

Impact Assessment Unit
Department of Transport and Planning

Email: environment.assessment@transport.vic.gov.au

**SUBJECT: Submission on Draft Scoping Requirements for the Victorian
Renewable Energy Terminal Project**

Dear Sir/Madam,

Thank you for the opportunity to provide comments on the draft scoping requirements for the Victorian Renewable Energy Terminal (VRET) Project.

The Victorian Renewable Energy Terminal is proposed to be located at the Port of Hastings, within the Mornington Peninsula Shire. Council has reviewed the draft scoping requirements and has outlined its comments and recommendations in the table below.

Should you have any questions regarding this submission or require further clarification, please do not hesitate to contact Ersi Ni, Strategic Planning Project Officer at Ersi.Ni@mornpen.vic.gov.au.

Yours faithfully,



Katanya Barlow
Manager – Strategic & Infrastructure Planning
Mornington Peninsula Shire Council

4 December 2024

Table of comments on draft scoping requirements

No.	Page	Section	Comment
1.	-	List of abbreviations	'MNES - Matters of National Environmental Significance' should be added to this list. MNES is used on Page 12 at s.3.2 'Content and format of the EES'.
2.	4	1.1 The project and setting	The term 'Commonwealth waters' should be clearly defined or described, accompanied by mapping to illustrate the extent of the 'Commonwealth waters adjacent to Victoria' mentioned in the first paragraph. Providing such mapping is essential to enhance understanding of vessel movements and their associated amenity impacts, including noise and visual effects. This visual representation will help clarify the spatial context and improve comprehension of the potential impacts in the relevant areas.
3.	5	Figure 1. Project Location – Regional Setting	What is the 'utility corridor,' and how was it defined? The 'utility corridor' should be clearly described. The Project and Setting, particularly if it is an integral part of this project's development. This section should define the utility corridor, specify its extent, and explain the criteria or process used to determine its boundaries. Including these details ensures clarity and completeness in the project description, helping stakeholders understand its role within the overall development framework.
4.	10	2.3 Accreditation of the EES process under the EPBC Act	If the Commonwealth Minister decides that the project is a controlled action, the Scoping Requirements will accordingly need to address the controlling provisions of the EPBC Act.
5.	11	3.1 General approach	'4. Assess the likely residual effects' The impact assessment should address the uncertainty regarding potential operational impacts of the wind turbine units (WTUs). While WTUs will be operated by others, reasonable consideration should be given to these impacts using available predictions or estimates. This aligns with the

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			consideration of 'direct, indirect, combined, cumulative, short- and long-term, beneficial and adverse effects' as outlined on Page 11.
6.	11	3.1 General approach	The scoping requirements should explicitly address the highest use scenario for Victoria's Renewable Energy Project, focusing on potential offshore wind (OSW) farm expansion and its impacts. Special attention should be given to the increased demand for this terminal, including its capacity to support expanded operations, associated infrastructure upgrades, and cumulative environmental and social impacts.
7.	13	3.3 Project description and rationale	The fifth dash point under the seventh dot point (details of project components) should also include a requirement to describe the proposed finishes for constructed elements. This information is critical for assessing potential landscape and visual impacts, ensuring a comprehensive evaluation of the project's aesthetic and environmental effects.
8.	13-14	3.4 Project development and alternatives	The scoping requirements should emphasize the need to comprehensively consider and assess alternative locations and sites for the VRET facility. Specifically: • Alternative Location Context: The EES should explore the feasibility of establishing the facility in non-port locations that could support Victoria's OSW development, examining potential environmental, social, and logistical implications. • Alternative Ports: A comparative assessment of other ports capable of supporting OSW should be included, detailing infrastructure suitability, environmental constraints, and economic impacts. • Alternative Sites within the Port of Hastings: The assessment should identify and evaluate alternative sites within the Port of

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			Hastings, considering proximity to sensitive environments, operational efficiencies, and potential mitigation of environmental impacts. Additionally, the EES should provide a transparent explanation of the decision-making process that led to the selection of the OTRA site at the Port of Hastings as the preferred location. This analysis must account for environmental considerations, demonstrating why this site offers the best balance of benefits and minimal impacts.
9.	13-14	3.4 Project development and alternatives	The scoping requirements should specify the need to assess the potential for distributing activities to alternative locations and/or sites, rather than concentrating all terminal and associated activities at a single site. The assessment should account for environmental and economic impacts, operational resilience, land use optimization, and community and social factors. This assessment ensures the decision-making process accounts for a balanced and sustainable approach to the terminal development and associated activities.
10.	13-14	3.4 Project development and alternatives	The scoping requirements should specify the need to assess alternative boating options. This includes exploring whether the use of different boat sizes or designs could achieve the same operational outcomes while minimizing the extent of dredging required.
11.	14	3.6 Environmental management framework	This section should elaborate on what constitutes the 'baseline environmental conditions'. This will ensure the assessment accurately captures pre-existing environmental parameters, providing a clear benchmark for impact evaluation and compliance with regulatory requirements.
12.	22	4.5 Other matters	Under 'Key issues', the last dot point should add 'and those at vantage points from which elements of the project may be visible' after 'nearby residents or community' to give consideration to potential sensitive receptors not considered being in the 'nearby' area.

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13.	22	4.5 Other matters	Another 'Key issue' that should be assessed is the impact of dredging and seagrass loss on carbon release and future carbon capture. It is important to ensure the project is aligned with the relevant laws and regulations regarding carbon capture, storage, and response to climate change.
14.			The Scoping Requirement should explicitly include a cumulative impacts assessment of significant developments and operations at the Port of Hastings. This assessment should consider both existing and future activities, including: • Current operations at the BlueScope Wharf and the Esso Wharf. • The proposed VRET. • The proposed Hydrogen Energy Supply Chain (HESC) project.
15.			Additionally, there is an urgent need for the State Government to develop a Strategic Framework for the Western Port Bay to balance development with environmental protection. The framework should: • Tackle ecological challenges such as habitat loss, pollution, and climate change impacts. • Support restoration of marine and catchment environments. • Set out a sustainable strategy for long-term economic and environmental resilience. Incorporating cumulative impact assessments (as noted in Item No. 14) and developing a Strategic Framework for Western Port Bay – supported by an environmental fund similar to the Port Phillip Bay Fund – would demonstrate a strong commitment to sustainable development while providing clear direction and support to address the growing environmental issues at the port.