

12 August 2025

Ms Sarah Carlisle
Chair
Western Renewables Link Inquiry and Advisory Committee (IAC)
Submission via Engage Victoria website

Dear Chair

2025 Western Renewables Link Environmental Effects Statement

The Northern Grampians Shire Council (NGSC) appreciates the opportunity to make this submission on the Western Renewables Link (WRL) Environmental Effects Statement (EES).

Background

The energy transition, including the construction of the WRL, is very significant for NGSC as it will have direct impacts for land use, agriculture and local communities in the region. As a potential host region for major proposed transmission projects including the WRL and VNI West, and renewable energy projects that would connect to the transmission projects, NGSC is strongly invested in ensuring all proposed developments reflect a transparent planning process and carefully consider community impacts.

The community of NGSC 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 and division on top of these other compounding issues. In recognition of its community's concern, in June 2025 the NGSC passed a motion opposing VNI West in its current form and advocating to the State Government for an alternative to VNI West. Further, in July 2025, the Council passed a notice of motion specifically stating its opposition to the introduction of a Renewable Energy Zone (REZ) within NGSC its current form.

NGSC's position is based on a range of concerns, including the lack of social license from the NGSC community, the impact of the VNI West 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.

Approximately 13km of the WRL 500kV transmission line is proposed to be situated in the NGSC area, starting from the existing Bulgana Terminal Station and running parallel to the existing 220kV transmission line between Bulgana and Waubra. A new 500kV terminal station and laydown area are also proposed within the NGSC area near Bulgana.

NGSC has a range of concerns regarding how WRL is presented in the EES. I attach NGSC's specific comments on the EES. The comments request a range of changes to the EES documentation to address our concerns. A summary of these concerns are outlined below.

CONTACT US

CONNECT WITH US

New Bulgana Terminal Station

NGSC submits that the proposed new substation at Bulgana should not form part of the WRL EES, as it is a component of the VNI West project and should be properly assessed as part of that separate project. The VNI West is being developed by Transmission Company Victoria, and its EES is currently in the early stages of development. As noted above, the NGSC opposes the VNI West in its current form. Our Council and its community want an adequate opportunity to scrutinise VNI West through its own EES. Including the new Bulgana Terminal Station in the WRL EES is seeking approval for part of the VNI West by stealth.

NGSC requests that the IAC exclude the Bulgana Terminal Station from its consideration and advise that it should be included in the VNI West EES.

Cumulative Impacts

The Scoping Requirements for the WRL EES (final, November 2023) provide that the EES must address (page 11, 3.1):

potential cumulative impacts arising in conjunction with other existing or proposed projects

NGSC submits that the WRL EES fails to consider the cumulative impacts of the multiple large-scale renewable energy and transmission projects proposed or underway in the region, including the Joel Joel Battery Energy Storage System (BESS) project and Watta Wella Wind Farm projects. These projects are immediately adjacent to the Western end of the WRL project in the Northern Grampians Shire.

- The **Joel Joel BESS** project is a 250 MW, four-hour battery adjacent to the existing Bulgana Terminal Station. The project was approved by the Minister for Planning in August 2024. Construction is planned to commence construction in the third quarter of calendar 2025 and will overlap with the proposed construction period for the WRL.
- The **Watta Wella Wind Farm** is a proposed 360 MW wind farm with turbines that surround the existing Bulgana Terminal Station and the existing 220 kV overhead transmission line. The project is planned to commence construction in late 2027 and will overlap with the proposed construction period for the WRL.

The cumulative impacts of these projects with the WRL include:

- the impacts of construction noise, traffic and dust on nearby residents,
- the impacts of traffic on the safety and road access of local road users, and
- the impacts of traffic on the condition and serviceability of local roads.

A significant number of the technical impact assessment reports, fail to consider, either one or both of these projects.

Impact on Agriculture

The construction and operation of the WRL will impact farm businesses along its route. The EES does not adequately consider these impacts. The Department of Transport and Planning *Peer Review Report* recommends that "land use and property attribute data be provided for each affected property." This recommendation has not been adopted, and NGSC requests that this work be required of the proponent to ensure impacts on farm businesses are identified and mitigated.

Additionally, NGSC requests that the proponent provide an individualised farmer advisory service to minimise the disruption to their businesses during construction, rehabilitation and operation.



Other Issues

The EES raises several issues for NGSC with regards to how the proposed planning scheme amendment will operate, including the operation of the Special Controls Overlay (SCO) and the Incorporated Document, and a range of other issues in the technical reports. In their present state, how the SCO and Incorporated Document will work is unclear or ambiguous. Examples of issues in the EES include:

- the Draft Planning Scheme map shows the existing Bulgana terminal station in the wrong location,
- there is no restriction on construction operating hours to reduce noise, dust and traffic impacts on nearby residents,
- the Bushfire Impact Assessment states that there have been no bushfires from transmission infrastructure in the last 30 years, despite the findings of the Bushfire Royal Commission.

Details of these and other issues are set out in the attachment.

Impact on Road Network

The WRL project poses significant risks to safety, damage and costs to our road network from the traffic for the project, including oversize and over mass vehicles. NGSC has experienced very significant detrimental impacts and road remediation costs from other energy projects in the Shire that have not been recovered from the project proponents. Our experience has included:

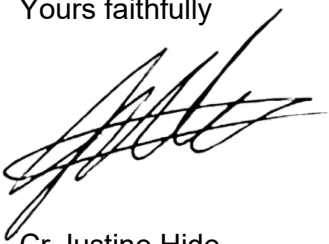
- Failure to comply with written traffic management plans, risking safety to other road users,
- Polluting home rainwater supplies with road dust, and
- Damage to roads, bridges and culverts that have had to be repaired at the Shire's expense.

It is unacceptable to the Council and our community that significant projects in our area experience these impacts even when projects go through extensive planning processes, such as an EES. To protect the interests of the Shire we are seeking detailed recommendations from the IAC, including the provision of financial security, to ensure that our rate payers are not out of pocket because of the WRL. Our comments on the impact on the road network in the attachment are extensive in order to address the identified shortcomings.

Our submissions on these and other matters are set out in the attachment.

We request the IAC to make recommendations to vary the project documentation to address our concerns.

Yours faithfully



Cr Justine Hide
Deputy Mayor



Comment ID	Report/Chapter	Section/Location	Reviewer Comment
1	All		The Joel Joel BESS (approved) but not yet constructed is located on the adjoining site (immediately adjoining the existing Bulgana Terminal Station). Watta Wella Windfarm and Battery is located immediately surrounding and adjacent both the existing and proposal terminal stations. For the most part, these projects have not been considered in the various impact assessments. NGSC requests cumulative impacts of multiple projects be taken into consideration across all EES documentation.
2	Incorporated Document		The Specific Controls Overlay (SCO) enables "The land identified in Clause 3 of this document may be used and developed for the purposes of the Project in accordance with the specific control in Clause 4 of this Incorporated Document". Clause 45.12 (Specific Controls Overlay) is used to apply specific controls designed to achieve a particular land use and development outcome in extraordinary circumstances. Land affected by the Specific Controls Overlay may be used or developed in accordance with a specific control contained in the corresponding incorporated document, which would be identified in the Schedule to Clause 45.12. The specific control may: • Allow the land to be used or developed in a manner that would otherwise be prohibited or restricted. • Prohibit or restrict the use or development of the land beyond the controls that may otherwise apply. In regard to the second dot point, NGSC requests confirmation that this does not prohibit the use of the land in accordance with the usual provisions of the scheme e.g. for farming activities.
3	Incorporated Document	4.3	"4.3 Ancillary activities to the use and development of the Project Land for the purposes of the Project includes, but is not limited to: b) Use and development for temporary workforce accommodation sites". The only reference to the two workforce accommodation sites is in Section 4.13. NGSC wants ensure that the workforce accommodation sites listed are sufficient to accommodate all works needed for the project and are limited to the two identified sites (ie will not be provided anywhere else in the SCO corridor length. Request that Section 4.3 specifically list the two sites.
4	Incorporated Document	4.3	"4.3 Ancillary activities to the use and development of the Project Land for the purposes of the Project includes, but is not limited to: e) Demolishing, removing or relocating buildings and infrastructure."

			NGSC requests confirmation this would not apply to dwellings or farm buildings.
5	Incorporated Document	4.3	"4.3 Ancillary activities to the use and development of the Project Land for the purposes of the Project includes but is not limited to: j) Storage and assembly of materials and equipment required for the Project, including concrete batching plants where required." The current plan does not appear to identify specific sites in the development plan/incorporated document. The project description chapter Section 6.6.6.2 Sourcing Concrete states that "The Project will primarily source concrete from local suppliers. Mobile concrete batch plants (where materials are mixed on-site using specialised plant) may be required for the Project's construction. If required, these plants will be located at the construction laydown areas or tower sites". Given the impacts associated with concrete batching and separation distances, NGSC requests that locations for these be identified within the development plan. The current wording would allow for anywhere within the SCO corridor. Batching plants have a 1km buffer requirement at clause 53.10, their location should be confirmed in Development Plan.
6	Incorporated Document		NGSC notes that SCO8 doesn't trigger a planning permit for new buildings/works within the SCO8 overlay area. This leaves potential for new farm sheds or other buildings potentially being built within the overlay/alignment without requiring a planning permit, which could then impact on the project. NGSC requests that SCO8 be amended to prevent this occurring.
7	Incorporated Document	Page 4 of 11 (Page 123 of overall document)	Clause 4.5.2 notes that use and development must generally be undertaken in accordance with the development plans except as permitted under Clause 4.7, which allows for the re-siting of tower footprints and stringing pads - but does not list any constraints on re-siting that prevent these being sited closer to dwellings, either within the proposed SCO or adjacent properties. NGSC seeks confirmation that there will be suitable setbacks retained for dwellings impacted by re-siting of tower footprints and stringing pads.
8	Project Description Chapter	6.6.10 Working Hours	NGSC notes there is currently no limit on 24-hour construction, other than EPA noise requirements. NGSC submits that there should be greater restriction on the ability to be able to undertake construction 24/7 construction.

			NGSC requests that construction be limited to daytimes only, within proximity to dwellings. NGSC also requests greater consideration of the cumulative impacts of construction 365 days a year for two years. NGSC requests inclusion of mandatory no construction days to ensure breaks from associated construction impacts e.g. noise, traffic, dusts.
9	Project Description Chapter	6.6.8.1	"The Project will establish five temporary laydown areas. Two of the laydown areas will be located at the existing terminal station sites (Bulgana and Sydenham), one at the new 500kV terminal station near Bulgana, and two intermediate laydown areas that are proposed to be co-located with workforce accommodation facilities southeast of Lexton and southeast of Ballan". "4.3 Ancillary activities to the use and development of the Project Land for the purposes of the Project includes, but is not limited to: a) Use and development of laydown areas for construction purposes". The laydown sites are referenced on the relevant map in the Development Plan, however the two laydowns at Ballan are Lexton aren't shown on the Development Plan, and an additional laydown is shown at Elaine, which isn't mentioned in the project description chapter. NGSC requests that all laydown sites are identified in the Incorporated Document. Currently the sites are not identified in the Incorporated Document, and current wording would allow for these anywhere within the SCO.
10	Draft Planning Scheme Amendment	Multiple references, specifically page 174	The Draft Planning Scheme Amendment proposes to 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 land subject to the Specific Controls Overlay (SCO8). NGSC requests clarification if the VicSmart application are exempt from notice and review.
11	Draft Planning Scheme Amendment	Multiple references, specifically page 19 and in the development plan (section 4.9)	There is a requirement that following completion of the project, the extent of SCO be reviewed, as follows <i>"The Incorporated Document includes as a condition the requirement for a review of the extent of land affected by the SCO8 to be undertaken, and a report prepared for the Minister for Planning which identifies any land which is not required for the purpose of the Project, and which may be removed from the SCO. ... It is highlighted that for any subsequent change to be made following consideration of the report by the Minister for Planning, that a further planning scheme amendment would be required if the extent of the SCO is proposed to be changed."</i>

			NGSC notes that Council does not want to be responsible for the subsequent amendment to review and revise the extent of the SCO.
12	Draft Planning Scheme Amendment	Multiple references, specifically page 182	<i>"2.0 Responsible authority for administering and enforcing a provision of this planning scheme: The Minister for Planning is the responsible authority for administering and enforcing the planning scheme, including the incorporated document titled Western Renewables Link Incorporated Document, XXXXX 2025, for land affected by the Specific Controls Overlay (SCO8) in the Schedules to Clause 45.12 and Clause 72.04 as shown on the planning scheme maps."</i> Proposed new wording for Schedule to Clause 72.01 is unclear. This wording makes it sound like the Minister is the RA for all applications for planning permits on land covered by the SCO8, even permit applications which may not be related to the WRL. This should be reworded to clarify that only permit applications related to WRL are to be approved by the Minister for Planning within the SCO.
13	Draft Planning Scheme Amendment - Mapping	Page 78 of 314 - map	The mapping for the proposed SUZ on the existing Bulgana Terminal Station is incorrect. The current terminal station is located across the title boundary of two parcels, Lot 1 PS737890 and Lot 2 PS737890m as shown in screenshot to the right. The rezoning is proposed to occur to only Lot 1, which means part of the terminal station will not be in the SUZ. NGSC requests that this is corrected. Given zoning should apply to a parcel/property, NGSC requests that this is resolved via a boundary realignment, so that Lot 1 matches the existing terminal station. As these sites are in separate ownership, with only Lot 1 owned by Ausnet - they would need agreement from the other landowner as part of any boundary realignment.
14	Draft Planning Scheme - Strategic Justification	Page 11 (Page 16 of 314 overall)	Under the words: <i>"The amendment also changes the Melton Planning Scheme to:"</i> The first dot point incorrectly refers to Northern Grampians Planning Scheme when it should be the Melton Planning Scheme NGSC requests to amend the Zone Map 10ZN of the Northern Grampians Planning Scheme <i>Melton Planning Scheme</i> to rezone land associated with the Sydenham Terminal Station (Lot 1 TP078358) from Special Use Zone (SUZ) Schedule 3 to Schedule 2.

15	Draft Planning Scheme - Explanatory Report	Page 21 of 28 (Page 152 of overall document)	NGSC notes that the amendment to the Draft Planning Scheme does not help to support the Municipal Planning Strategy. Northern Grampians Planning Scheme (NGPS) states that <i>"The key relevant policies of the Northern Grampians Shire's Municipal Planning Strategy focus on enhancing lifestyle, economic growth and providing sustainable infrastructure."</i> Under Clause 2.03-4 Natural Resource Management the NGPS states that <i>"Agriculture is the dominant land use and industry in the shire..." and in the accompanying Strategic Directions include:</i> • <i>"Support sustainable agriculture and horticultural industries, as the foundation to a strong and prosperous economy.</i> • <i>Support sheep farming, cattle farming and crop raising as the dominant agricultural activities of the shire ...</i> • <i>Protect productive agricultural land for the purposes of agricultural production and value-adding industries.</i> • <i>Ensure agricultural land is managed to protect its productive use."</i> NGSC notes the Draft Planning Scheme does not mention agriculture and its importance to the Shire. NGSC requests that the Draft Planning Scheme takes into consideration the key elements of the NGPS.
16	Technical-Report-E-Land-Use-and-Planning	pages 300-302 of 374	Under the maps for 'Other Overlays', the Flood Overlay (FO), Land Subject to Inundation Overlay (LSIO) and Bushfire Management Overlay (BMO) have been omitted. NGSC requests this to be corrected to give an accurate representation of the location of overlays.
17	Social Impact Assessment	page 119 of 135	NGSC notes that the Social Impact Report indicates that the Watta Wella Renewable Energy Project (WWREP) and VNI West projects may have coinciding construction periods and may all affect the same (small) number of dwellings. NGSC requests that there are mitigation actions put in place to avoid negative impacts to those dwellings.
18	Social Impact Assessment		NGSC notes that the Social Impact Assessment does not include Joel Joel Battery as a future project. NGSC requests that all future planned projects be included in this assessment to account for the cumulative impacts of several projects on the community.

19	Technical Report K: Bushfire Impact Assessment		Executive summary (and elsewhere in document) states: <i>"In the last 30 years, there has been no recorded incident in Victoria of electricity transmission infrastructure igniting a bushfire or grassfire that escaped from the site of ignition."</i> This appears to be incorrect, as Volume II – "Electricity Caused Fire" Section 4.1 of the Victorian Bushfires Royal Commission found that <i>"On 7 February 2009 the pattern was repeated. Failed electricity assets caused five of the 11 major fires that began that day—Kilmore East, Beechworth, Coleraine, Horsham and Pomborneit–Weerite."</i> A class action settlement of nearly \$500 million was made against SP AusNet for the Kilmore East fire. NGSC requests this report is updated to include accurate details of bushfires caused by electrical transmission lines.
20	Technical Report K: Bushfire Impact Assessment		The proposed Joel Joel battery facility is not included in Table 11-1: Relevant future projects within the Western Renewables Link study area with potential for cumulative impact on bushfires. NGSC requests confirmation that the Joel Joel battery facility has also been included in this bushfire assessment.
21	All		NGSC submits that the second terminal station at Bulgana is required for VNI West rather than the WRL project. NGSC requests this second substation be assessed in the VNI West EES at a later stage and be removed from the WRL EES.
22	Technical Report H: Agriculture and Forestry Impact Assessment		Appendix G 'DTP Peer review report' recommends that "land use and property attribute data be provided for each affected property" NGSC notes these recommendations have not been adopted. NGSC requests additional data highlighting the anticipated agricultural loss/impact for each individual property as requested in the Peer Review report is used.
23	Executive Summary & Agriculture and Forestry	8.8 & 15.4	As stated in the Executive Summary: <i>"The strategy will identify practicable situations where construction timelines could be adjusted to avoid or minimise disturbance at critical times such as breeding, lambing and calving, sowing and harvesting – helping farmers optimise production. Any agreed Specific Property Access Requirements (SPAR) would be recorded and maintained throughout both Project construction and operation to avoid or minimise ongoing impacts to the property and its operations."</i>

			NGSC requests to include a one-on-one farmer advisory service (as included in the Drought Support Package) where farmers can access support to forward plan to minimise the impacts of construction and rehabilitation of their farmland as part of compensation.
24	Technical Report E Land Use and Planning	page 117	7.3 Distribution lines notes that: <i>"The Project will require works to convert 62 existing above ground distribution lines to underground generally within the same alignment; divert 13 overhead distribution lines; and modify three overhead distribution line crossings that are associated with the Crowlands windfarm."</i> Location of the works should be provided as is as identified that <i>"The undergrounding of easements could affect land used for agriculture."</i> and <i>"The constraint of undergrounding distribution lines on agriculture and other land uses is considered to be minor."</i> NGSC notes that the documentation is unclear on the location of these lines/undergrounding. NGSC requests map showing location (if any are within the Shire).
25	Transport Report	7.5.1.2	NGSC notes that the Transport report identifies need for Vances Crossing Road to be upgraded and length of the upgrade is identified in the Development Plan Road (p3, p4). NGSC notes that there are no details on the nature of the upgrades to Vances Crossing Road (width, seal etc). NGSC requests details of the upgrade. NGSC does not agree that this is the only road that requires upgrading. See Comment 42 on other road upgrades.
26	Transport Report	10. Cumulative Impacts	The NGSC requests that the approved Joel Joel Battery and Watta Wella Windfarm/Battery are taken into consideration in the Transport Report. The report doesn't take into account approved Joel Joel Battery which is located next door, and doesn't take into account Watta Wella Windfarm/Battery which around the two terminal sites. The project documentation also provides no direction or guidance on how impacts on the road network are to be apportioned and rectified, when there are multiple overlapping projects.
27	Incorporated Document		The incorporated document contains minimal conditions relating to transport and traffic. NGSC requests clear requirements within the Planning Scheme Amendments (PSA) for dilapidation assessments, upgrades, and repairs to roads.

28	Transport Report	Page 42	Section 6 (page 42) states that "<i>This section describes the transport network in the study area in terms of capacity, condition, accessibility and potentially sensitive users</i>", yet fails to provide any commentary as to the condition of the road network. Failing to address existing conditions means that the proponent hasn't described whether the road pavement is capable of supporting existing loads, let alone an increase in load due to an increase in heavy vehicle traffic associated with the project. The report fails to assess the existing condition of the road network, meaning that no baseline has been established. As no baseline has been established, then the impact the project has on the road network cannot be established and the report fails to even seek to address the EES evaluation objectives specified in Table 4.1 of Chapter 04 of the report.
29	Transport Report	T6.1, page 43	Refers to a bridge crossing. There are no bridges on Vances Crossing Road; there are however, major culverts on Vances Crossing Road.
30	Transport Report	T6.2, page 44	Table 6.2 contains incorrect data, despite the proponent having been supplied with the correct data by Council. • There are no road hierarchy's in NGSC <i>Road Register</i> that align with the hierarchies in T6.2; despite the fact that note 1 references NGSC's <i>Road Register</i>. • The assumed traffic growth (0% per annum) is unreasonable; particularly since there has been no reference or data provided to support adopting a 0% growth rate. • NGSC does not have any traffic count data for Vances Crossing Road in 2023 and the date of the survey is likely wrong unless the proponent obtained traffic count data themselves. • NGSC does not have any traffic count data for Curries Lane in 2023 and the date of the survey is likely wrong unless the proponent obtained traffic count data themselves. • NGSC provided traffic count data to the proponent that contained 2018 data for Joel South Road; whereas T6.2 specifies a date of 2023. NGSC doesn't have any traffic count data for Shays Flat road in 2018. It has data for Shays Flat Road in 2019; which hasn't been provided. A copy of the traffic count data has been provided. • The date of the traffic count for Joel Joel Road south of Joel South Road provided by NGSC is 2017; not 2023 as specified in T6.2. • The above errors means that the traffic data used for the analysis is incorrect. Not only is there an unreasonable assumption of 0% growth applied, any growth that would have been applied would be from the incorrect date, leading to a potentially material misstatement of existing traffic on these roads. Furthermore, the proponent should have recognised the highly seasonal variation in traffic demand associated with rural roads in an agricultural area; particularly with large traffic generators (but not limited to) such as the Landsborough West silo which uses Joel Joel Road. Seasonality should have

			been incorporated into the assessment of existing conditions and the impact which it could have on any analysis that relies upon this information.
31	Transport Report	S6.1.8, pg 46	Crash data only covers the period from 2014 to 2019; whereas Department of Transport and Planning (DTP) make crash data publicly available for the period 1 January 2012 to 31 October 2024. There is no discussion as to why the 2014 to 2019 date has been adopted. Furthermore, two accidents which resulted in a fatality or serious injury occurred on the road network along the proposed construction transport route occurred in 2013. The proponent cannot establish a baseline for road safety as it excludes available crash data and therefore cannot determine whether there will be an impact on road safety as a result of this project. The methodology that the proponent has used to establish road safety is inadequate. A baseline could be established by performing an AusRAP assessment (or some other equivalent) rather than using historical crash data which is almost irrelevant where the proponent is estimating up to a 4,700% increase in traffic volumes. An AusRAP assessment will be capable of estimating the likely impact on road safety due to the increase in traffic on local roads along the proposed construction transport route. As it is; the methodology adopted by the proponent would be incapable of assessing the impact the project has on road safety.

32	Transport Report	T6.4, page 46	Table 6.4 specifies a load limit for a number of structures; however, it is not clear as to what the load limit refers to. Does the load limit mean a gross load limit? The information provided to the proponent as it relates to load limits describes the vehicles that may use the structures; i.e. a higher mass limit vehicle or a PBS Class 2 vehicle or a design vehicle load. It does not relate to the gross load limit, and this is unclear in T6.4. The following errors were identified in Table 6.4: • The box culvert over Six Mile Creek has a load limit appropriate for general access vehicles. The proponent has specified a load limit of 22.5 tonne which is incorrect. • There is no bridge over the Wimmera River on Vances Crossing Road, nor does it form part of the proposed construction transport route. Nevertheless; the box culvert at Vances Crossing Road over the Wimmera River has a load limit suitable for general access vehicles. • There is a major box culvert between Six Mile Creek and the existing 'Bulgana HV terminal' on Vances Crossing Road which has been missed from T6.4; but which NGSC provided information to the proponent. It is affected by the proposed construction transport route. It can support Higher Mass Limits (HML) vehicle loads. • There is a major culvert on Joel Joel Road between Curries Lane and the Wimmera River which has been missed from T6.4; but which NGSC provided information to the proponent. It is affected by the proposed construction transport route. It can support HML vehicle loads. • The bridge on Joel South Road over the Wimmera River has a T44 design vehicle load and may support PBS Class 2 vehicles. It does not have a load limit of 22.5 tonne. • There are two, separate major box culverts on Joel South Road between the Wimmera River and Joel Joel Road which has been missed from T6.4; but which NGSC provided information to the proponent. They are affected by the proposed construction transport route. They can support HML vehicle loads. • • The bridge on Joel Joel Road over Sheas Creek is capable of supporting T44 or PBS Class 2 vehicles rather than 22.5 tonne. • The load limit information for the bridge on Joel Joel Road over Glendhu Creek was shared with the proponent. It is capable of supporting T44 or PBS Class 2 vehicles rather than 'none specified'. • There is a major pipe culvert on Joel Joel Road between Bulgana Road and the bridge over Glendhu Creek that is missing from T6.4. The assumed (yet to be verified) load limit for this culvert is HML vehicles. This information was shared with the proponent. • There is a major pipe culvert on Joel Joel Road between south of Bulgana Road and north of the shire boundary that is missing from T6.4. The assumed (yet to be verified) load limit for this culvert are HML vehicles. This information was shared with the proponent. Due to these inaccuracies, the report fails to establish a baseline for the bridge and major culverts along the proposed construction transport route. As a consequence, the impact of the project cannot
----	------------------	---------------	---

			be established as there is a material misstatement of the load capacity of the bridges and major culverts.
33	Transport Report	S6, pg 42.	The report fails to assess the existing condition of the bridges and major culverts, meaning that no baseline can be established. As no baseline has been established, then the impact the project has on the bridges and major culverts along the proposed construction transport route cannot be established and the report fails to even seek to address the EES evaluation objectives specified in Table 4.1 of Chapter 04 of the report.
34	Transport Report	S3.4.1.1, pg 14	The proponent seems unclear as to whether there will be mobile concrete batching plants or whether the concrete will be sourced locally. This is significant as the origin of materials would change, consequently changing the proposed construction transport route. A mobile concrete batching plant would likely be sourcing cement, aggregate and sand from outside the municipality and could perceivably use the proposed construction transport route. Water; however, would likely be obtained from the electronic standpipe at the intersection of Joel South and Landsborough Road. Moreover, if concrete is sourced locally, then it would likely originate from Stawell. The proposed construction transport route doesn't incorporate the heavy vehicle movements associated with concrete. This is material as the proponent hasn't made a baseline assessment for the routes for these materials. Without a baseline, then there cannot be an assessment of the impact of the project on the surrounding road network. The movement of trucks along these roads could be substantial considering that some possible routes include Vances Crossing Road through the Joel Joel nature reserve which typically has an average annual daily traffic of just nine vehicles per day. Water carts or concrete trucks serving this project would substantially increase the amount of traffic on roads such as this and would amount to a substantial impact.

35	Transport Report	S6.7.1, pg 114	The proponent states that "<i>The laydown areas are proposed to be located at Bulgana Terminal Station, Sydenham Terminal Station, and near Ballan and Lexton. Local trips for locally sourced material such as raw materials for concrete or the labour force are assumed to travel directly from the laydown areas and workforce accommodation facilities to the Construction Sites using the same proposed construction transport route.</i>" Given that the proponent is unsure whether a mobile concrete batching plant is to be located at the Bulgana Terminal Station or whether locally sourced concrete will be used, then the proposed construction transport route is incomplete as it is clear that these materials cannot be sourced from along the proposed construction transport route. Since this is incomplete, a baseline cannot be established and the impact of the project on the existing road network cannot be estimated.
36	Transport Report	T6.28, pg 116	T6.28 nominates the estimated Oversize Overmass (OSOM) components dimensions and weights; including components that weight up to 142 tonne. The actual loads applied to the bridges and major/minor culverts along the route will be much larger than 142 tonne as any vehicle capable of moving a 142 tonne load will have substantial weight itself. It is not clear why there has been no estimate of the size and weight of the combined load given that the proposed route includes structures that have load limits and design loads substantially less than the proposed load. If the proponent doesn't have an estimate of the weight of vehicle and load, how can a baseline be established to determine if it is likely that the structures can support the load? It seems likely that either strengthening of the bridges/major culverts or an alternative route will be necessary. It quickly becomes clear that no assessment of the impact of the project can be made as either the proposed construction transport route will need to be amended or an estimate of whether the bridges and major culverts need to be strengthened.
37	Transport Report	T6.29, pg 118	T6.29 nominates Joel Joel Road, Joel South Road, Curries Lane and Vances Crossing Road as a suitable route from OSOM. Given that, the proposed loads substantially exceed the load limits given to the proponent by NGSC, it seems likely that either strengthening of the bridges/major culverts or an alternative route will be necessary. It quickly becomes clear that no assessment of the impact of the project can be made as either the proposed construction transport route will need to be amended or an estimate of whether the bridges and major culverts need to be strengthened.

38	Transport Report		Previous, similar projects within the area have, despite having a TMP in place: • Sufficiently contaminated drinking water of nearby homes by way of dust from transporting materials and labour along unsealed roads to such an extent that the water became unusable for drinking or laundry. Residents were forced to buy-in drinking water and launder their clothes in town. • Damaged sealed NGSC roads to the extent that they become unusable by the community. • Damaged NGSC culverts to the extent that large holes created in the road. • Insufficiently documented the condition of existing bridges, designed and delivered strengthening works that was of insufficient strength and then likely damaged the bridge during construction of the project and subsequently failed to inform NGSC of the damage. • Council observed as well as received numerous reports of construction vehicles failing to follow traffic management such as failing to halt at stop signs and running red lights at roadworks traffic lights • Council received numerous reports of construction vehicles driving down the centre of roads and forcing other road users off the road • Received reports of construction traffic using roads that did not form part of the approved TMP • Insufficient grading of unsealed roads making them unserviceable to 2WD vehicles • Whilst the contractors delivering the works acknowledge most of the above and sought to address the matter promptly they were generally ineffective and the same problems were repeatedly incurred throughout the construction period From the above, it becomes clear that suitable infrastructure must be installed in the first instance and that engineering controls to manage the risk were largely ineffective. The impact of the project was material and resulted in significant expense to the community and NGSC.
----	------------------	--	--

39	Transport Report		Having consideration of the above, and having regard to the EES framework objectives, then the following shall apply. Prior to the issue of any Planning Permit the proponent shall provide to NGSC, for review and approval, a Pavement Management Plan for any road within the municipality likely to be used for transport of materials or labour for the project. The Pavement Management Plan shall describe the necessary measures to ensure that other road users are not subjected to roads in a condition less than what is currently in place or that exceeds the triggers in NGSC Road Management Plan, whichever is the better. The Pavement Management Plan shall document the condition of the existing road network, estimate the likely impact of the project on the condition of the road network during construction, and describe the measures necessary to ensure that the condition of the roads for the project does not, at any stage, fall to a level less than what is already in place prior to construction works or exceed the triggers in the NGSC Road Management Plan. The Pavement Management Plan shall: 1. Document the existing remaining useful life of the pavement 2. Describe the riding quality of all sealed roads in IRI (International Roughness Index) for both traffic lanes 3. Describe the riding quality of all unsealed roads in IRI (m/km) for both traffic lanes 4. Describe the extent and depth of edge-drop off between sealed road edge and shoulder 5. Document the extent of cracking of the road surface 6. Document the extent and type of any sealed wearing course defects (flushing, stripping etc) 7. Demonstrate that the existing roads have sufficient strength to support the expected traffic 8. Describe the measures necessary to strengthen any pavements that cannot support the expected traffic 9. Measure the extent and depth of any rutting All to the satisfaction of NGSC. The proponent shall note that NGSC expects the hierarchy of controls to apply, meaning that, engineering controls (which includes signage and temporary works) will unlikely be considered as acceptable other than for the construction of permanent works on the road network.
----	------------------	--	---

40	Transport Report	Having consideration of the above, and having regard to the EES framework objectives, then the following shall apply. Prior to the issue of any Planning Permit the proponent shall provide to NGSC, for review and approval, a Structure Management Plan for any bridge or culvert (regardless of whether it is a major or minor culvert) within the municipality likely to be used for transport of materials or labour for the project. The Structure Management Plan shall describe the necessary measures to ensure that the structures affected by the works are left in a condition no worse than prior to the commencement of the project construction. The Structure Management Plan shall document the condition of the structures, estimate the likely impact of the project on the condition of the structures during construction of the project, and describe the measures necessary to ensure that the condition of the structures does not, at any stage, fall to a level less than what is already in place prior to construction works commencing. The Structure Management Plan shall: 1. Document the condition of each structure, including crack mapping of any existing cracks (including widths) 2. Document the load carrying capacity of each structure 3. Describe whether the structure is capable of supporting the proposed loads 4. Determine whether the structure has sufficient width for two-way traffic 5. Two-way traffic must be retained for Joel Joel or Joel South Road 6. Describe the measures necessary to increase the load carrying capacity (if necessary) or widening to accommodate the increase in traffic All to the satisfaction of NGSC. The proponent shall note that NGSC expects the hierarchy of controls to apply, meaning that, engineering controls (which includes signage and temporary works) will unlikely be considered as acceptable other than for the construction of permanent works on the road network.
----	------------------	---

41	Transport Report		Having consideration of the above, and having regard to the EES framework objectives, then the following shall apply. Prior to the issue of any Planning Permit the proponent shall provide to NGSC, for review and approval, a Road Safety Plan for any road within the municipality likely to be used for transport of materials or labour for the project. The Road Safety Plan shall describe the necessary measures to ensure that the roads affected by the works maintain, at a minimum, the same level of road safety during the construction of the project as exists prior to the commencement of the project construction. The Road Safety Plan shall document by way of an AusRAP (or other equivalent method approved in writing by NGSC) assessment of the existing road network to determine the star rating score (not star rating) prior to commencement of works, estimate the likely impact of the project on the star rating score of the road network during construction of the project, and describe the measures necessary to ensure that the condition of the structures does not, at any stage, fall to a level less than what is already in place prior to construction works commencing. The Road Safety Plan shall: 1. Provide an AusRAP star rating score (not star rating) of the existing road network based on existing conditions prior to commencement of the project 2. Conduct a Road Safety Audit of the intersection of Joel Joel Road and Joel South Road. 3. Provide an AusRAP star rating score (not star rating) of the existing road network based on the estimated project impact during project construction. 4. Provide a list of required works to ensure that the AusRAP star rating score (not star rating) does not fall to a level below the existing score during the construction of the project as well as any recommendations as part of the Road Safety Audit of the Joel Joel and Joel South Road intersection. All to the satisfaction of NGSC. The proponent shall note that NGSC expects the hierarchy of controls to apply, meaning that, engineering controls (which includes signage and temporary works) will unlikely be considered as acceptable other than for the construction of permanent works on the road network.
42	Transport Report		Having consideration of the above, and having regard to the EES framework objectives, then the following shall apply. Prior to the issue of any Planning Permit the proponent shall provide to NGSC, for review and approval, a Traffic Management Plan for any road within the municipality likely to be used for transport of materials or labour for the project. The Traffic Management Plan shall describe the upgrade works necessary to ensure that the level of service provided by the existing roads to the community is not reduced by the construction traffic. This will require at a minimum, widening seals and pavements and

			upgrading intersections to meet the widths recommended in the AustRoads Guide to Road Design Part 3, Part 4 and Part 4A as well as AS1742, based on the levels of project traffic: 1. Seal widening of Joel Joel and Joel South Roads 2. Pavement widening of Curries Lane and Vances Crossing Road 3. Upgrading the geometry of Joel Joel Road and Joel South Road intersection 4. Upgrading the geometry of Joel South Road and Curries Lane intersection 5. Upgrading the geometry of Curries Lane and Vances Crossing Road intersection 6. Widening of any bridges and culverts along Joel South Road and Joel Joel Road to satisfy the AustRoads guides and AS5100. 7. Installation of appropriate signage on narrow structures along Vances Crossing Road per AS1742. All to the satisfaction of NGSC. Furthermore, the Traffic Management Plan shall address how the proponent shall monitor the performance of the road assets and identify any non-conformances of vehicle traffic from the proposed construction transport route. This shall, at a minimum: 1. Include a method to measure the roughness of unsealed roads on a weekly frequency and a corresponding report sent to NGSC documenting the results of the measurements 2. Submission of a weekly, road condition report to NGSC by the proponent identifying any new defects that may have occurred: • Defects consist of any potholes, rutting greater than 25 mm in depth, flushing or stripping of the wearing course, edge-drop offs exceeding 100mm in depth, alligator or linear cracking, or any other damage attributable to the project traffic 3. Continuous traffic monitoring (by way of traffic counters) of roads surrounding the proposed construction transport route for a period of at least four weeks to establish a baseline for existing traffic movements. This monitoring shall occur immediately before construction works commence. A report documenting the baseline shall be provided to NGSC prior to the commencement of any works. 4. Continuous traffic monitoring (by way of traffic counters) of roads surrounding the proposed construction transport route during construction to identify if traffic volumes or traffic distributions on roads other than that nominated on the proposed construction transport route change. A weekly report shall be provided to NGSC of the results of the traffic monitoring. 5. Describe the triggers and response times for the proponent to rectify any defects on the road network; these shall be. • Road grading (with water cart if necessary) where the road roughness exceeds an IRI value of 7.5 m/km, within one week of exceeding the trigger level • Pothole filling - within 1 day of identification
--	--	--	---

			• Edge-drop off - within 1 week of exceeding the trigger level • Rutting - within 1 month of exceeding the trigger level All to the satisfaction of NGSC.
43	Transport Report		Two bank guarantees shall be provided by the proponent (and not it's contractors) for the management of any non-conformances arising from the project works. One guarantee shall be held for the value of 50% of the replacement (not written down value) cost, as determined by NGSC, of the roads nominated as part of the proposed construction transport route, once the extent of the route has been confirmed. 50% of the bank guarantee shall be returned upon the completion of rectification works to the satisfaction of NGSC. The remaining 50% shall be returned once 12 months of defect-free operation of the road network has been achieved to the satisfaction of NGSC. Furthermore, the bank guarantee shall be used by NGSC to cover any costs incurred by NGSC should any of the following occur: 1. Grading of unsealed roads where the proponent has failed to grade the road within one week of the unsealed road exceeding the trigger level 2. Pothole filling where the proponent has failed to rectify the defect within 1 day of identification of the pothole 3. Edge-drop off rectification where the proponent has failed to rectify the defect within 1 week of exceeding the trigger level 4. Rutting rectification where the proponent has failed to rectify the defect within 1 month of exceeding the trigger level. 5. Any works necessary to rectify any defects that occurs due to an increase in traffic or change in distribution of traffic on NGSC roads that are not covered by the proposed construction transport route, as determined by NGSC from the proponent (or a consultant engaged by NGSC) traffic counters Any upgrades to roads deemed necessary by NGSC following any complaints made by the public 6. The purchase of traffic counting services by NGSC from a contractor should the proponent fail to provide weekly traffic count data 7. Any outstanding amounts for the engagement of a suitably qualified engineer, selected and engaged by NGSC for the purposes of liaising with the proponent, its agents or any residents that may make a complaint to NGSC in relation to the project or its impact on the community. NGSC shall notify the proponent when the bank guarantee is to be drawn upon. NGSC shall only draw upon the bank guarantee to cover actual costs incurred by NGSC, however, the timing and the method of rectification of the defect shall be determined entirely at NGSCs discretion. A second bank guarantee shall be held for 50% of the replacement (not written down value) cost, as determined by NGSC, of any structures affected by the proposed construction transport route. 50% of the bank guarantee shall be returned upon the completion of rectification works to the satisfaction of

			NGSC. The remaining 50% shall be returned once 12 months of defect-free operation of the structures has been achieved to the satisfaction of NGSC. Furthermore, the bank guarantee shall be used by NGSC to cover any costs incurred by NGSC should any of the following occur: 1. Any works necessary to rectify any defects that occurs due to an increase in traffic or change in distribution of traffic on NGSC roads that are not covered by the proposed construction transport route, as determined by NGSC from the proponent (or a consultant engaged by NGSC) traffic counters. NGSC shall notify the proponent when the bank guarantee is to be drawn upon. NGSC shall only draw upon the bank guarantee to cover actual costs incurred by NGSC, however, the timing and the method of rectification of the defect shall be determine entirely at NGSCs discretion.
44	Transport Report		Within two weeks of the completion of the projects construction and cessation of use of the proposed construction transport route within the municipality (whichever is the latter), the proponent shall perform a post construction assessment of all roads affected by the work. This shall include, as a minimum: 1. Document the existing remaining useful life of the pavement 2. Describe the riding quality of all sealed roads in IRI for both traffic lanes 3. Describe the riding quality of all unsealed roads in IRI for both traffic lanes 4. Describe the extent and depth of edge-drop off between sealed road edge and shoulder 5. Document the extent of cracking of the road surface 6. Document the extent and type of any sealed wearing course defects (flushing, stripping etc) 7. Measure the extent and depth of any rutting. 8. A report specifying the results of the above testing and measuring. Where any of these measures have been detrimentally affected during the period of the project construction, the proponent shall provide to NGSC a recommended course of action to rectify the works to the satisfaction of NGSC. Within two weeks of the completion of the projects construction and cessation of use of the proposed construction transport route within the municipality, the proponent shall perform a post construction assessment of structures affected by the work. This shall include, as a minimum: • Document the condition of each structure, including crack mapping of any existing cracks (including widths) • Where the condition of the structures has been detrimentally affected during the course of the project construction, the proponent shall provide to NGSC a recommended course of action to rectify the works to the satisfaction of NGSC. Once NGSC is satisfied with the proposed method of rectification works and has approved any drawings and specifications necessary to undertake the rectification, the proponent shall complete the works within four weeks of NGSC approval. The works shall be executed to the satisfaction of NGSC.

45	Transport Report		Prior to the construction of any works or the commencement of use of the proposed construction transport route within the municipality (whichever is first) the proponent shall provide to NGSC for review and approval, drawings and specifications of any works deemed necessary as part of the Pavement Management Plan, Road Safety Plan or Traffic Management Plan. The drawings and specifications shall conform to the AustRoads guides, relevant Australian standards and DTP technical notes. No works shall commence on site until the works shown on the approved drawings have been delivered by the proponent.
46	Air quality Report		Having consideration of the fact that residents have previously been unable to use rainwater tank water for drinking or laundry due to the construction of similar projects, and having regard to the EES framework objectives, then the following shall apply. The risk of dust contamination from the proposed construction transport route of rainwater tanks used for supply to homes shall be eliminated by way of sealing a sufficient length of any road that could potentially result in contamination of water stored in rainwater tanks.
47	Noise Report		Noise pollution should be limited from traffic as much as reasonable. Trucks required for the project are likely noisy and will unreasonably disturb people. NGSC requests to limit the movement of heavy vehicles along NGSC roads to a reasonable time (possibly 7am-6pm). As per Comment 8, NGSC request inclusion of mandatory no construction days e.g. x number a year.
48	Transport Report		NGSC shall engage a suitably qualified engineer for the purposes of reviewing plans and reports, performing inspections, liaising with the proponent or its agents as well as any community members as they relate to the construction of the works. The proponent shall reimburse NGSC the cost of engaging the suitably qualified engineer on a month-to-month basis.