

26 June 2026

Alistair Parker
Chief Executive Officer
VicGrid
Via Engage Victoria and email: vicgrid@deeca.viv.gov.au

Dear Mr Parker

DRAFT 2026 DRAFT VICTORIAN TRANSMISSION PLAN GUIDELINES

Thank you for the opportunity to make this submission to VicGrid on the Draft 2026 Victorian Transmission Plan (VTP) Guidelines. This submission is made on behalf of nine councils in North West Victoria:

1. Buloke Shire Council
2. Gannawarra Shire Council
3. Hindmarsh Shire Council
4. Horsham Rural City Council
5. Loddon Shire Council
6. Northern Grampians Shire Council
7. Swan Hill Rural City Council.
8. West Wimmera Shire Council
9. Yarriambiack Shire Council

The mainstay of our region's economy is agriculture, and the State's policies to support energy and mining development in our region are having a major impact on our communities. Community uncertainty about (and opposition to) proposed transmission infrastructure, renewables and mining projects is growing and is negatively affecting community cohesion. We urge VicGrid to engage constructively and sensitively with councils and our communities with an understanding of this context.

Our councils take this opportunity to reiterate to VicGrid and the State that the impacts of the energy and mining transitions can only be addressed through strategic, forward investment in our region.

The foundation for our submission is the *Resource Ready - North-Western Victoria Energy & Mining Impact & Readiness Study (Readiness Study)* that our councils developed in collaboration with VicGrid. The Readiness Study is a good example of how Local and State Government can work together to identify the impacts that new industries, including energy and mining, will have on the region and what is needed to address these impacts.

The nine councils urge VicGrid to formally acknowledge the Readiness Study as an evidence base for planning in North-West Victoria and commit to working with us to implement its findings through a funded, strategic investment framework. We propose a stronger role for local government, working with the State, to identify and implement solutions for our region. The outcome we are seeking from this submission is a shared understanding of the impacts on our communities and genuine engagement with you and the

State Government to address energy transition and mining impacts through adequate planning associated with the 2027 VTP.

The Readiness Study describes existing conditions in our region, including labour shortages, extremely low rental vacancy rates, ageing housing stock, financially constrained councils, and infrastructure under pressure. In this context, the cumulative impacts of energy, transmission and mining projects pose significant risks to existing industries, communities and quality of life. These findings must inform how the energy transition is planned and implemented, including in the 2027 VTP.

Community Consultation

A fundamental concern of the nine councils is the adequacy and authenticity of VicGrid's consultation. The experience of our councils across multiple rounds of submissions and engagement has left communities concluding that decisions are not incorporating their input.

Community consultation must be genuine and adequately timed. Our councils and communities seek greater transparency about how feedback shapes decisions. The 2027 Guidelines describe a 'community engagement model' (section 5.1) that amounts to a communications and awareness-raising function. Objectives such as 'increasing awareness' and 'growing our visible presence' sit at the 'inform' level of the International Association of Public Participation (IAP2) framework, rather than reflecting the meaningful engagement process that our communities deserve.

VicGrid's recently published *Community Engagement and Social Value Guidelines* refer (p. 17) to the Wimmera Southern Mallee Regional Energy Collaboration. As councils have noted to VicGrid before, this is a poor example of engagement as the collaboration has excluded local government and community from its work. We urge VicGrid and the energy industry to work genuinely and collaboratively with councils.

Community Impact

The 2027 Draft VTP Guidelines, like the 2025 VTP Guidelines, remain largely silent on community impacts. The impact of multiple renewable energy, transmission and mining projects on our communities' livelihoods and mental health is significant and sustained. This was documented in the Readiness Study and has been raised repeatedly by councils in their submissions to VicGrid. The Guidelines must include explicit requirements for:

- **Community impacts**, including mental health, to be identified and assessed as part of the VTP process.
- **Cumulative impact assessment** across all proposed projects in each region, not just project-by-project assessments. This is a longstanding gap that has not been addressed despite repeated advocacy from our councils.
- **Decommissioning plans** for all renewable energy and transmission projects. This has been repeatedly raised by councils. The absence of decommissioning requirements remains a significant omission.
- **Forward investment frameworks** that go beyond optional 'social value' initiatives to require strategic, forward investment in line with the scale of impacts. The Readiness Study provides the evidence base for what our region requires. VicGrid and the State should formally acknowledge and fund implementation of its findings.

The councils note the reference in the Guidelines to 'maximising collective benefits'. We support this objective in principle but seek transparency about how it will be achieved in practice. The communities hosting energy infrastructure in our region have seen limited tangible benefits to date, while bearing significant and ongoing costs. The Guidelines must specify the mechanisms through which collective benefits will be delivered and measured.

VicGrid's Access Regime alone will not achieve the outcomes we seek. The councils also seek an active role in the governance of Community Energy Funds.

Scenarios in the VTP Guidelines

In previous submissions, councils have raised their concerns about the potential scale of renewable energy development in our region. In the 2025 VTP, under the high-energy demand scenario, the Western and Northwest Renewable Energy Zones are modelled to host around 45% of the state's new onshore wind and solar energy projects by 2040, even if 9GW of offshore wind is developed.

We are concerned that VicGrid is underestimating the potential scale of renewable energy development in our region by using implausible scenarios in the 2027 VTP.

The *National Electricity (Victoria) Act 2005* (NEVA) provides what a VTP must consider. Section 57(1)(a) requires the VTP to:

Define a set of **plausible**, high-impact scenarios that establish the electricity system's 25-year investment needs consistent with Victorian energy policy objectives and market outlook.

The Draft VTP 2027 Guidelines (page 30) include three proposed scenarios, two of which assume Victoria's target of 2GW of offshore wind generation by 2032 is achieved. We submit that these two scenarios are implausible and contravene the NEVA.

The Environment Impact Statement (EIS) for Victoria's most advanced offshore wind project, Star of the South, demonstrates that the 2032 target cannot be achieved. Chapter 4 of the Star of the South's EIS states "If approvals are obtained in the next few years, construction could start around 2030 and electricity generation from 2032." (PDF p. 6). However, the EIS's own project schedule conflicts with this information and shows that turbine construction would not start until 2034 (PDF p. 7). Without turbines, there is no electricity generation. Therefore, the earliest possible date for offshore wind energy generation in Victoria is 2034, two years after the 2032 target.

Moreover, the Victorian Auditor-General's Office report 'Managing the Transition to Renewable Energy' (December 2025) found explicitly that Victoria will not meet this 2032 offshore wind target. The Victorian Department of Energy, Environment and Climate Action's response to the report did not challenge this finding.

A transmission plan that does not model its scenarios honestly is not fit for purpose. VicGrid will not comply with the NEVA if it uses implausible scenarios. If offshore wind targets are not met, additional onshore wind and solar generation will likely be required to fill the gap. Much of that generation is likely to be sought from REZ regions like the Western REZ and North-West REZ.

Councils request that VicGrid uses only plausible scenarios in the VTP that reflect a realistic range of offshore wind outcomes, and that the VTP make clear how this would affect the scale and pace of onshore generation required in our region. Without realistic scenarios, our community cannot make informed judgements about what the energy transition means for our region, and councils cannot adequately advocate on their behalf.

The energy transition is having a profound and sustained impact on our communities' wellbeing, our agricultural landscapes and our local economies. Our nine councils remain committed to engaging constructively with VicGrid, but genuine engagement requires that community concerns are treated as fundamental planning inputs. The councils making this submission look forward to genuine engagement with VicGrid.

Yours faithfully



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