of the BD1 report resulted in the total project area that has been fully assessed raised from 76% to 79% (inclusive of the 9% of land which does not need assessment from land type such as cropping or quarries). The BD1 report highlighted that within the partially assessed area there is approximately 12.76 ha of general field surveys, 40.40 ha of targeted flora surveys, and 30 ha of targeted fauna surveys still to be completed and considered that of the 452.23 ha remaining in the not surveyed area, all would require some general field survey, but it was unclear at this point how much of the area would require targeted flora and fauna surveys.

The BD1 report demonstrated a reduction in impacts to native vegetation from 238.607 ha to 186.264 ha. The extent of vegetation assumed using modelled data also reduced, from 64.90 ha to 44.52 ha. The BD1 report

[2] Tabled document 49

[3] Tabled document 50

noted that while the overall amount of vegetation patches decreased from what was noted in the EES, the number of large and scattered trees increased.

The BD1 report considered that despite the changes in the impacts described within the exhibited EES and the updated figures, there had not been a notable change in the significance of impacts to these values, and the outcomes for the assessment of MNES are unchanged from the original assessment.

The BD1 report concluded that the extent of impacts will continue to be refined through the on-going work outlined in EPR BD1, however considered that the information within the BD1 report demonstrates that the further survey work, development of design, and mitigation measures within EPRs such as micro-siting can enable AusNet to avoid and further minimise impacts to native vegetation, TECs and threatened species.

Avoidance and minimisation of impacts to biodiversity values

The EES outlined how the principles of avoidance and minimisation through designing the project to seek to avoid large contiguous areas of native vegetation and habitat and prevent the creation of easements in areas which would fragment national parks, state and regional parks, and state forests. The EES noted that the avoidance of biodiversity values has driven the refinement of the project route, and that the project has considered the avoidance of key areas such as the Wombat-Lerderderg National Park, Long Forest Nature Conservation Reserve, Werribee Gorge State Park, Creswick Regional Park, Ben Major Nature Conservation Reserve, Landsborough Nature Conservation Reserve, Lexton Nature Conservation Reserve, Joel Joel Nature Conservation Reserve and Mt Beckworth Scenic Reserve, along with the majority of smaller conservation reserves in the study area.

The avoidance of impacts on biodiversity values described in the EES includes progressive project development, options assessments and ongoing micro-siting of project infrastructure. All of these measures have resulted in the avoidance of native vegetation and associated other biodiversity values, such as areas of EPBC Act and FFG Act TECs, high density areas of threatened flora and areas of threatened fauna habitat that could be fragmented or destroyed.

Independent peer review

AusNet arranged for an independent peer review of the biodiversity information by Mr Brett Lane of Nature Advisory. The peer review raised issues such as the assessment of the NRZ impacts, and the explanation of the partial clearance method. However, AusNet considered that a number of the issues raised by Mr Lane were resolved through revisions to the BIA prior to exhibition and through additional information and documents submitted by AusNet during the hearing. This included explanation of partial clearance in Technical Note 2 (TN2) and amendments to relevant EPRs.

The final peer review report[4] which was tabled as part of Mr Lane's expert witness statement concluded that the BIA was comprehensive in its coverage of EPBC Act and FFG Act listed matters and considered that the approach had been thorough and precautionary in assessing the potential impacts and risks to biodiversity.

Discussion

Native vegetation

The exhibited BIA outlined the potential total extent of 238.607 ha of native vegetation loss (direct and indirect) was estimated by considering all native vegetation determined to be impacted or potentially impacted by project works. The EES determined a total extent of 229.71 ha of native vegetation patch removal,

[4] Tabled document 122

with a loss of 844 large trees in patches and 213 scattered trees (147 large trees and 66 small trees). These figures were presented in the EES as a worst-case scenario, with the expectation that these figures will be reduced when surveys are undertaken in areas where access was not granted and conservative totals were assumed based on modelled data.

As noted in the assessment context section above, for the IAC AusNet presented updated impacts on native vegetation in the BD1 report, which saw the overall proposed worst-case impacts to native vegetation reduce to 186.264 ha. A comparison of the impacts to native vegetation as presented in the BIA and as presented in the BD1 report is set out below in Table 5-2.

Table 5-2: Impacts to native vegetation as shown in the exhibited BIA and BD1 report

Native vegetation impacts	Exhibited BIA	BD1 report tabled at IAC
Patches	229.71 ha	173.26
Large canopy trees in patches	844	1,000
Large scattered trees	147	172
Small scattered trees	66	94
Total native vegetation removal area	**238.607 ha**	**186.264 ha**

The EES outlined that the avoidance of native vegetation was an important design parameter for the project since its inception, noting that the mitigation hierarchy has been considered and applied through the avoidance of large contiguous areas of native vegetation and habitat where possible in order to prevent the creation of easements fragmenting national parks, state and regional parks, and state forests, along with micro-siting of project elements such as towers and access roads to avoid key biodiversity values. AusNet included a range of mitigation activities in the EPRs to further reduce potential impacts during project implementation, but noted they would only provide a limited degree of further reduction in the potential impacts.

As noted in the assessment context section above, the BD1 report provided updated information regarding the project's proposed impacts to native vegetation, including the incorporation of additional field data, addressing the impacts to NRZ and canopy associated with the construction footprint, and incorporating the 'no go zones' within the easement corridor construction footprint. The BD1 report noted that there was an increase in the number of large patch trees and scattered trees impacted, highlighting that this in part was due to the difficulties in estimating large patch trees and scattered trees in areas where surveys had not occurred due to land access constraints. The BD1 report concluded that the numbers of large patch trees and scattered trees may continue to increase as more field work is completed and areas can be mapped, however considered it likely that the overall modelled patch extents would continue to reduce due to the likelihood that modelled patches may only contain scattered trees.

The IAC concluded that the methodology in the BIA was appropriate, and that the extent of field work that had been undertaken to date was sufficient for the current stage of the project, noting that field surveys will be fully completed to inform the finalisation of the detailed design (section 4.2 (iv) of the IAC report).

The IAC noted the concerns raised by many submitters relating to native vegetation loss but found that AusNet had made reasonable efforts to avoid and minimise the loss of vegetation through the route selection

and refinement, along with the EPRs in the EMF and the partial and minimised risk clearance approaches which were outlined in TN2 and TN9 (section 4.3 (iv) of the IAC report). I accept this finding.

Partial clearance approaches

The EES calculated vegetation removal through both complete and partial removal. The proposed approach for partial clearance involves selectively removing taller components (above four meters) of the native vegetation such as canopy trees and using a different construction approach which would protect the understorey vegetation. Partial loss of vegetation was calculated at 50% of the vegetation present in areas where only vegetation above 3 m requires removal, and the understorey can be retained. The EES notes that this approach differs from the partial clearance approach which is referenced in the Victorian Assessors Handbook[5].

As noted above, the EES identified three key locations supporting high-quality native remnants and habitats, being Lexton bushland areas, the Haydens Hill bushland areas, and the Lerderderg – Long Forest bushland areas.

During the hearing process, the proponent provided further information on the alternative approaches for partial clearance which are discussed in TN2[6] and TN9[7]. AusNet proposed two partial clearance approaches in order to reduce impacts on key biodiversity values such as Melbourne Yellow Gum and Brittle Greenhood:

- the removal of canopy trees in areas of higher biodiversity values to retain as much of the understorey as possible; and
- a bespoke partial clearance approach for the Darley area, known as 'Minimal Risk Clearance'.

TN9 also investigated the potential for the minimised risk clearance approach to be applied at the Lexton and Hayden's Hill areas, considering potential scenarios where the tower heights remained unchanged or were potentially raised.

TN9 outlines the potential feasibility of further avoidance of native vegetation in areas of higher biodiversity significance, the approach and measures to partial clearance, the potential to achieve biodiversity gains by implementing a Minimised Risk Clearance approach and/or raising tower heights based broadly on preliminary assessments. TN9 notes that the Day 1 version of the EMF[8] included an additional proposed EPR BD9 which outlines the understorey retention plan to clarify the obligations in relation to understorey retention contained in EPR BD2, EPR BD4 and EPR BD6. TN9 considers the potential to reduce impacts, compliance with the Electricity Safety (Electric Line Clearance) Regulations 2020 and its Schedule – Code of Practice for Electric Line Clearance (also referred to as the code) for both distance with between the line and vegetation, and feasibility and constructability of the approach, along with consideration of the potential implications for visual impacts.

Darley

In the Darley area, the EES proposed a 'bespoke' approach for partial vegetation removal to reduce impacts on the high biodiversity values in this area. The BIA noted that the area between Swans Road and Lerderderg River was excised from the easement corridor construction footprint to reduce impacts to threatened species in that location. For this area, the project proposes to undertake the stringing of conductors and the

[5] Department of Energy, Environment and Climate Action (2025) Assessor's handbook - Applications to remove, destroy or lop native vegetation

[6] Tabled document 128

[7] Tabled deocument 278

[8] Tabled document 209

clearance of vegetation for fuel reduction to comply with the vegetation risk clearance footprint without impacting the other parts of the easement corridor.

To achieve this, AusNet has designated the area outside of the construction footprint and vegetation removal for the vegetation risk clearance footprint as a "no-go" zone, requiring that construction and vegetation removal must occur without any impact to native vegetation outside of those defined areas. The "no-go" zones are proposed to apply in areas where particular care is required to protect threatened species habitat in the easement corridor where access is not required to undertake fuel reduction works.

Further, AusNet applied a bespoke approach for vegetation removal instead of the 4 m maximum vegetation height that was applied elsewhere for this project. Through the use of LiDAR and consideration of the topography and terrain in the area, additional clearance between the vegetation and transmission line was identified and used to determine what vegetation needed to be removed from a risk perspective. TN2 concludes that this method allowed AusNet to remove less vegetation to meet the required clearance. TN2 highlights that additional operational management measures will be needed, including annual inspection, however the approach is appropriate for this location due to the topography allowing for taller vegetation to be retained.

TN2 noted that this approach is not routinely justified, but highlighted that for this location, the bespoke approach would allow for the retention of vegetation within the easement corridor, but outside of the construction footprint, to at least 6.6 m height, and allow the retention of vegetation greater than 6.6 m in height in some areas (where line sag is not an issue of concern), and in turn avoid impacts to a number of threatened species and communities, including Melbourne Yellow-Gum.

The IAC noted that TN2 indicated that the modelling of fuel density and flame height was considered to be an acceptable fire risk associated with the fuel load under the transmission line. However, the IAC also found that the bespoke approach at Darley may require further investigation from a fire risk perspective and recommended amendments to EPR BD10 and EPR BD2 to reflect this (section 4.3 (iv) and (v) of the IAC report).

While I understand the intent of this recommendation for the proponent to demonstrate that the fire risk is acceptable with this approach, I have further amended BD10 to ensure the any refinements as a result of the further investigations do not increase the significance of effects on biodiversity and other environmental values. In addition, as discussed further below (under 'Melbourne Yellow Gum'), I do not support the IAC's proposed amendment to EPR BD2(2j). The IAC made minor amendments to EPR BD1 to include the results of the further investigations outlined in BD10 as part of the updated mapping. I accept this change and have provided further minor amendments to clarify intent of further surveys required in the EPR.

Based on the information presented to the IAC on the preliminary investigation into the partial clearance in Darley, including the proponent's advice that the approach complied with the *Electricity Safety (Electric Line Clearance) Regulations 2020 and its Schedule – Code of Practice for Electric Line Clearance*, there is no evidence to demonstrate that the Minimised Risk Clearance approach cannot be implemented. It is also understood that the Vegetation Management Plan for Darley will need to be approved by Energy Safety Victoria to ensure that bushfire risk can be effectively managed.

In these circumstances, I consider it appropriate to focus on the proposed clearance approach for the Darley area that was considered as a part of the EES when calculating the impacts on this threatened species. I do not consider it necessary to consider potential alternative approaches, the effects of which have not been assessed.

Lexton

At Lexton, TN9 found little to no change in the potential avoidance of native vegetation with the application of the Minimised Risk Clearance approach with the currently planned tower heights. However, TN9 considered further investigation is warranted for the Minimised Risk Clearance approach with towers at the maximum designed height (approximately 73 m for suspension type towers). TN9 stated this may result in additional

avoidance of native vegetation that would be subject to 'risk clearance' with current tower heights and further considered that bespoke tower heights at approximately 75 m could result in no 'risk clearance' native vegetation removal. TN9, however, notes that these are areas for further investigation and there is the potential for this vegetation to still be cleared due to matters such as access, fire risk to meet the code compliance requirements, and also the technical feasibility of these options.

The IAC proposed an amendment to EPR BD10 to require AusNet to investigate further ways to avoid and minimise impacts for the Lexton Bushland Reserve area between towers F6120DL and F6123DL (section 4.3 (iv) of the IAC report). I accept this amendment.

Haydens Hill

At Haydens Hill, TN9 outlined that the application of the minimised risk clearance approach with the currently planned tower heights was not considered to achieve avoidance of any further adverse impacts on native vegetation, and the scenario with the towers at the maximum design height was considered to potentially only achieve some minor avoidance of the 'risk clearance' native vegetation removal.

TN9 considered that further investigation of the potential to retain native vegetation by raising tower heights is justified, noting that at Hayden's Hill they considered the use of bespoke towers with heights ranging between approximately 74 m and 94 m (with four towers over 90 m and two towers below 80 m) could potentially result in no 'risk clearance' native vegetation removal. TN9 also noted that the taller towers would require an amendment to the Incorporated Document. The IAC noted that partial clearance at Hayden's Hill would result in reduced impacts on native vegetation, however concluded that further investigation was not supported in this area due to the modelling of flame heights with the retained vegetation demonstrating an unacceptable fire risk (section 4.3 (iv) of the IAC report). I accept this conclusion.

There was discussion of potentially considering raising towers beyond what has been examined in the EES and at the IAC hearing, taking account of potential implications for bushfire risk and aviation. It is important to note that this assessment has only been able to consider the information assembled through the EES process, and therefore towers up to a maximum height of 80 m. Project refinements and targeted work by AusNet to consider opportunities to further avoid and minimise impacts is supported, as are many of the IAC's amendments to EPR BD10 (except where discussed further above). However, any potential refinements to the tower heights and associated examination of reducing and balancing impacts, beyond those assessed within this assessment, will need to result in improved environmental outcomes and not increase the significance of effects on biodiversity and other matters.

Overall, the IAC found that the impacts to native vegetation have been appropriately avoided and minimised and are considered acceptable with the implementation of the IAC's recommended EPRs (section 4.3 (v) of the IAC report). I accept this finding, with the exception of the matters discussed above in relation to EPR BD10 and the specific matters discussed further below.

Threatened flora

The EES noted that there were no EPBC listed threatened flora confirmed to be present within the project area during field surveys, while acknowledging there was six EPBC listed flora species with a greater than low likelihood of occurrence. Only three of these six species (Matted Flax-lily, Small Golden Moth Orchid and Swamp Fireweed) were considered in the EES to have a low-moderate or above potential impact and hence included in the residual impact assessment. These are outlined in Table 5-3 below, and further discussion on EPBC listed flora species is provided in Appendix A of this assessment.

The EES also identified 43 FFG listed threatened flora species as having a likelihood of occurrence above low within the study area, which were subject to further assessment to determine the potential impacts from the project. Of those species, ten were included in the residual impact assessment in the EES due to their potential to have an impact greater than low. These are outlined in Table 5-3 below.

One species in the EES, Brittle Greenhood, was predicted to be significantly impacted by the project. The EES did not consider significant impacts were likely to occur for any other flora species.

Table 5-3: Listed flora with a low-moderate or higher likelihood of occurrence within the study area (Source: EES Chapter 8)

Name	EPBC Act status	FFG Act status	Presence
Brittle Greenhood *Pterostylis truncata*		cr	Present
Buloke *Allocasuarina luehmannii*		cr	Present
Brooker's Gum *Eucalyptus brookeriana*		cr	Present
Melbourne Yellow Gum *Eucalyptus leucoxylon subsp. connata*		en	Present
Yarra Gum *Eucalyptus yarraensis*		cr	Present
Bacchus Marsh Wattle *Acacia rostriformis*		vu	Present
Fragrant Saltbush *Rhagodia parabolica*		vu	Present
Glaucous Flax-lily *Dianella longifolia var. grandis*		cr	Present
Cane Spear-grass *Austrostipa breviglumis*		en	High
Swamp Fireweed *Senecio psilocarpus*	VU		Moderate
Matted Flax-Lily *Dianella amoena*	EN	cr	Moderate
Small Golden Moth Orchid *Diuris basaltica*	EN	cr	Low-Moderate
Floodplain Fireweed *Senecio campylocarpus*		en	Low-Moderate

***KEY**: CR/cr = critically endangered, EN/en = endangered VU/vu = vulnerable Mi = migratory species Ma = marine species*

The BD1 report tabled during the hearing highlighted changes in impact totals to a number of threatened flora species (as outlined in Table 5-4 below), however it did not consider that these amended impact totals changed the significance of the impacts presented in the EES.

Table 5-4: Listed flora impact changes between the BIA and BD1 report (Source: Tabled document 49 – BD1 report)

Species	Exhibited EES		BD1 report tabled at IAC	
	Individuals	**Modelled habitat**	**Individuals**	**Modelled habitat**
Bacchus Marsh Wattle	500	21.53 ha	451	8.38 ha
Brittle Greenhood	1388	20.60 ha	648	13.18 ha
Brookers Gum	233	22.83 ha	254	13.41 ha
Buloke	27	47.25 ha	27	38.3 ha
Cane Spear-grass	0	33.51 ha	0	14.95 ha
Floodplain Fireweed	0	4.11 ha	0	2.05 ha
Fragrant Saltbush	3081	33.05 ha	3037	14.75 ha
Glaucous Flax-lily	0	40.25 ha	0	15.88 ha
Matted Flax-lily	0	40.25 ha	0	15.88 ha
Melbourne Yellow-gum	400	19.42 ha	500	10.787 ha
Small Golden Moth	0	1 ha	0	0.71 ha
Swamp Fireweed	0	4.11 ha	0	2.05 ha
Yarra Gum	63	40.32 ha	81	28.76 ha

The EES assessed that the project may result in a high residual impact for Melbourne Yellow Gum and Brittle Greenhood, and a moderate residual impact on Buloke, Brookers Gum, Yarra Gum, Bacchus Marsh Wattle and Fragrant Saltbush. The EES also assessed a low-moderate residual impact for Cane Spear-grass, Floodplain Fireweed and Glaucous Flax-Lily.

The IAC generally accepted the advice of Mr Lane and DEECA's submissions that the impacts on threatened flora can be acceptably managed with the implementation of the 'Day 1' EPRs and the inclusion of the proponent's proposed partial and minimised risk clearance approaches, albeit with some qualifications in respect of Melbourne Yellow Gum and Brittle Greenhood (section 4.6 (iv) of the IAC report). The IAC recommended additional changes to EPR BD2 in relation to both the Melbourne Yellow Gum and Brittle Greenhood. I am satisfied that the actual and potential impacts on the threatened flora species identified above can be managed to an acceptable level. I address the Melbourne Yellow Gum and Brittle Greenhood in more detail below.

Melbourne Yellow Gum

Melbourne Yellow Gum is listed as endangered under the FFG Act and is endemic to Victoria. The EES noted the species distribution is concentrated in the Brisbane Ranges area with small populations scattered across Melbourne.

The threatened species assessment for Melbourne Yellow Gum[9] notes that there is no reliable estimate for the population. Within the project area, the EES noted the species occurs in the Lerderderg – Long Forest bushland areas, particularly areas adjoining the Wombat-Lerderderg National Park and east of Merrimu Reservoir. The EES estimated that approximately 1,700 individuals of Melbourne Yellow Gum are likely to be to be present within the project area, and noted the species is an important feed tree for the critically endangered Swift Parrot.

The BD1 report predicted that approximately 500 individuals are expected to be impacted by the project, up from the 400 individuals predicted to be impacted in the EES, but the BD1 report also noted that the extent of likely impact on modelled habitat for Melbourne Yellow Gum was reduced by 8.65 ha, from 19.42 ha to 10.77 ha. The BD1 report highlighted that Melbourne Yellow Gum is the most affected species by the NRZ changes which were implemented after the peer review, as the original assessment had already considered most other species as lost. The EES and BD1 report both assessed a high residual impact for Melbourne Yellow Gum and calculated that an offset of 21.858 species units of habitat is required for the predicted impact on this species. The updated Offset Management Strategy advises that this requirement can be met through one or more of five new unregistered offset sites that can provide up to 86.373 species units of habitat for Melbourne Yellow Gum.

AusNet proposed additional measures to mitigate impacts to this species which were outlined in 'Day 1' EPRs and in TN2. The IAC noted that these measures were supported by DEECA[10], and included the bespoke vegetation clearance approach at Darley and the collection of seeds from Melbourne Yellow Gum within the project area and development of a program for growing them for future revegetation projects.

Mr Lane considered the removal of an estimated 500 Melbourne Yellow Gum was significant. However, he also noted that over 2,000 individuals had been recorded in the surveys in and around the project area, which increased the estimate of the state population of this species. Mr Lane considered that the specific minimisation measures adopted in this section of the project area, along with the identification of access track locations and 'no-go zones had minimised impacts on this species and concluded that the residual impact of removing approximately 500 Melbourne Yellow Gum was unavoidable based on the range of constraints to which the project has had to respond. In its submission, DEECA accepted the opinions of Mr Lane regarding Melbourne Yellow Gum.

The IAC noted that the implementation of the Minimal Risk Clearance approach at Darley enabled the retention of more than 700 Melbourne Yellow Gums. However, it also found that, if the Minimal Risk Clearance approach could not be implemented, the result would be the loss of a considerable proportion (1,200) of the known local population of this species (section 4.6 (iv) of the IAC report).

The IAC found that, even if 1,200 Melbourne Yellow Gums had to be removed, the likely impacts on the Melbourne Yellow Gum would still be capable of being managed to an acceptable level (section 4.6 (iv) of the IAC report). It recommended amendments to EPR BD2 to require the investigation of additional measures to mitigate impacts on the Melbourne Yellow Gum if the Minimal Risk Clearance approach could not be implemented (section 4.6 (iv) of the IAC report).

I note the position of the IAC, but I do not accept the proposed amendment to item 2(j) in EPR BD2. As noted above, based on the material before me the Minimal Risk Clearance approach can be implemented, and the EES has been prepared on the basis that in the order of 500 Melbourne Yellow Gums will be removed (i.e. as a worst case scenario for this species). My assessment of the significance and acceptability of impacts on Melbourne Yellow Gum is based on the predicted maximum level of impact (removal in the order of 500

[9] DELWP (2021) Threatened Species Assessment *Eucalyptus leucoxylon* subsp. *connata* Melbourne Yellow-gum

[10] Tabled document 407

individuals, and 10.77 ha of modelled potential habitat) specified through the EES process. Any potential increase in impact above the estimated 500 individuals and 10.77 ha of modelled habitat was not evaluated as a part of the EES process and further there is nothing in the information before me that suggests a potential increase in impact is warranted. The IAC's proposed amendment to item 2(j) in EPR BD2 is not required as I have found that there is no evidence that the Minimal Risk Clearance approach cannot be implemented and any clearing which exceeds the extent of clearing assumed in the BIA and the BD1 report has not been proposed or assessed. I do not accept the IAC's proposed amendment to item 2(j) in EPR BD2.

I accept the position of the IAC that the project will result in a significant but acceptable impact on Melbourne Yellow Gum with the removal of in the order of 500 individuals and impacts to 10.77 ha of modelled potential habitat.

Brittle Greenhood

Brittle Greenhood is listed as critically endangered under the FFG Act and is known to survive in only three locations in Victoria, including the Long Forest area[11]. The EES noted a population of approximately 2,775 individuals were recorded between Merrimu Reservoir and Long Forest. The BD1 report noted a total of 648 individuals are predicted to be impacted directly by the Project and 13.18 ha of modelled potential habitat may be impacted in areas yet to be surveyed (Table 3-33 and Appendix A.2, A.3). This is a reduction of 740 individuals from the 1,388 individuals predicted to be impacted in the EES, and a reduction of 7.42 ha from the 20.60 ha of modelled potential habitat predicted to be impacted in the EES. The BD1 report noted that these reductions in predicted impacts can be attributed to applying no-go zones within the easement corridor construction footprint. The EES noted there would be a high residual impact on the species, which was considered to be potentially significant. The BD1 report concluded that while the extent of impacts has reduced since the EES, the significance of the impacts is consistent with the original findings of the BIA in the EES.

The EES noted a conservative approach had been taken assuming all vegetation within the easement is to be removed, when in some areas there may be no impact at all. However, individuals may be indirectly impacted during works to remove taller vegetation in accordance with the risk clearance standards. The EES considered that impacts to the species are also considered likely including from increased solar radiation from the removal of canopy species, and competition from Sifton Bush, with an estimated loss of 50% of individuals considered when calculating the impact totals.

The EES calculated that an offset of 12.027 species units of habitat for Brittle Greenhood is required. The updated Offset Management Strategy advises that this requirement can be met through one or more of three new unregistered offset sites that can provide up to 52.268 species units of habitat for Brittle Greenhood.

AusNet's technical expert for biodiversity, Mr Stephens, noted the proposed partial clearing approach would benefit understorey species such as Brittle Greenhood. Mr Lane highlighted that while the intent is to minimise ground disturbance it remains unclear how ground disturbance will be minimised where canopy tree removal occurs. The IAC noted this concern and in addition to supporting the EPR BD9 understorey retention plan, it recommended amendments to EPR BD2 and EPR BD9 to provide for low impact tree removal methods based on arborist advice. DEECA's hearing submission indicated that it was satisfied with the mitigation measures outlined in TN2 and TN9. DEECA's hearing submission also supported EPR BD2 requiring the avoidance of the use of heavy machinery where Brittle Greenhood occurs, the AusNet's day 1 changes to the EPR BD7 vegetation management plan and inclusion of EPR BD9 in relation to understorey protection. The IAC concluded that the impacts to Brittle Greenhood are acceptable with their adoption of their recommended

[11] DEECA (2021) Threatened Species Assessment Brittle Greenhood (Pterostylis truncata) Taxon ID 502821

changes to EPR BD2 and EPR BD7 to strengthen and clarify the biodiversity EPRs (section 4.5 (iv) of the IAC report). I accept this finding.

It is my assessment that while the predicted impacts to Brittle Greenhood are significant, they can be managed to an acceptable level with the adoption of the IAC's amendments to EPRs BD2 and EPR BD7 and the required offsets being secured.

Bacchus Marsh Wattle

Bacchus Marsh Wattle is listed as vulnerable under the FFG Act. The EES notes the species is confined to the Bacchus Marsh area (Lerderderg Gorge, Long Forest, Coimadai, Balliang and Werribee) where it occurs in low hilly areas in Eucalyptus woodland. The EES noted that the total known population was estimated to be less than 8,000 plants. During field surveys completed for the EES 1,285 individuals were recorded within the project area. The BD1 report noted a reduction in impact to individuals compared to the EES by 49 down to 451 and to mapped habitat by 13.15 ha down to 8.38 ha due to additional no-go zones and fieldwork.

Mr Lane noted that, based on prior DEECA estimates, the impacts would be significant (removal of 451 trees from population of about 8,000 individuals) but the field assessments identified over 12,000 individuals in the survey area which reduces the significance of the impacts. He suggested that the residual risk can be addressed by replanting locally sourced Bacchus Marsh Wattle in the project area, including within the easement if appropriately spaced.

As the species is generally below 3 m tall, the EES estimated that in areas of partial clearance 25% of individuals can be retained. Other individuals within the easement may also be retained where fuel standards can be met. Mr Stephens noted the proposed bespoke clearance approach at Darley would reduce impacts to Bacchus Marsh Wattle by 350 individuals. EPR BD2 requires the WRL Construction Vegetation Management Plan to include measures to minimise impacts on Bacchus Marsh Wattle, including seed collection to use in revegetation and remediation for the project.

The EES calculated that an offset of 19.406 species units of habitat is required for Bacchus Marsh Wattle. The updated Offset Management Strategy advises that this requirement can be met through two or more of three new unregistered offset sites that can provide up to 32.765 species units of habitat for Bacchus Marsh Wattle.

The IAC supported the EES conclusion that the residual impact to Bacchus Marsh Wattle would be moderate and considered that the residual impact could be addressed through replanting locally sourced Bacchus Marsh Wattle in the project area, including the easement (section 4.2 (iv) of the IAC report). I accept these findings and it is my assessment that the impacts to Bacchus Marsh Wattle are acceptable, subject to implementation of the recommendations of the IAC.

Yarra Gum

Yarra Gum is listed as critically endangered under the FFG Act. The EES noted its distribution extends west from Traralgon to Daylesford and Ararat. The EES noted that within the project area Yarra Gum was recorded in an area east of Haydens Hill, on Long Swamp Road and along Newlyn Reservoir Road. The BD1 report concluded that a total of 81 individuals of this species are predicted to be impacted by the project. A total of 28.76 ha of modelled potential habitat may be impacted in areas yet to be surveyed (Table 3-32 and Appendix A.2). This is an increase of 18 individuals from the 63 individuals predicted to be impacted in the EES and a reduction of 11.56 ha from the 40.32 ha of modelled potential habitat assumed to be impacted in the EES.

The EES determined that impacts on 63 individuals are not expected to affect the viability of the impacted population. The area of 40.32 ha of modelled potential habitat is relatively small in comparison to the extent of potential habitat in the study area (280,765 ha) and a review of aerial imagery shows it includes many treeless areas. The BD1 report identifies an impact on 81 individuals and 28.76 ha of modelled potential habitat, which includes an increase of 18 individuals impacted that is primarily due to fieldwork identifying individuals in areas previously not surveyed, and a substantial reduction of 11.56 ha in modelled potential habitat impacted.

The BD1 report concluded that, despite the additional individuals impacts, the significance of the impacts was the same as described in the BIA.

Mr Stephens gave evidence the proposed route had been revised in the Haydens Hill area to avoid large populations of Yarra Gum, crossing an area where the population is less dense. Bald Hills Creswick Landcare Group[12] 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. The IAC agreed with Bald Hills Creswick Landcare Group's submission and recommended a change to EPR BD2 to this effect (section 4.2 (iv) of the IAC report). I accept this recommendation.

The EES calculated that an offset of 78.555 species units of habitat is required for Yarra Gum. The updated Offset Management Strategy advises that this requirement can be met through either the credit register with 82.776 species units available from thirteen sites or in combination with three new unregistered offset sites that can provide up to 57.812 species units of habitat for Yarra Gum. The EES noted there would be a moderate residual impact on the species, which was considered to be potentially significant.

The IAC supported the EES conclusion that the residual impact to Yarra Gum would be moderate (section 4.2 (iv) of the IAC report). I accept these findings and it is my assessment that the impacts are acceptable, subject to the IAC's amendments to EPR BD2 being implemented.

Buloke

Buloke is listed as critically endangered under the FFG Act. The EES stated 27 individuals were recorded in the project area and expected to be impacted due to their location within the Vegetation Risk Clearance Footprint, along with 47.25 ha of potential habitat. The EES considered that additional plants were expected to be found in the vicinity of the Bulgana Terminal Station. The BD1 report reduced the modelled extent impacted to 38.3 ha (8.95 ha less) but there was no change for individuals. The EES considered that given the species is estimated to have 100,000 to 10,000,000 mature individuals, the proposed impacts are unlikely to be significant. The EES included an EPR which requires the development of a Construction Vegetation Management Plan (EPR BD2) which will include specific measures to minimise impacts to Buloke.

The IAC accepted the advice of Mr Lane and DEECA's submissions that impacts to threatened flora can be acceptably managed and supported the EES conclusion that the residual impact to Buloke would be moderate (sections 4.2 (iv) and (v) of the IAC report). I accept these findings and it is my assessment that impacts on Buloke are acceptable.

Threatened ecological communities

The EES considered that five EPBC listed and six FFG listed TECs had the potential to be present within the project area, as outlined in Table 5-5 below.

The EES noted that all areas of Grassy Eucalypt Woodland of the Victorian Volcanic Plain TEC have been avoided by the project. Further, the EES concluded that Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains TEC does not occur within the project area as none of the patches of the Victorian EVC Plains Grassy Wetland meet the condition thresholds for this EPBC listed TEC. As such, I conclude that it is unlikely that the project will have any significant impacts on these EPBC-listed TECs.

The BD1 report revised impacts to Grey Box Grassy Woodlands and Derived Native Grasslands of South-eastern Australia, Natural Temperate Grassland of the Victorian Volcanic Plain, and White Box-Yellow Box-Blakely's Red Gum Grassy Woodland which are discussed further below. As discussed below, it is my

[12] Submission 516

assessment that the project is likely to have a significant impact on each of these TECs, but that those impacts are acceptable.

Table 5-5: Listed Threatened Ecological communities with a low-moderate or higher likelihood of occurrence within the study area (Source: EES Chapter *8).*

Name	EPBC Act status	FFG Act status	Presence
Grey Box Grassy Woodlands and Derived Native Grasslands of South-eastern Australia	EN		Present
Natural Temperate Grassland of the Victorian Volcanic Plain	CR		Present
White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland	CR		High
Grassy Eucalypt Woodland of the Victorian Volcanic Plain	CR		Low
Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains	CR		Low
Creekline Grassy Woodland (Goldfields) Community		Threatened	Present
Rocky Chenopod Open Scrub Community		Threatened	Present
Western (Basalt) Plains Grasslands Community		Threatened	Present
Victorian Temperate Woodland Bird Community		Threatened	Present
Grey Box-Buloke Grassy Woodland Community		Threatened	High
Western Basalt Plains (River Red-gum) Grassy Woodland Community		Threatened	Moderate

***KEY**: CR = critically endangered, EN = endangered VU = vulnerable*

EPBC listed TECs

Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia (GBGW)

GBGW TEC is listed as endangered under the EPBC Act. The BD1 report outlined that a total of 7.56 ha of this TEC may be impacted by the project, comprising of 6.12 ha which is confirmed and 1.43 ha potentially present in areas yet to be surveyed. The BD1 report considered that there was a low likelihood that these unsurveyed areas support the TEC, in line with the conclusion of the EES, however I note the requirement to complete further field survey as outlined in EPR BD1. Table 4-1 in the BD1 report noted the area of GBGW to be impacted decreased from the figures exhibited in the EES from 16.61 ha to 7.56 ha due to the inclusion of no-go zones and further fieldwork.

The EES included a significant impact assessment for this MNES that concluded a significant residual impact under the EPBC guidelines was likely on this TEC given there will be a reduction in extent, as well as

fragmentation and change in species composition associated with project construction. The BD1 report concluded that despite the reduction in both mapped extent (0.67 ha) and modelled impacts (8.39 ha) between the exhibited EES figures and the updated information, the conclusions regarding significance for the TEC had not changed, and the impacts were still likely to be significant.

The IAC accepted Mr Lane's evidence[13] that the project will affect a very small portion of the total area of GBGW in the wider landscape, however it considered the project will result in a high residual impact to this TEC (sections 4.2 (iv) and 4.9 (vi) of the IAC report). I accept this finding. While I acknowledge efforts made AusNet to minimise the impacts to this and other TECs, I consider that the reduction in extent along with the fragmentation and change in species composition likely results in a significant impact to this TEC.

The IAC recommended EPR BD2 be amended to include a requirement for seed collection from this TEC within the project area to be used in revegetation and remediation for the project, noting that this is consistent with the Conservation Advice for GBGW[14] (section 4.2 (iv) of the IAC report). I accept this recommendation.

It is my assessment that the residual impact to the GBGW TEC is significant, however the impacts are considered acceptable, subject to the IAC's recommended amendment to EPR BD2 being implemented and the required offsets being secured.

Natural Temperate Grassland of the Victorian Volcanic Plain (NTGVVP)

The NTGVVP TEC is listed as critically endangered under the EPBC Act as it has declined in extent in Victoria by approximately 98%. The EES mapped sixteen patches, totalling 38.05 ha within the project area, of this the EES noted that 4.47 ha may be impacted. The BD1 report included revised figures for NTGVVP, noting that 5.58 ha may be impacted, with 5 ha confirmed extent and a further 0.58 ha potentially present in areas yet to be surveyed. The BD1 report noted the area of NTGVVP to be impacted increased slightly from the EES from 5.37 ha to 5.58 ha. Most of the impacts to this community are associated with construction of tower structures and access tracks and the EES considers that further avoidance opportunities are limited.

The EES included a significant impact assessment that concluded a significant residual impact was likely given there will be a reduction in extent of the TEC.

Similarly to GBGW, the IAC acknowledged that the project would affect very small portions of the total area of this community in the wider landscape and considered that the residual impact of the project would be moderate (sections 4.2 (iv) and 4.9 (vi) of the IAC report). The EES concluded that the project is likely to result in a significant impact to this TEC. While I acknowledge the efforts by the project to minimise impacts to this TEC, it is my assessment that impacts will be significant due to the reduction in extent of the community which is a key threat outlined in the approved conservation advice[15] for this TEC.

Consistent with the conservation advice for this TEC, I recommend EPR BD2 be amended to include seed collection from this TEC within the project area to be used in revegetation and remediation for the project, including the proposed offset site.

It is my assessment that the residual impact to the NTGVVP TEC is significant, however the impacts are considered to be acceptable, subject to my recommended amendment to EPR BD2 being implemented and the required offsets being secured.

[13] Tabled document 122

[14] Commonwealth of Australia (2010) Approved Conservation Advice for the Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands and Derived Native Grasslands of South-east Australia

[15] Commonwealth of Australia (2008) Approved Conservation Advice for the Natural Temperate Grassland of the Victorian Volcanic Plain

White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (WYRGGW)

This TEC is listed as critically endangered under the EPBC Act and occurs along the western slopes of the Great Dividing Range. Given the currently highly fragmented and degraded state of this ecological community, the recovery plan[16] notes that all areas of Box-Gum Grassy Woodland which meet the minimum condition criteria should be considered critical to the survival of this ecological community.

The EES did not record any areas of WYRGGW in field surveys and considered that there was potentially 17.00 ha of modelled habitat within the unsurveyed area. The EES concluded that the worst-case impacts to the TEC would be 5 ha. The BD1 report outlined that a total of 6.04 ha may be impacted by the project with 0.81 ha confirmed extent and 5.24 ha potentially present in areas yet to be surveyed. However, the project continues to consider that 5.00 ha impact is the worst-case scenario for the project.

The EES included a significant impact assessment that concluded a significant residual impact was possible on this TEC given there will be a reduction in extent and fragmentation, for habitat critical to the survival of the community, as well as change in species composition and invasive species establishment associated with the project. EPR BD8 requires additional surveys for this community and further design refinements to ensure the extent of removal does not increase. The IAC made minor amendments to EPR BD8 to the updated mapping in detailed design to be in accordance with the BD1 report that has been completed by Jacobs and removed the reference to BD1. I understand the amendment made by the IAC, however, recommend that EPR BD8 should consider the results of the existing Jacobs report and the results of any further surveys in the areas yet to be surveyed that are required in EPR BD1.

Similarly to NTGVVP, the IAC acknowledged that the project would affect very small portions of the total area of this community in the wider landscape and considered that the residual impact of the project would be moderate (sections 4.2 (iv) and 4.9 (vi) of the IAC report). It is my assessment that while the impact to WYRGGW TEC is expected to be significant, the impacts are considered acceptable, subject to implementation of the EPR BD8 and the required offsets being secured.

FFG listed TECs

The EES concluded that four FFG listed communities would be impacted and two potentially impacted by the project as shown in Table 5-6 below. The EES noted that the mapping of the FFG listed communities were largely based on field assessment, however where field assessment was incomplete due to access constraints habitat for these communities were assumed as present in locations where the modelled EVC equivalents were mapped.

[16] Department of Environment, Climate Change and Water NSW (2010) National Recovery Plan for White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland.

Table 5-6: FFG listed TEC impact extent (source: EES chapter 8)

Name	EES impact	EES Potential habitat	BD1 report impact	BD1 report Potential habitat
Creekline Grassy Woodland (Goldfields) Community	6.05 ha	1.26 ha	5.40 ha	0.34 ha
Grey Box-Buloke Grassy Woodland Community	Not recorded	5.84 ha	0.12 ha	4.30 ha
Rocky Chenopod Open Scrub Community	3.33 ha	14.67 ha	1.81 ha	8.33 ha
Western Basalt Plains (River Red-gum) Grassy Woodland Community	Not recorded	6.76 ha	Not recorded	4.11 ha
Western (Basalt) Plains Grasslands Community	6.33 ha	0.90 ha	7.29 ha	0.71 ha
Victorian Temperate Woodland Bird Community	47.41 ha	12.66 ha	54.37 ha	7.88 ha

Creekline Grassy Woodland (Goldfields) Community

The EES stated that 9.69 ha of this community has been recorded within the project area and 1,167 ha is modelled to occur within the study area. The EES stated that 6.05 ha is likely to be impacted by the project, and considered the project will result in a moderate residual impact on the community. An additional 1.26 ha of potential extent occurs within the Construction Footprint in areas yet to be surveyed. The BD1 report reduced these extents to 5.4 ha confirmed extent and 0.34 ha potential extent, totalling 5.74 ha.

The EES considered that given the location of the community on alluvial terraces adjacent to waterways in the Goldfields area, which are often incised, it is likely that impacts will be limited to some canopy species removal with no impact to the grassy/sedgy component in most areas recorded. The EES noted that 85 patches of this community were recorded along much of the length of the project area, and across the three bioregions.

The BD1 report noted the proposed removal of 5.74 ha of this community from the 1,192 ha of potential habitat in the study area is unlikely to cause a notable reduction in the extent of this TEC, cause a substantial change in the species composition or long-term persistence of the TEC.

The IAC accepted the EES conclusion that the residual impact to this TEC would be moderate (section 4.2 (iv) of the IAC report).

It is my assessment that, due to the large area of potential habitat for the TEC in the study area and the limited scope for impacts due to the location of the community on alluvial terraces, the project is unlikely to result in a significant impact on the Creekline Grassy Woodland (Goldfields) Community.

Grey Box-Buloke Grassy Woodland Community

The EES stated this community has not been recorded within the project area, however, it considered that there is 5.84 ha of potential habitat in areas yet to be surveyed occurs within the Construction Footprint. The EES noted that 574 ha is modelled to occur within the study area. The BD1 report reduced this to 4.42 ha with

0.12 ha of confirmed extent and 4.30 ha of potential habitat. It noted, given the area of proposed impact to 4.42 ha of potential TEC in comparison with the 515 ha extent of potential habitat within the study area, that the proposed impacts from the project are unlikely to cause a notable reduction in the extent of this TEC. The IAC noted the EES conclusion that the project will result in a low-moderate residual impact on the community (section 4.2 (iv) of the IAC report).

It is my assessment that, in light of the large area of potential habitat for the TEC in the study area, the project is unlikely to result in a significant impact on the Grey Box-Buloke Grassy Woodland Community.

Rocky Chenopod Open Scrub Community

The EES stated that 4.23 ha of Rocky Chenopod Open Scrub Community was recorded within the project area, 3.33 ha of which occurs within the Construction Footprint. The EES noted there was a further 14.67 ha of potential habitat in areas yet to be surveyed may be impacted by the project giving a total impact of 18.00 ha. The EES noted that this extent of impact may be considered significant given the restricted extent of the community within Victoria (less than 200 ha). The BD1 report reduced the impacts to 10.14 ha anticipated to be impacted by the project, consisting of 1.81 ha confirmed extent and 8.33 ha of potential extent in areas yet to be surveyed. However, the BD1 report noted the impacts were still considered to be significant. The IAC noted the EES conclusion that the project will result in a moderate residual impact on the community, and also noted that DEECA submitted that this was one of two key FFG listed TECs of greatest concern but considered that the updated EPRs would adequately address project impacts (section 4.2 (iv) of the IAC report).

It is my assessment that the residual impact to the Rocky Chenopod Open Scrub Community is significant, however the impacts are considered to be acceptable with implementation of the EPRs.

Western Basalt Plains (River Red-gum) Grassy Woodland Community

The EES stated this community has not been recorded within the project area, however 6.76 ha of potential habitat in areas yet to be surveyed occurs within the construction footprint and may be impacted by the project. The BD1 report reduced the modelled extent impacted to 4.11 ha. The EES and BD1 report considered that in comparison to the estimated 14,255 ha of the community within the study area, the proposed impact to 4.11 ha of modelled extent of this TEC is unlikely to cause a notable reduction in the extent of this TEC within the broader landscape. The IAC noted the EES conclusion that the project will result in a low-moderate residual impact on the community (section 4.2 (iv) of the IAC report).

It is my assessment that the project is unlikely to result in a significant impact on the Western Basalt Plains (River Red-gum) Grassy Woodland Community.

Victorian Temperate Woodland Bird Community

The EES noted that 80.28 ha of habitat for the Victorian Temperate Woodland Bird Community has been recorded within the project area through field assessment. The EES noted a further 21.20 ha of EVC equivalents for this TEC may potentially occur in the project area in areas not yet surveyed. The EES concluded a total of 47.41 ha recorded and 12.66 ha of potential habitat occurs within the Construction Footprint resulting in a total impact of 60.06 ha. The BD1 report increased impacts to 54.37 ha for mapped habitat and decreased modelled potential habitat to 7.88 ha resulting in an increased extent of impact of 62.25 ha. The EES stated these impacts may lead to increased habitat fragmentation, however considered that given the highly mobile nature of the bird species in this community and the comparatively large amount of suitable habitat remaining in the wider study area, impact to these habitats is considered unlikely to have a significant impact on the species. The EES suggested mitigations such as strategic revegetation as well as understorey promotion are likely to minimise impacts. The EES further considered that hollow salvage and nest boxes will help to maintain a limited and critical resource for the community, and included a hollow replacement strategy as part of EPR BD2. The IAC noted the EES conclusion that the project will result in a moderate residual impact on the community (section 4.2 (iv) of the IAC report).

It is my assessment that the project is unlikely to result in a significant impact on the Victorian Temperate Woodland Bird Community.

Threatened fauna

The EES undertook a likelihood of occurrence assessment for all threatened fauna species that had been previously recorded or modelled to occur in the study area, and a targeted threatened fauna assessment was undertaken for selected species that were considered to potentially occur in the project land and in habitat areas which were identified during the general field surveys. Table 5-7 below outlines the listed fauna that had a low-moderate or higher likelihood of occurrence within the study area, as outlined in the EES.

Table 5-7: Listed fauna with a low-moderate or higher likelihood of occurrence within the study area (Source: EES Chapters 8 and Technical Appendix A)

Name	EPBC Act status	FFG Act status	Presence
Brown Treecreeper *Climacteris picumnus*	VU		Present
Diamond Firetail *Stagonopleura guttata*	VU	vu	Present
Gang-gang Cockatoo *Callocephalon fimbriatum*	EN	en	Present
Golden Sun Moth *Synemon plana*	VU	vu	Present
Latham's Snipe *Gallinago hardwickii*	VU, Mi		Present
Brown Toadlet *Pseudophryne bibronii*		en	Present
Powerful Owl *Ninox strenua*		vu	Present
Western Burrowing Crayfish *Engaeus merosetosus*		en	Present
Brush-tailed Phascogale *Phascogale tapoatafa*		vu	Present
Tussock Skink *Pseudemoia pagenstecheri*		en	Present
Grey-headed Flying-fox *Pteropus poliocephalus*	VU	vu	Known
Platypus *Ornithorhynchus anatinus*		vu	Known
Growling Grass Frog *Litoria raniformis*	VU	vu	High
Blue-winged Parrot *Neophema chrysostoma*	VU		High
Swift Parrot *Lathamus discolor*	CR	cr	High
White-throated Needletail *Hirundapus caudacutus*	VU, Mi	vu	High
Hooded Robin *Melanodryas cucullata*	EN	vu	Moderate
Painted Honeyeater *Grantiella picta*	VU	vu	Moderate
Southern Greater Glider *Petauroides volans*	EN	en	Moderate

Name	EPBC Act status	FFG Act status	Presence
Striped Legless Lizard *Delma impar*	VU	en	Moderate
Barking Owl *Ninox connivens*		cr	Moderate
Masked Owl *Tyto novaehollandiae*		cr	Moderate
Square-tailed Kite *Lophoictinia isura*		vu	Moderate
White-bellied Sea-Eagle *Haliaeetus leucogaster*		en	Moderate
Fat-tailed Dunnart *Sminthopsis crassicaudata*		vu	Moderate
Victorian Grassland Earless Dragon *Tympanocryptis pinguicolla*	CR	cr	Low-Moderate

***KEY**: CR/cr = critically endangered, EN/en = endangered VU/vu = vulnerable Mi = migratory species Ma = marine species*

Gang-gang Cockatoo, Hooded Robin and Diamond Firetail were EPBC listed after the EPBC referral decision for the project and are therefore only assessed under the FFG Act within this assessment. Brown Treecreeper and Blue-winged Parrot were also EPBC listed after the referral decision but are not FFG listed and are not stated as key threatened fauna species in the Scoping Requirements. Therefore, these two species are not specifically referenced in this assessment, despite being referenced in the EES.

The EES concluded that the project's potential impact was low for a number of threatened species including Latham's Snipe, Painted Honeyeater and White-throated Needletail.

The BD1 report noted changes in the impacts for the species listed in Table 5-8 below, however, it reached the same conclusion on the significance of the impacts as the BIA did.

Table 5-8: Listed fauna impact changes (Source:TN49 – BD1 report)

Species	Exhibited BIA			BD1 report tabled at IAC		
	Confirmed habitat	Field mapped potential habitat	Modelled habitat	Confirmed habitat	Field mapped potential habitat	Modelled habitat
Barking Owl	0 ha	23.96 ha	0 ha	0 ha	28.94 ha	0 ha
Blue Winged Parrot	0 ha	86.14 ha	22.64 ha	0 ha	105.92 ha	37.66 ha
Brown Treecreeper	0 ha	62.31 ha	6.95	0 ha	75.45 ha	11.51 ha
Brush-tailed Phascogale	9.16 ha	0 ha	1.31 ha	9.86 ha	0 ha	2.26 ha
Diamond Firetail	0 ha	52.92 ha	3.68 ha	0 ha	63.60 ha	10.58 ha
Fat-tailed Dunnart	0 ha	21 ha	0 ha	0 ha	21.48 ha	0 ha

Species	Exhibited BIA			BD1 report tabled at IAC		
	Confirmed habitat	Field mapped potential habitat	Modelled habitat	Confirmed habitat	Field mapped potential habitat	Modelled habitat
Gang-gang Cockatoo	1.76 ha	24.91 ha	0 ha	1.85 ha	30.7 ha	10.5 ha
Golden Sun Moth	9.71 ha	0 ha	11.29 ha	9.71 ha	0 ha	11.77 ha
Grey-Headed Flying-fox	0 ha	10.17 ha	0 ha	0 ha	17.66 ha	0 ha
Growling Grass Frog	0 ha	0.02 ha	0.72 ha	0 ha	0.02 ha	0.64 ha
Hooded Robin	0 ha	31.69 ha	3.14 ha	0 ha	39.03 ha	9.55 ha
Masked Owl	0 ha	23.96 ha	0 ha	0 ha	28.94 ha	0 ha
Painted Honeyeater	0 ha	37.79 ha	4.26 ha	0 ha	46.23 ha	11.89 ha
Platypus	0 ha	0 ha	0.03 ha	0.01 ha	0 ha	0.02 ha
Powerful Owl	0 ha	23.96 ha	0 ha	15.04 ha	13.9 ha	0 ha
Southern Greater Glider	0 ha	12.06	0 ha	0 ha	13.71 ha	0 ha
Square-tailed Kite	0 ha	65.44 ha	8.44 ha	0 ha	79.27 ha	16.38 ha
Swift Parrot	0 ha	16.89 ha	1.33 ha	0 ha	29.1 ha	3.78 ha
White-bellied Sea-Eagle	0 ha	15.53 ha	0.1 ha	0 ha	17.46 ha	0.08 ha

The IAC noted that the BIA found that the project will not have a high residual impact on any threatened fauna species, and provided some species specific conclusions which are discussed further below (section 4.2 (iv) of the IAC report). I accept this conclusion, with the exception of the specific matters discussed further below.

Swift Parrot

Swift Parrot is listed as critically endangered under the EPBC Act. The EES outlined that approximately 13,669 ha of potential habitat occurs within the study area, and noted that Swift Parrots will migrate through the study area, with stopping points up through the Brisbane Ranges and Long Forest, to the Box-Ironbark forests in the Goldfields to the north. The EES noted that impacts will mainly occur in the Long Forest Nature Conservation Reserve and Wombat-Lerderderg National Park.

The EES concluded that the project may result in impacts to a total of 18.22 ha of potential habitat for the species, comprised of 16.89 ha of field mapped habitat and 1.33 ha of desktop mapped habitat. The BD1 report noted a revision to the impacts for Swift Parrot, with an increase to a total of 32.88 ha of habitat potentially impacted by the project, comprised of 29.10 ha of field mapped and 3.75 ha of desktop mapped potential habitat.

The BD1 report concluded that while the extent of impacts had increased by 14.66 ha, the significance of the impact is consistent with the original findings of the EES, and the project is not likely to have a significant impact on the species.

The BD1 report does note the impacts to Swift Parrot have increased significantly since the exhibited EES, however the implications for further impacting (removing) foraging habitat for the survival of the species is not covered explicitly through this material tabled at the IAC. The National Recovery Plan for the species[17] under the EPBC Act note the critical importance of protecting and managing a broad range of habitats on the mainland to provide foraging resources for the survival of this species.

The National Recovery Plan for the species states that habitat critical to the survival of the species includes all preferred foraging species within the known and likely foraging habitat on the mainland including species such as Yellow Gum and Grey Box. The National Recovery Plan also notes that wherever possible the habitat critical to the survival of Swift Parrot should not be destroyed, however if impacts to foraging habitats on the Australian mainland cannot be avoided it is important to retain trees >60 cm in diameter at breast height or greater together with at least five trees per hectare from a mixture of other age classes to ensure continuity of food resources over time. There are limitations for where and whether this project can retain or replant trees within the easement, so it will be impractical to meet this part of the recovery plan.

Considering the updated level of likely impact on habitat critical to the survival of the species, which includes all preferred foraging species of trees within the known and likely foraging habitat, in line with the EPBC Significant impact guidelines 1.1[18], it is expected the project will result in a significant impact to Swift Parrot. I consider the further investigation required under EPR BD1 and threatened fauna management plan required under EPR BD3 will sufficiently address the residual uncertainty related to the species habitat, and note the draft Offset Management Strategy needs to be updated to outline the offset requirement for the species, to the satisfaction of the Commonwealth in accordance with EPBC Act offset policy.

It is my assessment that the project is likely to have a significant impact on Swift Parrot, however impacts are considered acceptable with the adoption of EPRs and the provision of appropriate offsets.

Grey-Headed Flying-fox

Grey-Headed Flying-fox is listed as vulnerable under the EPBC Act. The EES noted that Grey-Headed Flying-fox is highly mobile and the species moves along the east coast of Australia in search of food, and that the species is known to roost and breed in camps at sites typically located near water and forage at night up to 50km from their roost. The EES concluded that the project has the potential to impact on 10.17 ha of potential foraging habitat. The BD1 report revised this figure to 17.66 ha of potential foraging habitat which may be impacted.

The EES included a significant impact assessment that concluded a significant impact is not likely as impacts to potential foraging habitat are likely to be inconsequential when compared with similar and higher-quality potential foraging habitat across the landscape for foraging. The BD1 report concluded that while the extent of impacts had increased slightly, the significance of the impact is consistent with the original findings of the EES, and the project is not likely to have a significant impact on the species.

From the new information tabled at the IAC is it evident there is a concentration of impacts from the project on potential habitat in the eastern end of the project area[19]. The temporary local camp recorded at

[17] Commonwealth of Australia (2024) National Recovery Plan for the Swift Parrot *Lathamus discolor*

[18] Commonwealth of Australia (2013) Matters of National Environmental Significance - Significant impact guidelines 1.1. Environment Protection and Biodiversity Conservation Act 1999

[19] Tabled document 49: Appendix A.4 - Impact to threatened fauna habitat, Grey-headed Flying-fox

Lerderderg and the additional camp referenced at the Merrimu Reservoir, along with an increase of an additional 7.49 ha impacted raises residual uncertainty about regarding the potential for a significant impact on this species. However, this uncertainty can be addressed through a threatened species management plan, that ensures further information is obtained to detail how the project has characterised potential foraging habitat in line with the National Recovery Plan and includes clear mapping to demonstrate that the project impacts are inconsequential when compared to similar and higher-quality potential foraging habitat across the broader landscape, as referred to in the EES.

I recommend that EPR BD4 is amended to specifically reference Grey-Headed Flying-fox as a species which requires a threatened species management plan. I consider the further requirements in EPRs to minimise and mitigate impacts to threatened species including EPRs BD1, BD2 and BD3 will sufficiently address the residual risks to the species.

It is my assessment that the project is not likely to have a significant impact on Grey-Headed Flying-fox, subject to my recommended amendments to EPR BD4 being implemented.

Golden Sun Moth

Golden Sun Moth is listed as vulnerable under the EPBC Act and FFG Act. The EES outlined that all suitable habitat that was identified during the preliminary habitat assessment and VQA surveys was mapped as potential habitat. The EES outlined that Grassland habitat can be retained in the easement because it is under the maximum vegetation heights for clearing. The EES further noted disturbance to each patch is discrete and generally constitutes an insignificant portion of habitat at that location. The BD1 report noted the area of Golden Sun Moth habitat to be impacted increased slightly from the EES from 21.00 ha to 21.48 ha due to a new area of habitat being recorded.

The EES included a significant impact assessment for Golden Sun Moth against the significant impact thresholds for the species, which concluded that a significant impact was likely due to a reduction in size and area of occupancy of an important population. The EES included EPR BD4 which requires specific measures to minimise potential impacts to habitat for Golden Sun Moth to be included in the Threatened Fauna Management Plan.

The IAC noted that there would be a moderate residual impact to Golden Sun Moth from the construction works for the project but considered that the impacts will affect a very small portion of the total area of habitat in the wider landscape (sections 4.2 (iv) and 4.9 (vi) of the IAC report). It is my assessment that the residual impacts to Golden Sun Moth are significant, however the impacts are considered to be acceptable, with the provision of appropriate offsets and implementation of EPRs.

Southern Greater Glider

Southern Greater Glider is listed as endangered under the EPBC Act and FFG Act. The EES noted that while the species was not recorded during targeted survey within the project area it is considered a potential visitor to habitat areas of moderate quality within the project area in the Haydens Hill vicinity.

The BD1 report concluded that a total of 13.71 ha of field mapped potential habitat for the species may be impacted in the Haydens Hill area, which may be used as refuge habitat. Table 4-1 in the BD1 report noted the area of Southern Greater Glider habitat to be impacted increased slightly from the EES from 12.06 ha to 13.71 ha due to the reconsideration of notional root zone impacts associated with access tracks.

The EES included a significant impact assessment that concluded a significant impact on this species is possible. The cleared easement may contribute to fragmentation of habitat, adversely affect habitat critical to the survival of the species and interfere with recovery of the species. The EES considered that this fragmentation of habitat may be partially mitigated through the placement of glider poles and rope bridges in the area (EPR BD4) and a hollow replacement strategy (EPR BD2), and that direct impacts will be minimised via fauna salvage pre-clearance surveys such as hollow inspections (EPR BD2). The BD1 report concluded that

while the extent of impacts had increased slightly, the significance of the impact is consistent with the original findings of the EES, and the project is not likely to have a significant impact on the species.

The IAC considered that while Southern Greater Glider has not been recorded in the project area, low-moderate impacts are expected based on the habitat loss and fragmentation caused by the easement. However, the IAC also noted that the impacted habitat is a tiny portion of the extent of habitat in the wider landscape (sections 4.2 (iv) and 4.9 (vi) of the IAC report). The IAC concluded that the project could possibly result in a significant impact on Southern Greater Glider (sections 4.2 (iv) and 4.9 (vi) of the IAC report).

It is my assessment that the impacts to Southern Greater Glider are likely to be significant, however the impacts are considered to be acceptable with the adoption of EPRs and the appropriate offsets that meet commonwealth policy.

Striped Legless Lizard and Victorian Grassland Earless Dragon

Striped Legless Lizard is listed as vulnerable under the EPBC Act and endangered under the FFG Act. The EES noted that the species was not recorded during targeted surveys, however considered that it's presence cannot be ruled out in areas yet to be surveyed. The EES concluded that the project has the potential to impact on 1.44 ha of potential habitat in discrete areas associated with tower structures and access tracks resulting in changes in soil structure and terrestrial cover, noting that grassland habitat can be retained in the easement corridor. The figures for this species were not revised in the BD1 report.

Victorian Grassland Earless Dragon is listed as critically endangered under the EPBC Act and FFG Act, noting both listings occurred after the project was referred. The EES notes that the species is known from one population discovered in 2023 south of Bacchus Marsh. The EES outlined that reptile surveys undertaken for Striped Legless Lizard in areas of potential habitat did not record the species. The EES noted that 28.34 ha of potential habitat was recorded within the project area, and a total of 3.48 ha of mapped potential Victorian Grassland Earless Dragon habitat may be impacted. The figures for this species were not revised in the BD1 report.

The EES considered that a significant impact is possible for both Striped Legless Lizard and Victorian Grassland Earless Dragon. The EES included EPR BD4 which requires specific measures for Striped Legless Lizard and Victorian Grassland Earless Dragon to be included in the Threatened Fauna Management Plan.

DEECA submitted[20] that it was satisfied that the measures in EPR BD1 (no go zones) and EPR BD4 (Threatened Fauna Management Plan) will assist in the protection of Victorian Grassland Earless Dragon. The IAC noted that while Victorian Grassland Earless Dragon have not been recorded in the project area, there is potential for small areas of potential habitat that may be impacted by access tracks and tower construction. The IAC concluded that the project would result in a moderate residual impact on the species (section 4.2 (iv) of the IAC report). It is my assessment that the impacts to Victorian Grassland Earless Dragon are likely to be significant, however the impacts are considered acceptable and can be effectively managed and offset through the proposed EPRs.

The IAC concluded that the project will possibly result in a significant impact to Striped Legless Lizard, however, it noted that the species had not been recorded in the project area, and that impacts to potential habitat were limited to small areas related to the construction of access tracks and tower construction (sections 4.2 (iv) and 4.9 (vi) of the IAC report). The IAC considered residual impacts to be moderate.

[20] Tabled document 407

It is my assessment that the impacts to Victorian Grassland Earless Dragon are likely to be significant, and the impacts to Striped Legless Lizard may be significant, however the impacts to both species are considered to be acceptable, with the adoption of the EPRs and the appropriate offset.

Collision Risk

The EES considered the potential for the project to result in impacts to some bird and bat species, with an assessment of the species recorded within the study area which have the potential to utilise or pass through the project area, used to define a project specific list of 17 bird and one bat species which were considered species of interest for the project. The EES considered the potential for the project to result in a collision and/or electrocution risk to some bird and bat species, noting that the greatest potential risk is in the operations stage of the project, after the conductors and ground wires are stung and become electrified.

The collision and electrocution risk assessment completed within the BIA notes that out of the species of concern list, no species has an 'extreme' level of concern, however the level of concern was considered to be 'Concern' for three species, 'Mild' for nine species, with the remaining six species being considered to be of 'Minimal' concern. The three species listed as having a level of concern as 'Concern' were Black Swan *Cygnus atratus*, Wedge-tailed Eagle *Aquila audax*, and White-bellied Sea Eagle *Haliaeetus leucogaster*. Some listed species such as Brolga, Swift Parrot and Grey-Headed Flying-fox were considered to have a "Mild' level of concern. The EES concluded that all three species with a 'Concern' level of risk are unlikely to be exposed to population level impacts from any potential collision risks incurred by the project. However, the EES acknowledged that effects at the individual level are still possible but considered that these risks can be significantly reduced through mitigation strategies.

The EES noted that targeting mitigation measures in identified priority areas, including wetlands such as Lake Learmonth and Hepburn Lagoon and forested areas such as Mt Buangor State Park and Wombat-Lerderderg National Park will maximise their effectiveness and the potential mitigations for collision risk have a focus on the species with the level of concern of 'Concern' as well as important areas for species with a level of concern of 'Mild'. The EES includes EPR BD5 'Design and implement a Collision Risk Management Plan', which includes activities to reduce collision risk such as increasing the visibility of the overhead conductors for bird and bat species.

DEECA[21] noted that the area between Hepburn Lagoon and Lexton is the highest risk for Brolga, and supported the requirement in EPR BD5 for the installation of bird flappers in areas of highest collision risk.

The IAC noted the significant community concern regarding collision risk, particularly for large birds such as Brolga and Wedge-tailed Eagle, however accepted the evidence of Mr Stephens and Mr Lane that the risk assessment in the EES was appropriate, but constrained by the limited Australian literature about collision risk (section 4.4 (iv) of the IAC report). The IAC also accepted the advice provided by 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 (section 4.4 (iv) of the IAC report).

The IAC recommended that EPR BD5 is amended to require the annual publication of the results of the carcass monitoring program, and periodic review of the carcass monitoring program which takes into account the effects of climatic variability on bird and bat movements (section 4.4 (iv) of the IAC report). I accept these amendments.

The IAC also recommended that EPR BD3 is amended to insert a requirement to incorporate local knowledge (such as from Landcare Groups) in the mapping of nesting sites for Wedge-tailed Eagles (section 4.6 (iv) of the

[21] Submission 471

IAC report). I note the IAC's position on the matter and community concerns for this species however I consider the wording sufficient as drafted in the 'Day 3' EMF.

Offsets

AusNet exhibited an Offset Management Strategy with the EES (Attachment V), then submitted an updated Offset Management Strategy[22]based on the revised assessment of the extent of native vegetation loss and impacts outlined in the BD1 report. Other offset requirements were reduced following additional surveyed areas replacing modelled habitat as outlined in the BD1 report and updated draft Offset Management Strategy. There will be further changes to offset requirements after the field surveys are completed and detailed design is finalised. However, the figures in the EES and the BD1 report are considered to be a worst-case scenario, and final impacts and associated offsets are expected to be less than stated in the Offset Management Strategy.

The IAC accepted the advice of Mr Stephens that alternative species offsets are unlikely to be required for the project because the current estimate of project offsets, as shown in the Offset Management Strategy, can be sourced as direct offsets (section 4.8 (iv) of the IAC report). DEECA[23] advised there is still significant work to be done to secure the offsets required for the project but was satisfied the EMF and EPRs within it provide an adequate and clear framework for that to occur.

The IAC accepted 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 (section 4.8 (iv) of the IAC report). It noted the offset requirements will be subject to change until the detailed design and final biodiversity assessments are completed.

The IAC acknowledged that many submitters including Melton and Pyrenees Councils, requested offsets be secured locally rather than remote from the proposed impacts, and that DEECA advised it would also prefer local offsets but cannot require them (section 4.8 (iii) of the IAC report). The Native Vegetation Guidelines[24] require general offsets to be sourced in the municipality or the wider Catchment Management Authority area but allow species offsets to be sourced anywhere in the State where that species' modelled habitat occurs.

The IAC agreed with submissions that local offsets would be preferable to maintain local biodiversity values, and mitigate local habitat loss and fragmentation, particularly in situations where vegetation is lost from biolinks (section 4.8 (iv) of the IAC report). However, the IAC noted that local offsets cannot be compelled under State or Commonwealth Guidelines. In response, the IAC recommended a new condition in the Incorporated Document that offsets should be sourced locally to the extent reasonably practicable (section 4.8 (iv) of the IAC report).

I support the intent of the IAC's assessment and encourage AusNet to locate offsets as close to the project area as practicable, but I do not accept adding a condition to the Incorporated Document as it is inconsistent with the offset policy.

Riparian and aquatic ecosystems and biolinks

The EES notes that there are a number of biodiversity linkages and riparian restoration projects within the project land that intersect with the proposed route and highlighted that a number of these restoration

[22] Tabled document 50

[23] Tabled document 407

[24] Department of Energy, Environment and Climate Action (2025) *Guidelines for the removal, destruction or lopping of native vegetation,* Version 1.1

projects will be impacted by the project. The EES attributed impacts with removal of riparian vegetation for the construction of new or upgraded access tracks across waterways and to comply with electricity line safety clearances and fuel load requirements. The EES noted that EPR BD6 includes measures to reduce impacts on aquatic and riparian ecosystems.

The IAC noted that submissions raised concerns on impacts to specific biolinks, especially the Myrniong, Korkuperrimul Creek and Camerons Road biolinks, which connect the Wombat-Lerderderg National Park to other reserves. The IAC also noted that concerns were expressed about the impacts to 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.

The submission by DEECA[25] noted that public authorities have facilitated the development of a biolink as part of the Grow West project which has an aim of developing a vegetation corridor on private and public land between the Brisbane Ranges National Park and the Wombat-Lerderderg National Park. DEECA noted that the proposed route for WRL crosses through the area between Korkuperrimul and Myrniong Creeks, and highlighted that much of the work has been undertaken by Landcare groups and private landholders as part of conservation works. DEECA considered that the total removal of vegetation within the biolink may result in areas of habitat fragmentation which would undermine the strategic intent of the biolink and suggested that where possible the understorey should be retained within the easement to protect the integrity of the biolink.

The IAC agreed that the removal of native vegetation is contrary to the intent of the biolinks (section 4.7 (v) of the IAC report). The IAC also noted that the proposed co-designed community benefit fund proposed in EPR SC5 could be directed towards the restoration of biolinks.

The IAC considered a more targeted approach was required for revegetation to mitigate the impacts on biolinks and recommended the creation of a new EPR (EPR BD12) which requires support to be offered for revegetation within the biolinks that are impacted by the project (section 4.7 (v) of the IAC report). The IAC considered that the provision of local offsets within the same biolink, rather than offsets which are remote from the impacted sites would also help to mitigate the impacts on biolinks (section 4.7 (v) of the IAC report).

The IAC acknowledged the financial and in-kind contributions made by landholders to the existing revegetation and protection of remnant vegetation in the biolinks and recommended that EPR BD12 should include allowance for these landholders being offered support to replace remnant vegetation and revegetation plantings impacted by the project through plantings on another part of their property outside of the easement corridor (section 4.7 (v) of the IAC report). While I support the intent of EPR BD12 to ensure that biolinks, including the key Grow West project, should ensure that understorey vegetation is retained as far as possible, I do not support the requirement for the provision of additional funding beyond that which is proposed as part of EPR SC5. I recommend that EPR BD12 is amended to remove points 1b and 1c to support this. I further recommend that EPR BD12 includes a requirement for consultation with key stakeholders who have management responsibility for the land on which the biolinks are located, such as DEECA where the project is impacting key biolinks, to ensure that these sites can continue to function in the best possible way.

The IAC discussed the area around the Kororoit Creek riparian zone, noting that the map in the AusNet's reply submission[26] demonstrated that the towers within the Schedule 4 to the Significant Landscape Overlay (SLO4) in the Melton Planning Scheme are not situated within the tree-lined riparian zone of Kororoit Creek. However, they noted that the removal of large canopy trees from the Koroit Creek riparian zone will be required for electrical safety clearances as noted in the BD1 Report (section 4.7 (v) of the IAC report).

[25] Submission 471

[26] Tabled document 651 – Figure 29

The IAC recommended amendments to EPR BD10 to require the investigation of the feasibility of applying the 'Minimised Risk Clearance' approach to minimise impacts on the Kororoit Creek riparian zone however noted that this investigation would require consideration of any impacts on Melbourne Airport's protected airspace and, if taller towers are investigated, consideration should be given to the potential for increased impacts on landscape values protected under the SLO4 (section 4.7 (v) of the IAC report). This is discussed further in section 5.3 of this assessment.

The IAC discussed the potential for further retention of the riparian vegetation in the Birch Creek area in conjunction with the investigation for the retention of the Algerian Oak in TN14[27], (which is discussed further in sections 5.3 and 6.1 of this assessment). The IAC recommended that EPR BD10 should be amended to include a specific reference to Bullarook Streamside Reserve and Birch Creek riparian zone and concluded that the impacts of the project can potentially be further mitigated with a partial clearance approach, potentially in combination with raised tower heights, and considered that AusNet should investigate whether the approach is feasible in this location (section 4.7 (v) of the IAC report).

I accept the IACs amendment to EPR BD10 in relation to the Kororoit Creek riparian zone, noting that project refinements and targeted work by AusNet to consider opportunities to further avoid and minimise impacts is supported, as highlighted in section 4 of this assessment. As noted above, potential refinements to the tower heights and associated examination of reducing and balancing impacts, beyond those assessed within this assessment, will need to improve outcomes and not increase significance of effects on biodiversity and other matters.

The IAC concluded that impacts on aquatic and riparian ecosystems and biolinks can be acceptable, subject to their recommended amendments to EPR BD10 and EPR BD12(section 4.7 (v) of the IAC report). I accept this conclusion, subject to the inclusion of my recommended amendment.

Overall, the IAC recommended that if the project proceeds conditions on the approval under the EPBC Act should be included consistent with:

- (a) the relevant native vegetation offset conditions (clause 4.10) in the Incorporated Document as shown in Appendix E:1; and
- (b) the relevant biodiversity (BD) EPRs in the EMF as shown in Appendix E:2.

I accept this recommendation.

Assessment

It is my assessment that:

- The impacts to native vegetation have been appropriately avoided and minimised, and the worst-case scenario of the loss of up to 186.264 ha of native vegetation is significant but acceptable with the implementation of the EPRs, incorporating the recommended amendments, with further discussion on specific matters below.
- Further investigation of a partial or minimised vegetation clearance approach should be undertaken at Darley and at the Lexton Bushland Reserve area between towers F6120DL and F6123D and at other locations as reflected in the recommended amendments to EPR BD10.
- The project is likely to have a significant impact on the FFG Act-listed Melbourne Yellow Gum, Brittle Greenhood, Yarra Gum and Buloke. I am satisfied that the significant impacts to these threatened flora species can be managed to acceptable levels with the adoption and effective implementation of the EPRs incorporating the recommended amendments, and with appropriate offsets being secured. However, the

[27] Tabled document 367

IAC's proposed amendment to item 2(j) in EPR BD2 is not required as I have found that there is no evidence that the Minimal Risk Clearance approach cannot be implemented and any clearing which exceeds the extent of clearing assumed in the BIA and the BD1 report has not been proposed or assessed. I do not accept the IAC's proposed amendment to item 2(j) in EPR BD2. The project is likely to have a significant impact on the FFG Act-listed Rocky Chenopod Open Scrub Community as well as the following EPBC Act-listed TECs:

- Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia;
- Natural Temperate Grassland of the Victorian Volcanic Plain; and
- White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland.

I am satisfied that the significant impacts to these TECs can be managed to acceptable levels with the adoption and effective implementation of the EPRs incorporating the recommended amendments, and with appropriate offsets being secured.

- The project is likely to have a significant impact on the following EPBC Act-listed species: Swift Parrot, Golden Sun Moth, Southern Greater Glider, Striped Legless Lizard and Victorian Grassland Earless Dragon. I am satisfied that these significant impacts to threatened fauna can be managed to acceptable levels with the adoption of the EPRs incorporating the recommended amendments and the provision of appropriate offsets.
- The draft Offset Management Strategy satisfactorily addresses Victorian and Commonwealth offset requirements at the current stage of project, noting the offset requirements will be subject to change until the detailed design and final biodiversity assessments are completed. I do not support adding a condition to the Incorporated Document that requires offsets to be sourced locally, as this is inconsistent with the relevant offset policy.

5.2. Agriculture and forestry

Evaluation objective

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.

Assessment context

Agricultural and forestry effects are addressed in Chapter 15 and Technical Appendix H of the EES and in section 10 of the IAC Report. The proponent proposed four EPRs (EPR AF1, EPR EM3, EPR EM4 and EPR EM8) that, in combination with other EPRs within the EMF, are required to manage impacts on agricultural and forestry properties. EPR AF1, EPR EM3 and EPR EM8 were the subject of recommendations by the IAC.

The project traverses 229[28] agricultural and forestry properties along the 190 km alignment and will directly impact 2,228 ha (0.4% of the agricultural and forestry regional land use) of the total 33,612 ha of these properties during construction.

There are three key agricultural industries operating within the project corridor: cropping or broadacre farming, grazing or livestock production, and horticulture (primarily potatoes). Most properties are involved in multiple enterprises, including forestry in a small number of situations.

[28] Tabled document 85

The areas directly impacted by the project during construction vary, with 1,028 ha of cropping or broadacre mixed farming properties, 632 ha of horticulture properties, and 542 ha of grazing properties. The EES predicted collective losses during construction of approximately $6.3m per annum or 1.0% of the gross value of annual production across the region.

The EES noted that during operation, the permanently impacted area would reduce to 239 ha spread across the 229 affected properties, consisting of a total of 127 ha of broadacre and cropping, 64 ha of grazing, and 48 ha of horticulture. The EES predicted collective production losses of approximately $0.56m per annum during operation.

The forestry plantations intersected by the project (3 of 229 properties) include corporate growers (Hancock Victorian Plantations and Midway) and farm foresters. This equates to a small proportion of the directly affected area being forestry plantation (26 ha out of 2,228 ha). Losses to forestry plantations were predicted to be $0.46m for the life of the project.

The key potential effects on agriculture and forestry values from construction of the project examined in the EES were from reduced production and farm income, due to:

- restrictions on agriculture and forestry enterprises due to land excluded by the project;
- property access resulting in biosecurity breaches;
- disruption of normal agriculture and forestry activities; and
- isolation and redundancy of productive land where a paddock is split due to construction along the easement.

The key potential effects on agriculture and forestry values from operation of the project examined in the EES were from reduced production and income losses, due to:

- ongoing restrictions from planting trees in the easement;
- restrictions within the easement on farm design or use and development of farm infrastructure; and
- isolation and redundancy of productive agricultural land where a paddock is split by towers and an easement.

Effects on agriculture and forestry productivity from movement or compaction of soils, soil loss and contamination, and dust are interrelated impacts that could affect crop yields and are discussed in Section 5.9 of my assessment.

Agriculture and forestry impacts associated with the project were proposed to be managed through the implementation of the following: an Agriculture and Forestry Business Mitigation and Support Strategy (BMSS) (EPR AF1) to address property-specific impacts, disruption and compensation; a Property Access and Management Plan (PAMP) (EPR EM3) and Specific Property Access Requirements (SPAR) (EPR EM4) to manage construction and operation access; and a project wide Biosecurity Management Plan (EPR EM8) to avoid or minimise the spread of weeds, pests and diseases during construction.

The EES assessed residual effects to be minor at a state and regional scale during construction and operation, while acknowledging that - at the individual property or enterprise level- residual effects may be more significant in some cases and were proposed to be offset by compensation payments.

Access licences and construction leases will be negotiated with landholders under the LAC Act (see Section 3.3 of this assessment) pursuant to the Electricity Industry Act.

The EES did not find cumulative effects on agriculture or forestry values to be significant at a regional or state scale. At the property level scale, the cumulative effects were examined in combination with the VNI West project and considered to be moderate to high for directly affected properties but noted to be in small areas and confined to one or two properties.

Two peer reviews, one commissioned by the Department of Transport and Planning (DTP) and one by AusNet, were completed and included in the EES documentation made public during the exhibition.

Discussion

The key issues identified by the IAC and discussed in my assessment are:

- Adequacy of the agriculture and forestry impact assessment prepared for the EES (sections 10.2 and 15.5 of the IAC report);
- Acceptability of the project's impacts on agriculture and forestry (section 10.5 of the IAC report); and
- Adequacy of EPRs to mitigate agriculture and forestry effects (section 10.6 of the IAC report).

Adequacy of the agriculture and forestry impact assessment prepared for the EES

The key issues regarding the method and approach raised by submitters were:

- consultation with landholders was limited and compensatory measures such as farm case studies were not appropriate;
- economic impacts (from production losses) may have been understated; or were not quantified (isolation and redundancy impacts);
- the EES relied on the future preparation of agriculture and forestry plans required under the EMF (rather than undertaking that work upfront as part of the assessment process itself); and
- adequacy of the approach to avoid and minimise agricultural impacts.

Consultation

AusNet's expert witness for agriculture, Mr Shayne Annett, outlined in his expert statement[29] that the project sought to undertake detailed consultation with approximately 10% of directly affected landholders to inform the assessment; however, only 14 of the 53 invited landholders elected to participate. The IAC acknowledged that the low participation rate reflected landholder choice rather than a limitation in consultation effort and found that the assessment adequately identified the range of potential impacts (section 10.2(iv) of the IAC report). I agree with this finding.

Economic modelling

In relation to the economic impacts, Mr Annett considered the method adopted in the EES as intentionally conservative, to avoid understating potential impacts. The IAC concluded that the EES had successfully identified and described the scope of physical disruptions to farm activity and the impacts on production losses from the project, while finding that the EES would have benefitted from the opportunity to directly consult the intended 10% of directly affected landholders to inform the economic model (section 10.2 (iv) of the IAC report). I agree with this conclusion and finding.

Future reliance on agriculture and forestry EPRs

While acknowledging the uncertainty in relation to how property-specific impacts would ultimately be managed, the IAC noted that deferring the development of property-specific agriculture and forestry management plans was acceptable and common practice for large projects of this nature. On this basis, the IAC found that individual property-specific plans under the BMSS (EPR AF1), in combination with other agriculture and forestry EPRs, are an important management tool by which impacts from the project on individual farm business will be minimised and monitored. I agree with this finding.

[29] Tabled document 89.

The IAC concluded that the proponent's 'Day 3' EMF, subject to recommendations and proposed updates to the EPRs in its report, provides an appropriate framework for managing the project's agriculture and forestry impacts (section 10.6 (v) of the IAC report). I agree with the IAC's conclusions, subject to the matters set out below.

Approach to avoidance and minimisation of agricultural and forestry effects

The IAC found the AusNet's approach to developing the proposed route had adequate regard to avoiding or minimising potential impacts on agricultural and forestry values (section 10.4 (v) of the IAC report). While acknowledging there was scope to further refine the proposed route in response to stakeholder consultation, the IAC also accepted that, to date, the process had been impacted by the reluctance of some landholders to engage with AusNet.

In response to property-specific siting issues raised in submissions, the IAC found that a formal process for reviewing these was not needed but made a general recommendation that AusNet review relevant submissions in consultation with affected landowners (section 15.5 (iii and iv) of the IAC report). I accept the intent of the IAC's recommendation and consider that it would be advisable and good practice for AusNet to continue working with impacted landholders in finalising the development plans included in proposed condition 4.5 (development plans) of the proposed Incorporated Document. However, there are existing processes in place as part of negotiating easement agreements that provide for this engagement. I also acknowledge AusNet's commitment during the public hearing to continued consultation with impacted landholders with it seeking to negotiate Options for Easement for properties currently without agreements. Where negotiations are not successful, AusNet will be required to follow statutory processes for compulsory acquisition and subsequent compensation in accordance with the LAC Act.

In the context of assessment and mitigation of environmental effects under the Environment Effects Act, I also agree with the IAC's recommended changes to proposed clause 4.5.3 and new proposed clause 4.7.4 in the proposed Incorporated Document (section 15.5 (iv) of the IAC report). It is sound to require consultation with affected and neighbouring landholders to be documented and to require reporting on implications for agricultural productivity and general amenity, if amending development plans or utilising micro-siting plans. This is discussed further in Section 4.1 of this assessment.

Overall, I accept the IAC's findings that the process of developing the proposed route had adequate regard to avoidance and minimisation of impacts to agricultural land (section 10.4 (v) of the IAC report). I am also satisfied that there are further opportunities for engagement between AusNet and willing landholders and to consider feasible design refinements to reduce impacts while preparing its development plans.

Effects of landholder restrictions on agriculture operations

Effects at the state or regional level

The IAC found that any impacts on agriculture at a regional level would not be significant and are acceptable (sections 10.2 (v), 10.3 (v) and 10.7 of the IAC report). I accept that the project is unlikely to have a significant impact at a regional scale on availability of land for agricultural production, overall agricultural productivity, or its economic contribution. I also agree that residual impacts on agriculture at a broad landscape level are acceptable and the project would not impact the long-term vision for agricultural land use planning in the broader region.

Despite limited residual effects at a regional and state scale, the IAC found that the most significant long-term residual effects would be felt at the local and individual level (sections 10.2 (v), 10.3 (v) of the IAC report), which is discussed below.

Effects at the local and individual property level

The IAC found that impacts will vary and are likely to be more significant on horticultural and cropping farms than grazing farms (section 10.5 (v) of the IAC report). This was considered in the context of State planning policy, including strategies of clause 14.01-1S of the VPPs which seeks to protect agricultural land. Section 5.8 of this assessment discusses the project with regard to planning policy and land use.

The IAC agreed with Ballarat and Hepburn councils' expert witness on agriculture, Mr Gavin Beever[30], that the loss of 632 ha of highly productive horticultural land during construction and 48 ha for the life of the project, concentrated within the central part of the alignment between Waubra and Gordon would be a negative outcome of the project for local farming communities (section 10.3 (iv) of the IAC report). I agree with the IAC's finding that the project's construction and operation would remove highly productive land used for horticulture but also note that the construction impacts on 632 ha estimated in the EES is likely to be an over-estimate. Similarly for operation, calculations of the project's impact on 48 ha of horticulture land conservatively assumed that all towers would be located on high-value agricultural land, and that all access tracks will be retained for the duration of the project.

The IAC concluded that the EMF, as further amended by the IAC, provides an appropriate framework for mitigating impacts on agricultural operations (section 10.6 (iv) of the IAC report). The IAC found that in addition, there may be scope for further property-specific refinements through discussions between AusNet and landowners (section 10.5 (iv) of the IAC report). The IAC noted that consultation with landholders must be undertaken in accordance with the project's Communications and Stakeholder Engagement Management Plan (EPR EM5).

I agree with the IAC's findings and am satisfied that the relevant EPRs (EPR AF1, EPR EM3, EPR EM4 and EPR EM8) in combination with other EPRs under the EMF - subject to the recommendations by the IAC and as refined through my assessment - provide an appropriate framework to avoid, minimise and manage the project's effects on agriculture operations to acceptable levels.

Effects of landholder restrictions on forestry operations

The EES noted that the project will impact 26 ha of commercial plantations with provision of the easement, which for forestry operators equates to economic losses of $0.46m for the life of the project. This represents less than one percent of regional production, however these impacts will persist for the life of the project as tall trees are not allowed within the easement.

The IAC found that impacts on forestry would be negligible and are acceptable (section 10.2 (v) of the IAC report), which I accept.

Property access and biosecurity

The IAC acknowledged submitters' concerns about potential biosecurity impacts, such as introduction or spread of animal and plant pathogens and noxious weeds, during project construction and to a lesser extent, operation.

In response the proponent proposed, and the IAC supported, changes to EPR AF1, EPR EM3, EPR EM4 and EPR EM8. In addition, the IAC recommended EPR EM8 be amended further to also apply during operation and provide for property-specific biosecurity plans, where appropriate (section 10.6 (v and iv) and of the IAC report). The IAC also recommended that the Incorporated Document require preparatory buildings and works to have regard to potential biosecurity risks (section 10.5 (v and iv) of the IAC report).

[30] Tabled document 115 and Tabled document 136

Ultimately, the IAC concluded that, while there is no guarantee that biosecurity issues would not arise, it was satisfied that (subject to the implementation of its recommendations) appropriate management processes would be in place and any biosecurity impacts from the project had been acceptably minimised (section 10.5 (iv) and 10.6 (v) of the IAC report).

I agree with the IAC's conclusion, except for its further amendment to EPR EM8, where I note that property-specific biosecurity plans are required under EPR EM3 and this requirement should therefore not be duplicated in EPR EM8. For clarity, I instead recommend EPR EM8 refers to EPR EM3 and removed reference to the Biosecurity Management Plan being a subplan of the CEMP noting that it will also apply during operation.

Restrictions and disruptions to routine activities during construction and operation

The IAC accepted that the project has the potential to create a range of temporary and ongoing impacts on farm operations, with the nature and extent of impacts differing substantially between properties and farming systems. However, the IAC heard disagreement about the nature and extent of the property specific impacts on routine agriculture activities, which is explored further below.

Machinery heights, stubble burning and aviation operations

The IAC received several submissions, which noted that even minor restrictions on use of machinery (including central pivot and lateral moving irrigators), aerial operations, stubble burning, and other restrictions on farm design could have disproportionate impacts on tightly scheduled and weather-dependent farming systems. This is particularly for intensive horticulture and cropping enterprises. Submitters expressed concern that these restrictions may result in ongoing financial losses, opportunity costs, or increased production costs.

The project would introduce a range of safety-related operational constraints and these constraints may require changes to farming practices for some landholders and may inconvenience certain operations. The IAC determined that the majority of existing agricultural activities would be able to continue to occur within allowable safety parameters, and that safety assessments and compliance with permit to work requirements would only be needed in a few cases (section 10.5 (iv) of the IAC report). The IAC recommended AusNet revise and update the safety assessments and permit to work guidance to better reflect the material provided in TN 17[31] and to proactively assist landholders in understanding and effectively managing those assessment and permit processes (section 10.5 (iv and v) of the IAC report). The IAC also recommended publishing this guidance on the project website and making it available to directly affected landholders (section 10.5 (iv and v) of the IAC report). Furthermore, the IAC recommended that EPR AF1 be amended so the BMSS clearly defines the safety assessment and permit to work process with the objective of ensuring approvals are timely, tailored to farm needs, and additional costs and complexity are minimised for landholders (section 10.5 (iv and v) of the IAC report).

I agree with the IAC's recommendations and note that the BMSS (EPR AF1), in combination with the PAMP (EPR EM3) and SPAR (EPR EM4), as refined through my assessment, will effectively address the issue of the project's restrictions on routine activities.

Disturbance to the movement of livestock

The IAC accepted that construction may affect livestock operations, requiring stock to be relocated or sold, putting pressure on farming businesses in relation to costs and availability of suitable on-farm or off-farm agistment. It noted that these impacts would depend on the timing and staging of construction and accepted that specific arrangements for livestock movement should be addressed in consultation with the landholder.

[31] Tabled document 519

The IAC agreed with AusNet's inclusion of arrangements for moving livestock away from construction activities, including agistment where necessary and was satisfied that this inclusion in the PAMP (EPR EM3) improves the capacity of the project to manage livestock-related impacts (section 10.5 (iv) of the IAC report). I agree with the IAC's findings on this matter.

Isolation and redundancy of productive land and irrigation

The IAC accepted that managing isolation and redundancy impacts on landholders would be challenging and the need to redesign irrigation infrastructure would be a significant impact for some farms.

The IAC noted that some impacts were compensable and the proponent included various requirements in the EMF - including the requirement in BMSS (EPR AF1) to avoid irrigation systems and, where avoidance is not possible, to re-design and replace irrigation systems in consultation with landholders and specialist consultants - would acceptably mitigate the impacts. The IAC found that the EMF provides a suitable framework to acceptably mitigate the impacts but noted that its successful implementation will require effective consultation. The IAC also found that most impacts will be compensated under the LAC Act and Option for Easement processes. In addition, the IAC found that there should be further consideration of refining the proposed route within affected properties to avoid and minimise these and other impacts on agricultural land (section 10.5 (v) of the IAC report). I agree with these findings.

Assessment

It is my assessment that:

- The project is not predicted to have a significant impact at a regional level on the availability of land for agricultural and forestry production, overall output, or its economic contribution.
- The project would clearly impact on some individual farm businesses, due to ongoing operational constraints arising from the easement, including limits on land use flexibility and farm system efficiency.
- The project had adequate regard to avoiding and minimising impacts though the design and route refinement process.
- The agriculture and forestry EPR AF1 and applicable EPRs EM3, EM4 and EM8 under the EMF are adequate to sufficiently avoid, minimise and manage the project's effects on agriculture and forestry operations to acceptable levels, subject to the changes recommended by the IAC and as refined through my assessment. In situations where potential impacts are unavoidable, landholders will be compensated.

5.3. Landscape and visual

Evaluation objective

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

Assessment context

Landscape and visual effects are addressed in Chapter 11 and Technical Appendix D of the EES and in section 6 of the IAC Report. AusNet has proposed two EPRs to deal with landscape and visual effects (EPR LV1 and LV2) and both of these were the subject of recommendations by the IAC.

The project has the potential to impact on significant landscape values and landforms, and residents' visual amenity from open spaces, community facilities and dwellings. Residents and the broader community will experience temporary changes to landscape values and visual amenity during construction and decommissioning, and longer-term changes to landscape values and visual amenity from public viewpoints and dwellings during operation. The tallest and most visually noticeable features of the proposed project are its double-circuit steel lattice towers which will be up to 80 m high.

The study area used to assess project impacts on landscape and visual values in the EES incorporated project land and surrounding areas within 9.2 km of the proposed route, as the project would be barely visible beyond this distance. Potential project impacts on visual amenity from dwellings were assessed from locations within 2 km of the proposed route, being the distance that project towers have the potential to be highly visible and dominate the landscape.

The EES categorised the existing landscape into four broad regional landscape character areas and defined nine landscape character units which were assessed for their sensitivity to visual change. The EES assessed the visual impact of the project from a total of 119 public and private viewpoints. The significance of impacts on these views was based on the sensitivity of the landscape, viewer sensitivity, the degree of change, distance, viewer numbers and duration with impacts rated from 'nil' to 'high'.

The EES set out how AusNet sought to avoid and minimise visual impact through siting, co-locating with existing transmission infrastructure where possible, avoiding national and state parks and other conservation areas, and largely avoiding direct impacts to areas recognised as having historic heritage value. The project also adopted a double circuit design for most of the proposed route, which required a single 500kV tower in each location. This minimised the number of visible structures across much of the proposed route compared to a single circuit design, which for this project would have required two towers at each tower location. The design also sought to include right angle crossings of key roads and tourist routes (rather than running parallel), to minimise the duration of views of the project for people travelling along the roads.

The EES concluded that most construction activities would not result in residual impacts on visual amenity, as impacts would be temporary and short in duration, and most areas would be rehabilitated and returned to their prior use. However, two dwellings located to the south of the proposed Bulgana Terminal Station laydown area would experience high impacts on visual amenity, as it would not be possible to establish effective landscape screening within the two-year construction period.

As noted in the EES, the most significant residual impacts on landscape values and visual amenity would occur during operation. The EES identified and assessed key public vantage points such as water bodies, reserves and lookouts from which views across the landscape are valued the most. The highest residual impacts on views of valued landscapes were identified at the following locations:

- Bolwarrah Weir (high);
- two viewpoints along the Buried Rivers of Gold Tourist Drive, which extends through the area that is subject to the UNESCO tentative listing (visual impacts on heritage places are discussed in section 6.8 Historic Heritage) (high); and
- Bald Hill Activation Area (northern edge near the proposed entrance from Swans Road, and along the Sculpture Trail) (high).

Project impacts on landscape values and visual amenity from representative viewpoints within townships, and along highways and major and local roads were also considered. The EES assessed the impacts from the majority of these viewpoints as low.

In terms of impacts on visual amenity from private locations, the EES concluded that dwellings across the length of the proposed route would experience differing residual impacts on visual amenity. The greatest impacts would occur where mitigation through landscape screening is not effective, such as at dwellings that are located close to the project, dwellings that are elevated or where the topography falls away, or at dwellings that have been designed to take in views in the direction of the project.

The EES identified Darley as the area with the greatest number of affected dwellings from changes in visual amenity. The EES found that numerous dwellings on the north-facing slopes of Darley, many of which have existing views of the Wombat-Lerderderg National Park to the north, would experience high residual impacts on visual amenity from the project.

The EES found that the potential for cumulative impacts on landscape values and visual amenity would be dependent on the viewpoint, but unlikely to be significant enough to increase the level of impact anticipated from the project alone.

Discussion

Key matters relating to the assessment of landscape and visual effects examined by the IAC were:

- adequacy of the method used in the EES to identify and assess impacts (sections 6.2 and 6.3 of the IAC report);
- acceptability of impacts on landscape values and the visual amenity of residents (sections 6.4 and 6.5(i) of the IAC report); and
- acceptability of impacts on specific landscapes (section 6.5 of the IAC report).

Adequacy of the assessment

Overall assessment method

The IAC considered that the method used in the EES was generally fit for purpose and that the assessment of impacts on landscape values and visual amenity was robust and appropriate (section 6.2 (iv) of the IAC report). The IAC was satisfied the 119 viewpoints selected in the EES were representative of the project's landscape and visual impacts from both public places and private dwellings, noting that *'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'* (section 6.2 (iii) of the IAC report). I agree with the IAC's finding that the methodology of the LVIA was robust and appropriate (section 6.2 (iv) of the IAC report).

The independent peer review of the LVIA undertaken by Mr Schutt also found the method to be appropriate. The IAC directed Mr Schutt to meet with AusNet's landscape and visual expert witness (Mr Burge), as well as landscape and visual expert witnesses for Hepburn Shire (Mr Papworth) and the City of Melton (Mr Goss) to identify areas of agreement and disagreement in relation to the method. The Joint Expert Statement[32] indicated that while there was agreement on most aspects, there was disagreement between the experts in relation to viewer sensitivity, impact ratings and whether views from highways and tourist vantage points were sufficiently addressed. These issues are discussed further below.

As described above, the assessment of landscape and visual impacts in the EES was based on a design in which the tallest structures are the 80 m high double-circuit transmission towers. It is noted (as described in section 5.1 of this assessment) that the IAC recommended investigating the feasibility of installing higher towers to minimise biodiversity impacts at some locations. As discussed in section 5.1, any potential refinements to the tower heights and associated examination of reducing and balancing impacts, beyond those assessed within this assessment, will need to result in improved environmental outcomes and not increase the significance of effects on any environmental values.

Landscape character and viewer sensitivity

The IAC noted that none of the experts identified any issue with the way the LVIA characterised the area surrounding the proposed route into landscape character areas and units. Mr Papworth[33] was concerned that a single viewer sensitivity rating had been applied in the EES to each landscape character unit, which he considered did not adequately capture the unique landscapes in the municipality of Hepburn. The IAC noted

[32] Tabled document 191

[33] Tabled document 191

the approach of classifying the area into landscape character units with a single viewer sensitivity rating for each unit (as per the approach taken in the EES) is practical and appropriate for a large-scale project (section 6.2 (iii) of the IAC report). The IAC considered '*the classifications accurately reflect the different types of landscape character in Hepburn and the sensitivities assigned to each character unit are broadly appropriate*' (section 6.2 (iii) of the IAC report). It is my assessment that AusNet's method of classifying landscape character across the project is acceptable.

Impact ratings

Mr Papworth[34] considered that the EES should have included an 'extreme/catastrophic' rating in the scale of effects, however the IAC considered this was not appropriate for an objective impact assessment. The IAC accepted Mr Schutt's evidence[35] that the assessment should have included a 'very high' rating but that such a rating would not have resulted in impacts that were assessed as moderate being upgraded to 'high' or 'very high', but rather some 'high' impacts being upgraded to 'very high'.

The IAC stated that the impact ratings in the EES should have included a 'very high' rating, noting that 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 within 2 km of the proposed route, where the towers will be either visually dominant or highly visible in the landscape. The IAC noted that '*Stopping the ratings at 'high' risks understating the impacts on some viewpoints*' (section 6.2 (iii) of the IAC report).

I agree with the IAC's finding that whilst the EES should have included an impact rating of 'very high', '*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*'' (section 6.2 (iv) of the IAC report).

Public roads and tourist vantage points

The IAC considered whether the EES appropriately assessed impacts on visual amenity for people moving through the landscape on public roads or stopping at tourist vantage points.

Some community submitters raised concerns that the use of static photomontages did not capture project impacts on visual amenity for people moving through the landscape. Informed by evidence from Mr Papworth[36], Hepburn Shire also raised concerns that the project would significantly impact on the visual experience of people travelling along public roads and tourist routes in Hepburn Shire.

The IAC noted that the EES assessed views from key roads and vantage points where tourists or road users are more likely to stop and congregate. The IAC also noted '*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*' (section 6.3 (iii) of the IAC report). The IAC found the approach to assessing impacts on visual amenity from views from roads was adequate to inform consideration of the project's visual impacts, which I agree with (section 6.3 (iv) of the IAC report).

Identification of receptors

In assessing whether the project's impacts on visual amenity were acceptable, the IAC considered the impacts on receptors surrounding the proposed route. The IAC noted that residents, rather than private dwellings, are the receptors of the project's impacts.

[34] Tabled document 191

[35] Tabled document 106

[36] Tabled document 154

The IAC found that whilst the number of impacted dwellings is an indicator of the number of impacted receptors (residents), impacts on residents moving around the landscape are also relevant (section 6.4 (iv) of the IAC report), which I agree with.

Cumulative impacts

AusNet's peer review found that while the cumulative impact assessment was broadly appropriate, it should have considered the Joel Joel Battery Energy Storage System (BESS) Project, which is to be located immediately to the east of the existing Bulgana Terminal Station. The Joel Joel BESS Project has received planning approval but is not yet under construction.

Ballarat City Council submitted[37] that the cumulative impacts of the project and Nyaninyak Wind Farm should be considered because there will be spatial overlap between the two projects. The Nyaninyak Wind Farm is proposed to be located between Evansford, Clunes and Waubra. The EES did identify that the proposed route would intersect with the Nyaninyak Wind Farm boundary, however noted there was not sufficient publicly available information on this project at the time of developing the EES to enable the cumulative impact assessment to take it into account.

The IAC considered that the robustness of the LVIA was not undermined by not having considered the cumulative impacts associated with the Joel Joel BESS Project or the Nyaninyak Wind Farm. I agree.

Acceptability of impacts on landscape values and visual amenity

Landscape and visual amenity impacts in Darley

Many submitters expressed concern about the project's impacts on Darley, including impacts on the landscape values and visual amenity for both residents and on the Bald Hill Activation Area and noted the existence of Schedule 1 to the Significant Landscape Overlay (SLO) in the Moorabool Planning Scheme (Moorabool SLO1), titled 'Scenic Hilltops and Ridge Line Areas', which identifies the landscape around Darley as a significant contributor to the town's valued rural ambience.

Planning scheme context

The IAC found that the Moorabool Planning Scheme identifies the landscape around Darley and the Wombat-Lerderderg National Park as "highly visually sensitive" (section 6.5 (i) of the IAC report). The IAC considered that the planning scheme sets a legitimate expectation that the landscape values in the area and the visual amenity of residents in Darley will be considered in planning decisions (section 6.5 (i) of the IAC report). The planning controls that apply to the parts of Darley that would experience visual amenity impacts from the project, seek to recognise and protect visual amenity, associated with the landscape values, and to minimise the impact of development.

The Moorabool SLO1 applies to the southern foothills of the Pentland Hills between the Wombat-Lerderderg National Park to the north, Western Freeway to the south and Darley to the east. One tower and an access track are located within Moorabool SLO1. The 'Statement of nature and key elements of landscape' in the Moorabool SLO1 notes that '*The hilltops and ridge lines encircling the township of Bacchus Marsh provide significant scenic views and are a significant contributor to the valued rural town ambience*'[38].

Mr Burge[39] noted that SLO1 of the Moorabool Planning Scheme does not preclude development but rather, seeks to minimise impacts from any development. Mr Burge then set out how the project sought to minimise

[37] Submission 254

[38] Tabled document 308

[39] Tabled document 119

impacts on the values protected by Moorabool SLO1, through for example, the double-circuit configuration of towers in this location to reduce the number of towers visible from surrounding areas.

The IAC considered that the values that are sought to be protected by SLOs are not limited to just the specific areas to which these overlays have been applied and noted that SLOs '*set an expectation that the landscapes are valued and will be protected as cohesive units*' (section 6.4 (iii) of the IAC report). This is evident in Moorabool SLO1's reference to the relationship between the hilltops and ridge lines within the SLO1, and the Bacchus Marsh township. Moorabool SLO1 guides decision-makers to consider the impact of development on visual amenity both from adjoining properties, and from the township of Bacchus Marsh (including Darley).

The two Design and Development Overlays (DDOs) which apply within the Darley area are DDO2 (this applies to large parts of the Shire of Moorabool) and DDO14 (this applies to a 1.9 km section of the proposed route around Camerons Road). Sections of the proposed route would pass through DDO2 and DDO14 in Darley. These DDOs do not specifically address landscape and visual amenity outcomes. Rather, DDO14 seeks to protect the treed landscape of the area and ensure the siting of new buildings will protect the nature and habitat values of the Wombat-Lerderderg National Park and some local waterways (DDO14). DDO2 seeks to ensure new buildings and works avoid using reflective material which could have a detrimental effect on amenity. As noted in the EES, the galvanised steel used to construct the towers will be de-glared during the manufacturing process, prior to construction on-site.

Visual amenity impacts

Several submitters from Darley submitted that the project's impacts on visual amenity from their dwellings would be unacceptable. The EES found that impacts on visual amenity in Darley would be greatest for dwellings on the northern slopes, west of Links Road. It was noted in the EES that many dwellings in this area have been established to take in views of the vegetated hills within the Wombat-Lerderderg National Park to the north. The EES also noted that '*Views from most dwellings in this cluster are across or include built form in neighbouring allotments and quarries to the north east of the township'*[40].

The EES found the project would have either low or moderate impacts on visual amenity from local roads and other viewpoints from places that would be visited by Darley residents, including Benson Valley Road, Links Road, Swans Road, Lerderderg Gorge Road, Bacchus Marsh Golf Club and Bacchus Marsh Golf Course.

Mr Burge[41] and Mr Schutt[42] differed in their opinion on the number of dwellings in Darley that would experience high impacts on visual amenity. Mr Burge specified that 30 dwellings in Darley could experience high impacts on visual amenity on the most affected streets (Pamela Court, Augusta Place and St Andrews Way). Mr Schutt considered that 65 dwellings in Darley could experience high residual impacts on visual amenity across a more widespread area that in addition to the affected streets identified by Mr Burge, also included Fairway Crescent, Banadell Avenue, Swans Road, Chambers Court and Egan Court. The IAC found that the number of highly impacted dwellings in Darley was understated in the EES and would be more widespread than the at least 65 dwellings identified by Mr Schutt, as the IAC considered that an unquantified number of dwellings in the non-urban parts of Darley (along Swans Road, Camerons Road and Lerderderg Gorge Road) would also experience high impacts on visual amenity (section 6.5 (i) of the IAC report). As identified in the EES, screening could not be implemented at these dwellings without resulting in the loss of valued views. Darley landholders whose properties are within 1 km of the proposed route would be entitled to a one-off payment under AusNet's Near Neighbour Benefit Program.

[40] EES Technical Appendix D, Section 12.6.24

[41] Tabled document 119

[42] Tabled document 295

Noting that Darley residents could experience high impacts on visual amenity from their dwellings as well as impacts as they move through their township, the IAC formed the view that impacts on visual amenity in the Darley area could, in isolation, be considered unacceptable. However, the IAC also noted that these 'impacts must be balanced against the benefits of the project and the costs to the broader community in mitigating those impacts' (section 6.5 (i) of the IAC report). I agree that the acceptability of any particular impact needs to be considered on balance.

While the IAC did not discuss this conclusion in detail, it is my understanding that its consideration of the acceptability of impacts was based on the number of highly impacted dwellings in Darley, the planning scheme provisions that protect visual amenity and in particular, the IAC's statement that *'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*' (section 15.1 (iii) of the IAC report).

As described above (see Planning scheme context), Moorabool SLO1 seeks to minimise the impact of development on visual amenity from adjoining properties and the township more broadly. While there are relatively few properties directly adjoining Moorabool SLO1 west of Links Road in Darley, a substantial number of dwellings in this vicinity would experience high residual impacts on visual amenity. The impacts on these dwellings are an important consideration in assessing whether the project is consistent with Moorabool SLO1. However, impacts on visual amenity within the township of Bacchus Marsh also require consideration as the SLO1 seeks to protect these public viewpoints. As discussed earlier in this section, the EES found that the project would have low to moderate impacts on views from roads and other public viewpoints in Darley; in many cases, the project infrastructure would be screened by vegetation or would be a background element to the existing view. Whilst the project would significantly impact the views from a localised group of dwellings to the west of Links Road in Darley, I do not consider this to be inconsistent with the overall intent of the SLO1 to protect landscape values and public viewpoints in Darley.

This assessment is undertaken under the Environment Effects Act, not the P&E Act, and its role is to assess the effects of the project on the environment, including the magnitude, extent and duration of those effects. The assessment of these effects is influenced by the context within which they would occur, including the planning policy framework established under the relevant planning scheme and whether the effects are consistent with policy outcomes sought in the scheme. But the fact that a project may have an adverse effect, even a significant adverse effect, on a matter the scheme seeks to protect does not, by itself, mean that an effect is unacceptable. Consistency with policy will be a significant consideration when a decision is made in relation to the PSA but, even in that context, I note that a balancing approach is required. At Darley, visual amenity at some private dwellings would be highly impacted, and these impacts would continue for the life of the project. However, the EES indicated that this level of impact would not be extensive across public areas within the Darley township. It is also relevant that the impacts to visual amenity would occur within a visual setting that incorporates an established township with urban infrastructure and industry, rather than within an undeveloped landscape.

I agree with the IAC's finding that the planning scheme sets a legitimate expectation that the residential and visual amenity of residents in Darley will be considered in planning decisions (section 6.5 (i) of the IAC report). I also agree with the IAC's finding that the number of highly impacted dwellings in Darley is understated, and that 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 (section 6.5 (i) of the IAC report). It is my assessment that the project will have a significant effect on the visual amenity of a substantial number of residents of Darley, particularly at private dwellings on the northern slopes, west of Links Road.

On balance, I consider these likely effects of the project in the Darley area to be acceptable. I acknowledge that a substantial number of residents of Darley would experience impacts to visual amenity, however I consider these impacts are relatively limited in their scale and geographic extent in proportion to the broader

project. I also note that Darley is an established settlement, with the existing infrastructure and essential services that typically support such developed areas.

Whilst residents at more than 65 dwellings within Darley would experience very high impacts to visual amenity, these impacts must be considered in the context of the 7,410 dwellings located within 2 km of the proposed route (the distance at which the project towers have the potential to be highly visible). The landholders whose properties are within 1 km of the proposed route would be entitled to a one-off payment under AusNet's Near Neighbour Benefit Program. The highest impacts would largely be concentrated within a group of private dwellings located in a small area of the township. The EES found that residents would also experience some impacts to visual amenity to a lesser degree while moving about the township. As noted by the IAC, these impacts to visual amenity must be balanced against the other impacts and benefits of the project to the Victorian community.

Landscape impacts

The EES considered how the project would impact on significant landscapes and landforms in and around the Darley area. The EES found that the project's impacts on views from Wombat-Lerderderg National Park to the north of Darley, Mackenzies Flat Picnic Area, Lerderderg Gorge and Werribee Gorge would be negligible to nil, as views would be screened by existing vegetation. Views from most locations along the Lerderderg River trails would also be partially screened or filtered by existing vegetation and topography of this area.

The EES found that the project would be visible from parts of the Bald Hill Activation Area, including the proposed entry point and sections of the northern sculpture trail. Landscape screening in line with the requirements of EPR LV1 should help to mitigate views of the project's towers from the Bald Hill Activation Area and associated impacts on this landscape. However, the EES still assessed these likely residual impacts as high, as introducing screening would alter the existing panoramic views to the Darley township and the Wombat-Lerderderg National Park that can currently be seen at this location. The designated viewing areas and lookouts will be primarily oriented to the south and away from the project. I agree with the IAC's finding that, while the residual impacts on the Bald Hill Activation Area as a whole are acceptable, these impacts add to the range of impacts that would be experienced in the Darley area (section 6.5 (vi) of the IAC report).

It is my assessment that the project will have some significant effects on aspects of the landscape values around Darley. Due to its height and scale, the project is likely to affect the character of the landscape around Darley. These impacts to the landscape will be noticeable when viewed from some locations, including from the Bald Hill Activation Area.

However, the project would have a negligible impact on views of the surrounding landscape from key locations including the Wombat-Lerderderg National Park, Mackenzies Flat Picnic Area, Lerderderg Gorge and Werribee Gorge, at many other major viewpoints the project would be partially or fully screened from view. When considered in the broader landscape context, the likely residual effects on landscape values are not of state or regional significance. It is my assessment that these impacts on landscape values at Darley are on balance, acceptable. This is also when considered in light of the broader benefits to the Victorian community from the project.

Impacts on the visual amenity of residents outside Darley /Bacchus Marsh

Overall impacts on visual amenity

The EES found that dwellings in rural areas across open farmland, particularly those that have been designed to take in views in the direction of the proposed route, are most likely to experience moderate to high residual impacts on visual amenity from the project. In the urban areas of Hillside and Diggers Rest and in lower lying areas east of Links Road in Darley, views towards the project from many dwellings would be screened or filtered by existing buildings or vegetation. The EES found that the area with the greatest number of dwellings expected to experience visual amenity impacts would be the north facing slopes of Darley, generally west of Links Road. Landscape and visual amenity impacts in Darley are discussed separately above.

The IAC heard evidence from AusNet that, except for Darley, the majority of the 7,410 dwellings located within 2 km of the proposed route are in urban settings (just over 6,000, compared to 1,250 in rural areas) without long range continuous views. AusNet submitted that visual amenity impacts on such dwellings would be lower, compared to those in rural areas. AusNet also noted that the density of rural dwellings within 0 to 1 km of the proposed route, where impacts would generally be greatest, is significantly lower than the density of those rural dwellings within 1 to 2 km of the proposed route. AusNet suggested that most rural dwellings are located among existing vegetation which would assist in screening the project.

The IAC acknowledged that there is no legal right to have or maintain a view from a private location in Victorian law, however it also noted that several planning controls that apply to parts of the proposed route and its surrounding area provide for the protection of landscapes and natural features which contribute to residential amenity (including visual amenity) (section 6.4 (iii) of the IAC report). In addition to the SLOs (as discussed above), there is the Rural Living Zone (RLZ) and Rural Conservation Zone (RCZ); however, these zones are more concerned with protecting and conserving rural land for its environmental features and attributes (in the case of the RCZ) or facilitating appropriate residential developments within these areas (in the case of the RLZ). The IAC noted that the controls in the relevant planning schemes '*inform planning decision makers of the landscape values and features that are significant in the area'*, as well as informing '*the reasonable expectations of residents in relation to the level of protection of visual amenity and outlook from their properties'* (section 6.4 (iii) of the IAC report).

AusNet stated[43] that the project would generate high residual impacts on visual amenity at several hundred dwellings, spread across the entire length of the project. As identified by the IAC (section 6.4 (iii) of the IAC report), it is not clear how many of these dwellings are within the relevant RLZ, RCZ and SLOs.

In considering the significance and acceptability of project impacts on residents' visual amenity, the IAC looked not only at how impacts would be experienced at dwellings, but also how residents would be impacted while moving through their town or locality.

The EES noted the project would be visible from the outskirts of many townships along the proposed route. However, due to the presence of existing vegetation, dwellings and other buildings, views toward the proposed route would be limited, and the residual impact at most viewpoints was assessed as 'nil' or 'negligible' (where the project would not be visible or would be a barely discernible feature) or 'low' (the project would be noticeable but would not cause significant adverse impacts). The residual impacts on visual amenity were assessed in the EES as moderate at some viewpoints looking toward the project route at Kingston, Newlyn, Darley and Melton. Whilst the project would be visible from these township viewpoints, the EES found the project infrastructure would not be the dominant visual element due to partial screening, the prominence of other nearby features, or distance.

The IAC found that, based on the material before it, it was not possible to quantify the total number of residents that would experience high or very high impacts but considered that across the project it would likely to be in the high hundreds (section 6.4 (iii) of the IAC report). This finding was based on information from AusNet indicating that several hundred dwellings would likely experience high residual impacts on visual amenity and considering other potential impacts to residents when moving about the landscapes associated with the entire project. I agree with the IAC's finding.

The IAC considered that these impacts on visual amenity are clearly significant, however '*the significant extent of high visual impact does not necessarily render the Project's visual impacts unacceptable*'. The IAC noted that the impacts to many individuals' visual amenity must be balanced against the impacts across the

[43] Tabled document 319

project as well as the benefits the project will bring to the Victorian community (section 6.4 (iii) of the IAC report).

The IAC found that 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*' (section 6.4 (iv) of the IAC report). However, the IAC did not make any conclusions on the acceptability of these effects. Planning policy, including the SLO, is relevant to the assessment of the significance and acceptability of potential project impacts on residents' visual amenity, however it is not the only consideration. Key considerations are the number of affected residents, the magnitude and duration of the change, and the existing visual setting experienced by these residents. It is also important to consider the context in which this project is being developed, including its linear nature and scale.

Based on the information presented to the IAC, it is apparent that a substantial number of residents (several hundred) scattered across the proposed route would experience high or very high visual amenity impacts from their dwelling and that these impacts would be experienced over a long-term period during project operation. Given this, it is my assessment that the project's impacts on visual amenity would be significant.

These significant impacts would occur at a relatively limited proportion of dwellings along the overall length of the 190 km proposed route (in the high hundreds out of the 7,410 dwellings located within 2 km of the proposed route). Furthermore, whilst the visual amenity of some residents would be impacted at their private dwellings, the EES assessed impacts on visual amenity from public places in many towns in proximity to the proposed route as low or negligible. AusNet also stated that the majority of the 7,410 dwellings located within 2 km of the proposed route are located within urban settings, without long range continuous views. Within this context, it is my assessment that the project's overall impacts on visual amenity are on balance acceptable. I also arrive at this finding that these impacts are acceptable when considered in light of the broader benefits to the Victorian community from the project.

Landscape screening

Mr Burge[44] and Mr Schutt[45] acknowledged the limitations of landscape screening in effectively mitigating the visual impacts of the transmission towers, particularly where the project is located close to dwellings or where screening would also obstruct highly valued views. These limitations were also raised as concerns in submissions. Moorabool Shire Council proposed amendments to the landscape and visual EPRs (EPR LV1 and EPR LV2) to require the maintenance period for landscape screening at key public locations (Merrimu Reservoir and War Memorial, Bald Hill Activation Area and Bolwarrah Weir) to be five years, and to require consultation with Council to determine suitable plant species options for screening in each local area.

The IAC agreed that the maintenance period for new landscaping/screening on public land should be five years (section 6.6 of the IAC report), and this is reflected in the recommended changes to EPR LV1. The IAC did not consider the maintenance period in EPR LV2 for landscaping/screening on private land should be extended to five years, noting that maintenance periods of two years on private land are relatively standard for major projects (section 6.6 of the IAC report). The IAC stated it is not appropriate for councils to specify species for landscape screening on private properties, and the proposed change to EPR LV2 was not supported by the IAC (section 6.6 of the IAC report). I agree with these findings of the IAC and the proposed changes to EPR LV1 to reflect a requirement for new landscaping on public land to be maintained for a period of five years.

Impacts on visual amenity at MacPherson Park

[44] Tabled document 119

[45] Tabled document 106

The proposed route would run along the northern boundary of MacPherson Park, a regional active outdoor sports precinct in the City of Melton.

Relying on evidence from Mr Goss, Melton City Council submitted that the project would have unacceptable landscape and visual impacts on the park, particularly visual impacts where the proposed route would cross over the entrance to the park.

AusNet submitted that existing vegetation along the edges of the park would partially screen views of the project and as trees grow over time, partial screening would also be achieved to more established areas of the park. AusNet considered that these outcomes were suitable for an active recreation facility.

The IAC accepted that the towers and lines would be visually dominant at the entrance to MacPherson Park and the approaches to the entrance on Coburns Road. The IAC also noted that viewers at these locations may be high, these would not be locations where visitors would linger. While the towers would be visible from several locations in the park, the IAC noted that there are no activities that rely on, or would be significantly impacted by, views of the project. Based on this, the IAC found that visual impacts on MacPherson Park would be acceptable (section 6.5 (vii) of the IAC report). I agree.

Impacts on volcanic landscapes

The assessment of landscape impacts requires consideration of both the extent to which the project is likely to affect the character of valued landscapes themselves, and how views of these valued landscapes would be impacted.

The volcanic landscapes surrounding the project are valued for their contribution to landscape character and views and for their geological significance. The volcanic cones are prominent elements of the rural landscape.

Many of these volcanic landscapes are recognised for their significance in planning schemes and associated municipal strategies. Various SLOs seek to protect and minimise the impact of development on some of the volcanic features recognised in the Melton, Hepburn and Ballarat planning schemes. The proposed route generally avoids intersecting with land to which these SLOs apply. Four towers and some sections of access track are proposed to be located within the Hepburn SLO Schedule 1 (Volcanic Peaks Landscape Area and Ridges and Escarpments Area). A short section of the proposed route (no towers) would traverse the north-eastern edge of the Ballarat SLO Schedule 1 (Mount Bolton), and a small section of access track is proposed within the Melton SLO Schedule 1 (Volcanic Hills and Cones) that applies to Mount Kororoit, near the intersection of Leakes and Holden Roads.

The *South West Victoria Landscape Assessment Study – Landscape Character of South West Victoria (SWVLAS)* [46] recognises the significant volcanic landscapes of western Victoria, encompassing a broader area than is recognised by the relevant SLOs described above. The proposed route would traverse volcanic landscapes recognised in the SWVLAS as being of state and regional significance. In particular, the proposed route would traverse an area north of Creswick (SWVLAS area 1.10 Hepburn Gold Mines & Volcanic District) that is identified as a state significant landscape in the SWVLAS for its '*dense cluster of rounded volcanic rises*', as well as mullock heaps and mine building ruins from Victoria's gold mining era. In addition, the proposed route would pass through an area north-east of Ararat that is identified in the SWVLAS as being of regional significance (SWVLAS area 2.13 Lower Pyrenees) for its forested areas and the cleared undulating valleys between the steep escarpments of Mount Buangor, Mount Cole, Mount Lonarch and Mount Langhi Ghiran.

The SWVLAS also recognises other landscapes within the study area used for the EES assessment as being regionally significant, though the proposed route would not intersect these. This includes the area near

[46] Tabled document 381

Waubra where Mount Beckworth, Mount Bolton and Mount Ercildoun are located (SWVLAS area 2.12 Island Uplands). It is noted in the SWVLAS that the Waubra Wind Farm is located to the east of these peaks, and the tops of turbines are a visible feature in many parts of this landscape. Mount Warrenheip and Mount Buninyong, to the south of the study area, are also noted as being of regional landscape significance in the SWVLAS (SWVLAS area 1.11 Mount Buninyong & Mount Warrenheip) as volcanic cones are notable landmarks from which panoramic views of the surrounding agricultural landscape and volcanic plains are visible. The EES recognised that these volcanic features may also be visible from areas in proximity to the project.

AusNet's expert witness Mr Burge[47] noted that the SWVLAS informed the review of landscape character and sensitivity analysis in the EES, as well as the selection of viewpoints assessed to understand how the project could impact on views of significant landscapes.

Mount Blackwood was identified in the SWVLAS as a viewing location of state significance, and the Berry Deep Lead Gold Mine (along Daylesford-Clunes Road) as a viewing location of regional significance. The EES assessed the impact to views from these locations as low. The EES determined that the project would be visible at both locations, but that it would be a background element in views from Mount Blackwood and would not impede views of the heritage mining features associated with the Berry Deep Lead Gold Mine. The impact on historical heritage is discussed further in Section 5.7 of this assessment.

The EES concluded that the project would not alter the features of the volcanic landscapes which contribute to the character of the areas surrounding them and it would not remove volcanic features from existing views. The volcanic peaks would remain prominent features within the landscape that is traversed by the project, which predominantly sit within an already modified agricultural setting. The proponent's expert witness[48] (Mr Burge) noted that where the proposed route would cross the base of two volcanic cones east of Newlyn North township and Newlyn Reservoir that are within the Hepburn SLO1, it would do so in parallel with the existing 220kV Ballarat–Bendigo transmission line, minimising cumulative impacts at this location.

The EES noted that the towers would be noticeable features when added to some views of volcanic cones, particularly when viewed from points along the road network. The impacts would vary depending on the position of the towers and the surrounding topography. The EES assessed the residual impact as high at the Leakes Road / Holden Road intersection in Melton, where the project would be visible in the foreground of Mount Kororoit, which is recognised by Melton SLO1. However, the EES found that the towers would be a small element in long-range views to this peak '*...such that they will not alter the perception or prominence of recognised landscape features*[49]', and other features such as existing power lines would be more apparent.

The EES rated the impacts as 'low' or 'moderate' from many of the other viewpoints that were assessed from which the volcanic cones are visible. These included viewpoints assessed in the EES in the northern areas of Allendale, Kingston, Newlyn and Myrniong, where the project would be visible in the foreground of views towards volcanic cones and the vegetated hills of Wombat-Lerderderg National Park. The EES acknowledged that although views to the project from these locations would be short in duration, they may be frequently experienced by residents and are highly regarded by local communities. For viewpoints along public roads, the EES described how the transient nature of these views, and the likely low number of viewers, contributed to a low impact rating. Overall, the EES found that '*the transmission line towers would introduce new vertical elements and be obvious in some locations, but they would not remove, obscure, or replace the features that give the landscape its identity*.[50]'.

[47] Tabled document 119

[48] Tabled document 119

[49] EES Technical Appendix D, Section 11.5.19

[50] Tabled document 119

The City of Ballarat[51] raised concerns about how the project's towers would interrupt long distance views towards volcanic cone landforms, reducing their prominence and impacting on the overall scenic quality of the landscape. The City of Ballarat argued that project infrastructure would be visually dominant in the landscape, as it would be highly visible from surrounding roads and key vantage points. Similar issues were raised in submissions from other councils.

The IAC considered that the values that are sought to be protected by the SLOs are not limited to just the volcanic peaks to which these overlays have been applied (section 6.4 (iii) of the IAC report). The IAC found the project would have a very high impact on some parts of the highly valued landscapes through which the project traverses, including impacts on the volcanic cone landscapes identified and protected by various SLOs (section 6.5 (ii) of the IAC report). The IAC acknowledged that the level of impact would vary depending on the positioning of project infrastructure within the landscape. The IAC also found these impacts would need to be balanced and weighed up against the benefits of the project (section 6.5 (ii) of the IAC report).

While the project largely avoids the land to which the SLOs apply, it is my assessment that this does not mean impacts on the landscape values that are protected by these overlays have been avoided, consistent with the IAC's discussion regarding protection of landscapes as cohesive units. Due to the height and scale of project infrastructure, I agree with the IAC that the project would have a very high impact on some aspects of the volcanic cone landscapes, in particular views of these landscapes from public viewpoints along the proposed route.

It is my assessment that while some of these impacts are likely to be significant, they are on balance acceptable, particularly as the project would be in a modified rural setting where views towards volcanic features in some locations are already impacted by existing infrastructure. In addition, as identified in the EES, the volcanic peaks would remain prominent features within the landscape that would be traversed by the project and the presence of the towers would not remove, obscure or replace these features.

Moreover, as the IAC identified and as I have accepted, the acceptability of the impact(s) of the project on particular areas and landscapes needs to be considered alongside the benefits of the project. Taking into account the benefits of the project for the Victorian community as a whole, strengthens my conclusion that the impacts on the volcanic landscapes along the proposed route are acceptable.

Impacts on specific landscapes

Newlyn Reservoir

Newlyn Reservoir is located to the east of the small rural township of Newlyn. The proposed route would cross the Midland Highway to the north-west of the Reservoir, parallel to Telegraph Road, and then would continue south between the Reservoir and Blampied-Mollongghip Road. Land to the east of the Reservoir though which the project would traverse is identified in Hepburn Shire Council's Environmental and Landscape Values Plan as a significant landscape. Mount Bullarook, a volcanic cone, is visible from the Reservoir when looking east and is protected by the Hepburn SLO1.

The EES found that the project would be visible from some locations at the Reservoir, adding to existing views of Mount Bullarook and towers from the 200kV Ballarat to Bendigo transmission line. Other views from public areas set back from the reservoir shoreline would be screened or filtered by vegetation or oriented away from the proposed route. Overall, the EES assessed the impact of the project on views to and from this valued landscape as 'moderate'.

[51] Submission 254

Relying on evidence from Mr Papworth, Hepburn Shire submitted[52] that the landscape character and viewer sensitivity at this location had been underrated in the EES. Council argued that the project's towers would dominate views of the Mount Bullarook volcanic cone and that the existing Ballarat to Bendigo transmission line is barely visible.

The IAC noted that the towers would be highly visible and would represent a dominant element in the landscape and in views from the reservoir toward Mount Bullarook, particularly as they would sit above the horizon with little to no screening from existing vegetation. Both the EES and the IAC noted that additional screening would not be desirable as it would also remove the view across the reservoir towards Mount Bullarook. The IAC considered that impacts on views from the western shoreline of the reservoir looking east toward Mount Bullarook were understated in the EES and should be rated as at least 'high' (section 6.5 (iii) of the IAC report).

Despite this finding, the IAC concluded that the photomontage produced by Mr Goss[53] demonstrated that the relationship between the reservoir and Mount Bullarook can still be seen and understood, even though the towers would also be visible in the landscape. The IAC also accepted the EES's finding that views from the reservoir to the west and south-west would be maintained. The IAC concluded that overall, visual impacts on Newlyn Reservoir are not so significant as to be unacceptable (section 6.5 (iii) of the IAC report). I agree with this conclusion.

Having regard to the IAC's conclusion, it is my assessment that while impacts on views to valued landscapes from Newlyn Reservoir would be significant, these impacts would be acceptable. I note, and agree with, the IAC's finding that further screening is not beneficial in this context as it would block views to these valued landscapes.

Kororoit Creek Valley

The project passes over Kororoit Creek in Melton. Melton SLO Schedule 4 (Kororoit Creek Reach 1 – Toolern Vale to Urban Growth Boundary, Melton Highway) (SLO4) was applied to the area either side of Kororoit Creek through VC278, gazetted in mid-December 2025 as the IAC hearing was underway. Two towers are proposed to be located within the SLO4, on either side of the creek.

The 'Statement of nature and key elements of landscape' in the SLO4 highlights that the creek is a '*distinctive feature of the expansive basalt plain*', and that '*Low volcanic hills are visible from the waterway*'. The landscape character objectives in the SLO4 include '*To enhance the role of the waterway as an integrated and continuous landscape corridor, protecting the…landscape values of the waterway system*', '*To retain indigenous riparian vegetation and canopy trees or existing grasslands as the dominant landscape feature*' and '*To ensure the visual impact of buildings and works…is minimised when viewed from the waterway corridor*'. As it was not yet introduced, the SLO4 was not considered by AusNet in the EES.

Melton City Council submitted[54] that the towers cannot be sensitively integrated within the natural landscape due to their scale and form and highlighted the proximity of Mount Kororoit to the east, which is subject to the Melton SLO1. Council argued that that the project should be undergrounded in the vicinity of Mount Kororoit and Kororoit Creek, or that the towers should be relocated outside of the SLO4. AusNet explained to the IAC that the proposed route through this part of Melton had been sited to avoid a prime hard rock quarrying resource at the request of Resources Victoria and could not be easily shifted north to avoid the SLO4.

[52] Tabled document 381

[53] Tabled document 243

[54] Submission 260

Mr Burge[55] concluded that the landscape values at the point where the project would cross Kororoit Creek are 'modest', as there are limited accessible viewing points, visitation is low at this location and there is very little visual relationship between the creek and the public realm. The IAC acknowledged that the project would be a dominant element at this location in the Kororoit Creek Valley landscape, however consistent with AusNet's expert evidence, considered that the impacts on the landscape values sought to be protected under the Melton SLO4 were acceptable (section 6.5 (viii) of the IAC report). I agree.

The IAC noted that their recommendation to amend EPR BD10 to require investigation of a 'minimised risk clearance' to retain canopy trees in the Kororoit Creek riparian corridor would assist in maintaining the creek as a distinctive feature of the landscape. The IAC considered the project's landscape and visual impacts at Kororoit Creek to be acceptable even if this approach was not adopted and the canopy riparian vegetation is not able to be retained (section 6.5 (viii) of the IAC report).

Consistent with my comments in section 5.1 of this assessment, I accept the IAC's amendments to EPR BD10 and consider there may be potential to reduce impacts on the Kororoit Creek landscape, however I have recommended additional amendments to EPR BD10 to ensure any further refinements improve environmental outcomes and do not increase the significance of effects on biodiversity and other environmental values. I also agree with the IAC, that the impacts on the Kororoit Creek landscape would be acceptable even if they cannot be further reduced.

Hepburn Lagoon

Hepburn Lagoon is a reservoir located in the volcanic cones landscape of Hepburn Shire. The proposed route would pass to the southwest of the Lagoon.

Due to safety and access issues, the EES did not include an assessment of how views of the project would impact on valued views to and from Hepburn Lagoon. Instead, views were assessed from nearby public viewpoints, such as Daylesford Clunes Road across cleared farmland to Hepburn Lagoon. In this location, the proposed route would be behind Hepburn Lagoon in front of Forest Hill. Due to low viewer numbers, short duration of the view and the location of the project south of the lagoon, the impact on views of this valued landscape from this location was assessed as low.

Many submitters noted the importance of Hepburn Lagoon to their local community and described it as a picturesque feature in the landscape.

Hepburn Shire drew on evidence from Mr Goss showing the impact of the project on views associated with Hepburn Lagoon. Council contended that the project would have a high visual impact on views across the lagoon and the volcanic cones in the landscape.

While the IAC noted that land to the north of Hepburn Lagoon is identified as a significant landscape in Hepburn Shire's Environmental and Landscape Values Plan, it would not be traversed by the project. Instead, the proposed route would traverse land to the south of the lagoon, and the IAC noted it would not interrupt any significant view corridors identified in the planning scheme except for Midland Highway. Based on Mr Goss' photomontage, the IAC considered that Hepburn Lagoon and its place in the landscape, including its relationship to surrounding volcanic cones, would still be seen and understood with the project. The IAC found that the project would likely have a low to moderate visual impact on Hepburn Lagoon, which forms part of a valued landscape and that this impact was acceptable (section 6.5 (iv) of the IAC report). I agree.

[55] Tabled document 119

Mount Beckworth Scenic Reserve

Mount Beckworth Scenic Reserve is an elevated reserve in Horsham Shire used for bushwalking, picnics, camping and other activities.

The EES found that the project would have a low to moderate impact on views of valued surrounding landscapes. Views of the project would be screened from most of the publicly accessible areas in the reserve and summit and towers would be low in view and below the horizon.

Many submitters highlighted the importance of Mount Beckworth Scenic Reserve as a local landmark and for the activities that it offers.

The IAC noted that nothing was presented to it which demonstrated that the project would be more visible from additional locations in the reserve, or more prominent in views from the summit, than as depicted in the EES. While the IAC noted that the project would change views towards Mount Beckworth from the south, it was comfortable that this impact would reduce with distance. The IAC found that impacts on Mount Beckworth and the Scenic Reserve will be acceptable (section 6.5 (v) of the IAC report), which I agree with.

Assessment

It is my assessment that:

- For the reasons given below, the landscape and visual amenity impacts of the project, although significant, are acceptable on their own terms. This conclusion is strengthened when regard is had to the benefits that the project will provide to the Victorian community as a whole.
- The project will have a significant effect on the visual amenity of a substantial number of residents of Darley, particularly at private dwellings on the northern slopes, west of Links Road. I consider the likely impacts to be acceptable, as the impacts on visual amenity at Darley are relatively limited in proportion to the scale of the broader project, with the highest impacts largely concentrated within a group of private dwellings located in a small area of the township, which exists in a modified urban setting.
- There will be some significant impacts to the landscape values around Darley, given the height and scale of the project at this location. These impacts to the landscape will also be noticeable when viewed from some locations, including from the Bald Hill Activation Area, but at many other major viewpoints the project would be partially or fully screened from view. These likely impacts to landscape values are not extensive and are not of state or regional significance and are therefore acceptable.
- The project's overall impacts on visual amenity would be significant, given a substantial number of residents (several hundred) scattered across the proposed route would experience high or very high visual amenity impacts from their dwelling over a long-term period during project operation. These impacts are acceptable given they would occur at a relatively limited proportion of dwellings located along the overall length of the 190 km proposed route, and as the impacts to the visual amenity of residents at the majority of public viewpoints that were assessed would be low or negligible. The impacts on visual amenity at MacPherson Park would be acceptable, given there are no activities that rely on, or would be significantly impacted by, views of the project.
- Views of the volcanic landscapes from public viewpoints along the proposed route would be significantly impacted. I consider these impacts to be acceptable, given the project would be in a modified rural setting where views towards volcanic features in some locations are already impacted by existing infrastructure, and as the volcanic peaks would remain prominent features within the landscape and would not be removed or replaced by the project.
- Impacts on views to valued landscapes from Newlyn Reservoir would be significant but are acceptable, as the relationship between the reservoir and Mount Bullarook can still be seen and understood.
- Impacts on landscape values at Kororoit Creek Valley, Hepburn Lagoon and Mount Beckworth Scenic Reserve would not be significant and are acceptable.

– EPR LV1 and EPR LV2 should be amended in line with the IAC's recommended changes and as shown in Appendix B.

5.4. Socioeconomic

Evaluation objective

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.

Assessment context

Social effects are addressed in Chapter 21 and Technical Appendix F of the EES and in section 13 of the IAC Report. Economic effects are addressed in Chapter 14 and Technical Appendix G of the EES and in section 9 of the IAC Report. AusNet has proposed five EPRs to deal with social effects and four EPRs to deal with economic effects. Two social EPRs and three economic EPRs have been the subject of recommendations by the IAC. Additional EPRs will also contribute to managing socioeconomic effects (including EPR EM5, EM7, EM12, EM13, EM14, EM16) three of which have been the subject of recommendations by the IAC.

The project has the potential to generate socioeconomic effects on landholders with an easement on their property, surrounding landholders, the broader community and tourism businesses and attractions due to:

– land use change;
– amenity change; and
– an influx of the project construction workforce including housing them in temporary workforce accommodation facilities.

As noted in AusNet's Part B submission[56], in total 230 landholders will be directly affected by the creation of an easement on their property. Directly affected landholders, surrounding landholders and the broader community will experience changes in land use and amenity during construction and operation of the project. This includes temporary increased dust and noise emissions and traffic during construction and longer-term changes to land use and visual amenity during operation. The broader community also has the potential to be impacted by the creation of an easement on land used for community and/or recreation purposes and through changes in amenity. Tourism businesses within 2 km of the project that are reliant on visual amenity could also experience impacts from changes in amenity during project construction and operation.

Changes in land use and amenity have the potential to generate socioeconomic effects on wellbeing, connections to land/place and a valued rural lifestyle, community cohesion and reduced patronage/visitation of nearby businesses reliant on tourism.

The EES found that the most significant residual social impacts would occur during operations. This is the case for directly affected landholders, surrounding landholders and the broader community in selected parts of the Social Impact Assessment (SIA) study area, largely due to changes in land use and amenity:

– Directly affected landholders in sections 2 and 3 of the SIA study area[57], particularly horticulture (Section 2) and lifestyle with agricultural properties (Section 3), were expected to experience major residual social impacts and challenges to values relating to a peaceful rural lifestyle and sense of connection to their properties.

[56] Tabled document 203

[57] Section 2 includes land in the City of Ballarat, Hepburn and Moorabool shires and Section 3 includes land in Moorabool Shire

– Directly affected landholders in Section 4 of the SIA study area[58] which includes Darley and surrounds and has smaller equine and lifestyle properties with expansive views were expected to experience moderate to major residual social impacts associated with changed views and surroundings, affecting the attractiveness of properties.
– Surrounding landholders in Sections 2 and 3 were expected to experience moderate to major residual social impacts associated with a disruption to an aspirational rural lifestyle.
– Surrounding landholders in Section 4 were expected to experience major residual social impacts associated with disruptions to an aspirational lifestyle.
– Broader community in Section 4 were expected to experience moderate to major social impacts with the project potentially detracting from residents' sense of place and valued lifestyle.

The EES found that cumulative effects on social values would not be significant and noted that the proposed temporary workforce accommodation facilities would ensure that the project did not contribute to cumulative effects on the demand for housing in the region during construction.

The EES also identified that one dwelling located in the proposed easement would need to be relocated and reports that AusNet understands that the dwelling is not a permanent place of residence but instead used for occasional accommodation.

The project has generated significant concern and opposition. Many submitters expressed concern about AusNet's engagement during the EES process, and several indicated that it contributed to a lack of trust in AusNet and the process. The EES stakeholder and community engagement consultation report (Attachment IV) and associated chapter (Chapter 7) outline how community feedback and concern was considered and responded to.

Workforce requirements for the project have the potential to affect demand for housing and some community services. At its peak, 700 workers will be required to construct the project. Workers who are not living locally will be required to live in one of two temporary workforce accommodation facilities (each accommodating up to 350 workers) proposed on project land in Lexton and Ballan. The influx of non-local workers and their housing in accommodation facilities has the potential to generate amenity changes and disruption for nearby landholders and the broader community, and in turn create social effects. The proposed facilities also have the potential to minimise social effects by reducing demand for housing and community services.

Finally, the project has the potential to generate economic benefits through employment and business opportunities created during construction and to a lesser extent operation, and expected increases in Gross Domestic Product, Gross Regional Product and consumer welfare.

Discussion

Key matters relating to the assessment of socioeconomic effects examined by the IAC were:

– adequacy of the technical assessments (sections 9.2 and 13.2 of the IAC report);
– community engagement, opposition and social licence (section 13.2 of the IAC report);
– acceptability of social cohesion impacts (section 13.2 of the IAC report);
– acceptability of sense of place and wellbeing impacts (section 13.3 of the IAC report);
– economic impacts and benefits (section 9 of the IAC report);
– temporary workforce accommodation facilities (section 13.4 of the IAC report);
– adequacy of EPRs to mitigate socioeconomic effects (sections 9 and 13 of the IAC report); and

[58] Section 4 includes land in Moorabool Shire and the City of Melton

– significant residual social effects (section 13 of the IAC report).

Adequacy of the technical assessments

Moorabool Shire's expert witness Dr Kerkin[59] raised concerns that the assessment of social impacts had an over-reliance on other technical studies prepared for the EES. Dr Kerkin also raised concerns that direct community and stakeholder engagement by the SIA practitioner as part of the EES development was very limited and there was an over-reliance on engagement conducted by AusNet to inform the assessment. AusNet's expert witness Mr Weston[60] acknowledged that community views are important but considered that it was not necessary to inform an understanding of social impacts which are downstream of the project's primary impacts.

The IAC did not agree with Dr Kerkin and considered that the assessment prepared for the EES was broadly appropriate for the purposes of understanding the project's social impacts and that it was not essential for the SIA authors to have engaged directly with the community in the manner that Dr Kerkin suggested. While the IAC noted that the SIA practitioner did not independently identify or assess values of importance to individual community members, it was satisfied with the inclusion of a qualitative analysis of values present in the study area, informed by AusNet's engagement program.

As noted by the IAC, it is standard practice for an SIA practitioner to rely on the findings of other EES technical studies to inform an understanding of how social impacts could be experienced, and therefore the assessment for the EES is considered appropriate. However, the SIA for the EES would have benefited from greater engagement by the SIA practitioner. Such engagement would have also provided another important opportunity for community members with concerns about the project to feel heard. As pointed out by the IAC, some of Dr Kerkin's suggested engagement methods would have been impractical and unnecessary for an assessment prepared for an EES. It should also be acknowledged that the IAC and this assessment have benefited from the large number of community submissions, as well as expert evidence called by AusNet (particularly on wellbeing impacts[61]) which furthered understanding of community values.

The IAC heard evidence from Dr Kerkin that the wellbeing assessment prepared by AusNet's expert witness (Dr Wright[62]) contained several flaws, including an over reliance on EES technical studies and other reports. The IAC considered that Dr Wright's approach was systematic and comprehensive, involving both a quantitative and qualitative assessment. The IAC found that the methodology employed was appropriate (section 13.2 (iv) of the IAC report), which I agree with.

In response to expert evidence from AusNet's expert witness (Mr Schutt[63]), the IAC considered that some impacts such as visual amenity impacts from the project would be more significant in Darley than concluded in the EES, and therefore the extent of 'major' social impacts would likely be more widespread in Darley than the EES concluded. While this may be the case, noting evidence presented to the IAC from AusNet's expert witness (Mr Weston[64]) indicated that social impacts in Darley would be significant, I am comfortable that these potential impacts have not been undervalued in the SIA.

The IAC heard submissions from several councils that raised concerns with the adequacy of the EES's assessment of economic impacts. Concerns related to matters such as the approach taken in the assessment

[59] Tabled document 164

[60] Tabled document 110

[61] Tabled document 108 and Tabled document 110

[62] Tabled document 108

[63] Tabled document 106

[64] Tabled document 110

(for example that it should have included a cost benefit analysis and triple bottom line analysis), as well as errors and omissions it contained. AusNet's expert witness Mr Fenton[65] noted that whole of economy modelling using computable general equilibrium (CGE) modelling or similar, is a standard approach for assessing the economic impacts of major infrastructure projects.

The IAC concluded that the approach used in the EES, including the use of CGE modelling, was appropriate for the purposes of understanding the project's macroeconomic impacts and benefits, and that it was not necessary to include other approaches. The IAC noted that there was no evidence or submissions that established that CGE modelling was an inappropriate or inaccurate tool for assessing the project's economic impacts. The IAC found that the methodology employed was appropriate. I agree with this finding.

Community engagement, opposition and social licence

The IAC heard from many submitters that engagement conducted by AusNet during the project's development had been disrespectful and disingenuous and resulted in a collapse of trust. Community submitters also highlighted the strong level of opposition to the project and its lack of a social licence. AusNet's community engagement has an important role during the development of an EES, to help understand the potential for social impacts and views of the community.

The IAC considered that AusNet's engagement process has led to significant distrust between AusNet and the community, and that it is likely to impact on community capacity to positively engage with the project in the future. However, the IAC found that while community opposition can be an indicator of potentially deeper social impacts it is not in itself a social impact (section 13.2 (iv) of the IAC report).

While there are challenges associated with engaging communities across a 190 km proposed route, more effective engagement during the EES process would have assisted in reducing some of the community concerns. This is noted by the IAC in the context of its recommendation to amend the EMF to require that AusNet appoint an independent facilitator(s) to engage with landholders and other community members where the landholders and community members do not wish to engage directly with the proponent and such engagement is required to support implementation of relevant EPRs (section 13.5 (iv) of the IAC report). I support this recommendation of the IAC as well as the recommendation to change EPR EM5 to require that the communications and stakeholder engagement management plan outline the role of the independent facilitator(s) (Appendix E2 of the IAC report). EPRs focused on providing the community with project information (EPR EM12) and effectively responding to community complaints (EPR EM7) will also assist in responding to community concerns.

The focus of the rest of this section of my assessment is on the significance and acceptability of potential impacts.

Acceptability of social cohesion impacts

The IAC heard from submitters that the project has already created division and tension among affected communities, neighbours and sometimes families. Dr Wright[66] considered that with appropriate mitigation in place, impacts on social cohesion would dissipate over time. The IAC considered that, there had been a significant erosion in social cohesion in some communities, particularly between those who support the project (or are less vocally against it) and those who strongly oppose it. The IAC indicated that these impacts were most evident in Sections 2 and 3 of the SIA study area and considered that significant impacts on social cohesion had arisen because of the proposed project and AusNet's engagement with the community about

[65] Tabled document 90

[66] Tabled document 108

the project. However, the IAC considered that these impacts could be mitigated and managed, which I support. Commitments such as training and awareness raising for staff undertaking direct community engagement activities (EPR EM13), communication on matters of concern to the community (EPR EM16), the co-designed community benefit fund (EPR SC5) and community partnerships and investments (EPR SC4) will all assist in mitigating social cohesion impacts over time. Given the importance of the community benefit fund in mitigating social cohesion impacts across potentially affected communities, I consider that there should be representation from community members living across different parts of the 190 km proposed route on the group co-designing the fund. To this end, I recommend further changes to EPR SC5 to require that community members living across different parts of the 190 km proposed route be represented on the group co-designing the fund, where they self-nominate, to assist in sharing the potential benefits across different communities. To ensure that community members are supported to participate, I also recommend changes to EPR SC5 to require that AusNet bear any reasonable costs associated with co-designing the fund, including reimbursing members for required travel and expenses incurred by their participation.

Acceptability of sense of place and wellbeing impacts

Changes in land use and amenity, including the loss of views valued by members of the community, has the potential to create stress and generate impacts to wellbeing. Many submitters highlighted strong intergenerational connections to land and property and noted that they value their peaceful rural lifestyle and views from their property. The IAC heard from submitters about the stress and uncertainty that the project and the associated assessment process has created for them and how views of rural and natural landscapes are closely tied to their wellbeing and sense of place. AusNet's expert witness (Mr Weston[67]) recognised that the project has the potential to impact on these values. He considered that over time, people in affected areas would adapt to these impacts but some could experience lasting feelings of loss and powerlessness. Dr Wright indicated that while some individuals will find it hard to adapt should the project proceed, the affected communities generally have a good level of resilience and wellbeing and risks to wellbeing were considered low.

Dr Kerkin[68] argued that the lack of assessment of sense of place and associated psychological effects in the SIA led to impacts on social harm being understated. As outlined above, while the IAC found that the methodology used in the SIA was appropriate, it also noted that it did not identify or assess values of importance to the community such as place identity.

The IAC found that Dr Wright's conclusion that there is a low risk to wellbeing at a community level is heavily dependent on the effectiveness of proposed mitigations, which in turn rely on rebuilding the community's trust (section 13.3 (iv) of the IAC report). It is my assessment that people respond to stress and uncertainty differently and may require different support at different times.

I support the IAC's suggested changes to EPR EM14 to require that AusNet liaise with various parties to ensure they are aware of the mental health services being provided and know how to refer people to these services. I also support the IAC's proposed changes to EPR EM10 relating to the Residential Mitigation and Support Strategy, to require that AusNet continue to engage with landholders for two years following construction in relation to the visibility of towers from their property and/or other direct affects from the project on their property. Finally, I support the IAC's recommendation that AusNet appoint an independent facilitator(s) for engagement (section 13.5 (iv) of the IAC report). Delivering effective communication and engagement with affected landholders will also be critical to rebuilding community trust.

[67] Tabled document 110

[68] Tabled document 164

The IAC heard evidence from Melton City Council's expert witness Mr Panozzo[69] that the project would cause significant impacts to MacPherson Park, a regional active outdoor sports precinct in the municipality, including relocating equestrian facilities, downgrading its visual appeal and disrupt competitions during construction. The IAC agreed with Mr Weston[70] that the primary function of the park as a sports and recreation facility would not be overly impacted by views of the project and found that the social impacts on the park would be acceptable (section 13.2 (iv) of the IAC report). I agree with this finding.

While the IAC did not comment on the one dwelling located in the proposed easement that would need to be relocated, it is my assessment that compensation mechanisms are able to manage such impacts.

Economic impacts and benefits

The Economic Impact Assessment (EIA) for the EES found that tourism businesses within 2 km of the proposed route that are reliant on visual amenity may experience localised impacts from the project, particularly landholders hosting project infrastructure. The IAC heard from Destination Central Victoria[71] and Hepburn Shire's expert witness (Mr Flowers[72]) that tourism impacts would be more significant than assessed in the EIA and the councils expressed concern that these impacts could extend into the broader region. Mr Fenton[73] argued that there was a lack of credible evidence to suggest that tourism impacts would be significant at a local, regional or state level. AusNet proposed a Tourism Mitigation and Support Strategy (EPR EC4) in its 'Day 3' EMF which involves developing reasonable and practicable measures for promoting tourism in municipalities where the project is located.

The IAC found that impacts on tourism businesses will largely be confined to those that experience direct landscape, visual and amenity impacts (section 9.3 (v) of the IAC report). The IAC noted that many areas of Victoria host similar transmission infrastructure and no evidence was presented that broader regional tourism impacts were experienced in these areas. The range of compensation and support available to directly affected businesses (including under the LAC Act or Option for Easement process and under EPR EC1) provide a sound framework for managing potential impacts. I agree with this finding.

The IAC also made findings in relation to potential project impacts on property values having received and reviewed various submissions that raised concerns with how the project could impact on the value of their property. The IAC found that impacts on the value of properties directly affected by the project would be compensated under the LAC Act or Option for Easement processes (section 9.4 (v) of the IAC report).

The IAC also found that the project will have economic impacts, including reduced property values, on some indirectly affected properties or businesses within 2 km of the project (sections 9.4 (v) and 13.2 (iv) of the IAC report). The IAC found it was not possible to determine the likely amount, and therefore difficult to assess the significance and acceptability of these impacts (section 9.4 (v) of the IAC report). The IAC noted that it agreed with Mr Fenton that this is a complex issue and that impacts could vary depending on a range of factors. The IAC considered that impacts on property values needed to be considered within the broader context of net community benefit. I accept the IAC's view that there could be negative impacts on the value of some individual properties and agree with the IAC that this needs to be considered at a broader scale.

The IAC also found that economic impacts on some indirectly affected properties or businesses within 2 km of the project were unlikely to be fully mitigated by EPRs or the Near Neighbour Benefit Program and that these

[69] Tabled document 170

[70] Tabled document 110

[71] Submission 271

[72] Tabled document 137

[73] Tabled document 90

impacts would have a consequential social impact (section 13.2 (iv) of the IAC report). It is not clear how the IAC arrived at a finding that the EPRs or Near Neighbour Benefit Program were unlikely to fully mitigate impacts, having also found that it was difficult to assess the level of significance and acceptability of these impacts on property values. I am guided by the expertise of Mr Fenton that this is a complex issue.

In relation to impacts on businesses, the IAC recommended a change to EPR EC3 to clarify that the Business Mitigation and Support Strategy must address operational as well as amenity impacts, should businesses experience such impacts beyond amenity that are attributed to the project (section 9.5 (iv) of the IAC report). I agree with this recommendation.

In relation to economic benefits, Mr Fenton noted that during construction, the project will generate increased investment and employment and once operational, would likely facilitate cost-savings in electricity generation and transmission over the long-term. The IAC accepted the findings of the EIA and found that the project would have state and regional macroeconomic benefits (section 9.2 (iv) of the IAC report). I agree with this finding. EPR EC2 and EPR SC3 which involve supporting local communities, Traditional Owner groups and other vulnerable and disadvantaged groups with employment and procurement opportunities for the project will also assist in maximising opportunities for these economic benefits to flow through to different parts of the community.

Temporary workforce accommodation facilities

The IAC heard evidence from Mr Weston[74] that the project proposes to house construction workers in temporary workforce accommodation facilities to minimise potential impacts on local housing affordability, community services and social dynamics, and to manage potential safety issues with commuting distance. Dr Kerkin[75] raised concerns that the need for such facilities was based on unsupported assumptions. Dr Kerkin suggested that integrated accommodation models such as billeting workers in existing homes and caravan parks had the potential to generate greater social benefits for local communities. The IAC found that the large influx of workers has the potential to impact on access to housing and services and social cohesion in local areas (section 13.4 (v) of the IAC report). The IAC also found that with the adoption of EPR SC1 and EPR SC2, the temporary workforce accommodation facilities would effectively manage these impacts areas (section 13.4 (v) of the IAC report). I agree with these findings of the IAC. EPR SC1, which requires that workers access to nearby settlements be limited to essential trips, unless otherwise agreed with relevant councils, also provides a good balance between managing potential social impacts that could arise from the influx of these workers and allowing for local communities to realise potential economic benefits from their presence.

Adequacy of EPRs to mitigate socioeconomic effects

The IAC heard evidence from AusNet that social and economic impacts have been mitigated through project design, EPRs, compensation and community benefit sharing.

The IAC found that with some adjustments set out in its recommendations, the EPRs proposed in its recommended EMF provide an appropriate framework for mitigating social and economic impacts (sections 9.8 (iv) and 13.5 (iv) of the IAC report). The IAC also found that the co-designed community benefit fund would contribute towards offsetting social impacts from the project and should not result in further negative social impacts (section 13.5 (iv) of the IAC report). I agree with these findings of the IAC, subject to the further modifications recommended through this assessment. I also note that compensation will be available to directly affected landholders (including under the LAC Act or Option for Easement process), and one-off

[74] Tabled document 110

[75] Tabled document 164

payments will be available to eligible surrounding landholders (within 1 km of the easement in rural areas). While it is not possible to fully compensate for or mitigate all social impacts, particularly for some directly affected landholders and surrounding landholders, the proposed measures provide a sound framework for managing these effects.

Significant residual social effects

The IAC concluded that, on balance, the social impacts of the project are consistent with relevant policy and legislation and the relevant evaluation objectives. Nonetheless, it also concluded that the project is likely to have significant residual social impacts in many areas near the proposed route, particularly in Darley and Sections 2 and 3. While the IAC did not discuss this finding in detail, it seems to stem, at least in part, from the EES' findings that directly affected and surrounding landholders in these areas could experience moderate to major social impacts during project operation associated with land use and visual impacts. Mr Weston noted that key impacts relate to the project undermining an aspirational lifestyle, disrupting intergenerational connections to land and property (directly affected landholders) and challenging a shared sense of identify built on appreciation of these areas' setting and peaceful rural lifestyle.

Mr Weston[76] identified that social impacts in Darley would be significant due to impacts on the perceived attractiveness of numerous dwellings in this area. As outlined in Section 5.3 of this assessment, many residents in Darley who greatly value the views and lifestyle afforded by their properties will experience changes in visual amenity from private residential outlooks and, to a lesser extent, views from the public realm due to the project. Screening is unlikely to assist in mitigating these impacts.

Based on these findings, the IAC concluded that residents in Darley could experience significant social impacts during project operation. I agree with this finding. While the compensation and EPRs provide a sound framework for managing these effects to acceptable levels, some of these impacts cannot be fully mitigated.

The EES found that, in Section 2, 58 properties would be directly affected by the project, 29 of which have a dwelling. Mr Weston indicated that many of these properties are made up of horticultural land uses that produce a high yield over a small area. The EES found that the project would likely necessitate long term changes to how farming can occur on these properties and that changes to visual amenity and disruption to horticulture could have major social impacts on some landholders' sense of connection to their property. The EES also noted that these impacts would likely be felt by individuals and families who form part of the broader, integrated rural community.

In relation to surrounding landholders, the EES found that the project would not be visible from close to half of the dwellings in Section 2 that are within 2 km of the proposed route. However, direct views of the project would be available from some rural dwellings and from a selection of public views of highly valued landscape features such as Mount Beckworth and Mount Bolton. The EES found that the project may diminish community capacity and cohesiveness during construction and for some time afterwards, as landholders adjust to these altered conditions. The EES found that moderate residual social impacts could also be experienced in the broader community.

The EES found that, in Section 3, 55 properties would be directly affected by the project, 34 of which have a dwelling. Many of these are smaller lifestyle properties and Mr Weston noted that the project could undermine an aspirational lifestyle and disrupt intergenerational connections to property. The EES noted that views of the project may be available from some surrounding landholder dwellings and that due to the strong community connections to the area's scenic rural landscape, it could challenge a shared sense of identity

[76] Tabled document 110

associated with the area's scenic qualities and rural lifestyle. The EES found that minor to moderate residual social impacts could also be experienced in the broader community in Section 3.

As outlined above, the IAC concluded that the project is likely to have significant residual social impacts in Sections 2 and 3. While I broadly agree with this conclusion, I consider that impacts will be most notable for landholders directly affected by the project.

Assessment

It is my assessment that:

- The social and economic effects of the project have been adequately assessed.
- The project will cause social and economic effects - in some locations these are significant, but on balance these effects can be managed to acceptable levels through the EPRs, as modified in accordance with the IAC recommendations and as amended through this assessment.
- The project is likely to bring regional and state economic benefits.
- I support the intent of the IAC's changes to EPRs EC1, EC2, EC3, EM5, EM10, EM15, EM16, SC3 and SC5 with further modifications recommended in my assessment.

5.5. Bushfire

Evaluation objective

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.

Assessment context

Bushfire effects are addressed in Chapter 13 and Technical Appendix K of the EES and in Chapter 8 of the IAC Report. AusNet included bushfire conditions and requirements in the Incorporated Document to manage bushfire effects (including EPR EM2, EM3, and EM6). Other EPRs proposed in the EMF will also assist in managing effects on bushfire, including some EPRs that manage effects on agriculture and forestry during construction.

The project infrastructure will be a new element in the landscape that is a potential source of bushfire ignition and would be impacted by bushfires ignited by other sources over the project's life.

Planning policy for bushfire risk is provided by Clause 13.02-1S (bushfire planning) of the Ballarat, Hepburn, Melton, Moorabool, Northern Grampians and Pyrenees planning schemes. Clause 13.02-1S requires the consideration of bushfire risk, with the objective to strengthen the resilience of settlements and communities to bushfire through risk-based planning that prioritises the protection of human life.

The EES examined existing bushfire conditions across a broad study area, including landscape characteristics, vegetation, topography, fire weather, fire history and values at risk. It also considered likely ignition risks, fire behaviour and the project's implications for vegetation management, firefighting operations, and access and egress.

The EES noted that the project traverses a bushfire prone landscape but has been designed to avoid high risk areas in the Bushfire Management Overlay (BMO). The EES stated that approximately 85% of the proposed route would traverse land identified in the *Technical guide to planning permit applications within Bushfire*

Management Overlay areas[77] as having the lowest risk landscape types (type 1 and 2). The remaining 15% of the proposed route would traverse the highest risk (type 3 and type 4) landscape types at six main locations: near Elmhurst, Lexton, Glendaruel, Lawrence and Bolwarrah and between North Darley and Long Forest areas.

During project construction, key potential bushfire risks identified in the EES included ignition risks from 'hot works'[78], presence of vehicles in areas with dry grass or fires being deliberately lit for cooking or burning vegetation residue from clearing of the easement. During project operations, key bushfire ignition risks were noted to be from project infrastructure failures and flashover.

The EES described the legislative requirements and other controls that would manage the project's bushfire risk. The project would be constructed to comply with ESV's legislative framework, Australian Standard AS/NZS 7000:2016 Overhead Line Design, and AusNet's Electricity Safety Management Scheme (ESMS). The ESMS provides the framework for managing potential bushfire risks during operation, and includes a Bushfire Mitigation Strategy, Native Vegetation Plan and Asset Management Plan. AusNet's ESMS also provides for monitoring and audit of conformance with regulatory requirements.

Condition 4.11 of the Incorporated Document requires my approval of a project-wide construction and operational Bushfire Management Plan, in consultation with the relevant fire authority. Condition 4.13 includes requirements to manage bushfire risk at the Ballan and Lexton temporary workforce accommodation area and at laydown areas.

The EMF includes several requirements that will manage fire risk, namely, a CEMP (EPR EM2), a Property Access and Management Plan (EPR EM3), and a Construction Emergency Management Plan (EPR EM6). Each of these specify bushfire protocols and mitigations.

In addition to project controls, business-as-usual bushfire planning, management and emergency responses by Emergency Management Victoria, Forest Fire Management Victoria (FFMV; includes DEECA and Parks Victoria), CFA and Fire Rescue Victoria will also manage bushfire risk. The EES noted that these approaches will need to be adapted for the project.

The EES concluded that this fire risk management regime would result in almost all bushfire-related residual impacts from the project to be low to very low.

The EES predicted that cumulative bushfire impacts from seven projects with the WRL project would be low to very low, noting that each project would be subject to similar bushfire management requirements and approaches as the project.

AusNet commissioned a peer review by Mr Graeme Taylor and Mr Mark Potter, to check that the EES bushfire impact assessment assumptions, limitations and method for characterising existing conditions and assessing impacts were reasonable, appropriately sourced, and effectively addressed the relevant EES evaluation objective.

Discussion

Key matters relating to the assessment of bushfire effects examined by the IAC were:

- adequacy of the bushfire impact assessment prepared for the EES (section 8.2 of the IAC report); and
- acceptability of bushfire ignition risks and bushfire risk management (sections 8.3 to 8.8 and section 15.1 of the IAC report).

[77] DELWP, 2017

[78] Hot works are activities that create sparks or generate hot particles, such as welding.

Adequacy of the assessment

Several submitters considered the bushfire impact assessment method flawed and impacts understated.

A central issue raised in submissions and expert evidence was whether the assessment placed undue emphasis on the low likelihood of project-related ignitions, without sufficient regard to the potentially catastrophic consequences of bushfire.

In particular, planning and bushfire experts for Moorabool Shire, Professors Buxton and March[79], contended that the impact assessment did not properly account for the risk of rare but catastrophic events. In their view, the assessment should have used a risk matrix that gave greater weight to high-consequence outcomes, even where likelihood was low. They also stated that the assessment failed to properly consider the vulnerability of existing and future communities and to prioritise the protection of human life.

The CFA (which was represented on the EES technical reference group) raised no concerns about the bushfire impact assessment method and advised the IAC that the bushfire risk and bushfire protection measures were appropriate.

The IAC concluded that, for a large-scale project that covers a broad area, the assessment method was practical, grounded in accepted bushfire assessment practice, and fit for purpose in identifying the project's incremental contribution to existing bushfire risk (section 8.2 (iii and iv) of the IAC report).

The IAC was satisfied that the assessment adequately considered consequence, which included a bushfire hazard assessment (not in the matrix format suggested by Professors Buxton and March) and an assessment of potential impacts and their mitigations (section 8.2 (iii and iv) of the IAC report).

The IAC accepted that the size of the incremental risk increase was a relevant factor in assessing the project's bushfire impact. It concluded that the EES determined that the additional risk due to the project would be extremely low, a result that mirrored the more limited fire simulation modelling carried out by Professor Penman[80] (section 8.2 (iii) of the IAC report).

In considering planning policy, the IAC noted that prioritising the protection of human life does not mean that any increase in bushfire risk is unacceptable (section 8.2 (iii)of the IAC report).

I agree with the IAC's findings and consider that the EES adequately assessed the bushfire risks and potential impacts of the project and responded to the appropriate policy.

Bushfire ignition risks from the project

Many submitters were concerned that the project could create an ignition risk as it passes through areas of high bushfire risk. The Ballarat Group of Fire Brigades[81] contended[82] that, although transmission lines in Victoria may not have caused a large-scale bushfire previously, there are documented examples of smaller ignition events linked to the network. They also pointed to overseas examples, including a major wildfire in California, as evidence that transmission infrastructure can cause serious fires in certain circumstances. Similar views were expressed by Professors Buxton and March, who did not consider that the EES appropriately addressed the possibility of ignition from transmission infrastructure.

[79] Tabled document 138

[80] Tabled document 260

[81] 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)

[82] Tabled document 487

AusNet further clarified that bushfire ignitions by power lines are overwhelmingly linked to lower-voltage distribution networks (up to 66 kV), while equipment operating at 220 kV and above poses a negligible fire risk due to their non-combustible and robust design.

In a written submission, the CFA[83] advised that fire ignition risk for transmission lines relates primarily to project construction and decommissioning, for which it has appropriate systems and procedures in place to manage ignition sources during a fire danger period. The CFA noted that it had no concerns about ignition risks during project operations. The CFA clarified that while distribution lines present a risk of ignition and have historically resulted in several Victorian bushfires, it was not aware of any bushfires started by transmission lines. The CFA also noted that there was no evidence that transmission lines increase the fire risk in high bushfire risk areas.

DEECA[84] also accepted AusNet's position that the project area is now, and will remain, bushfire prone, and that the project would only make a small change to the risk of bushfire.

On this basis, the IAC found the project's bushfire ignition risk to be very low and acceptable (section 8.3 (v) of the IAC report). It was satisfied that the risk would be appropriately managed through a combination of the project-wide Bushfire Management Plan, broader EPRs and the various plans under the ESMS (as discussed above) (section 8.3 (v) of the IAC report). I agree with the IAC's conclusion.

The IAC recommended drafting changes to the Incorporated Document to better clarify that the Bushfire Management Plan applies to both construction and operation (section 8.3 (v) of the IAC report). Refer to Section 4.1 of this assessment for my consideration of these changes. The key bushfire ignition risks from the project, as noted by the IAC, are discussed in my assessment below.

Project infrastructure failure

Tower collapse

The EES noted that there have been 12 major high-wind transmission tower collapse events since 1959, involving 51 towers and that one of these events in NSW in 1981 led to an ignition escaping the site.

Many community submitters expressed concern about the risk of tower collapse, as did Professors Buxton and March, who contended that the EES had understated the risk of towers falling and provided evidence of 14 tower failures between 2016 to 2022 across the National Electricity Market[85]. They claimed that the EES did not provide enough comparative evidence to justify the claim that newer towers would perform better, nor enough modelling of how towers would behave under extreme conditions.

The CFA noted 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. The IAC was satisfied, based on TN6[86] tabled by AusNet, that the EES had adequately considered climate change and there was no reason to require a higher overhead line design standard than the current Australian Standard (i.e. *AS/NZS 7000:2016 Overhead Line Design*) (section 8.4 (v) of the IAC report).

The IAC also found the risk of tower collapse to be very low and the likelihood of collapse causing an ignition that then escalates into a bushfire to be even lower (section 8.4 (iv and v) of the IAC report). The IAC considered that these risks could be effectively managed through AusNet's Bushfire Management Plan and

[83] CFA's original submission no 159 and Tabled document 421

[84] Tabled document 407

[85] Tabled document 138, Appendix 2

[86] Tabled document 249

Asset Management Plan under the ESMS and modern overhead line design standards (section 8.4 (iv) of the IAC report). I agree with these findings of the IAC.

Fallen transmission lines

The EES stated that high voltage transmission lines that have fallen onto the ground are unlikely to ignite bushfires due to their design and reliability. The IAC noted that transmission network protection systems detect faults and immediately switch off the power to prevent an electrical fire.

After automatically deactivating, the EES stated that the line may take some time to cool from its operating temperature of around 90 degrees centigrade, but this is well below the ignition temperature for grass or other fine fuels (which would be in excess of 300 degrees).

Based on the information provided in the EES, the IAC accepted that the ignition risks from fallen conductors would be low, which I agree with (section 8.4 (v) of the IAC report).

However, the IAC noted that any contact with the ground, vegetation or fences would still require a rapid response to prevent sparks or flashovers causing ignition and recommended that the project-wide Bushfire Management Plan include such a procedure, if not already covered under the ESMS (section 8.4 (v) of the IAC report). I agree with this recommendation and consider this further in Section 4.1 of my assessment.

Lightning strikes

The EES indicated that there are no known incidences of lightning strikes on transmission towers causing fires in Victoria. It stated that, in the absence of the transmission towers, lightning would strike the next highest feature in the vicinity (for example, a tree or the ground) and the discharge of electricity would be uncontrolled. Towers are designed and constructed with earthing mechanisms in accordance with the Australian Standard, resulting in a very low residual impact.

The IAC was satisfied that a lightning strike of the transmission line was highly unlikely to cause a bushfire ignition (section 8.4 (iv) of the IAC report), which I agree with.

Flashover

The EES defined a flashover as *"...a phenomenon whereby electricity is conducted from a powerline (transmission or distribution) via smoke, flame or water vapour to the ground. It presents a safety hazard to those nearby. It may also lead to further fire ignitions (noting that they would only occur in close proximity to an existing fire)."* [87].

The EES indicated that, under everyday conditions, powerlines are designed to be safe from flashover due to their height and separation. The *Electricity Safety (General) Regulations 2019* specify safe clearances to be maintained for people, vehicles or other plant near transmission lines to prevent flashover and bushfire ignition. However, the EES noted that protection systems may not entirely prevent flashover or sparks when electricity initially makes contact with the ground or grounded structure (for example, a tree).

The CFA's standard operating procedures for firefighters working near electrical structures and conductors[88] to avoid exposure to a potential flashover include maintaining a 25 m clearance from the outer wire of a transmission line or from fallen transmission lines when there is smoke or gases from a fire burning under or near a powerline.

[87] EES Technical Report K, page ii

[88] Tabled document 422

The Ballarat Group of Fire Brigades[89] expressed concern with the EES's assessment of hazards associated with transmission lines and the potential for flashover events to occur. AusNet contended that fire crews already manage the dangers of flashover around existing transmission lines and that there would be no reason why such risks associated with the project could not be managed just as effectively.

The IAC noted that, despite decades of firefighting around transmission lines occurring in Victoria, no examples were provided of flashovers occurring, or having caused injury or death, including around aging transmission infrastructure. Based on this, the IAC found that flashovers from transmission infrastructure would likely be very low probability events (section 8.5 (iv and v) of the IAC report). I agree with this finding and consider that any risk of a flashover event associated with the project can be managed in line with existing procedures.

That said, the IAC further noted that, should a flashover occur, the consequence could be severe and as such, a precautionary approach is required to manage this risk. To this end, the IAC found that firefighters and the public need to maintain a 25 m separation distance from the transmission line in fire conditions to avoid flashover risks unless advised otherwise (section 8.5 (v) of the IAC report). Refer to further information under 'Bushfire risk management' below. I discuss the need for a 25 m separate distance below under the heading 'Impacts on access and egress in a fire emergency', where I conclude that it is desirable to achieve a 25 m clearance where possible, but such clearances are not necessary to ensure the impacts of the project are acceptable.

Bushfire risk management

Vegetation management

Professors Buxton and March[90] submitted that the EES and others consider that some parts of the proposed route are at a considerably higher fire risk by virtue of fire suppression potentially being hampered by vegetation and topography, and that the potential consequences are also high due to proximity of settlements for these route sections.

The IAC noted the advice of AusNet's expert witnesses on bushfire, Mr Potter and Mr Taylor[91], who acknowledged that distribution lines (not transmission lines) have led to past ignitions within vegetated areas, and that the overall risk was very low. They also noted that potential ignition sources are controlled through design standards and systems that protect infrastructure resilience and vegetation management.

The CFA also noted that while distribution lines present a risk of ignition that has resulted in some bushfires in Victoria, it was not aware of any transmission lines starting any bushfires.

The IAC found that bushfire ignition risks arising from the project were very low and would be acceptable (section 8.3 (v and iv) of the IAC report). AusNet's varying approaches to vegetation management within easements is outlined within Section 5.1 of this assessment, including standard and partial clearance approaches to managing vegetation and fuel loads below the transmission lines.

The IAC noted that, in certain areas such as Darley, additional operational management measures would be needed, including annual inspection, so that the vegetation maintains the clearance distance required under the Code.

[89] Tabled document 487

[90] Tabled document 138

[91] Tabled document 192

Given AusNet is proposing different easement vegetation clearance approaches in Darley and potentially other areas along the proposed route, and given the potential for additional operational complexities, the IAC recommended that local fire authorities are consulted on vegetation management since this could have firefighting implications in the easement (section 8.3 (iv and v) of the IAC report). The IAC recommended this change to the Incorporated Document (as addressed in Section 4.1 of this assessment), in terms of assessing and mitigating environmental effects under the Environment Effects Act. I agree with this recommendation.

Impacts on firefighting operations

The EES noted that firefighters can drive below transmission lines but working in the easement is subject to maintaining a 25 m separation distance to ensure electrical safety. The EES found that depending on the orientation of an approaching fire and the control line, this restriction has the potential to reduce the effectiveness of the fire response. The EES also found that the project could impact aerial firefighting operations with the residual risk assessed as low to very low due to Civil Aviation Safety Authority (CASA) advising of the presence of the project and multiple water sources being available near the proposed route.

Many submitters[92] expressed concern that the project would constrain their ability to fight fires in and around the project's easement. Moorabool Shire[93] reinforced the importance of aerial firefighting in the Shire including access to Merrimu Reservoir.

The CFA advised the IAC that CFA's standard operating procedure does not prohibit fire fighters' access to areas within 25 m of transmission lines per se, as each situation is assessed based on a dynamic risk assessment and the application of appropriate controls in the vicinity of any power infrastructure. The CFA noted that firefighting is tailored to any type of infrastructure present. If there was a major fire in the project area, CFA would liaise with AusNet and the transmission line may be deactivated to allow safe firefighting in the easement. The CFA considered that transmission lines do not present a significant impediment to aerial firefighting given aerial operators are familiar with working in and around transmission lines and procedures protect pilot safety. The CFA noted that Merrimu Reservoir and other reservoirs near the project are large enough to allow access away from the transmission line. The CFA also advised that it had no reported incidents of transmission lines ever having interfered with radio communications.

DEECA[94] noted that its operational procedures provide the necessary framework to adapt firefighting, fuel management and land management activities around the proposed transmission line.

The IAC was satisfied that, in most areas surrounding the proposed route, firefighting would be able to adapt to the presence of the project without compromising safety (section 8.6 (iv) of the IAC report). The IAC recommended several changes to the Incorporated Document (section 8.6 (v) of the IAC report). These included new recommendations (such as condition 4.11.4 and 4.11.5), in relation to:

- providing support and training to firefighters regarding firefighting around electricity infrastructure; and
- ensuring that firefighters are immediately notified any time that the infrastructure is de-energised during an incident or emergency (section 8.6 (v) of the IAC report).

I agree with these recommendations.

In addition, the IAC recommended amending condition 4.5 (development plans), to require that AusNet specify the minimum clearance of the transmission lines above the road surface at all road crossing points along the proposed route (section 8.6 (v) of the IAC report). While I agree with the intent of this recommendation, the

[92] This includes the Ballarat Group of Fire Brigades (Tabled document 487), Kingston District Power Alliance (Tabled document 675) and Charleson Group (including members such as Mr Henderson-Drife) (Tabled document 117)

[93] Tabled document 348b

[94] Tabled document 407

development plans would not benefit from this level of detail. Instead, I recommend this information be documented in the Bushfire Management Plan (condition 4.11.1), which can then be provided to firefighters to assist with bushfire planning (further addressed in section 4.1 of this assessment).

The IAC concluded that, provided changes to condition 4.5 and other bushfire management measures under the Incorporated Document are properly implemented, the project's impacts on firefighting would be acceptable in most locations (section 8.6 (v) of the IAC report) except in high-risk bushfire areas where a minimum ground clearance of 25 metres (plus the height of a firefighting appliance) cannot be achieved at transmission line 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.

Based on the information tabled through the process - including the findings of the EES, the evidence of AusNet's expert witnesses Mr Potter and Mr Taylor (both of whom are former CFA members) and the expert advice from the CFA in particular - it is my assessment that the potential impacts on firefighting from the project will be acceptable for the entire project. This finding is discussed further below in the context of impacts on access and egress routes, including for Darley.

I note the IAC makes recommendations about CFA's Standard Operating Procedure[95] in response to submitter feedback (section 8.6 (iv) of the IAC report). It would be good practice for AusNet to work with the CFA to provide greater clarity for users regarding the procedure and to consider valuable observations of the IAC as a guide to inform the discussion and review process.

Impacts on access and egress in a fire emergency

The EES noted that the project crosses several priority access and egress routes identified in local government Municipal Fire Management Plans[96] and on 'undesignated' roads. The EES also identified several measures to be taken to mitigate the risk of infrastructure failure (tower collapse or fallen lines), including situating towers more than 80 m away from roads. The EES stated that, of the 446 towers proposed as part of the project, 16 were sufficiently close to a fire control or strategic fire access road that a tower could fall onto the road and a further 57 towers could potentially fall onto an undesignated road. The EES also identified the points at which the project easement would intersect with a road.

The EES also identified where the project easement intersected with the most direct route between nearby townships and other residential areas and a place of safety[97] and assessed whether there were alternative routes which did not intersect with the easement.

Further, the EES (Appendix H of the Bushfire Impact Assessment) identified that:

- There were eight settlements (Barkstead, Blakeville, Bolwarrah, Coimadai, Darley North, Korweinguboora, Long Forest and Mollongghip) where the easement intersected with the most direct route to a place of safety but that practicable alternative routes were available for all eight of these settlements;
- For two settlements (Bolwarrah and Mollongghip), all of the practicable alternative routes were also impacted by the easement; and

[95] Tabled document 422

[96] These routes are designated for persons evacuating from bushland in the Pyrenees Ranges, Wombat State Forest, Lerderderg and Long Forest areas and for emergency services accessing fire grounds in these and some other areas

– While the residential areas of Darley North generally had alternative egress routes, those located along Lerderderg Gorge Road did not.

The EES stated that, in order for flashover ('electrical induction between the transmission line and the ground') to occur, heavy smoke would be required and that smoke would render travel unsafe in any event.

The EES concluded that the residual risk of the project impeding access to or egress from nearby bushfires - due to for example, the collapse of a tower - to be very low for all areas except for Darley (discussed further below).

Professors Buxton and March considered that the information in the EES provided sufficient understanding of project constraints on access and egress routes but failed to derive a risk level from which to assess acceptability.

The views of Mr Potter and Mr Taylor[98], were that the risk of egress routes being blocked by infrastructure failure already exists, as country roads are crossed by distribution and private lines in multiple locations. They emphasised the importance of residents in high bushfire risk areas where roads are in poor condition having individual bushfire plans, planning ahead and leaving early.

The IAC report noted that the project could potentially impact on access and egress in two distinct ways:

– Through roads being blocked by project infrastructure failure (collapsed towers or fallen lines); or
– Due to the potential for flashover where the project intersects with a road (section 8.7(iv) of the IAC report).

The IAC considered that the information and analysis in Appendix H of the Bushfire Impact Assessment (as identified above) was 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.

The IAC report noted that the CFA advised that road access is often compromised during bushfire events for a range of reasons. The CFA advised that if a tower collapsed and blocked road access, the CFA would work with the infrastructure owner to have the road cleared as quickly as possible, although it noted that in some cases roads can be blocked for several days. The CFA also noted that warnings about road closures are issued as part of normal community messaging and evacuation warnings. The CFA did not have concerns about the potential for the project to impact on access and egress routes.

The IAC stated that it considered the likelihood of roads being blocked from project infrastructure failure to be 'very low'. It referred back to its recommendations regarding fallen transmission lines discussed above, which I have already accepted. It did not recommend any other measures to mitigate the risk to access and egress from fallen infrastructure. The IAC did not make any express finding on the acceptability of the risk to access and egress posed by infrastructure failure. I am satisfied that the risk is, as the IAC found, very low and that it is acceptable in a context, where there is already an existing risk that those roads may be blocked in a bushfire situation for a variety of reasons, and where the CFA (as the expert body responsible for responding to bushfire) did not express any concern about the impact of the project on bushfire access and egress.

The IAC found that access and egress risks associated with flashover were less clear than the risks associated with infrastructure failure, but that the risk from flashover could not be 'entirely discounted' (section 8.7(iv) of the IAC report).

On this basis, the IAC concluded that for the project's bushfire risk to be acceptable, its design must be modified to ensure 25 m minimum safe clearances plus the height of a firefighting appliance where the project intersects with 'key roads', being roads:

[98] Tabled document 93

– 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 there is no suitable safe alternative access and egress route available (i.e., no alternative road that does not intersect with the project) (section 8.7 (v) of the IAC report).

In reaching these conclusions, the IAC referred to information provided in Appendix H.3 of the EES[99] (section 8.7 (iv) of the IAC report). The IAC recommended a new condition 4.11.2 to the Incorporated Document to provide this clearance at road crossings (section 8.7 (v) of the IAC report).

While I accept that the risk to access and egress posed by flashover cannot be fully discounted, I consider it to be small and acceptable. As the IAC found in its discussion of flashovers, there are no recorded examples of flashovers having occurred in Victoria, despite decades of firefighting around transmission lines. This indicates the risk of flashovers occurring is very low. The risk is also confined to the geographically small areas where the easement crosses a road and the primary impact on access and egress would be where the easement crosses a road that is required to access a place of safety. The EES found that all but three locations (settlements of Bolwarrah and Mollongghip and residents located along Lerderderg Gorge Road) within 10 km of the proposed route had access to a place of safety without having to cross the project easement. I note that the risk from flashover can be avoided entirely if landholders follow the advice of fire authorities and leave well in advance of bushfires arriving, including at Lerderderg Gorge Road where I accept that there is only one egress route available, and this route requires crossing the easement.

Such a modification has the potential to impact on other environmental values considered through the EES and this assessment. As described earlier, the assessment of likely impacts through this EES is based on a design in which the tallest structures are the 80 m high double-circuit transmission towers and the consequences of requiring a 25 m clearance at all road crossings have not been assessed in any of the documentation.

While I do not support requiring 25 m clearances at the relevant road crossings, I do accept that it would be desirable to provide such clearances where feasible, particularly at Lerderderg Gorge Road. Accordingly, I recommend that the proponent investigate if 25 m minimum road clearances (plus the height of firefighting appliances) can feasibly be delivered where the transmission lines intersect with 'key roads', being 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 there is no suitable safe alternative access and egress route is available (i.e., no alternative road that does not intersect with the project) (section 8.7 (v) of the IAC report).

The assessment of feasibility should be undertaken in consultation with relevant fire authorities and must have regard to any additional impacts that would arise from changes to the design of the project (including biodiversity and visual impacts). Any feasible options must be implemented through the appropriate mechanism (such as the proposed Development Plan/s under proposed condition 4.5 of the proposed Incorporated Document).

Overall, it is my assessment that the project's likely impacts on access and egress are acceptable, in particular noting that the project presents a small incremental increase in bushfire risk, where there is already an existing level of risk present.

[99] Egress from eight settlements 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 more than one route is available, all are intersected by the project. While Darley residential areas generally have alternative egress routes, those residents living located along Lerderderg Gorge Road have only one route.

Specific areas of concern

North of Darley

Fuel loads

Professors Buxton and March were concerned that the consequences of a fire in the northern parts of Darley could be severe based on EES fire scenario modelling showing very high flame heights in this area.

As outlined in TN2[100] AusNet conducted fuel density and flame height assessments to confirm that the transmission line asset was adequately protected from fire risk and found that a clearance of 8.4 m between the transmission line and vegetation for the Darley area complied with the Code and bushfire requirements.

Mr Potter and Mr Taylor reviewed TN2 to assess the type of vegetation in the Darley area and noted in their written statement[101] that vegetation is dominated by scattered trees with very little ground fuel due to the rocky nature of the landscape. While they acknowledged that steep slopes exist, they noted that low fuel loads would assist with reducing the likely bushfire intensities in and around the transmission line infrastructure. They further stated that the main topographical areas that will influence bushfire behaviour when aligned with the likely approach (northwest or southwest) is from the southwest, noting that there is a reasonably short run of approximately 200 metres before it impacts on the transmission line tower.

The IAC noted that the vegetation partial clearance approach outlined in TN2 would require regulatory approval from ESV and if granted, would help ensure that the vegetation clearance approach at Darley adequately manages bushfire risk (section 4.3 (iv) of the IAC report). The IAC also noted that the assessment of bushfire risk is not static, and ESV could require changes to the management plans to allow alternative vegetation clearance approaches.

The IAC did note however, that no analysis was presented in the EES on how quickly north of Darley could be evacuated if a fire was approaching from any direction. The IAC considered that fuel density would be higher if AusNet's proposed bespoke vegetation clearance approach to retaining vegetation in the easement north of Darley was implemented to reduce biodiversity impacts, compared to the standard clearance approach (i.e. retaining vegetation to a height of 4 m). The IAC recommended that further investigations be undertaken into the fire risk associated with the bespoke clearance approach proposed by AusNet (see Section 5.1 of this assessment) (refer to section 4.3 (iv) of the IAC report).

TN2 highlights that AusNet has undertaken modelling that supports the proposed bespoke approach of retaining vegetation in the easement in the Darley area, while also managing the existing level bushfire risk. Further, AusNet does need to satisfy ESV that its bespoke approach appropriately manages bushfire risks for the purposes of public safety and protection of the transmission line assets. Therefore, it is my assessment that the risks can be managed to acceptable levels, and with ESV needing to be satisfied that what is proposed is appropriate.

Access and egress

The EES found that infrastructure failure or flashover could affect access and egress at either Lerderderg Gorge Road or Camerons Road in north Darley. The EES also found that residents escaping on Lerderderg Gorge Road have no safe alternative route and those escaping on Camerons Road would have to divert through bushland along Seereys and Russells Roads towards the Bacchus Marsh-Gisborne Road. The EES noted that Seereys Road could be dangerous to use for evacuation if the surrounding area was under ember attack and spot fires but considered there was a low likelihood of either event occurring. The EES also found

[100] Tabled document 128

[101] Tabled document 659

that the project could disrupt fire crews' access to Darley and Long Forest but considered that there are practicable alternative access routes.

The IAC sought the advice of the CFA[102], who noted that it had already specifically considered access and egress on the roads around Darley and Lerderderg Forest, including Lerderderg Gorge Road and Camerons Road. The CFA advised that access is already compromised (in the absence of the project) on these two roads during bushfire events and that the access and egress challenges that exist are not caused by proposed transmission line infrastructure. The CFA advised that the surrounding landscape already gives rise to equal or greater risks, due to factors such as falling trees and other existing power infrastructure, including distribution lines. The CFA also emphasised the important role (under all circumstances) of the community acting in accordance with the recommendations associated with each Fire Danger Rating under the Australian Fire Danger Rating System.

The CFA indicated that it had consulted with two regional branches of the CFA that operate within the area that the proposed route would traverse and that those branches did not express any concerns about the project crossing priority access and egress routes. Further, the CFA stated that if the project was approved it would incorporate the infrastructure into incident action planning, including the establishment of exclusion zones, where necessary. Community warnings and evacuation advice would be informed during fire events by fire behaviour and identified risks, including any infrastructure-related hazards.

The IAC noted that there are many scattered residential properties north of Darley that rely on Long Forest Road, Swans Road, Lerderderg Gorge Road or Camerons Road for safe egress to the south in the event of a bushfire. The IAC highlighted that even if a 25 m minimum safe ground clearance (plus the height of firefighting appliances) could be achieved at these transmission line road crossings, access and egress routes are very limited and some residents do not have access to a safe place north of the project in the event of a fire that caused the roads to be inaccessible. For instance, the IAC noted that residents located on Lerderderg Gorge Road have no alternative egress route. The IAC also considered that ember attack and spot fires in bushland surrounding Seereys Road[103] would be reasonably foreseeable.

The IAC concluded that a combination of factors, including very high bushfire risk, limited access and egress routes, terrain and fuel load make firefighting (and potentially evacuations) in this area challenging (section 8.8 (i) of the IAC report). Given these reasons, the IAC did not consider that the bushfire evaluation objective for assessment of this project and its potential impacts could be met in the Darley area and concluded that the project's small incremental increase in the bushfire risk in this area is unlikely to be acceptable (section 8.8 (i) of the IAC report).

It is clear from the documentation available through this EES process and the IAC's analysis that firefighting and potentially evacuations are challenging in the Darley area, with or without the project. It is my assessment, however, that the additional risk posed by the project is very small and is acceptable. I have reached this conclusion on the basis of the IAC finding that the project's bushfire ignition risk would be very low. The likelihood of infrastructure failure occurring is, also as the IAC found, very low. While flashover events cannot be discounted, the lack of any recorded examples of flashovers having occurred in Victoria, despite decades of firefighting around transmission lines also suggests that there is a very low likelihood of such an event occurring. Nothing in the information before me suggests that the additional risk posed by the project to access and egress is significant in a context where there is already an existing risk that access or egress during bushfires will be impacted for a variety of reasons. I also take into account the expert advice provided

[102] Tabled document 421

[103] Seereys Road is identified in Moorabool Shire Council's Capital Improvement Projects 2025/26, and will be subject to structural treatments in three locations (Capital Improvement Program | Moorabool Shire Council)

by the CFA, which has responsibilities under the *Country Fire Authority Act 1958* and the *Emergency Management Act 2013*, and which said it had specifically reviewed access and egress routes in Darley and surrounds and did not have any concern about the project crossing these access and egress routes. I also observe that any additional risk to access and egress can be mitigated by following fire authority guidance and evacuating early.

However, it is clear that existing access and egress routes in the north of Darley are already very limited. As such, if the Moorabool Shire has not already fully examined any potential alternative options for safe access for firefighters and egress options for residents living on Lerderderg Gorge Road and Camerons Road, AusNet should engage with the Shire and appropriate fire authorities, to do so. I recommend that AusNet undertakes this work as a matter of good practice in consultation with Moorabool Shire and relevant fire authorities. This work will also strengthen local partnerships and lay down foundations for potential subsequent work for continuously improving the management of bushfire risks in such areas. AusNet should document this in the Bushfire Management Plan. This general recommendation is further considered in Section 6 of my assessment.

The Glendaruel area

The Charleson Group[104] raised concerns about the impact of the project on the ability to fight a fire coming into the Glendaruel area from extreme bushfire risk areas, notably Mount Beckworth or Mount Bolton.

The CFA stated that the area between Mount Bolton and Mount Beckworth is a concern with or without the project. The CFA noted that ignitions in this area (regardless of the source) can be difficult to quickly contain. The CFA further clarified[105] that there are alternative egress routes for residents living in Glendaruel to areas of lower bushfire risk.

The IAC considered that the Glendaruel area is less steep than the Darley area, with lower fuel loads and a lower concentration of surrounding extreme bushfire risk areas. The IAC acknowledged that while it would be difficult to fight a fire in the project easement, there would be locations from which a fire moving through this landscape could be directly supressed.

I agree with the IAC's conclusion that the project's small incremental increase in the already high bushfire risk in the Glendaruel area is acceptable (section 8.8 (ii) of the IAC report).

Assessment

It is my assessment that:

- Bushfire ignition risks arising from the proposed project, including tower collapse, fallen transmission lines, flashover and lightning strikes are very low. There is also a very low risk of ignition escalating into bushfire.
- Further, the additional risk posed by the project is acceptable as it is only a small incremental change to the existing risk profile at higher bushfire risk areas such as Darley and the Glendaruel area.
- CFA's and DEECA's operational procedures provide the necessary framework to adapt firefighting, fuel management, and land management activities, as relevant. It would be valuable for AusNet to work with CFA to consider opportunities to provide greater clarity for users of the Standard Operating Procedure;
- Consultation and coordination with relevant fire authorities as part of the fire prevention, planning and response in managing vegetation and fuel management in the easement, will be important for managing any ignition risks from the project.

[104] Tabled document 260

[105] Tabled document 421

- Potential impacts on access for firefighting and egress for residents from the project will be acceptable (across the entire project).
- As a matter of good practice, if Moorabool Shire has not already fully examined any potential alternative options for safe access for firefighters and egress options for residents living on Lerderderg Gorge Road and Camerons Road in the area north of Darley, AusNet should engage with the Shire, in consultation with fire authorities, to do so.
- The project's bushfire ignition risks will be managed to an acceptable level through complementary controls. Proposed conditions 4.11 and 4.13 from the proposed Incorporated Document will be able to compliment EPRs EM2, EM3, and EM6 within the EMF, consistent with the IAC's recommendations and as further refined through this assessment.

5.6. Aboriginal cultural heritage

Evaluation objective

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

Assessment context

Aboriginal cultural heritage effects are addressed in Chapter 9 and Technical Appendix B of the EES and in Section 5 of the IAC report. AusNet proposed two EPRs (EPR ACH1 and EPR ACH2) in the EES to manage impacts on Aboriginal cultural heritage. Other EPRs proposed in the EMF will also assist in managing effects on Aboriginal cultural heritage values, including some EPRs that manage effects on biodiversity and surface water during operation, and decommissioning.

The project would be on lands historically occupied and used by clans from the Jadawadjali, Djab wurrung (or Tjab wurrung), Dja Dja wurrung (or Djadja wurrung), Wadawurrung (or Wada wurrung) and Woi wurrung. The Aboriginal cultural heritage assessment for the EES was informed by engagement with Barengi Gadjin Land Council Aboriginal Corporation (BGLCAC), Eastern Maar Aboriginal Corporation (EMAC), Dja Dja Wurrung Clans Aboriginal Council (DJAARA), Wadawurrung Traditional Owners Aboriginal Corporation (WTOAC), Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation (WWCHAC), Traditional Owners (TOs) and First-Peoples State Relations. The Aboriginal cultural heritage assessment for the EES was based on six study areas, for which nine approved cultural heritage management plans (CHMPs) are required under the Aboriginal Heritage Act. The EES noted that AusNet was preparing CHMPs in parallel with the EES process and standard and complex assessments for the project's CHMPs were ongoing.

The Aboriginal cultural heritage assessment identified 79 Aboriginal places previously registered on the Victorian Aboriginal Heritage Register (VAHR) and 125 new Aboriginal places within the study areas. The project intersects with 77 Aboriginal cultural heritage values and will directly impact these values. Further, the EES acknowledged that 10 previously unrecorded Aboriginal cultural heritage places were impacted through discovery activities during site investigations, however no additional impacts by the project are expected. The EES's assessment of intangible Aboriginal cultural heritage was informed by five cultural values assessments (CVA) that sought to identify and understand traditional and contemporary Aboriginal cultural heritage values and meanings held by TOs and the ways in which these values can be interpreted. Cultural landscapes identified as part of the CVAs include the Pyrenees Ranges landscape, Hepburn Lagoon, Wimmera River, Avoca River, Werribee River, Mount Kororoit and Kororoit Creek.

The EES found that construction activities associated with ground disturbance, such as site investigations and installing infrastructure, will have the greatest impact on both tangible and intangible values, including impacts on six known intangible cultural heritage values. Residual impacts during construction were assessed to range from low to high, with high residual impacts on values including high significance scatters, geomorphological features and culturally modified trees.

Operations and decommissioning will also result in residual impacts to tangible and intangible values. Effects on tangible heritage during operations were assessed as low since works are unlikely to extend beyond what already occurred during construction, e.g. vegetation management, and the majority of sensitive areas within the easement would be known. In contrast, effects on intangible cultural heritage were found to remain high during operation of the project due to its visual presence and potential to continue to interact with intangible values, especially where project infrastructure is located within cultural landscapes.

Decommissioning is unlikely to impact on any additional tangible values as ground disturbance will occur in areas already disturbed during construction and operations. Visual impacts to intangible cultural values and landscapes will be reduced as project infrastructure is removed. The EES concluded that residual impacts on tangible and intangible cultural heritage during decommissioning are expected to be low.

The EES found that the project, along with other nearby projects, would contribute to an overall moderate cumulative effect on tangible and intangible Aboriginal cultural values.

The EES concluded that, with implementation of CHMPs and EPRs, overall, the project would have a moderate residual effect on Aboriginal cultural heritage.

Discussion

The IAC identified the following key matters for assessing effects on Aboriginal cultural heritage values:

- adequacy of the assessment (section 5.2 of the IAC report); and
- adequacy of EPRs to manage Aboriginal cultural heritage effects (section 5.2 of the IAC report).

DJAARA, WTOAC and BGLCAC culturally sensitive information, including hearing submissions and presentations was shared with the IAC at a closed hearing session and otherwise remains confidential. As such, my assessment is based on publicly available information provided in the EES, submissions and the IAC report.

Adequacy of the assessment of Aboriginal cultural heritage

The EES stated that adequate fieldwork had been conducted to inform the impact assessment even though fieldwork was ongoing and additional unrecorded Aboriginal cultural heritage was likely to be encountered during future investigations.

A predictive model was developed as a part of the EES to identify areas with potential for Aboriginal cultural heritage presence in the study areas. This model also supported desktop assessment of areas that could not be accessed for field surveys. The model indicated a moderate to high potential for additional Aboriginal cultural heritage in areas not yet surveyed, however this was likely to be of similar nature and form to that in surveyed areas and unlikely to increase the significance of impacts on Aboriginal cultural heritage.

AusNet's TN19[106] noted that there had been an increase from 125 to 149 of previously unrecorded Aboriginal cultural heritage values within the project land due to CHMP fieldwork completed after the EES was finalised. TN19 indicated that, while fieldwork was continuing to progress, some study areas still had less than 50% fieldwork coverage. The update also outlined a number of new finds and revisions to Aboriginal cultural heritage values but considered that the nature of the new finds was consistent with that previously identified and the project's residual impact remained moderate.

[106] Tabled document 521

The IAC found that the EES appropriately assessed Aboriginal cultural heritage effects although noted that further investigations were necessary and still progressing via the CHMP process (section 5.2 (v) of the IAC report). I agree with the IAC's finding.

Adequacy of EPRs to manage Aboriginal cultural heritage effects

The EES committed to managing impacts to Aboriginal cultural heritage across all phases of the project through implementing approved CHMPs (EPR ACH1) developed in consultation with RAPs, TO (Traditional Owner) groups and First Peoples – State Relations (FP-SR). The CHMPs would contain specific management conditions including contingency protocols for discovery of previously unknown Aboriginal cultural heritage values. EPR ACH2 commits AusNet to engage with RAPs and TO groups to manage effects on intangible cultural heritage values by addressing recommendations from the CVAs.

A suite of other EPRs will further manage effects on tangible and intangible cultural heritage values through requiring ongoing involvement and engagement with RAPs and TO groups. These include ecological EPRs (EPR BD1, EPR BD2, EPR BD3, EPR BD4, EPR BD5, EPR BD6 and EPR BD7), surface water EPR SW3 and decommissioning EPR EM11. Additionally, AusNet committed to a new EPR ACH3 during the hearing ('Day 1' version of the EMF[107]), which requires it to provide TO groups with technical and administrative support for applying for registration of intangible cultural heritage values and, at the request of TO groups, to recognise cultural knowledge of places that contribute to intangible values.

The IAC noted that in the confidential hearing session, BGLCAC, WTOAC and DJAARA sought changes to EPRs to provide for better consultation and participation with RAPs and TO groups. WWCHAC also advocated for the protection of native species including those of significance to TOs such as Bunjil (Wedge-tailed Eagle) and Kangaroo populations. The confidential nature of the submissions limited the extent to which AusNet was able to respond to issues raised as well as the ability of the IAC to discuss them in detail.

During the hearing, AusNet tabled its 'Day 3' version of the EMF[108], which revised EPRs to respond to submissions. AusNet noted that there would be ongoing formal discussions with RAPs and TO groups for the CHMP process. AusNet's TN1 and TN18 proposed developing a benefit sharing agreement with TOs, which would incorporate principles of self-determination. Key updates to EPRs proposed by AusNet included an amendment to EPR EM13 to mandate cultural awareness and anti-racism training to be delivered in consultation with TO groups, an amendment to EPR ACH2 to provide support for each RAP to update CVAs and amendments to EPR EC2 and EPR SC3 to include TO and Aboriginal-owned businesses for procurement and employment initiatives. AusNet also proposed a new EPR EM15 to develop and implement a TO Engagement and Communications Plan as well as EPR amendments to respond to TO requests about biodiversity.

The IAC was satisfied that AusNet had sought to avoid and minimise impacts on cultural heritage and acknowledged AusNet's updates to EPRs to strengthen engagement and involvement between TO groups and project implementation. However, the IAC recommended additional amendments to the EPRs to strengthen these commitments. Notably, the IAC recommended amending EPR EM15 to require that TO Engagement and Communications Plans be prepared consistent with the Leading Practice Principles: First Nations and Renewable Energy Projects[109] guidelines. These guidelines document and promote best practice for renewable energy projects engaging with TOs on managing and protecting cultural values as well as outlining how to

[107] Tabled document 209

[108] Tabled document 652

[109] *Leading Practice Principles: First Nations and Renewable Energy Projects*, 2024, Clean Energy Council & KPMG

support TO participation in EPR ACH2, EPR ACH3, EPR EC2 and EPR BD11 (section 5.2 (v) of the IAC report). I agree with these amendments to the EPRs, subject to further amendment to EPR ACH3 to acknowledge that the EPR is about working with relevant RAPs and TO groups.

The IAC recommended further amendments to EPR ACH2 to support improved engagement with TO groups and maximise opportunities for self-determination in the CVAs (section 5.2 (v) of the IAC report). I agree with this recommendation, subject to further amendment to EPR ACH2 to acknowledge that support is to be provided to relevant RAPs and TO groups. The IAC also recommended amendments to EPR BD2, EPR BD6 and EPR BD11 to provide for TO groups' involvement (where they have land and waterway responsibilities), consultation and engagement in managing effects on culturally significant species and materials, and on riparian and aquatic habitat (section 5.2 (v) of the IAC report). I agree with these changes to the EPRs where they relate to TO engagement and consultation. The IAC did not provide a specific finding in relation to WWCHAC's concerns about project effects on culturally significant species such as the Wedge-tailed Eagle and Kangaroo, however the IAC's recommended amendments to EPR BD11 would support further discussion and engagement with WWCHAC to address their concerns about these species. The IAC also recommended EPR EC2 be amended to further recognise TO procurement opportunities through reference to the TO Engagement and Communications Plans (EPR EM15). The IAC further recommended amending EPR SC3 to require consultation with TO groups on the development of a plan to maximise employment opportunities for First Nations people (section 5.2 (v) of the IAC report). I agree with these amendments to EPR EC2 and EPR SC3. The IAC considered that its recommended amendments to the EPRs and AusNet's benefit sharing arrangements would provide opportunities for TOs and First Nations communities to share in the project benefits (section 5.2 (v) of the IAC report). I agree with this finding.

Overall, the IAC found that residual impacts on Aboriginal cultural heritage will be acceptable and that impacts could be suitably managed through the CHMPs and EPRs (section 5.2 (v) of the IAC report). I agree with the IAC's finding. While the CHMP process is ongoing, the assessment work to date has demonstrated that complete avoidance of harm is unlikely to be possible for any new Aboriginal cultural heritage values that are encountered as part of this ongoing process. However, the CHMP process and the implementation of the EPRs, subject to the IAC's recommended amendments, will ensure that effects on tangible and intangible cultural heritage values would be appropriately managed and acceptable.

Assessment

It is my assessment that:

- The effects of the project on Aboriginal cultural heritage have been adequately assessed.
- Effects on tangible and intangible Aboriginal cultural heritage values will be appropriately managed through the CHMPs and the EPRs, subject to the IAC's recommended amendments, and are acceptable.
- The ongoing consultation and engagement process outlined in the EPRs will support advancing the CHMP assessments and enable effects on any new Aboriginal cultural heritage values to be appropriately managed as the project is further developed.

5.7. Historic heritage

Evaluation objective

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

Assessment context

Historic heritage effects are addressed in Chapter 10 and Technical Appendix C of the EES and in Section 5.3 of the IAC report. AusNet proposed four EPRs (HH1, HH2, HH3 and HH4) in the EES to manage effects on

historic heritage and three EPRs were the subject of recommendations by the IAC. Additional EPRs in the EMF will also assist in managing effects on historic heritage values such as EPR EM2, EPR EM11 and EPR T1.

The EES identified 62 historic heritage places or archaeological sites listed or registered in the study area, including both statutory and non-statutory lists and registers. A total of 90 individual, previously unregistered or unidentified, potential historic heritage places (including archaeological sites) were also identified within the study area. EES investigations led to five archaeological sites being added to the Victorian Heritage Inventory (VHI).

The EES identified a range of historic heritage values in the study area, including archaeological sites such as former gold mines and diggings as well as buildings and structures like historic homesteads, churches, residences, mills, bridges, military camp and dry-stone walls. Of the identified places of historic heritage value within the study area, 20 were assessed as potentially experiencing some form of impact from the project. This included two places (Pattinson/Lidgett Dairy, Korobeit and Settler Gravesites, Greendale) that were assessed as having the potential to experience severe impacts.

The EES indicated that physical impacts to all identified places of historic heritage value would be managed through the EPRs and residual impacts would be low or nil. Construction activities were identified to pose the greatest risk of potential physical and visual impacts to identified historic heritage places. The potential for discovery of previously unidentified historical archaeological sites was also identified as a risk.

The EES found that operation and decommissioning are not expected to result in physical impacts beyond those experienced during construction with a low likelihood of encountering previously unidentified historical archaeological sites during these phases of the project.

The EES found that visual impacts on significant historic heritage places would be low during construction and operation. During decommissioning, areas previously affected by the project would be returned to their original condition and any visual impacts would be removed.

As the project intersects the Berry Deep Leads Mining Landscape, the EES included a significance and impact assessment of potential project impacts on this landscape. The Berry Deep Leads Mining Landscape is part of the Creswick and Deep Leads Landscape proposed through the United Nations Educational, Scientific and Cultural Organisation (UNESCO) serial nomination of the Victorian Goldfields to the World Heritage List. A Tentative Listing for this landscape was established in January 2025 and the earliest a decision could be made on the World Heritage Listing outcome is mid-2030. This process has been a collaborative partnership between local governments, TO groups, the Victorian and Commonwealth Governments and world heritage experts. The area is densely populated with mining sites which date back to the 1870s and represents one of the most extensive, coherent and best surviving 19th century global gold rush landscapes in the world. Some sites within the mining landscape are individually included on the Victorian Heritage Register (VHR), VHI and Hepburn Shire heritage overlay. The EES found that although the project would be a highly prominent visual addition to the landscape, it would not have a detrimental physical or visual impact on the significance or the understanding of the landscape from a historic heritage perspective.

The EES concluded that the project would not contribute to cumulative impacts to the significance, setting or archaeological values of any of the historic heritage places, landscapes or archaeological sites.

Discussion

Key matters relating to the assessment of historic heritage effects examined by the IAC were:

- appropriateness of the methodology used to assess heritage impacts (section 5.3 of the IAC report);
- acceptability of the visual impacts on heritage places and the appropriateness of the assessment (section 5.3 of the IAC report); and
- acceptability of impacts on specific heritage places and landscapes (section 5.3 of the IAC report).

Adequacy of assessment methodology

Submitters raised concerns about what they saw as the limitations of the historic heritage assessment in the EES, including that the assessment relied too heavily upon desktop investigations and did not site survey all identified historic heritage places. The IAC considered that, while site visits are a valuable assessment tool, they are not always necessary, practical or possible (section 5.3 (v) of the IAC report). The IAC noted that site visits had been attempted for all significant heritage sites and that, where site visits were not undertaken, the assessment had involved a comprehensive desktop assessment which utilised a range of source material. The IAC acknowledged many archaeological sites had not been inspected but was satisfied that the historic heritage assessment contained an appropriate analysis of archaeological value and place history for archaeological sites. The IAC noted that because of the EES assessment, five new sites were listed on the VHI, and consent will be required from Heritage Victoria before any disturbance to these sites could occur. The IAC considered that this would ensure that any archaeological material discovered during project works will be appropriately managed (section 5.3 (v) of the IAC report). I agree with this finding.

The IAC was ultimately satisfied that the methodology used was appropriate and proportionate to the potential historic heritage impacts and stage of the project (section 5.3 (v) of the IAC report). I agree with this finding.

Visual impacts on historic heritage places

Submitters raised concerns regarding the potential visual impacts of the project on many historic heritage places. Hepburn Council[110] and community submitters raised concerns that the project would pass directly over and interrupt views of Kerrins Bridge, a bluestone bridge over Birch Creek that is included in the Hepburn heritage overlay. Melton City Council[111] submitted that the project would be visible from and have an intrusive visual impact on Melton Park, a house on the Melton heritage overlay. Several avenues of honour and memorial plantings were also brought to the attention of the IAC, including the Kingston Avenue of Honour, which is listed on the VHR.

The IAC acknowledged that the project would introduce a visual change to the setting of many of these heritage places. The IAC found that there was a lack of evidence to support that any of these heritage places were designed around particular visual considerations that would be unable to accommodate visual change without destroying the understanding of the place's historical significance. The IAC found that, from a heritage perspective, the visual impacts of the project would be low (section 5.3 (v) of the IAC report). I agree with this finding.

While the IAC did not make a specific finding on whether visual impacts on historic heritage places had been appropriately assessed the IAC observed that the historic heritage assessment had appropriately applied the concept of 'setting' and recognised the relationship between visual impacts and the design of a heritage place and its setting I agree with this observation.

Berry Deep Leads Mining Landscape

The EES found that the project would introduce large and visually prominent structures across the Berry Deep Leads Mining Landscape but that overall, the project would not have a detrimental effect on the significance or understanding of the landscape from a historic heritage perspective. The IAC heard from several submitters, including Hepburn Council[112], that project impacts on the Berry Deep Leads Mining Landscape

[110] Tabled document 381

[111] Submission 260

[112] Tabled document 381

could threaten the bid for permanent UNESCO World Heritage Listing of the Victorian Goldfields. The IAC considered that the Berry Deep Leads Mining Landscape was one of six geographically distinct landscapes that form part of the bid and the only one to be impacted by the project. The IAC noted that the project would introduce visual change to the Berry Deep Leads Mining Landscape but highlighted that visibility of the project alone was not sufficient to demonstrate a heritage impact. The IAC also noted that visual impact depends on the degree to which the project would disturb the understanding of the cultural landscape or the setting of a heritage place, where that setting contributes to the place's historical significance. The IAC noted that the Berry Deep Leads Mining Landscape was not consciously designed with regard to its visual setting, but rather by the location of the remnant mining infrastructure and mullock heaps which reflect where the resource was located.

The IAC found that, while the project would introduce significant visual change to parts of the mining landscape, it would not significantly compromise the understanding of the landscape, the relationship between various elements within the landscape, or the heritage values within it (section 5.3 (v) of the IAC report). I agree with this finding.

The final boundaries for each of the six components that contribute to the Victorian Goldfields cultural landscape and the elements that contribute to the historic heritage value of the cultural landscapes are subject to formal definition and may vary from what was recognised in the Tentative Listing. Given this, close communication and engagement between AusNet and Heritage Victoria will be vital to ensuring that any potential impacts to the cultural landscape are appropriately avoided (where possible) and managed. While EPR HH1 includes commitments to design and construct the project to avoid and minimise impacts on heritage, in consultation with the landholder and relevant statutory authorities, in light of the potential significance of this cultural landscape I recommend that EPR HH1 be amended to specifically require close ongoing engagement with Heritage Victoria regarding this matter.

Some submitters criticised the EES's assessment of potential impacts to the Berry Deep Leads Mining Landscape, contending that the study area should have included all elements in the master plan prepared in support of the UNESCO World Heritage Listing bid. AusNet's peer reviewer (Ms Gray[113]) found that the EES had appropriately assessed impacts to the Berry Deep Leeds Mining Landscape as a cultural landscape and that the assessment had aligned with the approach taken in World Heritage Tentative Listing documentation as a serial listing. The IAC found that the study area used for the assessment was sufficient to form an understanding of the cultural and heritage significance of the landscape and noted that it had included all critical elements that contribute to the landscape. I agree with this finding.

Physical impacts on historic heritage places

Construction of the project may result in physical impacts to places of historic heritage value. Several submitters raised concerns about potential construction-related impacts on Kerrins Bridge, located in the Bullarook Streamside Reserve in Kingston, Seven Hills Estate Field Tile Drainage System near Allendale and potential damage to the Kingston Avenue of Honour.

The IAC found that physical impacts to heritage places during project construction needed to be carefully managed, particularly for Kerrins Bridge and the Kingston Avenue of Honour. The IAC was satisfied that EPR HH1, EPR HH4 and EPR HH5 establish an appropriate framework for managing any physical impacts of construction (section 5.3 (v) of the IAC report). I agree with these findings.

Many submitters also raised concerns about the project's proposed removal of the Algerian Oak located in Bullarook Creek Streamside Reserve, a tree highly valued by the local community and included on the

[113] Tabled document 56

National Trust Register of Significant Trees. In response to concerns, AusNet tabled two design options[114] under consideration to avoid removal or pruning of the tree. These included an option to move the transmission line to the north and an option to increase the height of towers on either side of the tree. AusNet noted a preference for the second option as this would avoid introducing a tower onto a landholder's property and reduce other potential impacts on nearby dwellings. Notwithstanding this, AusNet recommended that stakeholders and other affected landholders be consulted to understand their views prior to committing to a modification of the project design.

While the IAC acknowledged that the tree is valued by the local community, it accepted evidence by AusNet's expert witness (Mr Zweep[115]) that it does not have significant historic heritage value. Given this, the IAC found that project modification to avoid impacting the tree was not necessary but noted that AusNet may still choose to avoid the tree through one of the options proposed (section 5.3 (iv) of the IAC report). I agree with this finding but note that any change to the project must not result in an increase in effects on other values.

Project construction may impact on a localised part of the Seven Hills Estate Field Tile Drainage System. This site was nominated and listed on the VHI during EES preparation and would require consent under the Heritage Act before any disturbance could occur. The IAC received written evidence of heritage advisor Mr Clarke[116] on behalf of a community submitter, who contended that avoidance of the tile drainage system should be the priority and if avoidance could not be achieved, further assessment and investigations should be undertaken before works commence. The IAC also received evidence from Mr Zweep that any impact on the drainage system, if it occurred, would be limited.

The IAC considered that it was likely that the project would damage or even destroy part of the tile drainage system but found that the impacts would be localised and a significant proportion of the system would not be physically impacted. In this context, it found that the heritage value of the system was not so high as to require avoidance via re-routing of the project. The IAC concluded that EPR HH1, EPR HH4 and EPR HH5 would provide an appropriate framework for managing any physical impacts during construction. The IAC was also satisfied that the consent process required under the Heritage Act would ensure that impacts to the heritage value of the place are appropriately managed. I agree with these findings. The IAC also noted that the new commitment proposed by AusNet during the hearing to manage and repair any damage to historical built heritage places through EPR HH5 in consultation with the landholder, would enable the existing functionality of the system to be maintained. While I support EPR HH5, I note that it will not assist in managing impacts on the heritage values of the tile drainage system arising from the loss of part of the system due to project works. It may, however, enable the functionality of the drainage system to be maintained in consultation with the landholder. Several councils also proposed changes to EPRs during the IAC hearing[117] to provide greater clarity on consultation requirements, custodianship of archival records and pre-construction surveys. The IAC recommended changes to EPR HH1, EPR HH2 and EPR HH5 to reflect these concerns. Otherwise, the IAC concluded that the EPRs provide an appropriate framework to manage any physical impacts to historic heritage places (section 5.3 (v) of the IAC report). I agree with the addition of EPR HH5 by AusNet and the IAC's recommended amendments to EPR HH1, EPR HH4 and EPR HH5.

Overall, the IAC found that, while physical effects during construction would need to be carefully managed through the EPRs, the residual physical effects of the project on historic heritage during construction were acceptable (section 5.4 of the IAC report). I agree with this finding.

[114] TN014, Tabled Document 367

[115] Tabled document 111

[116] Tabled document 153

[117] Tabled document 595

Assessment

It is my assessment that:

- The methodology of the historic heritage impact assessment was appropriate.
- Visual effects on historic heritage places were appropriately assessed.
- Visual and physical impacts on historic heritage places and values will be appropriately managed through the EPRs, subject to the implementation of the amendments recommended by the IAC and this assessment, and via the consent process under the Heritage Act.
- The likely effects of the project on historic heritage values are acceptable.

5.8. Land use and planning

Evaluation objective

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.

Assessment context

Land use and planning effects are addressed in Chapter 12 and Technical Appendix E of the EES, in the draft PSA documents in Attachment III of the EES and in Section 7 of the IAC Report. AusNet has proposed two EPRs to deal with land use and planning impacts (EPR LU1 and LU2). The IAC did not recommend any changes to the exhibited EPRs related to land use and planning.

The project is proposed on land within six municipalities (Northern Grampians, Pyrenees, Ballarat, Hepburn, Moorabool and Melton) and is subject to the provisions of the respective planning schemes. The EES characterised the project area and surrounds as grazing, cropping, horticulture and forestry (including plantations and native forestry) land uses, on both freehold and Crown land. 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 co-located with an existing 220kv transmission line.

The EES identified the main land use effects of the project as:

- The acquisition of land or severance of properties due to the establishment of an easement and its conditions that limit use has the potential to change how the land or part of the land is used;
- Occupation and access of land to undertake construction activities that restrict land use or limit access to land temporarily; and
- Construction activities and permanent infrastructure that potentially results in changes to the amenity of the land, including changes to amenity due to windblown dust, noise and visual impacts.

The EES identified that, during construction of the transmission line, temporary land use impacts would generally be confined to the proposed easement, although impacts may also occur where project components occur outside the proposed easement (i.e., access tracks, stringing pads, distribution crossovers, hurdles, laydown areas and workforce accommodation facilities).

The EES identified that impacts during the operations stage will be associated with the limitations on land use activities, the effect of the project's built form and the requirements for maintenance of the transmission towers, easement, terminal stations, and access tracks. Laydown areas, workforce accommodation facilities, and stringing pads will no longer be required and works associated with assembly areas and distribution line crossovers will be complete.

The project has broad strategic support with regards to state, regional and local planning policies, strategies and plans. However, a key challenge for the project is balancing energy-related policies with other planning

policies in the context of integrated decision making. The IAC identified that the proposed land uses in some areas are more likely to be impacted than others, including areas of productive agricultural land and areas of high landscape value. My findings on the potential agricultural land use effects are considered in Section 5.2 of this assessment and Section 5.3 for landscape and visual land use impacts.

Discussion

The key issues in my assessment are whether:

- the project is broadly consistent with the relevant planning policy (sections 7.2 and 7.3 of the IAC report);
- the project effects on existing land uses are reasonable and acceptable (sections 7.2 and 7.3 of the IAC report); and,
- there will be unreasonably impacts on potential future land uses (section 7.2 of the IAC report).

Consistency with planning policy

As set out in Clause 71.02-3 (integrated decision making) *Victorians have various needs and expectations such as land for settlement, protection of the environment, economic wellbeing, various social needs, proper management of resources and infrastructure. Planning aims to meet the needs and expectations by addressing aspects of economic, environmental and social wellbeing affected by land use and development.*

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.

Integrated decision making has formed the basis of this assessment however I do not consider the issue of net community benefit in this section. This will be a matter for consideration under the Planning and Environment Act, in relation to whether or not to prepare, adopt and approve draft PSA GC209.

The relevant objectives of planning in Victoria, as specified in the P&E Act, seek to:

- provide for the fair, orderly, economic and sustainable use, and development of land;
- provide for the protection of natural and man-made resources and the maintenance of ecological processes and genetic diversity;
- secure a pleasant, efficient and safe working, living and recreational environment for all Victorians and visitors to Victoria;
- conserve and enhance those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value; and
- balance the present and future interests of all Victorians.

These objectives have informed the VPPs and the planning policy framework of the six planning schemes. All decision making under the P&E Act must support these objectives.

The EES stated the project is largely consistent with the planning policies and provisions contained in the Planning Policy Framework including Clause 11 (Settlement), Clause 12 (Environmental and Landscape Values), Clause 13 (Environmental risks and amenity), Clause 14 (Natural Resource Management), Clause 15 (Built Environment and Heritage), Clause 16 (Housing), Clause 17 (Economic Development), Clause 18 (Transport) and Clause 19 (Infrastructure).

The EES states the overarching policy driver for the project is Clauses 19.01-1S (Energy supply), 19.01-2S (Renewable Energy) and 19.01-2R (Renewable energy – Wimmera Southern Mallee). These polices seek to

facilitate the delivery of transmission infrastructure to increase electricity transmission capacity and enable further development of renewable energy generation.

The EES identifies that approximately 90 per cent of all land within the project area is located within a rural zone which includes the Farming Zone, Rural Conservation Zone, Rural Living Zone and Green Wedge Zone. Typically, these zones accommodate land that is used for agricultural production, and to a small degree is also used for dwellings associated with farms, and other non-farming activities such as extractive industry. The remaining 10 per cent of all land is located within land zoned for public purposes, special purpose zones and residential zones, which typically accommodate public reserves, water reservoirs, terminal stations, roads and other public uses.

The EES found that the use of land for utility installations is considered a compatible use with agricultural land under state, regional and local planning policy, including the applicable rural zones. The EES stated that cropping and grazing, market gardens, orchards and horticultural nurseries, water storage (subject to land clearance) and the operation of irrigation equipment can continue within the proposed easement and around the transmission towers. Ground growing crops can grow within 5m of the towers subject to AusNet permission and provided access for maintenance works is maintained. There are restrictions, however, on some of the practices associated with agricultural use that may impact farming but not prevent this land use from continuing if other alternatives are supported.

None of the planning overlays along the alignment prohibit the project's use and development of land, however, several of the overlays seek to identify and protect the environmental landscape. These include the Environmental Significance Overlay (ESO) in Pyrenees, Hepburn and Moorabool. The proposed route also crosses various ESOs applied to waterways. Notably, the proposed route traverses areas north of Darley which are subject to a DDO and SLO which seek to minimise the impacts of development on the scenic hilltops and ridgeline areas.

Submitters noted the broad policy support for agriculture, with some submitting the project's impacts on agriculture were not consistent with the objectives of the P&E Act, VPP clause 14.01 (Agriculture) and local agriculture policies and strategies. Councils also highlighted the extensive planning scheme support for protecting productive agricultural land at the state, regional and local levels, referring to several municipal strategies within the planning schemes which note the agricultural productivity of the region, its role as a food bowl and its contribution to food security.

The IAC noted that there is strong legislative and policy support for renewable energy and for the project, although this support needs to be balanced against competing planning objectives, which generally relate to the protection of productive agricultural land and the impacts of the project to areas of high landscape value.

The IAC concluded that the project is largely consistent with State and local planning policy in the project area and surrounds, provided its numerous recommendations are applied. Notably, the IAC found that the losses to productive agricultural land would not be significant in the state or regional contexts; however, they would be significant in the local context and therefore would not achieve the overarching planning objective of preserving farmland (section 10.3 (iv) of the IAC report). I note the IAC found that this failure did not mean that the project would not produce a net community benefit. This is discussed in greater detail in Section 6.3 of this report. The IAC found that, except in the Darely area, the project met the policy directive to prioritise human life above all other considerations (section 16.3 of the IAC report). I address the Darley area in further detail at section 6.1 of my assessment where I conclude that any increase in bushfire risk associated with the project is small and incremental. Consistent with the IAC's finding that the bushfire policy directive does not automatically mean that any increase in bushfire risk is unacceptable, I am satisfied that, notwithstanding this small increase in risk and subject to the adoption of the EPRs and EMF as recommended in this assessment, the project is consistent with the bushfire policy directive along its whole length. The IAC found that the project would be inconsistent with the policy objective at 18.02-7S, regarding the protection of airports for nearby development, because it had the potential to impact on the viability of the aerodrome by

constraining potential future expansion and potentially deterring usage by trainee and less experienced pilots (section 11.3 of the IAC report). However, these are expressed in future possible terms, rather than a concrete finding of a negative impact on current use. The land use impacts associated with the Melton Aerodrome are discussed further in Section 5.9 of this assessment.

The VPPs direct decision makers to integrate planning policies relevant to the issues to be determined and balance conflicting objectives in favour of net community benefit and sustainable development. This does not include bushfire affected areas where planning and decision makers must prioritise the protection of human life over all other policy considerations. Having considered the objectives of the VPPs and acknowledging the impacts on agricultural land, I am satisfied that the proposed use of land along the alignment is acceptable as the project is generally consistent with relevant policy and legislation associated with energy supply and renewable energy within the VPPs. The IAC considered that, with some exceptions, the project was generally consistent with state and local planning policy and applicable zoning. Provided the recommendations of this assessment are implemented, this assessment supports the conclusion that the project is generally consistent with applicable zones and overlays along the alignment, including the overlays related to the protection of significant landscapes. While net community benefit will be considered further as a part of decision making under the P&E Act for the project, it is noted that at a project level the IAC was satisfied that the project would deliver a net community benefit.

Effects on existing and future land uses

The EES identified the acquisition of land or severance of properties due to the establishment of an easement and its conditions that limit use has the potential to change how the land or part of the land is used. It also identified potential impacts of the project construction, operation, and decommissioning including the extent, magnitude and duration of changes to land use, access and amenity.

The IAC found 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 (section 7.2(iv) of the IAC report). I accept that land uses in some areas are more likely to be impacted than others, including areas of productive agricultural land and areas of high landscape value.

The EES concluded that despite some limitations on the use of land, particularly agricultural land, the use of land for a utility installation is considered a compatible use with farming land under state, regional and local planning policy. The development of the transmission line towers on large parcels of agricultural land has been a preference for route design to allow greatest flexibility, if needed, to address potential localised impacts. The proposed route has been located along property boundaries where possible to minimise disruption to the current use of the land and to prevent the severing or separation of large agricultural land parcels that support extensive farming operations.

I understand that the project will impact on some agricultural land along the proposed route by restricting the activities that can be undertaken on any part of the land affected by the easement. Given that the substantive (agricultural) use of the land along the proposed route will be retained, and impacts are confined to a limited number of activities, it is my assessment that these impacts are acceptable.

Assessment

It is my assessment that:

- Subject to my findings regarding impacts at Darley which are discussed in section 6.1 of this assessment, the project is generally consistent with strategic land use and planning policies, which seek to facilitate energy supply infrastructure in Victoria.
- The loss of agricultural land would be significant at a local level but not at a State or regional level.
- The proposed land use is compatible with the use of the land along the alignment for agricultural purposes.

- Project infrastructure has been appropriately sited to avoid and minimise adverse effects on land use noting there is scope for further reductions of impacts through the micro-siting condition of the Incorporated Document.
- Subject to changes to EPR EC3, which is considered below, the project will not unreasonably impact the development of future projects in the region.
- The residual land use planning effects of the project, as addressed in the preceding sections of this report, can be appropriately managed through the provisions of the Incorporated Document and the EPRs contained within the EMF.

5.9. Other effects

As noted in my published reasons for requiring an EES, the EES was to focus on potentially significant effects of the project, including those related to alternatives, on biodiversity, Aboriginal and historic cultural heritage values, visual and landscape values and on land uses and the community. The EES, submissions, IAC report and supplementary information carefully examined these potential effects. These effects are considered in sections 5.1 to 5.8 of this assessment.

Other effects of the project that the EES found to be more localised and less significant are discussed below. These effects are air quality, aviation, contaminated land, electromagnetic interference (EMI) and electric and magnetic fields, geology and soils, greenhouse gas and climate change, groundwater, noise and vibration, surface water and transport.

Table 5-9 outlines the IAC's findings about these other effects and discusses their significance, the proposed EMF and management controls. This assessment supports the findings of the EES and the IAC in relation to these effects and consider that they can be effectively managed to acceptable levels through well-established practices including those committed to in the EPRs.

Table 5-9: Other effects

EES IAC findings and recommendations	Assessment
Air quality (EES Chapter 18 and Technical Appendix I; IAC Report section 14.5) The project has the potential to affect air quality through dust from earthworks and stockpiles and combustion engine exhausts. The EES concluded that approximately 30 residences located within 100 m of the transmission line, with many located downwind considering prevailing local winds, were most susceptible to experiencing dust impacts from project construction. Allendale to Sydenham was considered more sensitive than Bulgana to Allendale due to a higher density of nearby residences. Mitigation measures required by the EPRs would reduce residual dust impacts at all residences to low. Less soil disturbance during project operation would result in minor residual impacts. Residual impacts from other air emissions, such as combustion engine exhausts, were negligible. The IAC was satisfied that air quality impacts had been assessed appropriately (section 14.5 (vi) of the IAC's report). The IAC was satisfied that the risks associated with construction activities were well understood, and that commonly used mitigation	I agree with the IAC's findings.

EES IAC findings and recommendations	Assessment
measures required by the EPRs were proven to be effective. Further, it considered that the EPRs are consistent with the General Environmental Duty under the *Environment Protection Act 2017*. The IAC considered that construction activities at all locations apart from the terminal stations would be of short duration and dust monitoring would provide evidence of air quality performance The IAC did not support provision of real time air quality data because there were other mechanisms under the EMF to review the air quality data and report on environmental performance. The IAC considered that dust impacts can be managed to avoid health impacts and that the EMF will appropriately avoid and minimise air quality impacts (section 14.5 (vi) of the IAC's report).	
Aviation (EES Chapter 16 and Technical Appendix J; IAC report Section 11) The project has the potential to interfere with aviation through encroachment of airspace by project infrastructure, particularly near aerodromes, and use of helicopters for project construction and maintenance activities. The EES concluded that sections of the proposed route would be near protected airspace and helicopters may need to fly in Melbourne Airport's protected airspace during construction of nearby towers. The project could impact authorised low-flying activities and operations from the certified Melbourne Airport and uncertified Melton Aerodrome. While flight adjustments may be required for the project, the EES found that residual impacts on aviation values were minor to negligible apart from Melton Aerodrome, where they were moderate during project construction. Melton Air Services submitted that, due to impacts of the project on Melton Aerodrome operations, including the risk of wire strike, its commercial viability would be impacted, and undergrounding of the transmission line was sought. The IAC was satisfied with the aviation impact assessment. The IAC found that impacts on low flying activities and on certified and uncertified aerodromes would not be significant and would be avoided, respectively, subject to notifications to Airservices Australia (EPR AV1) and proposed tower heights near Melbourne Airport, except for impacts on Melton Aerodrome. The IAC was satisfied that the project would not have a significant impact on the operation of approved runways noting that submissions were mainly about project impacts on a current unapproved runway	I agree with the IAC's findings and the IAC's proposed changes to EPR EC3.

EES IAC findings and recommendations	Assessment
(section 11.3(v) of the IAC's report). The IAC acknowledged general concerns about safety risks in some circumstances while noting that pilots would be responsible for informing themselves about hazards and responding accordingly. The IAC found that the project could potentially affect viability of Melton Aerodrome due to constraints on its future development, including runway expansion and possible reduced use of the aerodrome for training (section 11.3 (vi) of the IAC's report). The IAC considered this would be inconsistent with State Planning Policy Condition 18.02-7S (Airports and airfields) of the Melton Planning Scheme and recommended an addition to EPR EC3 so that it applies to businesses that operate out of the Melton Aerodrome (section 11.3 (vi) of the IAC's report). The IAC was satisfied the project impacts in the Toolern Vale and Melton Aerodrome area do not warrant undergrounding. The IAC considered that obstacle lighting was justified around Melton Aerodrome (EPR AV2) but that the evidence did not support obstacle lighting at all towers.	
Contaminated land (EES Chapter 23 and Technical Appendix R; IAC report section 14.4) Disturbance of contaminated soil or rock, or acid sulfate soils and dewatering near these materials has the potential to harm human health and the environment. Accidental spills of chemicals can contaminate soil, rock and groundwater. The EES concluded that project design had avoided areas with high potential for contamination, such as historical gold mines, quarries and landfills, and that acid sulfate soils may be encountered at isolated waterbodies northwest and east of Ballarat. Contaminated land investigations where earthworks and dewatering are planned and sampling of excavated soil will inform project design (EPR CL1). In addition, implementation of contaminated land mitigation measures (EPR CL2), a contingency and unexpected finds plan (EPR CL2) and a spoil management plan (EPR CL3) will reduce residual impacts to negligible. Procedures for managing project chemicals, fuels and hazardous substances and contingency measures (EPR EM6) will reduce residual impacts from accidental spills to negligible. The IAC was satisfied that the contaminated land impact assessment was adequate (section 14.4 (vi) of the IAC's report).	I agree with the IAC's findings and the IAC's proposed changes to EPR GSL1 (see 'Geology and soils' below) on the basis that it will address the requirements of EPR CL1 for a soil contamination assessment in areas of planned ground disturbance prior to any earthworks.

EES IAC findings and recommendations	Assessment
The IAC was satisfied that the presence of a transmission line would not be considered relevant for landholders seeking to gain accreditation under the Livestock Production Assurance Integrity. The IAC considered that the risks of contamination from chemical spills, imported materials and mining wastes would be appropriately managed. The IAC found the EMF would appropriately avoid and minimise contamination impacts (section 14.4 (vi) of the IAC's report).	
EMI and electric and magnetic fields (EES Chapter 17 and Technical Appendix L; IAC report section 14.6) Electric and magnetic fields surround transmission lines and have the potential to impact nearby receptors sensitive to electric and magnetic fields and create EMI. Sensitive receptors can include hospital and medical centre equipment, point-to-point radio communications equipment, electrical/electronic equipment, animals and humans. The EES concluded that electrification of the transmission line during project operation would cause electric and magnetic field emissions below project limits for protection of human and animal health under the transmission line. For sensitive medical and research receptors, residual impacts of electric and magnetic fields were negligible. The EES concluded that EMI emissions during project operation would cause minor residual impacts on AM and FM radio and emergency services radio reception when raining. Residual impacts of EMI on TV, point-to-point communication links, global positioning system (GPS) and mobile phone and WiFi reception would be negligible. Differential GPS correction signals for land navigation would experience a minor residual EMI impact directly under the proposed transmission line in heavy rain. EPR EL1 requires a verification assessment to inform detailed design and pre- and post-construction testing to reduce impacts to as low as reasonably practicable to avoid and minimise impacts. The IAC was satisfied with the EMI and electric and magnetic fields impact assessment (section 14.6 (vi) of the IAC's report). The IAC accepted evidence that project electric and magnetic fields would be safe for people with active implantable medical devices (such as pacemakers). The IAC accepted that bee hives should not be placed at the low point under transmission lines. The IAC accepted evidence that a momentary loss of GPS signal due to EMI directly under a transmission line during heavy rain would not compromise the function of autonomous plant or equipment.	I agree with the IAC's findings.

EES IAC findings and recommendations	Assessment
The IAC found that the EMF would appropriately avoid and minimise impacts from electric and magnetic fields and EMI (section 14.6 (vi) of the IAC's report).	
Geology and soils (EES Chapter 22 and Technical Appendix Q; IAC report section 14.3) Geology along the proposed route influences landscape topography, soils and drainage. Construction and operation of the transmission line has the potential to cause erosion, sedimentation and land productivity issues and affect land stability. Scientific geological values may also require protection. The EES concluded that project design has sought to avoid steep slopes, unstable ground conditions and geologically significant sites and minimised soil disturbance. Prior to construction, surveys to identify erodible/dispersive, reactive or saline soils and detailed design responses including avoidance (EPR GSL1) will reduce residual impacts to low, negligible and low respectively. Similarly, compressible soils near creeks and rivers, and hills, ridgelines and steep side-slopes susceptible to slope instability will be avoided or designed for (EPR GSL1) to achieve negligible and minor residual impacts, respectively. Inspections during project operation will identify any erosion and land stability issues and these will be remediated (EPR GSL3). Numerous geologically significant sites were identified in the study area, with the proposed route passing close to Mount Beckworth and Hepburn Lagoon. Such sites will be avoided where practicable (EPR GS1) and, where access has been provided to these sites, safe access will be maintained (EPR GS4) to reduce residual impacts to negligible. The IAC noted landholder concerns about soil compaction and supported EPR GSL2, which acknowledges the need to avoid and minimise soil compaction. The IAC recommended revisions to EPR GSL1 to include soil site investigations in addition to geotechnical investigations (Appendix E2 of the IAC's report). The IAC was satisfied with the geology and soils impact assessment. It was further satisfied that the EMF provides for geological and erosion impacts to be acceptably managed using well-established measures and through careful consideration of erodible, dispersive and compressible soils and construction on slopes (section 14.3 (vi) of the IAC's report).	I agree with the IAC's findings and the IAC's proposed changes to EPR GSL1 on the basis that it will address the requirements of EPR CL1 for a soil contamination assessment in areas of planned ground disturbance prior to any earthworks.

EES IAC findings and recommendations	Assessment
Greenhouse gas (EES Chapter 26 and Technical Appendix M; IAC report section 14.8) **and climate change** (EES Chapter 28 and Technical Appendix N; IAC report section 14.8) The climate is projected to continue changing due to elevated greenhouse gas emissions in the atmosphere. Greenhouse gas emissions from project construction and operation need to be considered in the context of targets designed to reduce and mitigate these emissions. The project will also support transition towards increased renewable energy generation, and with it, reduced greenhouse gas emissions in the future. The EES concluded that generating a total of 464 kilotonnes of CO_{2e} (Scope 1 and 2 emissions) from project construction was a moderate residual impact (0.3 percent per construction year of Victoria's greenhouse gas emissions). Residual impacts from project operation would initially be moderate and decrease to minor (0.03 to 0.01 percent of Victoria's emissions). In addition to well-established measures for protecting construction from extreme climatic events, a climate change risk assessment will inform project design (EPR CC1) with five-yearly reviews to protect project performance (EPR CC2), especially from extreme heat. The IAC was satisfied with the greenhouse gas and climate change assessments and found that the project was consistent with renewable energy policies and will assist in reducing overall greenhouse gas emissions and addressing climate change issues (section 14.8 (vi) of the IAC's report). The IAC supported the proposed EPRs for reducing the project's greenhouse gas emissions and addressing climate change issues. However, it recommended a change to EPR SG2 to make it more proactive in implementing environmentally sustainable design (section 14.8 (vi) of the IAC's report).	I agree with the IAC's findings and its recommendation to change EPR SG2.
Groundwater (EES Chapter 24 and Technical Appendix S; IAC report section 14.1) The project has the potential to impact groundwater where earthworks and infrastructure will be below the water table. Groundwater values include habitat, heritage and domestic, agricultural and industrial uses. The EES concluded that groundwater could be present within 10 m of the surface over almost half the study area with transmission tower, distribution line crossover and terminal station earthworks potentially intercepting the water table. Transmission tower earthworks typically reach a depth of approximately 9 m. Dewatering would generally not be required during construction, but for those towers, trenching or terminal station sites where it is required for a	I agree with the IAC's findings.

EES IAC findings and recommendations	Assessment
short period, a groundwater management plan (EPR GW2) would reduce residual impacts on groundwater levels and flows to a negligible level. The risk of contaminating groundwater can be managed through EPR GW2 with residual impacts being reduced to a negligible level. Direct physical impact to existing groundwater bores will be avoided where practicable through careful siting of transmission towers and terminal stations, alignment of trenched distribution line crossovers, with negligible residual impacts. Where bores cannot be avoided, they may need to be abandoned and replaced in agreement with the landholder or compensated for, with minor residual impacts. The IAC considered that, where works may compromise a groundwater bore, replacement of that bore or compensation would be consistent with EPR GW1(c) or AusNet's 'Landholder Guide: Option for Easement Process, Compensation and Benefits', respectively. If dewatering is needed for towers or trenching within 50 m of a groundwater dependent ecosystem, then EPR GW1 and EPR GW2 would reduce residual impacts to a negligible level. During operations, the EES found the small scale of foundations would cause negligible residual impacts on groundwater recharge and storage capacity. Three sections of the easement where vegetation removal could cause increased groundwater levels comprised minor and undetectable impacts. The IAC was satisfied with the groundwater impact assessment (section 14.1 (vi) of the IAC's report). The desktop assessment was considered adequate given publicly available information and provision for monitoring by EPR GW1. The IAC concluded that the EMF appropriately avoids and minimises impacts on groundwater (section 14.1 (vi) of the IAC's report).	
Noise and vibration (EES Chapter 19 and Technical Appendix O; IAC report section 14.7) Construction of the transmission line has the greatest potential to generate noise and vibration impacts on nearby sensitive receivers such as people in residences and community infrastructure. The EES concluded that installation of transmission towers would take 9 to 22 weeks over a 2-year period with elevated noise for most nearby residents during this time (up to 65 dB L_{Aeq}), which is comparable to living adjacent to a busy road. Five residents would experience noise levels greater than 75dB L_{Aeq} , which is comparable to a neighbour renovating within 15 m. Residents along those sections where a helicopter is used for	I generally agree with the IAC's findings. Regarding the IAC's conclusion about offering respite where there are noise and vibration impacts, EPA Publication 1834.2 suggests that offers of respite should reflect transparent criteria and the level of impact. I agree with this approach and recommend that it is reflected in EPR NV4.

EES IAC findings and recommendations	Assessment
stringing lines or tower construction would experience the loudest noise for a few hours over several days. Longer term construction at terminal stations (20 months) and temporary workforce accommodation and laydown areas may be audible intermittently but would not be significantly higher than the existing ambient environment (except at six dwellings near the Lexton site where noise levels would reach between 46 and 50 dB_{Aeq}) with minor residual impacts. Residual noise impacts due to construction traffic would be minor. Residual construction vibration impacts would be minor. Residual noise impacts of operating project terminal stations and the transmission line would be minor. The IAC was satisfied with the noise and vibration impact assessment (section 14.7 (vi) of the IAC's report). The IAC considered that offering respite where works may cause a noise or vibration impact would be consistent with EPA Publication 1834.2 and EPR NV1. The IAC accepted evidence that aeolian noise and corona noise will be minimised through proposed measures. The IAC did not support provision of real time noise data because there were other mechanisms under the EMF to review the noise data and report on environmental performance. The IAC was satisfied that the EMF will appropriately avoid and minimise noise and vibration impacts (section 14.7 (vi) of the IAC's report).	
Surface water (EES Chapter 25 and Technical Appendix T; IAC report section 14.2) The project could impact flows, flooding and water quality in creeks, rivers, dams, lakes and wetlands with associated values including habitat, heritage and recreational, domestic, agricultural and industrial uses. The EES concluded that project infrastructure would generally be set back (see EPR SW1) from waterways and water bodies to protect surface water banks and beds, flows and water quality. During construction, disturbed areas would include permanent and temporary waterway crossings (including an approximately 50 m long crossing of Lerderderg River) and access tracks and cleared areas for the temporary workforce accommodation facilities and laydown areas (including approximately 12 ha and 24 ha for Lexton and Ballan sites	I agree with the IAC's findings and its recommended amendments to condition 4.13 of the Incorporated Document and to EPR SW2.

EES IAC findings and recommendations	Assessment
respectively). These disturbed areas would cause minor residual impacts to beds and banks, flows and water quality. Project design will largely avoid flow and flooding impacts during project operation with residual impacts negligible. Cleared easement areas and permanent unsealed waterway crossings and access tracks located within minimum set back distances will be inspected and maintained to minimise impacts on water quality (EPR SW5). Residual impacts on surface water quality will be minor. Prior to construction, a surface water management plan is required by EPR SW2, including site-specific assessment and management and mitigation measures to protect beds and banks, flows and water quality. The IAC was satisfied with the surface water impact assessment (section 14.2 (vi) of the IAC's report). The IAC accepted that approvals may be required for wastewater infrastructure at the temporary workforce accommodation sites and considered that it should be considered during preparation of the Temporary Workforce Accommodation Plan (Condition 1.13 of the Incorporated Document). It recommended an amendment of the Incorporated Document Condition 4.13 (Temporary Workforce Accommodation Facilities) at Condition 4.13.2(c), which is considered in Section 4.1 of my assessment (section 14.2 (vi) of the IAC's report). The IAC was satisfied that landholder drainage matters will be appropriately addressed by the property access and management plan (EPR EM3). The IAC accepted that councils have a role in waterway management and drainage and recommended that EPR SW2 be amended to require consultation with councils to inform the surface water management plan (section 14.2 (vi) of the IAC's report). The IAC found that the EMF appropriately avoids and minimises impacts on surface waters (section 14.2 (vi) of the IAC's report).	
Transport (EES Chapter 20 and Technical Appendix P; IAC report Section 12) The EES concluded that most project traffic would be generated by transport of materials, equipment and labour during construction. AusNet proposed a construction transport route that could provide direct access from the Port of Melbourne, laydown areas and accommodation facilities to laydown areas and construction sites. The EES found that construction traffic would cause minor delays to traffic on the road and freight network. While the level of service projected for the Western Freeway between Ballan-Daylesford Road and	I agree with the IAC's findings.

EES IAC findings and recommendations	Assessment
Midland Highway would reduce, its rating would still be acceptable and roads with existing poor performance would not change significantly. The EES indicated that EPR T2 would ensure that degradation of local roads, bridges and major culverts by haulage and heavy vehicles would be short-term and reversible resulting in minor residual impacts. Minor residual safety impacts were found for schools, for users of active transport, for public transport and school buses, and at locations with severe crash histories. The IAC was satisfied that the traffic impact assessment was adequate to inform the EES and that further investigation and consultation with responsible road authorities will appropriately inform mitigation measures under transport management plans and dilapidation surveys (EPR T1 and EPR T2) (section 12.2 (v) of the IAC's report). The IAC did not agree with submitters that traffic management plans should have been exhibited as part of the EES (section 12.2 (v) of the IAC's report). The IAC was satisfied that potential damage to road infrastructure would be appropriately managed through the EMF and that any safety issues could be addressed through alternative routes or time restrictions for heavy vehicles. The IAC found that the EMF will manage transport impacts appropriately and residual impacts would not be significant (section 12.2 (v) of the IAC's report).	

6. Key matters and conclusions

6.1. Key Matters

This part of the document summarises some of the IAC's key findings and conclusions and provides my findings and assessment for some key matters and my overarching conclusions.

At an overall project level, the IAC found that the project would have many impacts, some of which would be significant, and that a number of these impacts – particularly biodiversity, landscape, social, and bushfire impacts – would remain significant even after the mitigation measures specified in the EMF were adopted (Executive Summary of the IAC report).

The IAC went on to say that, 'viewed in isolation', these residual impacts might be considered unacceptable. It acknowledged, however, that these impacts need to be weighed against the project's contribution to the achievement of climate change and renewable energy initiatives (Executive Summary of the IAC report). I agree that the assessment of the environmental effects of a proposed project requires consideration of both adverse impacts and benefits of those works.

The IAC found that, adopting this approach and adopting its preferred mitigation measures, the individual impacts of the project would be acceptable 'in most places' (Executive Summary of the IAC report).

The exception to the IAC's finding that the individual impacts would be acceptable in most places was its finding that in Darley, landscape, bushfire, social and potentially biodiversity impacts, would be unacceptable cumulatively (section 15.1 (iv) of the IAC report). Due to what the IAC viewed as unacceptable cumulative adverse impacts in the Darley area, the IAC considered that the proposed route between Korkuperrimul Creek to Gisborne Road required an alternative solution. Further the IAC recommended that "*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*" [118] (section 15.1 (iv) of the IAC report).

As set out in sections 5.1, 5.3-5.5, I agree with the IAC's findings that project impacts on some environmental values are likely to be significant, some very significant, in the Darley area. This is particularly so for impacts on some landscape and visual, biodiversity and social values. Bushfire risks also require careful management, particularly in the north of Darley where access and egress routes are already very limited and fuel loads in the surrounding area are high. While the EES applied measures to avoid, minimise and (in some cases) offset impacts and the IAC report and this assessment have recommended further such measures, some significant impacts are still expected.

However, a finding that the project has the potential for significant impacts does not mean that its impacts are unacceptable. On balance, it is my assessment that the project's impacts are acceptable both individually and cumulatively. My reasons are set out below.

The IAC recommended that AusNet should further investigate alternatives that avoid or better mitigate impacts in the Darley area due to what the IAC viewed as some significant and unacceptable impacts in this area (Executive Summary of the IAC report). While I consider that these impacts will be acceptable, I agree with the intent of the IAC's recommendation to sufficiently explore any feasible options in the Darley area that reduce likely significant effects and improve environmental outcomes, while achieving the objectives of the project. While this further investigation is not essential to arrive at conclusions on the acceptability of likely effects, this work could improve outcomes for an area of the project for which there are clear challenges to balance impacts and project outcomes. Therefore, sufficiently investigating what opportunities there are to

[118] WRL IAC report, 2026, p. 300

better manage and further reduce environmental risks in the Darley area, is important for this project and the community.

While Section 5 included my assessment of the different environmental effects of the project, below I explain why I have concluded that the impacts in Darley are on balance acceptable in the context of an integrated assessment. The key matters are:

- critical need for the state energy infrastructure;
- linear nature of the infrastructure and lack of feasible alternatives in Darley;
- significance and acceptability of the adverse effects relative to the likely project benefits; and
- acceptability of impacts in the Darley area.

Need for state energy infrastructure and acceptability of effects relative to the likely project benefits

A key objective of the project is to maintain the security and reliability of the transmission network by increasing electricity transmission capacity in western Victoria. The EES noted that additional transmission infrastructure including this project is essential to minimise network congestion constraining current and future electricity generation in Western Victoria. It is my assessment that the project is of critical importance to the development of a secure and reliable transmission network, in particular one that sustainably supports the transition to renewables and meets Victoria's growing energy needs. The likely environmental effects of the project need to be considered in the context of both their individual significance in relation to relevant policy and legislation, as well in the criticality of this infrastructure for the state.

Expanding the transmission network servicing the Western Victoria Renewable Energy Zone (REZ) will assist in facilitating the transition to renewables and achieving net zero emissions targets in Victoria. As noted by the IAC, the project will also generate economic benefits by facilitating a reliable electricity supply, securing investment and increasing employment, particularly during construction. While net community benefit will be considered further as a part of decision making under the P&E Act in relation to the project, this assessment needs to evaluate the overall significance and acceptability of likely adverse effects of the project, relative to likely project benefits. While the project will generate significant environmental effects in localised areas along the proposed route, including Darley, it will also generate very significant benefits for the Victorian community.

Linear nature of the infrastructure and lack of feasible alternatives in the Darley area

The EES noted that the area around Darley is highly constrained by existing built infrastructure and dwellings. The EES indicated that these constraints limit alternative overhead route options through the Darley area. The EES also noted that Darley has challenging terrain and the proposed route has sought to minimise impacts on key environmental values in and around this area by following the narrow area between Darley and the Wombat-Lerderderg National Park. The EES examined two alternative overhead routes through Darley and five potential partial underground routes. The EES found that the preferred route was favoured over the alternative overhead routes and that the five potential partial underground routes did not meet project objectives and were not feasible, due in large part to cost and delays for the provision of this infrastructure for government and the Victorian community. These alternatives are discussed further below.

Based on the EES and other information presented to the IAC, it is apparent that the Darley area is highly constrained and that no feasible alternative has been identified that meet the project objectives and avoids a range of significant impacts. While some impacts on environmental values in Darley will be significant, these need to be considered context of this highly constrained area and scale of the project (which extends across 190 km). In addition, due to the linear nature of the project which needs to extend across a large continuous area, impacts cannot be contained to an isolated area.

The IAC recommended that AusNet should investigate alternative options for the design or project route through Darley and suggested that this may include further investigation of options assessed in EES

Attachment I. As outlined above, I agree with the intent of the IAC's recommendation and consider that further investigation is warranted into what opportunities there are to better manage and further reduce environmental risks in the Darley area.

Acceptability of impacts in the Darley area

As outlined in Section 5, I find that while several project impacts in Darley are likely to be significant, they are acceptable individually. When considered cumulatively and as a part of an integrated assessment, I find that on balance they are acceptable, particularly in the context of the significant community benefits that will be generated by the project. These impacts will be further refined and addressed through the effective implementation of the final EMF and EPRs. The likely impacts in the Darley area will not, either when considered in isolation or in combination, be unacceptable and of such a scale as to outweigh the project benefits. While it is my finding that these impacts are acceptable, even if my assessment found that one of these project impacts in Darley was unacceptable individually, I would still have found the project impacts to be acceptable when considered in the context of the significant benefits that it will deliver for the Victorian community.

6.1.1. Consideration of project alternatives

As set out in the scoping requirements and the procedures and requirements the Minister issued for this EES under the Environment Effects Act, the EES was required to describe and assess impacts of relevant and feasible alternatives, particularly where feasible alternatives offered the potential to avoid or minimise adverse environmental impacts and meet project objectives.

The Ministerial Guidelines[119] note that an EES would not normally be required to document alternatives to a project but should consider alternatives for a project.

The scoping requirements outlined that the key aspects of the project that the EES needed to demonstrate consideration of feasible alternatives included the boundaries of the original area of interest, including potential corridors and alignments within the area of interest, rationale for the preferred mode of construction and other feasible alternatives raised in stakeholder feedback.

Chapter 5 and Attachment I of the EES outlined how the project was developed, including how the Regulatory Investment Test for transmission (RIT-T) process confirmed the preferred network solution for the project. It also outlined the alternatives considered during the project's development, including alternative corridors and routes, alternatives to the siting of project components (such as the new terminal station in Bulgana, laydown areas and temporary workforce accommodation facilities) and alternative transmission structures and explained why these alternatives were not feasible, pursued or assessed further in the EES.

As explained in the EES, once an area of interest had been identified, potential transmission line corridors were determined before a preferred corridor and then a proposed route was selected within the least constrained corridor. To arrive at a proposed route, highly constrained areas were examined, including in proximity to Hepburn Lagoon and Melton aerodrome, to determine whether other potential route options would minimise impacts on environmental values. The EES also considered alternative routes and variations to the proposed route proposed by communities and other stakeholders during EES preparation, including a route further north of the proposed route in Darley.

When the May 2023 *National Electricity (Victoria) Act* (NEVA) order uprated the project to 500 kV end to end and removed the requirement for a terminal station north of Ballarat, the area of interest, constraints mapping and corridor and route assessments in this area were reviewed. A further alternative route was also

[119] Victorian Government, 8th edition, 2023

assessed in Darley (Darley southern route) to examine avoidance of impacts on threatened vegetation communities. Due in large part to the high visual and biodiversity impacts expected in and around Darley from construction of an overhead line, the EES also assessed five potential partial underground routes through Darley. This assessment considers the alternative overhead and underground routes assessed in Darley further below.

In response to stakeholder concerns, the EES presented an underground concept design for a double circuit 500kV transmission line of approximately 190 km, described the potential environmental issues that could be associated with such a design and set out key differences between it and an overhead line. The assessment found that the preferred technology for an underground project would be a high voltage direct current (HVDC) with point-to-point connection from Bulgana to Sydenham. However, it also found that such a design would not meet one of the project objectives of cost efficiently and easily facilitating connections from renewable energy generators in the Western REZ. As part of the EES process, prior to completion and exhibition of the EES, AusNet's alternatives assessment was independently peer reviewed by Bureau Veritas, who were appointed to complete this review on behalf of DTP[120].

The IAC considered that it was within its Terms of Reference to consider project modifications involving undergrounding, provided that the extent of undergrounding could be described as a modification 'to' the project. The IAC considered that, consistent with its Terms of Reference, a finding that the project will have significant environmental effects is sufficient to trigger consideration of undergrounding to avoid or mitigate those significant effects. The IAC considered that its role did not extend to recommending a different project (or alternative to the project) and noted in that context that full undergrounding might be considered a different project.

The IAC identified that the various costings presented for partial and full undergrounding were difficult to compare as they used different input data, costed different partial underground routes and included high voltage alternating current (HVAC) and HVDC options, which have substantially different costs. Noting this, the IAC indicated that, based on the various costs presented to them, a fully underground project would cost more than 10 times that of an overhead project and the cost of undergrounding an individual section would be in the order of 7 to 10 times more than that of an equivalent section of overhead line.

The IAC indicated it was satisfied that based on the information before it, undergrounding would cost significantly more than the overhead project and that the additional costs must be proportionate and justified to mitigate the impact of an overhead transmission line.

The IAC considered that its task did not extend to considering alternative routes beyond the area of interest, which would be different projects (alternatives to the project) to from one assessed in the EES. The IAC did not comment on alternative overhead routes considered in the EES except in relation to Darley, Toolern Vale, Bullarook Streamside Reserve and Barunah Park which I consider further below.

While the IAC did not comment on the acceptability of the alternatives assessment in the EES, it noted that the route selection process had considered potential impacts on agriculture in combination with a range of other values, such as native vegetation and biodiversity. The IAC considered that it was appropriate for the route selection process to have prioritised the protection of a range of values including agriculture, native vegetation and biodiversity values and found that the proposed route had adequate regard to avoiding or minimising impacts on agricultural land (section 10.4 (v) of the IAC report). I agree with this finding of the IAC.

Based on the IAC's recommendation that further investigation of options in the Darley area was necessary, it is my understanding that the IAC was not satisfied that alternatives in this area had been adequately

[120] EES Attachment II, Appendix E

considered. I agree with the intent of the IAC's finding that further work into any potential opportunities to improve environmental outcomes is warranted in Darley, in a bid to further reduce likely significant environmental effects. However, I am satisfied that the EES adequately assessed project alternatives in line with the Ministerial Guidelines and the Scoping Requirements. This included consideration of the preferred mode of construction and other feasible alternatives raised in stakeholder feedback, such as partial undergrounding.

In addition to the alternatives assessed through the EES, during the inquiry process AusNet presented the findings of a preliminary assessment of further avoidance and minimisation approaches to reduce impacts in high biodiversity areas[121]. As outlined in Section 5.1 of this assessment, the alternatives considered included the bespoke 'Minimal Risk Clearance' approach in Darley and raising tower heights in Lexton Bushland Reserve, Hayden's Hill and Lerderderg-Long Forest bushland areas to assist in further avoiding some areas of higher quality native vegetation. AusNet's preliminary assessment indicated that the partial clearance approach in Darley and increased tower heights in Lexton would be effective in minimising biodiversity impacts. Noting that the EES was based on a tower height of up to 80 m, any consideration of taller towers in these areas would need to be considered in this context and the potential to generate increased impacts on other environmental values.

Darley

The proposed route travels between Wombat-Lerderderg National Park and the urban part of Darley, an area that the EES described as highly constrained.

As outlined above, two alternative overhead routes were considered in proximity to Darley, a northern route and a southern route. These alternative overhead routes were not considered in detail by the IAC. However, the EES found that the proposed route was preferable to the two overhead alternatives explored as a part of the EES. The EES indicated that the alternative overhead route further north of Darley would reduce visual impacts on Darley residences by providing greater separation (1,400 m compared to 650 m for the proposed route). The northern route was also found to have reduced visual impacts on residents in the Myrniong area but it would move the route into the Lerderderg Gorge and State Park significant landscape outlined in the South West Victoria Landscape Assessment Study[122].

Other key differences were that the northern route was found to potentially disturb 3.4 ha less endangered ecological communities compared to the proposed route but greatly increase the loss of native vegetation (by 12.3 ha) and associated offsets requirements as it would traverse Wombat-Lerderderg National Park. In terms of bushfire risk, the northern alternative route was found to have a greater length in the Bushfire Management Overlay but to create a more effective firebreak for forest fires fanned by north winds. Overall, the EES found that the northern route had higher impacts than the proposed route.

The EES found that the alternative southern route through Darley would have an increased impact on visual amenity compared to the proposed route. Based on Figure 7.19 of EES Attachment I, the biodiversity impacts of the alternative southern route appear to be less than those associated with the preferred route, but the EES noted that both routes would have impacts on native vegetation. Based on this information, it is apparent that neither of the alternative overhead routes assessed in the EES through Darley would avoid significant environmental impacts.

The EES assessed five potential partial underground routes in Darley due in large part to the high visual amenity and biodiversity impacts expected in this area from construction of an overhead line. The findings of

[121] Tabled document 278

[122] DPCD, 2013

the assessment indicated that partial undergrounding at Darley would substantially reduce visual amenity and biodiversity impacts in this location along with bushfire and historic heritage impacts. However, increased ground disturbance associated with trenching a partial underground line was found to introduce impacts or transfer impacts to other areas, including Aboriginal cultural heritage, surface water, groundwater and contaminated land. More notably, the assessment found that partial undergrounding in this location would cost approximately 1.4 times more than an equivalent end-to-end HVAC overhead line and take too long to deliver (two to three years). Based on these feasibility considerations, and the ability to apply mitigation measures to further reduce impacts associated with the preferred route for the overhead line in this location, the EES concluded that partial undergrounding in Darley was not able to be pursued consistent with project objectives.

At the IAC, AusNet drew on the findings of the EES to conclude that partial undergrounding in Darley was not feasible and submitted that biodiversity impacts had been avoided and minimised through 'no go zones' and the bespoke clearance approach proposed in Darley. AusNet also considered that bushfire risks in this area could be effectively managed (e.g., by north Darley residents having a bushfire response plan that involves leaving before a potential entrapment risk).

Many community submitters expressed a strong interest in alternatives, including partial undergrounding in Darley. The EES assessed five potential partial underground routes in Darley and found them not to meet project objectives and not to be feasible, due in large part to cost and delays for the provision of this infrastructure for government and the Victorian community. In addition, increased ground disturbance associated with trenching a partial underground line was found to introduce impacts or transfer impacts to other values. While the IAC acknowledged that undergrounding would involve very significant additional costs, the IAC noted that this must be considered in the context of its conclusion that impacts of the proposed overhead route in the Darley area would be unacceptable and the IAC therefore recommended that AusNet should investigate alternative options for the design or project route through Darley (section 15.1 (iv) of the IAC report). The IAC recommended that this may include further investigation of options assessed in EES Attachment I.

Based on the EES and other information presented to the IAC, I am not satisfied that partial undergrounding through Darley would result in improved outcomes. This is not only because of the potential for significant costs to the Victorian community, project delays and delivery risks, but also because there is no clearly feasible alternative that meets project objectives and avoids a range of significant impacts – this is examined through the EES and information provided by AusNet through this assessment process. In addition, while some impacts on environmental values in Darley will be significant, in the context of this highly constrained area, linear nature and scale of the project (which extends across 190 km), on balance I consider that these impacts are acceptable.

I agree with the intent of the IAC's recommendation to sufficiently explore any feasible approaches in the Darley area that can reduce likely significant effects and improve environmental outcomes, while achieving the objectives of the project (section 15.1 (iv) of the IAC report). It is my recommendation that this work should sufficiently investigate what opportunities there are to better manage and further reduce environmental risks in the Darley area. Further work to reduce environmental risks in the Darley area should be progressed in line with my proposed condition of the proposed Incorporated Document.

Toolern Vale

Melton City Council[123] argued that if the project could not be undergrounded in full, it should be partially undergrounded in proximity to MacPherson Park in Toolern Vale to avoid impacts on the park. Council argued that this would avoid what its expert witness[124] described as major adverse visual amenity impacts from the project on MacPherson Park and Harkness Memorial Park, a proposed memorial park south-west of MacPherson Park due to commence operations in 2027.

The IAC found that visual amenity and social impacts from the project on MacPherson Park would be acceptable (sections 6.5 (vii) and 13.2 (iv) of the IAC report) and its review of submissions and evidence on Harkness Memorial Park indicated that the development could be planned and staged to have regard to the project. While the IAC found that the project could potentially have negative impacts on the Melton aerodrome, it noted that this needed to be considered in the context of the broader planning policy, including renewable energy policy (section 11.3 (vi) of the IAC's report). Finally, the IAC noted that based on the material provided to it, the cost difference between an overhead and partial underground transmission line in this area would be significant in the context of its findings that impacts would be limited and can be acceptably managed. Based on this, the IAC found that impacts of the proposed overhead route through Toolern Vale were acceptable and did not warrant the project adopting a different route or being undergrounded (section 15.2 (iv) of the IAC report). I agree with this finding.

Bullarook Streamside Reserve

The IAC heard evidence from many submitters about biodiversity, historic heritage and amenity impacts from the project on Bullarook Streamside Reserve.

AusNet submitted TN14[125] which set out two options for modifying the proposed route in this area to avoid removal of the Algerian Oak in the Reserve, which is included on the National Trust Register of Significant Trees. These included an option to move the transmission line to the north (Option A) and an option to increase the height of towers on either side of the tree (Option B). AusNet noted a preference for Option B as it would avoid introducing a tower onto a landholder's property and reduce other potential impacts on nearby dwellings.

The IAC expressed concern about cumulative impacts from the project on the reserve and considered that a modified version of Option B could mitigate impacts on biodiversity values of Birch Creek and the Algerian Oak. Based on this, the IAC found that the project's impacts on the Bullarook Streamside Reserve including Birch Creek could potentially be further mitigated with a partial clearance approach, potentially in combination with raised tower heights. The IAC found that AusNet should investigate the feasibility of such an approach in this location (section 15.3 (iv) of the IAC report). In principle I agree with these findings of the IAC. However, changes to the project that might stem from this work to improve outcomes, should not, as a result, increase effects on other environmental values already assessed through this process.

Barunah Park

Barunah Park Geelong Pty Ltd (BPG) objected[126] to the alignment of the proposed route through its property Barunah Park in Long Forest, and suggested that alternative routes had not been adequately assessed. BPG submitted that it was seeking to rezone Barunah Park, a farming property with an unoccupied dwelling, to

[123] Tabled document 363

[124] Tabled document 202a

[125] Tabled document 367

[126] Submission 283

allow for residential development. AusNet tabled evidence[127] of five route options considered through this property and advised that two of the options, routes C and D, were unacceptable due to biodiversity impacts and technical considerations, respectively. Routes A and E were found to have greater biodiversity impacts than route B (the proposed route).

While the IAC noted BPG's preference for route E, which would pose fewer constraints on the property than the proposed route, it expressed concern over the potential biodiversity impacts. In particular, the IAC noted that route E would have much greater impacts on the EPBC listed Grey Box Grassy Woodlands and Derived Native Grasslands of South-eastern Australia threatened ecological community (GBGW TEC) compared to the proposed route (1.47 hectares for route E compared to 0.02 hectares for route B). Based on this the IAC found that the exhibited alignment through the BPG property should be retained (section 15.4 (iv) of the IAC report). I agree with this finding.

6.2. Conclusions

If constructed, WRL will support the upgrade of the transmission network to enable greater access to renewable energy generation in western Victoria and support the state's clean energy transition. However, a project of this scale also comes with the potential to generate significant environmental effects, as well as a range of views and concerns amongst the array of stakeholders and affected members of the community.

It is my overall assessment that, while the project is likely to have some significant impacts on some environmental values, on balance it can proceed with acceptable environmental effects, particularly in the context of the significant community benefits that will be generated by the project. Project impacts will be further refined and addressed through the effective implementation of the final EMF and EPRs and having taken account of the findings and recommendations of this assessment. This conclusion has been informed by the technical assessments undertaken by AusNet for the EES, further inputs to the IAC proceedings, the thorough and independent analysis undertaken by the IAC, as well as the range of community and stakeholder input to the process.

The project is of critical importance to the development of a secure and reliable transmission network, in particular one that sustainably supports the transition to clean and reliable energy that meets Victoria's growing energy needs. The likely impacts and their acceptability also need to be considered in that context and I have done so.

Consistent with the IAC, my assessment concludes that the project is likely to have significant impacts on visual amenity and landscape values in a selection of areas located in proximity to the proposed route, including Darley. This assessment also concludes that impacts on some social values may be significant, particularly among landholders most affected by changes in visual amenity who place great value on the views and lifestyle afforded by their properties and locality, such as in Darley.

In relation to biodiversity, my assessment concludes that the project is likely to have a significant impact on Grey Box (Eucalyptus microcarpa) Grassy Woodlands 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, Melbourne Yellow Gum, Golden Sun Moth, Southern Greater Glider, Striped Legless Lizard, Swift Parrot and Victorian Grassland Earless Dragon. It is my assessment that these impacts can be managed to acceptable levels, consistent with the recommendations of the IAC and this assessment.

[127] Tabled document 527

Bushfire risks also require careful management, particularly in the north of Darley where access and egress routes are already very limited and fuel loads in the surrounding area are high. However, this assessment finds that the project would give rise to only a small incremental increase to the existing bushfire risk profile in the Darley area.

The IAC considered some significant impacts in the Darley area to likely be unacceptable. The IAC recommended that AusNet should further investigate alternatives that avoid or better mitigate impacts in this area. As outlined in this assessment, on balance while I consider that these impacts are significant, they are acceptable and will be further refined and addressed through the effective implementation of the final EMF and EPRs. However, I support the intent of the IAC's recommendation to explore any feasible options in the Darley area that reduce likely significant effects and improve environmental outcomes, while achieving the objectives of the project. To this end, my assessment recommends a new condition of the Incorporated Document to further investigate what opportunities there might be to better manage and further reduce environmental risks in the Darley area, particularly relating to landscape and visual, bushfire, biodiversity and social values. While this work is not essential to arrive at conclusions on the acceptability of likely effects, this work could improve outcomes for an area of the project for which there are clear challenges to balance impacts and project outcomes.

The effects of the project on other values including land use, agriculture and forestry, economic, heritage, air quality, aviation, contaminated land, electromagnetic interference and electric and magnetic fields, geology and soils, greenhouse gas and climate change, groundwater, noise and vibration, surface water and transport are acceptable, particularly with the implementation of the EPRs as recommended by the IAC and as refined through this assessment. I note that the management of these effects will be addressed and regulated through the necessary statutory approvals including under the P&E Act, Aboriginal Heritage Act and Heritage Act.

Decision-makers need to consider this assessment before deciding whether and how the project should proceed. As a matter of good practice, I expect decision-makers to write to me and advise how my assessment was considered and applied.

Table 6-1 summarises my response to the IAC's key recommendations as provided in the Executive Summary of the IAC report. My additional primary recommendations are summarised in Table 6-2. The IAC's and my detailed recommendations relating to each environmental aspect are outlined in Appendix B.

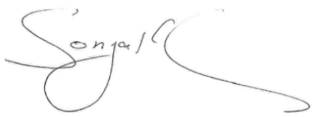
Table 6-1: Response to IAC's key recommendations

	IAC key recommendations	Minister's response	Section of this assessment
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	My assessment and decision-making on the PSA GC209 under the P&E Act, will not occur until after this assessment under the Environment Effects Act.	Section 4.1

	IAC key recommendations	Minister's response	Section of this assessment
	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.	Generally accepted subject to the recommendations of my assessment that have refined the EPRs. While I do not accept excising the section of the proposed route through Darley, I support the intent of the IAC recommendation that further work into any potential opportunities to improve environmental outcomes is warranted in the Darley area.	Sections 4.1 and 6 and Appendix B
3	If the Project proceeds, include conditions on the approval under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) consistent with: the relevant native vegetation offset conditions (clause 4.10) in the Incorporated Document as shown in Appendix E:1 the relevant biodiversity (BD) Environmental Performance Requirements in the Environmental Management Framework as shown in Appendix E:2.	Accepted.	Section 5.1 and Appendix A

Table 6-2 Minister for Planning's additional primary recommendations

No	Primary recommendations	Section of this assessment
1	I recommend that, if the Moorabool Shire has not already fully examined any potential alternative options for safe access for firefighters and egress option for residents living on Lerderderg Gorge Road and Camerons Road, AusNet should engage with the Shire and appropriate fire authorities, to do so. This work will also strengthen local partnerships and lay down foundations for potential subsequent work for continuously improving the management of bushfire risks in such areas. AusNet should document this in the Bushfire Management Plan (condition 4.11.1). This could occur after the PSA is approved.	Section 5.5
2	I recommend that AusNet should further investigate what opportunities there are to better manage and further reduce environmental risks in the Darley area, particularly relating to landscape and visual, bushfire, biodiversity and social values through a new condition of the Incorporated Document.	Sections 6



HON SONYA KILKENNY MP
Minister for Planning
Date: 27/07/2026

Appendix A Matters of national environmental significance

Context

The EES and this assessment examine the likely impacts on relevant MNES, in the context of the controlling provisions identified in the Commonwealth EPBC Act controlled action decision for this project, which are section 18 and 18A relating to listed threatened species and communities respectively.

This appendix consolidates information on likely effects of the project on MNES protected under the EPBC Act, drawing on the assessment of specific matters discussed in other sections of the assessment. This includes assessment findings on biodiversity (section 5.1).

Potential impacts on relevant MNES were discussed in Technical Report A – Biodiversity (also known as the Biodiversity Impact Assessment (BIA)) and Attachment V – Offset Management Strategy to the EES and summarised in Chapter 8 - Biodiversity and Habitat, Chapter 27 – Matters of National Environmental Significance. The key finding of the EES was that three Threatened Ecological Communities (TECs) and four listed threatened fauna species may be significantly impacted by the project. The EES concluded that while other listed species and communities were recorded in the study area, the project is unlikely to result in a significant impact on other MNES.

During the hearing AusNet submitted the 'Report 1 on Ecological Surveys Required by EPR-BD1'[128] (referred to as the BD1 report) which outlined the additional on-ground surveys completed since EES finalisation to meet the requirements of EPR DB1. The BD1 report includes revised assessments of the impacts to biodiversity based on the results of additional field surveys undertaken between July 2024 and May 2025, and further refinement of the project description. In light of the revised assessment of project impacts on biodiversity, the offset requirements were also recalculated, and outlined in an updated draft Offset Management Strategy[129] which was tabled at the hearing. The BD1 report notes that, for a number of species there has been an increase in the impacts from what was stated in the EES, outlining that the increase was predominately due to the inclusion of Canopy and NRZ impacts associated with the vegetation clearance construction footprint, along with smaller increases associated with other components of the construction footprint. AusNet also tabled a memo prepared by Jacobs[130] which outlined the updates made to the 'quality of impacted area' score used within the EPBC Act Offset calculator following ongoing discussions with the Department of Climate Change, Energy, the Environment and Water.

Section 4.9 of the IAC report summarised the likely impacts on MNES, with discussion of evidence and submissions related to MNES also provided in Section 4.5 of the report. The IAC considered that the project had avoided and minimised significant impacts on MNES to the extent reasonably practicable subject to applying the IAC's recommended EMF. The IAC noted that significant impacts on MNES can be satisfactorily addressed by offsets, as set out in the draft Offset Management Strategy. The IAC's comments on specific MNES have been included in the below assessment.

Table A1 summarises the species considered in relation to MNES that have a likelihood of occurrence of 'low-moderate' or higher within either the project area or broader study area used to inform the biodiversity assessments.

[128] Tabled document 49

[129] Tabled document 50

[130] Tabled document 658

Table A1: MNES species with a low-moderate or higher likelihood of occurrence within the study area (Source: EES Chapter 8 and Technical Appendix A)

Species	EPBC Status	Presence
Golden Sun Moth *Synemon plana*	VU	Present
Latham's Snipe *Gallinago hardwickii*	VU, Mi	Present
Grey-Headed Flying-fox *Pteropus poliocephalus*	VU	Known
Growling Grass Frog *Litoria raniformis*	VU	High
Swift Parrot *Lathamus discolor*	CR	High
White-throated Needletail *Hirundapus caudacutus*	VU, Mi	High
Painted Honeyeater *Grantiella picta*	VU	Moderate
Southern Greater Glider *Petauroides volans*	EN	Moderate
Striped Legless Lizard *Delma impar*	VU	Moderate
Matted Flax-lily *Dianella amoena*	EN	Moderate
Swamp Fireweed *Senecio psilocarpus*	VU	Moderate
Victorian Grassland Earless Dragon *Tympanocryptis pinguicolla*	CR	Low-Moderate
Small Golden Moth Orchid *Diuris basaltica*	EN	Low-Moderate
Basalt Peppercress *Lepidium hyssopifolium*	EN	Low-Moderate
Spiny Rice-flower *Pimelea spinescens subsp. spinescens*	CR	Low-Moderate
Button Wrinklewort *Rutidosis leptorhynchoides*	EN	Low-Moderate

***KEY**: CR = critically endangered, EN = endangered VU = vulnerable, Mi = migratory species*

The EES concluded that the project's potential impact was low for the following species:

- Latham's Snipe - the project is avoiding wetland habitats;
- Painted Honeyeater - the project is outside their core habitat in northern Victoria;
- White-throated Needletail - it is an aerial species with only a mild risk of collision;
- Basalt Peppercress, Spiny Rice-flower, Swamp Fireweed and Button Wrinklewort - all potential habitat; and within the project area was surveyed and they weren't detected.

The BD1 report noted minor changes in the impacts for Painted Honeyeater and Swamp Fireweed, however, it concluded that the significance of the impacts is consistent with the findings of the BIA exhibited as part of the EES, and subsequently impacts were still considered to be low for these species.

Based on these findings, it is my assessment that the project is unlikely to result in a significant impact on any of these species. Table A2 outlines the TECs considered in the EES and their likelihood of occurrence in the study area.

Table A2: Threatened Ecological Communities (TEC) likelihood of occurrence within the study area (Source: EES Chapter 8 and Technical Appendix A)

Species	EPBC Status	Presence
Grey Box Grassy Woodlands and Derived Native Grasslands of South-eastern Australia	EN	Present
Natural Temperate Grassland of the Victorian Volcanic Plain	CR	Present
White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland	CR	High
Grassy Eucalypt Woodland of the Victorian Volcanic Plain	CR	Low
Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains	CR	Low

KEY: CR = critically endangered, EN = endangered

The EES noted that all areas of Grassy Eucalypt Woodland of the Victorian Volcanic Plain threatened ecological community (TEC) have been avoided by the project. Further, the EES concluded that Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains TEC does not occur within the project area, as all patches of the Victorian EVC Plains Grassy Wetland do not meet the condition thresholds for this EPBC listed TEC. The BD1 report revised impacts to Grey Box Grassy Woodlands and Derived Native Grasslands of South-eastern Australia, Natural Temperate Grassland of the Victorian Volcanic Plain, and White Box-Yellow Box-Blakely's Red Gum Grassy Woodland which are discussed further below.

Based on these findings it is my assessment that the project is unlikely to result in a significant impact on Grassy Eucalypt Woodland of the Victorian Volcanic Plain and Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains.

A.1 Listed threatened species and communities

Grey Box (Eucalyptus microcarpa) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia (GBGW)

GBGW TEC is listed as endangered under the EPBC Act. The BD1 report outlined that a total of 7.56 ha of this TEC may be impacted by the project, comprising of 6.12 ha which is confirmed and 1.43 ha potentially present in areas yet to be surveyed. The BD1 report considered that there was a low likelihood that these unsurveyed areas support the TEC, in line with the conclusion of the EES, however I note the requirement to complete further field survey as outlined in EPR BD1. Table 4-1 in the BD1 report noted the area of GBGW to be impacted decreased from the figures exhibited in the EES from 16.61 ha to 7.56 ha due to the inclusion of no-go zones and further fieldwork. The EES noted that the location of the majority of the impacts on this TEC is in the Darley area, east of the Lerderderg River, due to fuel load reduction required within the proposed easement. The EES considered that the TEC vegetation to be impacted is of moderate quality, with an average VQA score of 0.56.

The EES included a significant impact assessment that concluded a significant residual impact was likely on this TEC given there will be a reduction in extent, as well as fragmentation and change in species composition associated with project construction. The BD1 report concluded that, despite the reduction in both mapped extent (0.67 ha) and modelled impacts (8.39 ha) between the exhibited EES figures and the updated

information, the conclusions regarding significance for the TEC had not changed, and the impacts were still likely to be significant.

The IAC accepted Mr Lane's evidence[131] that the project will affect a very small portion of the total area of GBGW in the wider landscape, however considered the project will result in a high residual impact to this TEC (sections 4.2 (iv) and 4.9 (vi) of the IAC report). I accept this finding. While I acknowledge efforts made by AusNet to the minimise impacts to this and other TECs, I consider that the reduction in extent along with the fragmentation and change in species composition is likely to result in a significant impact to this TEC.

The updated draft Offset Management Strategy outlined that the revised offset required under the EPBC Act is 73.01 ha, noting that three sites have been identified that can supply approximately 101 ha to meet direct offset requirements under the EPBC Act. The IAC recommended EPR B2 be amended to include a requirement for seed collection from this TEC within the project area to be used in revegetation and remediation for the project, noting that this is consistent with the Conservation Advice for GBGW[132] (section 4.2 (iv) of the IAC report). I accept this recommendation.

It is my assessment that the residual impact to the GBGW TEC is significant, however the impacts are considered acceptable, if the appropriate mitigation measures (including the recommended EPRs) and offsets are implemented effectively.

Natural Temperate Grassland of the Victorian Volcanic Plain (NTGVVP)

The NTGVVP TEC is listed as critically endangered under the EPBC Act as it has declined in extent in Victoria by approximately 98%. The EES mapped 16 patches, totalling 38.05 ha within the project area, of this the EES noted that 4.47 ha may be impacted. The BD1 report included revised figures for NTGVVP, noting that 5.58 ha may be impacted, with 5 ha confirmed extent and a further 0.58 ha potentially present in areas yet to be surveyed. The vegetation to be impacted is mostly on the edges of patches and of moderate quality with an average VQA score of 0.42. Table 4-1 in the BD1 report noted the area of NTGVVP to be impacted increased slightly from the EES from 5.37 ha to 5.58 ha, with a subsequent increase in the offsets required than what was outlined in the exhibited EES. Most of the impacts to this community are associated with construction of tower structures and access tracks and the EES considers that further avoidance opportunities are limited.

The EES included a significant impact assessment that concluded a significant residual impact was likely given there will be a reduction in extent of the TEC. The updated draft Offset Management Strategy noted that the revised offset required for NTGVVP is 61.56 ha and one site has been identified that can supply approximately 63 ha to meet direct offset requirements under the EPBC Act. The site includes 53ha of NTGVVP and an additional 10 ha of native grassland that would require restoration to NTGVVP condition.

Similarly to GBGW, the IAC acknowledged that the project would affect very small portions of the total area of this community in the wider landscape and considered that the residual impact of the project would be moderate (sections 4.2 (iv) and 4.9 (vi) of the IAC report). The EES concluded that the project is likely to result in a significant impact to this TEC. While I acknowledge the efforts by the project to minimise impacts to this TEC, it is my assessment that impacts will be significant due to the reduction in extent of the community which is a key threat outlined in the approved conservation advice[133] for this TEC.

[131] Tabled document 122

[132] Commonwealth of Australia (2010) Approved Conservation Advice for the Grey Box (*Eucalyptus microcarpa*) Grassy Woodlands and Derived Native Grasslands of South-east Australia

[133] Commonwealth of Australia (2008) Approved Conservation Advice for the Natural Temperate Grassland of the Victorian Volcanic Plain

Consistent with the conservation advice for this TEC, I recommend EPR B2 be amended to include seed collection from this TEC within the project area to be used in revegetation and remediation for the project, including the proposed offset site.

It is my assessment that the residual impacts on the NTGVVP TEC are significant, however, I consider the impacts are acceptable, if the mitigation measures proposed are implemented and appropriate offsets are secured.

White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (WYRGGW)

This TEC is listed as critically endangered under the EPBC Act and occurs along the western slopes of the Great Dividing Range. Given the currently highly fragmented and degraded state of this ecological community, the recovery plan[134] notes that all areas of Box-Gum Grassy Woodland which meet the minimum condition criteria should be considered critical to the survival of this ecological community.

The EES did not record any areas of WYRGGW in field surveys and considered that there was potentially 17.00 ha of modelled habitat within the unsurveyed area. The EES concluded that the worst-case impacts to the TEC would be 5 ha. The BD1 report outlined that a total of 6.04 ha may be impacted by the project with 0.81 ha confirmed extent and 5.24 ha potentially present in areas yet to be surveyed. The vegetation is of low quality with an average VQA score of 0.37.

The EES included a significant impact assessment that concluded a significant residual impact was possible on this TEC given there will be a reduction in extent and fragmentation, for habitat critical to the survival of the community, as well as change in species composition and invasive species establishment associated with the project. EPR BD8 requires additional surveys for this community and further design refinements to ensure the extent of removal does not increase. The BD1 report notes that the proposed offset requirement rose by 14 ha compared to what was exhibited in the EES due to an increase in the quality score from the further fieldwork that was undertaken, however, the 5.00 ha impact is still noted to be the worst-case scenario for the project. The updated draft Offset Management Strategy indicated that the offset required is 55.16 ha, and notes that there are two sites identified that can supply approximately >60 ha to meet direct offset requirements.

Similarly to NTGVVP, the IAC acknowledged that the project would affect very small portions of the total area of this community in the wider landscape and considered that the residual impact of the project would be moderate (sections 4.2 (iv) and 4.9 (vi) of the IAC report).

It is my assessment, that while the impacts to White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland TEC are likely to be significant, the impacts are considered acceptable, if the mitigation measures proposed are implemented and appropriate offsets are secured.

Matted Flax-lily

Matted Flax-lily is listed as endangered under the EPBC Act. The EES highlighted that no Matted Flax-lily were recorded during targeted surveys in spring/summer between 2020-24, however identified 40.25 ha of potential habitat which had not yet been surveyed. This figure was revised down to 15.88 ha of potentially present habitat in the BD1 report.

[134] Department of Environment, Climate Change and Water NSW (2010) National Recovery Plan for White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland.

The EES included a significant impact assessment that concluded a significant residual impact was unlikely, given no populations are expected to be impacted by the project. The BD1 report noted that there is no significant change in the conclusions for the species since the EES.

The Construction Vegetation Management Plan (EPR BD2) will include specific measures to minimise impacts to Matted Flax-lily. Therefore, given the species has not been recorded and measures are proposed to minimise impacts should they be discovered in the remaining unsurveyed areas, it is my assessment that the project is not likely to have a significant impact on Matted Flax-lily.

Small Golden Moth Orchid

Small Golden Moth Orchid is listed as endangered under the EPBC Act. The EES noted that targeted surveys have not detected the taxa, which is known from just three populations west of Melbourne. The EES concluded that a total of 2.34 ha of potential plains grassland habitat had yet to be surveyed and the project had the potential to impact on one hectare of the potential habitat. The BD1 report revised down the modelled potential habitat that could be impacted to 0.71 ha in areas yet to be surveyed. The EES noted the impacted modelled potential habitat is of degraded quality and unlikely to support the species. In the highly unlikely occurrence that the species is identified within the construction footprint, given its small size and likely small population, micro-siting would be able to avoid impacts.

The EES included a significant impact assessment that concluded a significant residual impact was unlikely given no populations are expected to be impacted. The BD1 report noted that there is no significant change in the conclusions for the species since the EES.

The Construction Vegetation Management Plan (EPR BD2) will include specific measures to minimise impacts to Small Golden Moth Orchid should they be detected. It is my assessment that the project is not likely to have a significant impact on Small Golden Moth Orchid.

Golden Sun Moth

Golden Sun Moth is listed as vulnerable under the EPBC Act. The EES outlined that all suitable habitat that was identified during the preliminary habitat assessment and VQA surveys was mapped as potential habitat. During surveys for the EES, 40 individuals were recorded across areas of unimproved pasture between Elmhurst and Lexton. 250 ha of suitable habitat was identified in the project area of which a total of 21.48 ha of known and field mapped habitat may be impacted by ground disturbance. Of the potentially impacted area, 9.71 ha is confirmed habitat, and the remaining 11.77 ha modelled habitat.

The EES outlined that Grassland habitat can be retained in the easement because it is under the maximum vegetation heights for clearing. The EES further noted disturbance to each patch is discrete and generally constitutes an insignificant portion of habitat at that location. The BD1 report noted the area of Golden Sun Moth habitat to be impacted increased slightly from the EES from 21.00 ha to 21.48 ha due to a new area of habitat being recorded.

The Golden Sun Moth Significant Impact Guidelines[135], indicate impact to habitat less than half a hectare over a habitat patch of more than ten hectares is a significant impact. The EES estimated a total of 12.49 ha of impacts to areas of >0.5 ha within large or contiguous habitat (>10 ha) will occur, which is above the significant impact threshold. For small or fragmented habitat (0.25 ha to 10 ha) any habitat loss or degradation is considered to be above the significant impact threshold. Therefore, the remaining areas of impact are also deemed to be significant. The EES included a significant impact assessment for Golden Sun Moth against the significant impact thresholds for the species, which concluded that a significant impact was likely due to a

[135] Commonwealth of Australia (2009) Significant impact guidelines for the critically endangered golden sun moth (*Synemon plana*)

reduction in size and area of occupancy of an important population. The EES included EPR BD4 which requires specific measures to minimise potential impacts to habitat for Golden Sun Moth to be included in the Threatened Fauna Management Plan.

The updated Offset Management Strategy outlined the offset required is 125.22 ha and three sites have been identified that can supply approximately 130ha of the direct offset requirements. The IAC noted that there would be a moderate residual impact to Golden Sun Moth from the constructions works for the project, but considered that the impacts will affect a very small portion of the total area of habitat in the wider landscape (sections 4.2 (iv) and 4.9 (vi) of the IAC report).

It is my assessment that the residual impacts to Golden Sun Moth are significant, however the impacts are considered to be acceptable, if the mitigation measures proposed are implemented and appropriate offsets are secured.

Growling Grass-Frog

Growling Grass-Frog is listed as vulnerable under the EPBC Act. The EES noted that Growling Grass Frog were not directly recorded within the project area during fieldwork. However, the BD1 report noted that an eDNA survey in 2025 recorded the species at Goodmans Creek. Growling Grass Frog is associated with aquatic habitat and adjacent grassy areas. The BD1 report considered that these areas are not expected to be impacted by the project as the majority of potential aquatic habitat will be avoided and protected through EPR BD4 which requires specific measures for the protection of Growling Grass Frog habitat to be included in the Threatened Fauna Management Plan.

The BD1 report noted that a total of 0.66ha of potential habitat may be impacted by the project which was reduced from the 0.74 ha figure which was exhibited in the EES, which is very small compared to the wider habitat area for this species in this landscape. The EES included a significant impact assessment against the guidelines for the species, which indicated a significant impact is unlikely, and this conclusion was not changed in the review undertaken in the BD1 report.

The IAC considered that the project would result in a low-moderate residual impacts to Growling Grass Frog and noted that the potentially impacted habitat for the species was very small compared to the wider habitat area for this species (sections 4.2 (iv) and 4.9 (vi) of the IAC report).

It is my assessment that the project is not likely to have a significant impact on Growling Grass Frog.

Swift Parrot

Swift Parrot is listed as critically endangered under the EPBC Act. The EES outlined that approximately 13,669 ha of potential habitat occurs within the study area and noted that Swift Parrots will migrate through the study area, with stopping points up through the Brisbane Ranges and Long Forest, to the Box-Ironbark forests in the Goldfields to the north. The EES noted that impacts will mainly occur in the Long Forest Nature Conservation Reserve and Wombat-Lerderderg National Park.

The EES concluded that the project could impact on a total of 18.22 ha of potential foraging habitat for the species, comprised of 16.89 ha of field mapped habitat and 1.33 ha of desktop mapped habitat. The BD1 report noted a revision to the impacts for Swift Parrot, with an increase to a total of 32.88 ha of foraging habitat potentially impacted by the project, comprised of 29.10 ha of field mapped and 3.75 ha of desktop mapped potential habitat.

EPR BD4 requires specific measures for Swift Parrot to be included in the Threatened Fauna Management Plan. The EES included a significant impact assessment that concluded that a significant impact is not likely as impacts to potential habitat are mostly limited to smaller marginal foraging habitat areas, with the species considered more likely to utilise larger and higher quality intact eucalypt woodland in the surrounding area. The BD1 report concluded that while the extent of impacts had increased by 14.66 ha, the significance of the

impact is consistent with the original findings of the EES, and the project is not likely to have a significant impact on the species.

The BD1 report does note the impacts to Swift Parrot have increased significantly since the exhibited EES, however, the implications for the survival of the species from further impacting (removing) foraging habitat were not covered explicitly through this material tabled at the IAC. The National Recovery Plan for the species[136] under the EPBC Act note the critical importance of protecting and managing a broad range of habitats on the mainland to provide foraging resources for the survival of this species.

The EES noted the majority of the Swift Parrot population crosses the study area twice yearly due to their annual migratory behaviour, where the species move between areas in response to flowering events and climactic conditions. The EES outlined that the area includes winter and spring flowering gums which the species uses during migration including Yellow Gum, Yellow Box and Grey Box, and referenced that areas of important feed trees (Melbourne Yellow-Gum and Grey Box) occur in high concentrations in some areas of the project area. The EES also noted the impacted area included a small proportion of habitat which is recognised as important migratory habitat, although the location of the impacts to this critical habitat were not clearly defined in the EES and were not discussed further in the BD1 report.

The National Recovery Plan for the species states that habitat critical to the survival of the species includes all preferred foraging species within the known and likely foraging habitat on the mainland including species such as Melbourne Yellow Gum and Grey Box. The Recovery Plan also notes that wherever possible the habitat critical to the survival of Swift Parrot should not be destroyed, however if impacts to foraging habitats on the Australian mainland cannot be avoided it is important to retain trees >60 cm in diameter at breast height or greater together with at least five trees per hectare from a mixture of other age classes to ensure continuity of food resources over time. There are limitations for where and whether this project can retain or replant trees within the easement, so it will be impractical to meet this part of the recovery plan.

Considering the updated level of likely impact on habitat critical to the survival of the species, which includes all preferred foraging species of trees within the known and likely foraging habitat, in line with the EPBC Significant impact guidelines 1.1[137], it is expected the project will result in a significant impact to Swift Parrot. I consider the further investigation required under EPR BD1 and threatened fauna management plan required under EPR BD3 will sufficiently address the residual uncertainty related to the species habitat and note the draft Offset Management Strategy needs to be updated to outline the offset requirement for the species, to the satisfaction of the Commonwealth in accordance with EPBC Act offset policy.

It is my assessment that the project is likely to have a significant impact on Swift Parrot, however impacts are considered acceptable if the mitigation measures proposed are implemented and appropriate offsets are secured.

Southern Greater Glider

Southern Greater Glider is listed as endangered under the EPBC Act. The EES noted that while the species was not recorded during targeted survey within the project area it is considered a potential visitor to habitat areas of moderate quality within the project area in the Haydens Hill vicinity.

The BD1 report concluded that a total of 13.71 ha of field mapped potential habitat for the species may be impacted in the Haydens Hill area, which may be used as refuge habitat. Table 4-1 in the BD1 report noted the

[136] Commonwealth of Australia (2024) National Recovery Plan for the Swift Parrot *Lathamus discolor*

[137] Commonwealth of Australia (2013) Matters of National Environmental Significance - Significant impact guidelines 1.1. Environment Protection and Biodiversity Conservation Act 1999

area of Southern Greater Glider habitat to be impacted increased slightly from the EES from 12.06 ha to 13.71 ha due to the reconsideration of notional root zone impacts associated with access tracks.

The EES included a significant impact assessment that concluded a significant impact on this species is possible. The cleared easement may contribute to fragmentation of habitat, adversely affect habitat critical to the survival of the species and interfere with recovery of the species. The EES considered that this fragmentation of habitat may be partially mitigated through the placement of glider poles and rope bridges in the area (EPR BD4) and a hollow replacement strategy (EPR BD2), and that direct impacts will be minimised via fauna salvage pre-clearance surveys such as hollow inspections (EPR BD2). The revised Offset Management Strategy outlined that the revised offset required is 88.28 ha and three sites have been identified that can supply approximately 89 ha of the direct offset requirement. The BD1 report concluded that while the extent of impacts had increased slightly, the significance of the impact is consistent with the original findings of the EES, and the project is not likely to have a significant impact on the species.

The IAC considered that while Southern Greater Glider has not been recorded in the project area, low-moderate impacts are expected based on the habitat loss and fragmentation caused by the easement (section 4.2 (iv) of the IAC report). However, the IAC also noted that the impacted habitat is a tiny portion of the extent of habitat in the wider landscape. The IAC concluded that the project could possibly result in a significant impact on Southern Greater Glider (sections 4.2 (iv) and 4.9 (vi) of the IAC report).

It is my assessment that the impacts to Southern Greater Glider are likely to be significant, however the impacts are considered to be acceptable if the mitigation measures proposed are implemented and appropriate offsets are secured.

Grey-Headed Flying-fox

Grey-Headed Flying-fox is listed as vulnerable under the EPBC Act. The EES noted that Grey-Headed Flying-fox is highly mobile and the species moves along the east coast of Australia in search of food, and that the species is known to roost and breed in camps at sites typically located near water and forage at night up to 50km from their roost. The EES highlighted that no camps have been recorded in the project area, but a temporary camp was recorded nearby at Darley in 2024. Given the mobility of the species, the EES considered that it is likely that individuals may make occasional use of 26.02 ha of potential foraging habitat within the project area.

The EES concluded that the project has the potential to impact on 10.17 ha of potential foraging habitat. The BD1 report revised this figure to 17.66 ha of potential foraging habitat which may be impacted.

The EES included a significant impact assessment that concluded a significant impact is not likely as impacts to potential foraging habitat are likely to be inconsequential when compared with similar and higher-quality potential habitat across the landscape for foraging. The BD1 report concluded that, while the extent of impacts had increased slightly, the significance of the impact is consistent with the original findings of the EES, and the project is not likely to have a significant impact on the species.

The National Recovery Plan for the Grey-Headed Flying-Fox considers that habitat critical to the survival of the species include a range of myrtaceous plants which flower within a defined season. However, the National Recovery Plan also notes that the plants are not annually reliable and the location of productive foraging habitat from these plants varies and in most months it is difficult to predict which locations will be productive as foraging habitat for the species. The National Recovery Plan for the Grey-headed Flying-Fox also states that the species has complex habitat requirements and requires multiple populations of food trees dispersed over a large area.

The EES noted that no permanent or 'nationally significant' camps are located within 20 km of the project area, however noted that there was an incidental observation of a temporary camp of approximately 100 to 200 individuals were located on the eastern bank of the Lerderderg River about two kilometres south of the

project area in 2024. The EES noted that the location of the camp is outside of the areas impacted by the project and the camp was not sighted in follow up visits in April and May 2024, and noted that there were limited records of the critical flowering species for the species in particular Yellow Box. The EES also briefly references that an additional new campsite had been reported at Merrimu Reservoir, which was also assumed to be temporary as it was not able to be located during surveys.

From the new information tabled at the IAC is it evident there is a concentration of impacts from the project on potential habitat in the eastern end of the project area[138]. The temporary local camp recorded at Lerderderg and the additional camp referenced at the Merrimu Reservoir, along with an increase of an additional 7.49 ha impacted raises residual uncertainty about regarding the potential for a significant impact on this species. However, this uncertainty can be addressed through a threatened species management plan, which ensures further information is obtained to detail how the project has characterised potential foraging habitat in line with the National Recovery Plan, and includes clear mapping to demonstrate that the project impacts are inconsequential when compared to similar and higher-quality potential habitat across the broader landscape, as referred to in the EES.

I recommend that EPR BD4 is amended to specifically reference Grey-Headed Flying-fox as a species which requires a threatened species management plan. I consider the further requirements in EPRs to minimise and mitigate impacts to threatened species including EPR BD1, EPR BD2 and EPR BD3 will sufficiently address the residual risks to the species.

It is my assessment that the project is not likely to have a significant impact on Grey-Headed Flying-fox, subject to my recommended amendments to EPR BD4.

Striped Legless Lizard

Striped Legless Lizard is listed as vulnerable under the EPBC Act. The EES noted that the species was not recorded during targeted surveys, however considered that it's presence cannot be ruled out in areas yet to be surveyed.

The EES concluded that the project has the potential to impact on 1.44 ha of potential habitat in discrete areas associated with tower structures and access tracks resulting in changes in soil structure and terrestrial cover, noting that grassland habitat can be retained in the easement corridor. The figures for this species were not revised in the BD1 report.

The EES included a significant impact assessment that stated a significant impact is possible, as impacts may reduce the areas of occupancy of an important population and contribute to changes in soil structure and terrestrial cover. The EES included EPR BD4 which requires specific measures for Striped Legless Lizard to be included in the Threatened Fauna Management Plan. The updated draft Offset Management Strategy outlined that the offset required is 6.30 ha and one site has been identified that can supply approximately 6.5 ha of the direct offset requirement.

The IAC concluded that the project will possibly result in a significant impact to Striped Legless Lizard, however noted that the species had not been recorded in the project area, and that impacts to potential habitat were limited to small areas related to the construction of access tracks and tower construction (section 4.2 (iv) of the IAC report). The IAC considered residual impacts to be moderate (sections 4.2 (iv) and 4.9 (vi) of the IAC report).

[138] Commonwealth of Australia (2021) National Recovery Plan for the Grey-Headed Flying-fox *Pteropus poliocephalus*

It is my assessment that the impacts to Striped Legless Lizard may be significant, however the impacts are considered to be acceptable, if the mitigation measures proposed are implemented and appropriate offsets are secured.

Victorian Grassland Earless Dragon

Victorian Grassland Earless Dragon is listed as critically endangered under the EPBC Act. The EES notes that the species is known from one population discovered in 2023 south of Bacchus Marsh. The EES outlined that reptile surveys undertaken for Striped Legless Lizard in areas of potential habitat did not record the species. The EES noted that 28.34 ha of potential habitat was recorded within the project area, and a total of 3.48 ha of mapped potential Victorian Grassland Earless Dragon habitat may be impacted. The figures for this species were not revised in the BD1 report.

The EES included a significant impact assessment that concluded a significant impact is possible, as the impacts may reduce the areas of occupancy of the species and adversely affect habitat critical to the survival of a species. The EES included EPR BD4 which requires specific measures for Victorian Grassland Earless Dragon to be included in the Threatened Fauna Management Plan. The updated draft Offset Management Strategy outlined that EPBC offset required is 28.80 ha and two sites have been identified that can supply approximately 28.80 ha.

DEECA submitted[139] 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. The IAC noted that, while Victorian Grassland Earless Dragon have not been recorded in the project area, there is potential for small areas of potential habitat that may be impacted by access tracks and tower construction (section 4.2 (iv) of the IAC report). The IAC concluded that the project would result in a moderate residual impact on the species (sections 4.2 (iv) and 4.9 (vi) of the IAC report).

It is my assessment that the impacts to Victorian Grassland Earless Dragon are likely to be significant, however the impacts are considered acceptable and can be effectively managed and offset through the proposed EPRs.

A.2 Assessment

It is my assessment, taking account of the findings and recommendations of this assessment, that:

- The project will have a significant impact on:
  - Grey Box (Eucalyptus microcarpa) Grassy Woodlands 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;
  - Golden Sun Moth;
  - Southern Greater Glider;
  - Striped Legless Lizard;
  - Swift Parrot; and
  - Victorian Grassland Earless Dragon.
- The project is not likely to have a significant impact on the following species, and appropriate mitigation will be adopted through the EMF and EPRs:
  - Matted Flax-lily;

[139] Tabled document 407

- Small Golden Moth Orchid;
- Swamp Fireweed;
- Growling Grass Frog; and
- Grey-Headed Flying-fox.

While the project is likely to have significant impacts to some specific protected matters noted above, overall I am satisfied that these impacts can be acceptably managed through the recommended EPRs, including the recommended changes through this assessment, and with the appropriate offsets secured in accordance with policy under the EPBC Act.

The provision of my assessment under the Environment Effects Act concludes the accredited state assessment for the project for the purposes of the EPBC Act and will inform the Commonwealth Government Minister for Environment and Water's decision about whether and under what conditions to approve the project.

Appendix B – Environmental Performance Requirements

The IAC recommended specific changes to the EMF and several EPRs in response to submissions and through their analysis of the issues. Section 4 of this assessment outlines the IAC's key findings and recommendations relating to the EMF and my response. Further to this, Section 5 of this assessment sets out where I support and/or recommend further changes to the EPRs considered by the IAC.

Table B1 contains AusNet's 'Day 3' version of the EMF that was tabled at the inquiry hearing (Tabled Document 652) and incorporates recommended changes from the IAC denoted as either 'additions' and/or ~~'deletions'~~. I generally endorse all changes recommended by the IAC except where qualified in Table B1. Further details regarding my findings and recommendations in this table are contained in Section 6 of this report.

Table B1: Recommended changes to the environmental performance requirements

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
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*.	Construction, Operation, Decommissioning	Accepted.	No change required.
EM2	**Develop and implement a Construction Environmental Management Plan**	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
EM3	**Develop and implement a Property Access and Management Plan** 1. Develop, prior to the commencement of construction, an overarching Property Access and	Construction	Accepted	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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:			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.	Construction, Operation	Accepted.	No change required.
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	Construction	Accepted, with an editorial amendment.	**Develop and implement a Communications and Stakeholder Engagement Management Plan**

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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; 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;			1. Prior to commencement of construction, 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; 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 of the EMF;

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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).			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 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.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
				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	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	ii. Evacuation triggers, planned evacuation routes, assembly locations and locations to which crews are to evacuate in the event it is required 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.	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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.	Design, Construction and Operation	Accepted with minor amendments to: Remove reference to the requirement for individual property specific plans (which is covered in EPR EM3) and remove reference to the Biosecurity	**Develop and implement a Biosecurity Management Plan** 1. Develop, prior to the commencement of construction and in consultation with DEECA (Agriculture Victoria), an overarching Biosecurity Management Plan to be implemented during construction and operation to avoid and minimise impacts on biodiversity values, land use (including agriculture and forestry) and landholders.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.		Management Plan being a subplan of the CEMP noting that it will also apply during operation.	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 at individual properties (EPR EM3). 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.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			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.
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	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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. 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.			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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	Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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).			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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. 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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,	Decommissioning	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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: 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;	Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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	Design, Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	commencement of works on country (and every 12 months while construction works are occurring on the respective country of each Traditional Owner group).			
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.	Design, Construction, Operation	Accepted.	No change required.
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	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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: 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.	Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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*.	Design, Construction, Operation, Decommissioning	Accepted.	No change required.
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	Design, Construction	Accepted, with amendments to acknowledge both RAPs and Traditional Owner groups.	**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,

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			Wadawurrung Traditional Owners Aboriginal Corporation, and Wurundjeri Woi-wurrung Cultural Heritage Aboriginal Corporation 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 relevant RAPs or Traditional Owner groups. Relevant RAPs and 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 RAPs and Traditional Owner groups 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 RAP and Traditional Owner group's Cultural Values Assessment to avoid or minimise impacts on intangible cultural heritage values from the Project.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
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.	Design, Construction, Operation, Decommissioning	Accepted.	No change required.
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	Design, Construction and Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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. 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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				

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
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,	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	monitoring results or as a result of investigating complaints: 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: Follow-up with the potentially affected stakeholder(s) and capture all details. vii. 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. viii. Identify Project contributions, including key activities, as well as contributions from other surrounding projects that could be leading to cumulative effects. ix. Review associated controls for Project activities, and where necessary modifying			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	these controls or the intensity of activities to address the measured/reported issue. x. 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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).	Operation	Accepted.	No change required.
Aviation				
AV1	**Provide notification to Airservices Australia** 1. The Project must provide relevant Project details to Airservices Australia so that pilots, including	Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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	Design, Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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 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.	Design	Accepted, with minor amendments for clarity.	**Complete ecological surveys and finalise design** 1. Prior to the finalisation of the detailed design for an area, finalise ecological survey of the areas that have been partially surveyed or not yet surveyed (additional surveys) and identify native vegetation and

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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:			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

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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). 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			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

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	tree protection zones), TECs, wetlands and threatened taxa habitat to the extent practicable.			notional root zones, in accordance with the Assessor's Handbook (DEECA 2025), 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). 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:	Design, Construction	Generally accepted, with the exception of the amendments made by the IAC to 2(j). I consider that based on the material before me that the Minimal Risk Clearance can be implemented, and therefore additional mitigation measures are not required.	**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.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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:			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 within the areas identified for partial or minimised clearance and areas identified in the understorey retention plan (EPR DB9), understorey vegetation 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

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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 ii. minimise ground disturbance in patches of native vegetation where works are required			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. Tailored construction methods and measures being implemented in areas

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			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 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.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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).			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. 3. The WRL Construction Vegetation Management Plan must include measures to minimise impacts to threatened flora, with a particular focus on 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)

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	o. Any other threatened indigenous flora identified during the completion of the field surveys or the construction phase of the Project. 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			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. 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

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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 those seeds 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			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.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			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 those seeds 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

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
				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 weed management.
BD3	**Develop and implement a Fauna Management Plan** 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	Construction	Accepted, except for the IAC amendments to 1(d).	**Develop and implement a Fauna Management Plan** 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

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			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. 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

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	collisions with wildlife, and protocols in relation to vehicle strike of wildlife, including reporting requirements.			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)	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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). 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 b. 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.			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
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.	Design, Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
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);	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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: 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	Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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~~.			
	k. ~~Clearing of native vegetation must be limited to works required for maintenance of the easement to meet compliance with the Code:~~			
	~~between tower spans F4387-F4386-F4385, located between Lerderderg State Park and Darley.~~			
	~~subject to the outcomes of the work required by EPR BD10, between tower spans F6120DL-F6121DL-F6122DL-F6123DL, around Lexton Bushland.~~			
	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.			
	Limiting native vegetation trimming or removal in all other areas to the minimum required for			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	maintenance of the easement to meet compliance with the Code. 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~~. l. 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. m. ~~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 n. Processes to manage any spread of weeds and pathogens resulting from ongoing maintenance works within easement			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
BD8	**Complete ecological surveys and finalise design for TEC – White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland (WBYB)** 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.	Design	Accepted, with amendments to clarify surveys and to include the results of the Jacobs BD1 report, and any further survey data for this TEC.	**Complete ecological surveys and finalise design for TEC – White Box - Yellow Box - Blakely's Red Gum Grassy Woodland and Derived Native Grassland (WBYB)** 1. Prior to finalisation for the detailed design of an area, undertake surveys for WBYB in areas which: a. have not previously been surveyed for WBYB; or b. have been previously identified as containing WBYB and impacts to the WBYB population in that area 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 and any further surveys completed as part of BD1. 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	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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~~ ~~a.~~ 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	Appendix O of Technical Report A: Biodiversity Impact Assessment will be updated.			
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. 2. The further investigations must consider: a. ~~assess~~ native vegetation avoidance, fire risk, cost, feasibility and constructability of increased	Construction	Accepted with amendments, noting that the intent of the further investigation is to improve environmental outcomes for biodiversity and native vegetation through further avoidance and minimisation and not increase the significance of effects on biodiversity and other environmental values.	**Partial or minimised clearance approach in areas of higher biodiversity value** 1. Prior to the finalisation of the detailed design, define the criteria for areas to be considered as being of higher biodiversity value in consultation with DEECA, then investigate ways to further avoid and minimise vegetation clearance in areas of high biodiversity value 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. 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. 2. The further investigations must consider:

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			a. native vegetation avoidance, fire risk, cost, feasibility and constructability of increased tower heights b. landscape and visual impact of increasing any tower height up to 80m; c. 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. e. Update mapping in Appendix O of Technical Report A: Biodiversity Impact Assessment in accordance with the outcomes of the further investigations. f. ensure any proposed changes as a result of the further investigations do not result in increased impacts to other environmental values. 3. 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	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	5. The plan must be consistent with the engagement approach outlined in the Traditional Owner Engagement and Communications Plan (EM15).			
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. 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.	Design, Construction	Accepted the development of a plan to mitigate impacts on biolinks, however do not agree with the provision of additional funding as referenced in points 1(b) and 1(c) as this can be covered by EPR SC5. Further, I consider this should include consultation with key stakeholders such as DEECA where the project is impacting key biolinks.	**Biolink impact mitigation plan** 1. Develop and implement a plan to mitigate impacts on biolinks. Measures to be included in the plan must include the retention of understorey vegetation in the easement corridor to the extent practicable, having regard to the operation clearance requirements, and criteria for identifying 'key biolinks'. The plan must be prepared in consultation with the persons or bodies with management responsibility for the land on which the biolinks are located, including DEECA where the biolink is identified as a 'key biolink'.
Climate change				
CC1	**Undertake a climate change risk assessment**	Design	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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	Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	performance expectations as critical electricity supply infrastructure under climate change. Those measures would be implemented through on-going asset management.			
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.	Design	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	c. Characterisation of all excavated soil in accordance with waste management requirements in EPA Publication 702.2 Soil sampling for waste soils.			
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.	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
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. 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:	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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				

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
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, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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: 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.			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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** 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	Construction Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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	Construction, Operation	Accepted with minor editorial changes.	**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 eligible for support 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

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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 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			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 infrastructure and day to day

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			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).

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
				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.	Operation	Accepted.	No change required.
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	Design, Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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. 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.			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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	Design	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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:	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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. 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.			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
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.	Construction, Operation	Accepted.	No change required.
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.	Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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) 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)			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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. 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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. 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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	Design, Construction	Accepted, with the addition of the recommendation for close, ongoing engagement with Heritage Victoria on managing effects on the Berry Deep Leads Mining Landscape.	**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 from physical impact during the construction

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			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. 3. Conduct close, ongoing engagement with Heritage Victoria on managing project effects on the Berry Deep Leads Mining Landscape.
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	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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.	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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).			
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.	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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 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.	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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	Design	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	service infrastructure in consultation with the asset owners and managers.			
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.	Design, Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			

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	Design, Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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. 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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**	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
NV3	**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).	Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	Location / **Guideline target (VDV m/s$^{1.75}$)** **Residential (Night – 10pm to 7 am)** 0.2 **Residential (Day – 7am to 10 pm)** 0.4 **Commercial offices, 7am to 10 pm** 0.8 **Workshops, 7am to 10 pm** 1.6 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. 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**	Design	Accepted with an addition to require that offers of respite	**Design operational noise sources to minimise noise so far as reasonably practicable**

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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		for noise and vibration impacts be in line with the criteria and level of impact as set out in EPA Publication 1834.2	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, Prevent unreasonable noise by ensuring the risk of sporadic noise and low frequency noise is eliminated or managed to the extent reasonably practicable, and ii. 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

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	noise (EPA Publication 1996 as amended from time to time).			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). 2. Offers of respite for noise and vibration impacts should be in line with the criteria and level of impact as set out in EPA Publication 1834.2.
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.	Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
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.	Operation	Accepted.	No change required.
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: a. A commitment that at least 95% of all construction workers working on the Project who cannot commute safely to work from their	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			
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 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.	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.	Design, Construction	Accepted.	No change required.
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;	Construction, Operation	Accepted, with additional recommendations in Section 5.5 being: - require that community members living across different	**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:

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.		parts of the 190 km proposed route be represented on the group co-designing the Community Benefit Fund. - require that the proponent bear any reasonable costs associated with co-designing the fund, including reimbursing members for travel associated expenses incurred by their participation.	a. be funded by the Proponent; b. be codesigned with a group of community members living across different parts of the 190 km proposed route 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; d. be administered by the Proponent in accordance with the outcome of the design process. 2. The proponent will bear any reasonable costs associated with co-designing the fund, including reimbursing community members for travel associated expenses incurred by their participation.
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.	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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: 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).			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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) 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	(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	Construction, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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).			
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:	Design, Operation	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	water environments, so far as reasonably practicable			
SW5	**Manage stormwater runoff to reduce potential for surface water impact** 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.	Operation	Accepted.	No change required.
SW6	**Operational emergency flood response management** 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.	Operation	Accepted.	No changed required.
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.	Design, Construction, Operation	Supported.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	2. To aid in achieving the targets, the Principal Contractor must: 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.	Design, Construction	Supported.	No changed required.
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	Design, Construction	Accepted.	No change required.

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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. 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			

EPR Code	IAC Recommendation	Phase	Minister's Response	Minister's recommendation
	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.			

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	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			

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	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 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	Design, Construction	Accepted.	No change required.

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	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 a~~A~~pproach 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).			

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	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).			


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