

24 June 2025

Enquiries: 03 5358 8700

Mr Alistair Parker
Chief Executive Officer
VicGrid
Submission via Engage Victoria

Dear Mr Parker

Draft 2025 Victorian Transmission Plan

Northern Grampians Shire Council appreciates the opportunity to provide feedback and submit questions on the Draft 2025 Victorian Transmission Plan (VTP).

Agriculture is the backbone of our shire's economy, community, landscape and lifestyle. The proposed Renewable Energy Zone (REZ) in the draft VTP represents a major proposed change to the farming community. It may be a line on a map, but this proposal, if it goes ahead, will have a significant impact on the shire's lifestyle, rural landscape, and connected farming community. Council does not support the proposed REZ as it stands, as there are too many unanswered questions about it (detailed below in Technical Questions) and requires much more time to consider the proposal.

There is significant opposition to renewable energy projects from our farming community. It is this same farming community that is located within the proposed REZ. It is unclear why the proposed REZ has been identified over this land, given the lack of support, and refusal from many to host these projects. Our farming community are extremely busy currently with farming operations and trying to manage in drought conditions. The time open for submissions is completely inadequate for our farming community to respond meaningfully.

The VTP is very significant for Northern Grampians Shire Council as it will have direct impacts for land use, agriculture and local communities in the region. The VTP proposes a Grampians Wimmera REZ which is mostly located in the Northern Grampians Shire. As a potential host region for major proposed transmission projects including VNI West and Western Renewables Link (WRL), Northern Grampians Shire Council is strongly invested in ensuring the VTP reflects a transparent planning process and carefully considers community impacts.

The community of Northern Grampians Shire Council is currently facing a range of stressors including drought, cost of living, the introduction of the Emergency Services Levy and impacts of the 2024-2025 Summer bushfires. There is significant community opposition to the renewable energy transition that is causing community angst on top of these other compounding issues. Four weeks is not considered adequate time for the community to review the plan and make submissions, noting the significance of the proposed REZ, and stressors as noted above. VicGrid has allowed too little time for consultation on such a significant plan, especially given all the other challenges that our region faces. We request an extension of time of one month for submissions to allow the Council to properly consult with our community, and to allow community members to make submissions.

CONTACT US

CONNECT WITH US

In recognition of its community's concern, on Monday 2 June the Northern Grampians Shire Council passed a motion opposing VNI West in its current form and advocating to the State Government for an alternative to VNI West. The Northern Grampians Shire Council urges VicGrid to engage constructively and sensitively with the Council and its community with an understanding of this context.

Northern Grampians Shire Council has several concerns regarding how VNI West and WRL are presented in the VTP. The VTP assumes that both VNI West and the Western Renewables Link (WRL) will proceed, despite these projects still being subject to formal approval processes. Council questions why these projects are not classified as new proposals. It is essential that the planning framework does not pre-empt the outcomes of these approvals. Council opposes the assumption that VNI West and WRL will be built, as its community's concerns about the transmission lines have not been adequately addressed by the State Government, VicGrid, Transmission Company Victoria, or through the relevant approval processes.

Northern Grampians Shire Council's position is based on a range of concerns, including the lack of social license from the community, the impact of the project (and the uncertainty around it) on community wellbeing, the disruption to agriculture in the shire, and the adequacy of the consultation process to date. Northern Grampians Shire Council concerns are heightened by the State Government's intention to use compulsory powers to access land, acquire easements over land and build on it.

Critical Community Issues

Community benefit initiatives are crucial for the VTP because they help ensure that local communities share in the value created by major infrastructure developments. These initiatives should build trust, improve local outcomes, and contribute to long-term social license by addressing community needs, mitigating impacts, and delivering tangible, lasting benefits where disruption occurs. Nonetheless, the VTP includes no new community benefit initiatives. The VTP does not include any commitment to new or additional benefits for Northern Grampians Shire Council (or any other council) beyond what has already been publicly announced.

A critical pressure in the Northern Grampians Shire Council region is the ongoing shortage of suitable and affordable housing for current residents and for people seeking to relocate to the region. This constraint impacts the shire's ability to attract and retain a workforce across key sectors such as agriculture, health and education. New energy projects in the Shire will put more pressure on housing and residents living in the shire, yet the VTP makes no mention of how this issue will be addressed.

Northern Grampians Shire Council wants to understand what the Community Energy Funds will provide and what, if any, contribution the Victorian Government and its agencies will make to support our community on critical matters such as housing. Northern Grampians Shire Council recommends that the scope of REZ Community Energy Funds be broadened to include essential local priorities, with a particular emphasis on housing. Furthermore, Council seeks direct engagement with VicGrid and the Minister for Energy and Resources to discuss the region's critical and ongoing housing challenges.

Technical Questions

The VTP remains high-level in its current form and lacks sufficient detail about a wide range of technical issues. The VTP describes the range of factors that it has considered in deciding where to locate the REZ's, but it reveals no detail on these factors for any of the REZ's. As a result, it is unclear why the Northern Grampians REZ is located where it is. The map on page 67 of the VTP shows seven "Key land use and landscape values" in the REZ, more than in any of the other six REZ's in the VTP. Of these seven, five are identified biodiversity areas. It also:

- identifies mining as a key value,
- does not identify agriculture as a key value, and
- does not reflect the strong opposition to the VNI West and renewable energy development in the area of the proposed REZ.

The failure to acknowledge agriculture as a key land use in the proposed REZ is hard to comprehend. Agriculture is the main industry in the shire. The failure to acknowledge its importance also raises serious biosecurity concerns: how will these be managed when the VTP does not even acknowledge agriculture in the area?



The movement of people, vehicles, materials and soil when developing projects in the REZ poses a very high risk that the VTP does not acknowledge. How will the VTP ensure proper biosecurity measures to protect our shire's agricultural enterprises over the coming decades?

The identification of five biodiversity areas within the proposed REZ is both disappointing and confusing, given the significance of these areas. The south eastern end of the proposed REZ covers some of the highest quality areas of biodiversity in the State. Further it appears from the REZ mapping that parts of a sixth area (Landsborough Nature Conservation Reserve) may also be within the proposed REZ. The REZ also directly abuts two other biodiversity areas, Mount Bolangum and Big Tottington Nature Conservation Reserve, and Kara Kara National Council requests reconsideration of the mapping taking into account the significance of these areas, both individually and collectively. Council also requests clarification of the weighting and assessment process that has led to these areas being included in the proposed REZ. Park.

In light of these features of the proposed Northern Grampians REZ, why is the REZ located where it is, and why is no REZ proposed further north along the proposed VNI West?

In relation to land holders and land access, Northern Grampians Shire Council requests the following information:

- When will TCV access private land without landholder consent? This activity will be disruptive for our community, and we would like advance notice of when it will occur.
- What is the timeline for the EES process for VNI West? The most recent public information is the VNI West Landholder Guide dated May 2024 – we seek an updated, detailed timeline for the project.
- What further engagement do VicGrid and TCV plan with landholders on the proposed VNI West route?

The VTP states that the land required for renewable energy projects will be minimal. However, this is based on assumptions that may not hold true. Firstly, it assumes that future onshore wind developments will remain limited to between 320 and 480 MW in the Grampians Wimmera REZ. However, there are already proposed projects within Northern Grampians Shire that exceed this capacity. Council is concerned that the VTP does not convey the true potential scale of wind development in the Shire. These concerns are reinforced by the statement that *“the figures are not caps or limits”*. Council understands that a cap on the new generation that can connect within each REZ – called an access limit – will be defined for each REZ as part of REZ access schemes. How will the Victorian Access Regime limit projects above the estimated range, and what will be involved in a Grid Impact Assessment?

Northern Grampians Shire Council is concerned that the 320 - 480 MW ‘capacity’ is misleading. Proposed wind projects within the Grampians Wimmera REZ total approx. 1860 MW, four times greater than the capacity outlined with the draft VTP. Other than the access limit, of which details have not been provided, it is unclear whether existing proposed projects will be allowed to proceed, acknowledging the significant disparity between the identified ‘capacity’ by 2040 and that of existing proposed projects.

Secondly, the VTP assumes that Victoria's offshore wind program will progress successfully (despite some uncertainty). The VTP assumes that offshore wind will provide the bulk of new renewable energy generation in Victoria. Offshore wind is significantly more expensive than onshore wind and solar. The VTP does not consider what happens if the offshore wind targets are not met and where the new renewable energy generation will be built if this offshore wind is not built. What if the offshore wind targets are not met? Where will the new renewable energy generation be built then?

The VTP is also limited to a 2040 timeframe. This scope fails to address long-term impacts beyond 2040, raising questions around what will happen to the region after this timeframe, including the potential for considerably more new renewable energy generation in the shire after 2040.

Northern Grampians Shire Council requests further information from VicGrid in the VTP beyond 2040. Our community needs to understand the picture for the longer term. It is not acceptable to wait until the proposed 2027 VTP for this information.

The VTP is unclear about what it means by “projects currently in development.” What level of development is required to be considered “currently in development”? How does VicGrid classify all projects in the shire?

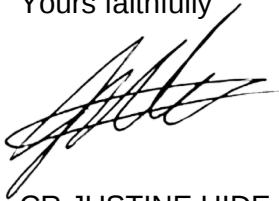


Why does the VTP contain no battery limit? While agriculture may occur around wind towers and solar farms, battery projects take up the land they occupy fully and exclude agriculture from that land. Battery developments are an intensive industrial activity in our rural landscape. It is noted that the Victorian State Government is consulting on a PILOR discussion paper. The discussion paper refers to “unique characteristics of energy storage projects” (page 8) and states “*For example, a 100MW wind farm might have a land footprint of 2,000 hectares, while a 100MW battery might take up just one or two hectares*”. This description of the land footprint of a wind farm contradicts the VTP which attributes to wind farms only the land taken up with turbines and roads to service them. The Victorian State Government is making contradictory arguments in two papers that are out for consultation at the same time: this sort of inconsistency is unacceptable and will breed cynicism.

Council seeks more details of the proposed Northwest strengthening program, which includes replacement of sections of the existing single circuit transmission with a new high-capacity double circuit line. Will this increase the height and size of existing line? Is this in addition to the extension & doubling of the WRL? Will the single 220kV line operate as well as the double transmission 500kV?

Northern Grampians Shire Council appreciates VicGrid’s engagement with the Council to date, and I request an urgent meeting with you to discuss the issues raised in our submission.

Yours faithfully



CR JUSTINE HIDE
DEPUTY MAYOR

