16 November 2026

Sarah Raso
Chair
Victoria to New South Wales Interconnector West (VNI West)
Inquiry and Advisory Committee

Submission via Engage Victoria website

Dear Chair,

VNI West Environment Effects Statement
Joint submission of Northern Grampians Shire Council and Buloke Shire Council

Introduction
Northern Grampians Shire Council (NGSC) and Buloke Shire Council (BSC) (the Councils) appreciate the opportunity to make this joint submission on the VNI West Environment Effects Statement (EES) and draft Amendment GC316.

This is a joint submission on behalf of NGSC and BSC. Unless otherwise stated, references to "the Councils" mean NGSC and BSC, and the views expressed are shared by both. Where a view is held by only one Council, or the Councils differ, this will be stated.

The Councils' overarching position is that the EES, as exhibited, does not allow the impacts of VNI West on our communities to be properly understood, evaluated or managed. Key information about construction sites and roads in the two shires is redacted from the EES, and much of the alignment was not surveyed on the ground.

The Terms of Reference for the Inquiry and Advisory Committee (IAC) prevent the Councils from presenting evidence on important issues such as roads and transport, issues that directly affect council assets and ratepayers. Many of the impacts that matter most to our communities, including damage to local roads, pressure on housing and labour, and the cumulative effect of many projects, are understated or left to plans to be prepared after approval that do not allow for input from the Councils or our communities.

The decisions made considering recommendations of the EES Inquiry report will shape community life, land use, agriculture and the condition of our roads for generations. This submission sets out the Councils' main concerns and what we ask the IAC to recommend in its Inquiry report. Attachment 1 provides the Councils' more detailed comments on the EES.

The VNI West EES acknowledges that the Project is causing division within our communities. In recognition of the Project's impacts, NGSC resolved in June 2025, and BSC resolved in May

2025, to oppose VNI West in its current form. The Councils' positions rest on the lack of social licence from our communities, the Project's impact on community wellbeing, the disruption to agriculture, and the inadequacy of consultation to date. This submission is to fulfil the Councils' responsibility to ensure that the Project's impacts on our communities and assets are properly assessed and addressed.

Energy and mining in our region

Our region is experiencing significant new growth in energy and mining projects. To understand the cumulative impacts of these projects, nine north-western Victorian councils (including BSC and NGSC), with the support of VicGrid, commissioned *Resource Ready: North-Western Victoria Energy and Mining Impact and Readiness Strategy* (the Readiness Strategy). The Readiness Strategy looks at VNI West, other transmission upgrades, 33 renewable energy projects and 22 mining projects proposed across the region. The Readiness Study estimates that these projects could require around 3,800 construction workers at their peak, an increase of approximately 9 per cent in employment across the region, in a region with minimal spare labour and very limited available housing.[1]

The Readiness Strategy provides an important assessment of the cumulative impacts of the renewables, transmission and mining projects in our region. We request that the IAC consider and give weight to the Readiness Strategy and the evidence it provides of the cumulative impacts of energy and mining projects on our region.

The route and infrastructure in our shires

The proposed VNI West alignment runs for approximately 60 km through Buloke Shire and approximately 80 km through Northern Grampians Shire. Together our shires would host more than half of the Victorian section of the line.

In Buloke Shire, the alignment passes through farming country around Glenloth, Teddywaddy, Jeffcott and Wooroonook. A combined laydown and workforce accommodation area is proposed near Charlton.

In Northern Grampians Shire, the alignment passes Swanwater, Marnoo East, Morrl Morrl, Greens Creek and Joel Joel before ending at the proposed Bulgana Reactor Station, where it would connect to the Western Renewables Link. Laydown areas are proposed near St Arnaud, and a combined laydown and workforce accommodation area is proposed at Greens Creek.

The Inquiry process

Terms of Reference

Upon reviewing the Terms of Reference for the IAC issued on 29 September 2026, the Councils were surprised and disappointed to learn that the environmental matters have been split into "key matters" and "other matters". Only the key matters, being ecology, Aboriginal cultural heritage, and agricultural and socioeconomic aspects of land use, are to be examined at a public hearing with expert evidence. The other matters, which include roads and transport, landscape and visual, bushfire and community amenity, are to be dealt with by written submission alone.

The decision about what is a key matter and what is not, has been made before a single submission has been received. The purpose of public exhibition is to find out what matters to

[1] Urban Enterprise, *Resource Ready: North-Western Victoria Energy and Mining Impact and Readiness Strategy* (16 February 2026), page 7.

the people affected and why. It is hard to see how the key matters can be determined before the community has had its say.

Given the nature of this Project, the preselection of key matters is concerning. This is an above-ground transmission line crossing four municipalities. Yet matters such as landscape and visual, roads and transport, and bushfire are not considered key matters. As a result, neither the Councils nor the wider community can make oral submissions or present evidence on these matters, including on the management plans to which much of their regulation is deferred. Taken together, the advance ranking of what is important and the limits on what can be put to the IAC are, in the Councils' view, extraordinary and unacceptable.

As councils, we are the responsible road authorities for the local roads that VNI West's construction traffic will use. Roads and transport are among the most significant issues affecting our shires. We are deeply concerned that we will not be able to call independent expert evidence on them, and that this was decided without prior notice to the Councils.

The Councils, through their legal representatives, have written to the Minister for Planning seeking amendment of the Terms of Reference to allow us, as the responsible road authorities, to make written and oral submissions on traffic and roads and to call expert evidence on these matters. The Councils anticipate requiring 1.5 days to present their case and evidence. In the Councils' view, the current arrangement does not otherwise provide a fair or adequate hearing process.

The limitations in the Terms of Reference for the IAC highlight the shortcomings of the EES process. The *Ministerial Guidelines for Assessment of Environmental Effects* state that the EES process "is the highest level of environmental assessment in Victoria."[2] Despite this claim, the Councils and their residents are prevented from making submissions on many important aspects of the EES.

This limitation also illustrates how lopsided and unfit-for-purpose the EES process has become. The EES has been in preparation for years and is 9,690 pages long, yet participation in its development has been very onerous and unrewarding for the Councils. Now that the EES has been published, the State appears to want to rush the Inquiry by limiting the opportunity to appear at it.

The Councils consider that these concerns go beyond this Project. An assessment process that produces a document of more than 9,000 pages, redacts key information about construction sites and roads, is exhibited during harvest, defers more than 50 plans, strategies and assessments to be prepared after approval, and limits who can be heard on matters such as roads, bushfire and visual amenity, places the greatest burden on the small rural councils and farming communities least able to carry it. The EES process should make it easier, not harder, for the people most affected by a project to understand it, test it and influence the outcome. The Councils ask the IAC to record these shortcomings in its report, so that they can be considered by the State in any future review of the EES process.

Redacted information

The *Environment Effects Act 1978* exists "to require the Environmental Effects of certain Works to be assessed". The Ministerial Guidelines made under the Act say that "transparency, public

[2] Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978 (Eighth edition, 2023), page 3 (Minister's foreword).

involvement and the community's opportunity to respond to proposals are vital elements of the assessment process".[3] They describe the objective of assessment as "the transparent, integrated and timely assessment of the environmental effects of projects", supported by "public access to information on potential environmental effects as well as fair opportunities for stakeholders and public participation".[4] The Guidelines also require the matters in an EES to be "sufficiently investigated and clearly documented to enable informed responses by the community, stakeholders and decision-makers".[5]

Important parts of the exhibited EES are redacted or shown only as examples. This includes the construction laydown and workforce accommodation areas, which will be key hubs of traffic, noise and activity in our communities for the life of construction.

- The Project Description shows the workforce accommodation and laydown areas only through example layouts and photographs from other projects (Chapter 4 Project description). Four accommodation sites have been assessed, but only three will be used, and the Councils do not know which. The EES states that "it would ultimately be up to the construction contractor to determine which of these sites are used",[6] and the details of the establishment and operation of the site compounds are also left to the construction contractor.
- In the Traffic and Transport chapter, the names of some roads that will carry laydown and accommodation traffic are blacked out (Chapter 18 Traffic and transport). In Northern Grampians, the potential access road for Laydown and Workforce Accommodation Area 9 is redacted. Yet that road is rated as a high safety risk (Chapter 18 Traffic and transport, page 46) and is expected to carry the largest increase in local road traffic identified in the whole assessment, up to 101 extra vehicles a day (Chapter 18 Traffic and transport, page 38). A council and its citizens cannot comment on the safety of a road that they are not allowed to identify.
- Under the draft amendment, workforce accommodation may be developed and used before the general Development Plans are approved, based on plans approved by the Minister after the EES process has ended (Attachment I PSA Planning Report).

It is not possible to properly assess the environmental effects of parts of a proposal that are kept secret.

The EES materials give no reason for these redactions. The Councils accept that some information, for example about culturally sensitive places, may properly be withheld. However, no such explanation is offered for roads and construction sites.

The Landscape and Visual chapter is a good example of the problem. It concludes that the visual impact of the laydown and accommodation areas is moderate but will fall to low once screening vegetation is planted around them (Chapter 17 Landscape and visual, page 29). That screening depends on landholder agreement. The community cannot test that conclusion when

[3] Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978 (Eighth edition, 2023), page 6.
[4] Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978 (Eighth edition, 2023), page 7.
[5] Ministerial guidelines for assessment of environmental effects under the Environment Effects Act 1978 (Eighth edition, 2023), page 28.
[6] VNI West EES, Chapter 3 Project development and alternatives, page 3-36, section 3.9.

the sites and their access arrangements are not disclosed, and it cannot test it at a hearing at all, because under the Terms of Reference, landscape and visual impacts are not a "key matter."

Engagement with the Councils and our communities

Exhibition during harvest

The EES is being exhibited during harvest, which is the busiest time of the year for farmers. Farmers are the people most affected by this Project, and they do not have the capacity to read the exhibited material and prepare submissions at this time of year. The Councils have raised the timing of engagement with VicGrid repeatedly. Exhibiting the EES at harvest is not genuine engagement with the people who will bear the greatest impacts of the Project.

This comes on top of significant consultation fatigue, with VNI West consultation alongside the Western Renewables Link, Renewable Energy Zones and the Victorian Transmission Plan.

Technical Reference Group

Both Councils were members of the Technical Reference Group (TRG) but formally withdrew from the TRG and wrote to the Minister for Planning setting out our concerns. The Councils' experience on the TRG was disappointing, and it did not provide the Councils with a genuine opportunity to make their case on the issues that matter most to our communities.

Whilst we acknowledge the funding provided by VicGrid to engage technical specialists to review the EES, much of that input went into correcting errors and gaps in VicGrid's own technical work. In effect, the Councils were doing review work that properly sat with VicGrid, without the ability to influence outcomes. We repeatedly identified likely negative effects on roads, housing, employment and other matters, and our input did not lead to material change.

A key reason for our withdrawal was the concern that our participation would be relied upon as evidence that the Councils had been adequately consulted, or that we had accepted the EES or its proposed mitigation measures. Our strong impression is that the TRG was, in practice, tokenistic rather than a genuine mechanism for local government influence on VNI West.

Local economic benefit, labour and workforce

The EES itself shows a gulf between the benefits of VNI West to the State and the benefits to the communities that will host it. During construction, the Project is expected to add $1.3 billion to Gross State Product and support on average around 720 full-time equivalent jobs across Victoria. By contrast, it is expected to add $10.68 million in net value to the four shires along the route over the 3.5-year construction period, and around 30 full-time equivalent jobs a year.[7]

The lack of jobs expected to be available in the shires on the VNI West route is in stark contrast to the claims the State makes about the benefits of renewable energy to regional Victoria. In June 2026, the Victorian Government announced the *Victorian Energy Jobs Plan* with the headline "Our $18 Billion Energy Jobs Guarantee to Regional Victoria". The EES belies this claim and illustrates why locals are deeply sceptical about the benefits of the energy transition for them and their communities.

Section 7.2.4 of Chapter 7, Stakeholder and Community Engagement, acknowledges community opposition to the Project and seeks to explain this. Absent from the explanation is

[7] EES Chapter 22 Business and economics; Technical Appendix O: Business and economics, Table 7-2 and EY Parthenon VNI West – Economic Impact Assessment, section 2.

the fact that the benefits to the community (as distinct from the State) from the Project are hard to identify, whereas the Project's negative impacts on our region are clear.

This disconnect between the location of the Project and where its benefits are experienced is a feature of transmission and renewable energy projects. The Wimmera Mallee is attractive for renewable energy projects for its large land area, relatively sparse population, land already cleared for agriculture, and wind and solar resources. Energy projects have large, shorter-term construction workforces that need to be brought in from out of the region, and small operational workforces. As a result, the disbenefits of the Project are obvious, whereas the benefits are less so.

The EES provides VicGrid with the opportunity to acknowledge the disbenefits and address them. The EES Scoping Requirements require VicGrid to identify negative impacts and propose "clear, active measures for avoiding, minimising, managing and monitoring effects".[8] The Councils' experience of the EES process has been that VicGrid has sought to downplay the Councils' concerns about negative impacts and has not taken the opportunity to mitigate them. Chapter 22 of the EES illustrates clearly how the benefits of the Project accrue disproportionately to Victorians outside the Project area.

The Readiness Strategy identifies "competition for labour and resources as the key potential economic disbenefit to mitigate for the region".[9] With high existing workforce participation and low population growth, our region does not have a significant reserve of workers available to absorb the cumulative construction peak of projects in our area.

The Readiness Strategy identifies that, to support the workforce required for projects such as VNI West, the following will be needed:[10]

- Diversion of workers from other sectors of the economy; and/or
- Workers to be sourced from outside of the region.

Both options will have flow-on implications for housing and accommodation. The lack of housing availability in the region is already a major constraint on economic activity. Without more housing being made available in the region, workers will instead be redirected from agriculture and other local employers, creating vacancies that will be hard to fill rather than net new employment. This diversion of workers is also likely to affect the Councils; Council workers (including those who maintain the local roads that the Project will use) may be drawn to Project job opportunities.

The Readiness Strategy notes that local worker participation is "highly dependent on the alignment of workforce skills, training pathways, and industry demand within regional areas",[11] and that the small average size of local businesses limits their ability to participate in major project supply chains. It calls explicitly for planning to address the expected increase in competition for labour, equipment, materials, water and housing arising from the proposed

[8] Scoping Requirements for the Victoria to New South Wales Interconnector West EES (February 2025), page 11, section 3.2.
[9] Urban Enterprise, *Resource Ready: North-Western Victoria Energy and Mining Impact and Readiness Strategy* (16 February 2026), page 7; see also page 76.
[10] Urban Enterprise, *Resource Ready: North-Western Victoria Energy and Mining Impact and Readiness Strategy* (16 February 2026), page 5; see also page 58.
[11] Urban Enterprise, *Resource Ready: North-Western Victoria Energy and Mining Impact and Readiness Strategy* (16 February 2026), page 7.

major projects. No equivalent understanding of the complexity of the related issues appears in the EES.

Most materials, equipment and labour will come from outside our shires, and a drive-in, drive-out workforce housed and fed in self-contained camps will spend little in our towns. That is a small return for communities that have been told the energy transition would bring local opportunity.

The EES accepts that there may be labour shortages and higher costs for local employers, but concludes that labour impacts will be minor because few local people will be employed. Even after mitigation, the EES acknowledges that "there may be labour shortages during the construction period as a result of increased demand".[12] That same reasoning confirms how little employment benefit will stay in our shires. If the Project proceeds, the Councils want the maximum opportunity for local workers and businesses, supported by planning for the extra demand for labour and housing this creates.

The Councils ask the IAC to recommend that VicGrid implement:

- local procurement and local employment targets;
- apprenticeship and training programs linked to the Project;
- regional planning, before construction starts, for the expected increase in competition for labour, equipment, materials, water and housing, as the Readiness Strategy recommends.

Housing and workforce accommodation

The housing shortage

There is very limited spare housing in our region. The Readiness Strategy found that rental vacancy across key towns was effectively zero, at 0% to 1.2% as of August 2025, and that active rental bonds are at their lowest level since 2015–16.[13] Commercial accommodation is limited and concentrated in Horsham and Swan Hill, and construction workers from projects across the region will compete directly with tourists and business travellers. Our towns already struggle to house essential workers such as teachers and nurses, and any added demand will exacerbate this situation.

The EES concludes that the impact on housing will be low because workers from outside the region will live in temporary workforce accommodation. That conclusion only holds if the camps absorb all demand from the Project, but this is not realistic. Given the low unemployment rate in our shires, local workers who take project jobs will leave vacancies at existing businesses, and those vacancies can only be filled by people moving into a region with no housing for them. The Councils have explained this repeatedly to VicGrid throughout the development of the EES, and the EES records this concern.[14] It also accepts that "[t]here is the potential for a high level of labour demand outside the Project to attract workers to the area during the construction phase, leading to temporary pressure on local accommodation."[15]

[12] VNI West EES, Chapter 22 Business and economics, page 22-31, section 22.8.4.
[13] Urban Enterprise, *Resource Ready: North-Western Victoria Energy and Mining Impact and Readiness Strategy* (16 February 2026), page 51.
[14] VNI West EES, Chapter 22 Business and economics, section 22.8.3.
[15] VNI West EES, Chapter 22 Business and economics, page 22-29, section 22.8.3.

Despite this, the EES makes no commitment to increase the supply of housing in towns and communities. The only reference is to exploring the transfer of workforce accommodation assets for community use when the camps close, which provides no benefit during construction. The EES calls the impact temporary, but 3.5 years is a long time for a business that cannot fill positions, and building houses has long lead times. The Councils submit that worker accommodation will not adequately address all the impacts on housing in our region.

The Environmental Management Framework includes Environmental Performance Requirement SC01, which requires VicGrid to develop a "Social Value Strategy" prior to the commencement of construction. The Strategy is being developed outside the EES, through a Social Value Reference Group facilitated by a VicGrid engaged consultant, and is described as running "concurrently, but independently from the EES".[16] Although both Councils are represented on the Reference Group, that group is only one input to a process controlled by VicGrid, and the Strategy remains a draft on which VicGrid "plans to further consult" in 2026.[17] The draft Strategy was not exhibited with the EES and cannot be tested through this Inquiry. Nor does EPR SC01 commit VicGrid to delivering any outcome: it requires only that the Strategy identify "practical actions the Project could support", together with principles, processes and governance arrangements.[18] It does not require any initiative to be funded or delivered, including the permanent housing initiative referred to in the EES.[19] This undermines the Councils' confidence in VicGrid's ability to deliver real benefits in our region.

The Councils ask the IAC to recommend a new Environmental Performance Requirement requiring VicGrid to deliver a measurable net increase in permanent housing in our municipalities, with targets and timeframes agreed with the Councils before Project construction begins. The Councils are not seeking another strategy, but housing that is actually built. Temporary workforce accommodation does little to address the existing housing shortage, and any new permanent housing must be in suitable locations within or adjoining our towns, on land that is not subject to flooding. The approach should be consistent with the regional Worker Housing Plan recommended in the Readiness Strategy.[20]

Workforce accommodation sites

The Councils have serious concerns about how the workforce accommodation sites were chosen. When consulted on the selection criteria, the Councils told VicGrid, in meetings and in writing, of our strong preference for sites within or next to existing towns, so that the investment in servicing them could be reused for permanent housing. VicGrid instead preferred sites away from towns and relied on a public expression of interest process, which narrowed the field to whatever land was offered. It then declined to share the shortlist with the Councils and did not tell the Councils which sites were selected. Council staff found out about the sites from later drafts of the technical reports provided to the TRG.

By the Councils' own analysis, the Charlton and Greens Creek sites each meet only 5 of VicGrid's 15 published selection criteria. Each camp will need its own water, wastewater and power, with potable water trucked in and wastewater managed through a town sewerage

[16] VNI West EES, Technical Appendix O: Business and economics, page 53; see also Chapter 7 Stakeholder and community engagement, pages 7-12 to 7-14.
[17] VNI West EES, Attachment II Stakeholder and community engagement report, page 101.
[18] VNI West EES, Chapter 28 Environmental Management Framework, EPR SC01, pages 28-183 to 28-184.
[19] VNI West EES, Technical Appendix O: Business and economics, page 53.
[20] Urban Enterprise, *Resource Ready: North-Western Victoria Energy and Mining Impact and Readiness Strategy* (16 February 2026), page 9, Table S1, Action C1.

connection, a septic tank periodically emptied by a contractor, or an on-site treatment plant.[21] Any buildings and facilities provided will be removed after construction. This is an inefficient use of resources with no lasting benefit to our communities. The Councils reiterate their preference that the workforce accommodation be located and designed so that it provides a contribution to long-term, permanent housing in our towns.

The EES's conclusion on housing also rests on an assumption that workers will use the accommodation.[22] There is no commitment that workers will in fact live in the accommodation provided. If they do not, the pressure on rental housing in our towns will be greater than the EES has assessed. By comparison, the Environmental Management Framework recommended for the Western Renewables Link requires at least 95 per cent of construction workers who cannot commute safely to reside in the project's workforce accommodation while on shift.

Whether the workforce accommodation leaves any lasting benefit is also largely decided before construction, when the accommodation units are specified and the sites are laid out. As noted above, EPR SC01 commits only to the "exploration of opportunities to relocate and transfer construction workforce accommodation assets for community use as part of the accommodation decommissioning process".[23] The draft Incorporated Document requires the Councils to be consulted only on the fire management plans for the workforce accommodation, not on its site layout, operation or decommissioning.[24]

The Councils ask the IAC to recommend that:

- EPR SC03 include a firm commitment that non-local construction workers will reside in the Project's workforce accommodation while on a rostered shift, with exceptions limited to fatigue management, specific health and safety reasons, or as otherwise agreed with the relevant council;
- before each workforce accommodation area is built, VicGrid agree with the relevant council a legacy plan setting out the build and relocation standards needed for reuse as housing or community facilities on land that is not subject to flooding, the assets to be relocated or transferred and to whom, and the timing, with the plan to be published; and
- the site, operational and decommissioning plans for each workforce accommodation area be prepared in consultation with the relevant council.

Flooding at Charlton

Flooding at Charlton is one of the BSC's most serious concerns. The proposed Charlton combined laydown and workforce accommodation site could house around 200 workers, yet the whole site is covered by the Land Subject to Inundation Overlay and adjoins the Floodway Overlay. It was under water in the October 2022 floods. Technical Appendix G: Surface water states that relocating construction activities at Charlton outside the 1% AEP flood extent is "impractical". BSC does not accept this. The site was put forward through VicGrid's expression of interest process, and there is no need for workforce accommodation to be located on flood-prone land.

[21] VNI West EES, Chapter 4 Project description, page 4-94, section 4.9.1.
[22] VNI West EES, Technical Appendix Q: Social, page 113, VNI West EES, Chapter 28 Environmental Management Framework, EPR SC03, page 28-185.
[23] VNI West EES, Chapter 28 Environmental Management Framework, EPR SC01, page 28-183.
[24] VNI West EES, Attachment I PSA Planning Report, draft Incorporated Document, clauses 7.18 to 7.26.

The EES also gives little attention to the effect of the Project on the Charlton floodplain. Around Charlton, the alignment overlaps the 1-in-100-year flood extent for about 12 km, with approximately 35 tower platforms within it. Floods in 2011 and 2022 reached 8.60 m and 7.87 m on the Charlton town gauge, and flooding in Charlton has often required the evacuation of homes. There is no assessment of how the tower platforms, construction activities or workforce accommodation would affect the movement of floodwater, including on neighbouring properties, and no evidence of consultation with emergency services about placing around 200 workers on a site that floods. The assessment also does not reflect the updated flood mapping for Charlton introduced by Amendment C47blok, gazetted on 1 October 2026.

BSC ask the IAC to recommend that, before any approval is granted:

- a comprehensive flood assessment be prepared for the Charlton workforce accommodation site, and for the transmission towers and construction activities on the Charlton floodplain, using current flood mapping and including impacts on floodwater movement and adjoining properties;
- alternative sites for the Charlton workforce accommodation, outside flood-prone land, be properly considered; and
- emergency management arrangements, including evacuation, be prepared in consultation with BSC and emergency services for any Project facilities on flood-prone land.

Any reuse of workforce accommodation as permanent housing must be on land that is safe from flooding. The Councils do not support permanent housing being left on a flood-prone site without the necessary assessment and protections in place.

Social Value Strategy

The EES places considerable reliance on the Social Value Strategy. Chapter 7 describes its goal as driving a "transformational and measurable positive impact" on the outcomes that matter most to affected communities,[25] and Chapter 29 states it will support "energy upgrades in local communities."[26]

As noted above, EPR SC01 does not commit VicGrid to delivering any outcome. It also sets no targets, states no budget, does not say who will undertake the "annual independent evaluation" it lists as a verification measure, and does not require the results to be published.[27] By contrast, EPR SC07 requires the Social Impact Management Plan to be independently reviewed at least every three years.[28] For the Western Renewables Link, indicative values for community partnerships and investment, and for a community benefit fund, were put before that project's Inquiry. No equivalent information has been provided for VNI West. Without it, the Councils and our communities cannot judge what the Strategy will achieve.

The Councils ask the IAC to recommend that EPR SC01 be amended to require the Social Value Strategy to set measurable targets, with baselines and timeframes, and to state the budget committed to its delivery, before Project construction commences. The Strategy should be evaluated annually by an evaluator independent of VicGrid and the Delivery Partner and approved by the Minister for Planning, with each evaluation published in full. The Strategy should also include the electricity supply measures sought under Other issues below.

[25] VNI West EES, Chapter 7 Stakeholder and community engagement, page 7-12.
[26] VNI West EES, Chapter 29 Conclusion, page 29-19.
[27] VNI West EES, Chapter 28 Environmental Management Framework, EPR SC01, pages 28-183 to 28-184.
[28] VNI West EES, Chapter 28 Environmental Management Framework, EPR SC07, page 28-191.

Traffic and the road network

The Project will use the existing State and local road network to build VNI West. Road assets are the most significant assets owned by the Councils, and the Councils are concerned to protect their communities' safety and use of their roads, and council assets.

BSC's State roads have recently been rated as the second worst roads in the state, with around 84% in poor or very poor condition.[29] BSC's road network was severely damaged in floods in 2022, and BSC is still waiting for flood recovery funding to repair its roads.

The Councils' concerns are grounded in direct experience of other energy projects in our shires. For example, contractors have not complied with approved traffic management plans, putting other road users at risk. Dust from project traffic has contaminated household rainwater supplies to the point that residents could not use them. Roads, bridges and culverts have been damaged and repaired at ratepayers' expense, and the costs have not been recovered from project proponents.

The VNI West EES documentation and proposed mitigations do not give the Councils confidence that this will not happen again. Final construction routes have not been identified. Traffic data was available for only about 45 per cent of the roads assessed, dozens of local roads in our shires do not appear to have been inspected, road condition was assessed visually without pavement testing, and no council bridge or culvert has been assessed.

The limited assessment concludes that roads will remain within their traffic capacity. However, on low-volume rural roads, including formation-only and dry-weather roads, the real constraint is whether the road can carry repeated heavy loads in all weather. These roads also carry school buses, emergency vehicles, grain and livestock trucks, and the freight our local economies depend on. The EES does not assess harvest traffic, the effect of delays on freight-reliant businesses, or how compliance with approved routes will be enforced. The assessment adopts what it calls "a conservative allowance of 20 vehicle movements per day for each accommodation area", and assumes these trips will not coincide with peak construction traffic.[30] For camps designed to house 200 to 300 workers each,[31] the Councils do not consider this credible.

Despite these gaps, the EES rates the residual impact on roads as low and leaves the detail to plans prepared by the construction contractor after approval.

The Councils are also asking VicGrid to provide them with financial security, in the form of bank guarantees held by each Council, to cover damage to council roads, bridges and culverts. A bank guarantee requirement of this kind has been adopted in the planning permit for the Wimmera Plains Wind Farm (PA2000877-1). The bank guarantees should be in place before construction begins and remain in place until council roads, bridges and culverts have been reinstated to the Councils' satisfaction. Just as importantly, damage should be repaired as it occurs, rather than being left until the Project finishes, so that roads remain safe and usable for our communities during construction. The Councils should have the authority to require urgent

[29] Victorian Auditor General's office, *Maintaining State Roads*, September 2026.
[30] VNI West EES, Chapter 18 Traffic and transport, page 18-51; see also Technical Appendix K: Traffic and transport, section 8.2.
[31] VNI West EES, Chapter 22 Business and economics, page 22-29.

repairs, and the full cost of the Councils' monitoring and oversight of Project works on council assets should be met by the proponent.

The Councils request that the IAC recommend the following Environmental Performance Requirements be included in the Environmental Management Framework:

- Provide the Councils with authority to determine the upgrade or road construction that needs to occur to council roads before use for the Project. The Councils would consider a suitable dispute resolution mechanism as part of this authority.
- Bank guarantees, held by each Council, to be in place before construction begins and to remain in place until council roads, bridges and culverts are reinstated to the Councils' satisfaction.
- Damage to council roads, bridges and culverts caused by Project traffic to be repaired as it occurs, with the Councils having authority to require urgent repairs.
- The full cost of the Councils' monitoring and oversight of Project works on council assets to be met by the proponent.

Impact on agriculture
Agriculture is the dominant land use and industry in both shires. As stated above, the Councils are concerned that farm workers will be drawn to construction jobs on transmission and energy projects, worsening existing farm labour shortages. The EES agriculture assessment does not adequately consider this. Construction will also compete with farms for inputs, particularly water and quarry materials, and is likely to raise prices.

Productive land will be lost, and farm operations will be disrupted during construction and for the life of the easement. The movement of vehicles, plant and materials between properties raises real biosecurity concerns. Farmers have repeatedly asked that access to their properties be given with adequate notice, timed to avoid critical periods such as lambing and harvest, and managed with proper regard to safety and biosecurity. The EES leaves these matters largely to property management plans and other plans yet to be prepared. The Councils urge VicGrid to manage these impacts in consultation with farmers. This should include the provision of independent advice to farmers concerning the management of impacts and assistance in the preparation of Farm Management Plans to minimise and offset impacts.

Cumulative impacts
VNI West is one of many transmission, renewable energy and mining projects proposed in our region. Our communities will experience these projects together, not one at a time, and their impacts on noise, traffic, dust, road safety and access, road condition, housing and labour will compound.

The EES does not assess cumulative impacts properly. Instead, each technical study applies its own narrow zone of influence. The Curyo Wind Farm and Wilkur Energy Park in Buloke, and the Joel Joel battery next to the Bulgana Reactor station, are left out of many of the assessments. For example, Wilkur is excluded from the traffic and transport cumulative assessment,[32] even though traffic from Curyo, Wilkur and the Donald Mineral Sands project will use the same roads as VNI West. The Traffic and Transport chapter acknowledges that "limited information is available regarding the final construction traffic routes and volumes and construction programs for most nearby projects", yet concludes that "no significant cumulative impacts have been

[32] VNI West EES, Chapter 18 Traffic and transport, page 18-56. Compare Chapter 24 Social, pages 24-60 to 24-61, and Chapter 25 Aboriginal cultural heritage, page 25-45, which include Wilkur Energy Park.

identified within the Project's zone of influence".[33] The cumulative assessments appear to have identified other projects largely from referral and planning registers, and it is not clear that projects already operating in the region have been considered.[34] Where overlapping impacts are acknowledged, they are dismissed as temporary and left to each proponent to manage separately.[35]

The Councils ask the IAC to recommend an Environmental Performance Requirement to prepare a proper regional cumulative impact assessment that:

- Has regard to the range of projects identified in the Readiness Strategy (plus others that have been developed since that Strategy was completed);
- Includes a method for coordinating construction traffic and apportioning responsibility for road damage between projects; and
- Assesses the combined demand of those projects on housing, labour, essential services and council capacity, and establishes a regional coordination mechanism to respond where pressures exceed defined thresholds.

Incomplete field investigations
The EES acknowledges that there was limited or no access to private land from south of Teddywaddy through to Bulgana. Geographically, that is most of the alignment through the two shires. Access was obtained to approximately one-third of the private land along the Proposed Easement, primarily in the north. Of approximately 30 properties approached under statutory entry powers, only one was accessed.[36] Only about 32 per cent of the Proposed Easement was accessed for ecological assessment.[37] The lack of access affected ecological and Aboriginal cultural heritage surveys, geotechnical investigations, verification of access tracks and agricultural land use assessments. Many conclusions about impacts in our shires therefore rest on desktop information.

The Councils raised deficiencies in the ecological surveys through the TRG process. We acknowledge that this is due to land access, but we do not accept that the EES can be considered complete without proper surveys. The Councils ask that the outstanding field investigations be completed and published, and that the conclusions that depend on them be revisited, before any Project approval that rests on those investigations is provided.

The logical means of addressing this is through a supplementary EES process.

Planning policy and the draft amendment
The EES and draft amendment claim that the Project is generally consistent with State and local planning policy. The Councils reject this conclusion because our policies direct housing to existing townships and seek to improve housing supply and affordability. Temporary workforce accommodation outside our towns does not align with these policies.

[33] VNI West EES, Chapter 18 Traffic and transport, page 18-58.
[34] VNI West EES, Chapter 24 Social, page 24-60 (projects identified from the VIC EES Planning Portal, council websites and the EPBC public notices list).
[35] VNI West EES, Chapter 23 Land use and planning, section on cumulative impacts.
[36] VNI West EES, Attachment VI Detailed Project development and alternatives, pages 10–11, section 1.5; see also Chapter 3 Project development and alternatives, page 3-3.
[37] VNI West EES, Technical Appendix S: Ecology, section 5.7.

Several measures listed as mitigation, including a Workforce Housing and Accommodation Strategy, a community benefit sharing program and community funds, are not required by any Environmental Performance Requirement. More broadly, the management of impacts including any requirement for the rehabilitation of farmland impacted by the development is deferred to plans prepared by the construction contractor and accepted by VicGrid, with the Councils only consulted. The cost to the Councils of administering the new controls has not been assessed.

The scale of what has been deferred is significant. The hierarchy of environmental controls in Chapter 28, together with the further strategies, plans and assessments referred to elsewhere in the Environmental Management Framework, lists more than 50 documents still to be prepared after approval.[38] They include Development Plans, bushfire and fire emergency plans, Workforce Accommodation Plans, construction, operational and decommissioning environmental management plans and their sub-plans, Property Management Plans, Traffic Management Plans, road condition and dilapidation assessments, the Social Value Strategy and the Local Workforce Development Strategy. Many of the matters that go to the heart of the Project's impacts on our communities, including how roads will be used and reinstated, how farm businesses and biosecurity will be managed, and where workers will live, will therefore be settled through secondary approvals by the Minister for Planning, or plans accepted by VicGrid, after the EES process has ended. In most cases the Councils will only be consulted, and neither the Councils nor our communities can test the adequacy of these controls through this Inquiry.

The Councils ask that every mitigation measure relied on in the EES be secured through an Environmental Performance Requirement, that plans affecting council assets and services require the Councils' agreement, and that the Councils' costs of participating in Project oversight be met by the proponent. In particular, the Social Impact Management Plan required by EPR SC07 should set baseline indicators, monitoring frequency, thresholds and mandatory responses for housing, labour, essential services and community wellbeing, rather than leaving these to be developed after approval.

Electricity supply in our communities

Our communities will host major electricity infrastructure that carries power through their districts, yet many of them do not have a reliable electricity supply of their own. The EES itself recognises this. It records that some people in the councils that the Project will cross experience regular electricity supply interruptions due to limitations in the distribution network, and that, despite hosting transmission infrastructure, these limitations are unlikely to be aided by the Project.[39] It rates the distributive inequity of energy supply as a high negative residual impact, because no Environmental Performance Requirements have been recommended to address it.[40]

The Councils raised this issue directly with VicGrid. In October 2024, BSC advised that a community benefit it sought was an upgrade to the Charlton substation (which also serves St Arnaud), that operates with only one line in and one line out, resulting in unreliable power and, at times, extended outages.[41]

The EES responds that the distribution network is owned by others and sits outside the Project's control. Yet Chapter 29 states that partnering with specialists to support energy upgrades in

[38] VNI West EES, Chapter 28 Environmental Management Framework, Table 28-4.
[39] VNI West EES, Technical Appendix Q: Social, page 8.
[40] VNI West EES, Chapter 24 Social, page 24-50.
[41] VNI West EES, Attachment I PSA Planning Report, page 103, section 5.2.2.

local communities would be captured in the Project's Social Value Strategy.[42] EPR SC01, which requires that Strategy, makes no reference to energy supply.[43] The Councils do not accept that a high residual impact, identified by the EES itself, should be left without any requirement to address it.

The Councils ask the IAC to recommend a new Environmental Performance Requirement that requires VicGrid, before construction and in consultation with the distribution network service provider and the Councils, to assess the reliability and capacity of electricity supply to towns and farming districts in the municipalities intersected by the Project, publish that assessment, and fund, deliver or co-fund upgrades to address the shortfalls identified. Connections to the distribution network for workforce accommodation and other Project facilities should also be designed, where practicable, to leave lasting supply capacity for nearby towns.

Other issues
Councils and our communities have by necessity engaged throughout the EES assessment. It expects and anticipates that other government agencies and authorities, including members of the Technical Reference Group provide the IAC with expert commentary and advice in respect to their technical knowledge to ensure environmental, amenity and risk are appropriately resolved.

Councils would welcome input from other State government agencies on the issues that are raised in our submissions during the panel process.

The attachment includes the Councils' submissions on a wide range of other issues.

Summary of the Councils' requests
A summary of the Councils' key requests is below. Further detail on the Councils' requests is provided in Attachment 1.

1. The full, unredacted EES be exhibited, with the time for submissions extended;
2. The Councils be permitted to make oral submissions and call expert evidence on traffic and roads, with 1.5 days allocated;
3. The Councils be given authority to determine the upgrade or road construction needed on council roads before their use for the Project, subject to a suitable dispute resolution mechanism;
4. Bank guarantees be in place before construction begins and remain until council roads are satisfactorily reinstated;
5. Damage to council roads be repaired as it occurs, with the Councils able to require urgent repairs;
6. Funding be provided to cover the Councils' reasonable costs of engaging in the Project's implementation, including technical review, planning, monitoring and compliance and oversight of works on council assets, with a dispute resolution mechanism where costs cannot be agreed;
7. A new Environmental Performance Requirement requiring VicGrid to deliver a measurable net increase in permanent housing within or adjoining our towns, with agreed targets and timeframes;
8. Workforce accommodation be located and serviced for reuse as housing in our towns, on land that is not subject to flooding;

[42] VNI West EES, Chapter 29 Conclusion, page 29-19.
[43] VNI West EES, Chapter 28 Environmental Management Framework, EPR SC01, pages 28-183 to 28-184.

9. Non-local construction workers be required to reside in the Project's workforce accommodation, and a legacy plan for each accommodation area be agreed with the relevant council before it is built;
10. A new Environmental Performance Requirement to assess electricity supply in host towns and farming districts, publish the assessment, and fund or co-fund upgrades to address the shortfalls identified;
11. The Social Value Strategy set measurable targets and a budget before construction, with an annual independent evaluation published in full;
12. A comprehensive flood assessment of the Charlton workforce accommodation site and the Charlton floodplain, consideration of alternative sites outside flood-prone land, and emergency arrangements be completed before any approval is granted;
13. Binding local procurement and employment targets, and regional planning for labour, materials, and housing be in place before construction;
14. A regional cumulative impact assessment be prepared that has regard to the Readiness Strategy;
15. Outstanding field investigations be completed and published before any approvals are granted; and
16. Every mitigation measure relied on in the EES be secured through an Environmental Performance Requirement.

Closing statement

It is unacceptable to both Councils and our communities that significant projects in our area cause negative impacts, even after an extensive planning process such as an EES. To protect the interests of our communities, we are seeking detailed recommendations from the IAC to address the Councils' and our communities' concerns.

Yours faithfully,



Trenton Fithall
Acting Chief Executive Officer
Northern Grampians Shire Council



Daniel McLoughlan
Chief Executive Officer
Buloke Shire Council

Attachments

Attachment 1: Councils' detailed submissions.

Attachment 1: Specific comments on the VNI West Environment Effects Statement

Joint submission of Northern Grampians Shire Council (NGSC) and Buloke Shire Council (BSC)

Comments are ordered by EES chapter, then technical appendix, then attachment. Unless stated otherwise, references to "the Councils" mean both Councils. Comments that relate to only one Council are marked "This comment refers to NGSC only" or "This comment refers to BSC only". References to "the Readiness Strategy" are to Urban Enterprise, *Resource Ready: North-Western Victoria Energy and Mining Impact and Readiness Strategy* (16 February 2026), as described in the Councils' cover letter.

General comments

No.	Report / Chapter / Appendix	Report Section / Location	Comment
1	General	General	Numerous incomplete section references across the documents e.g. Section 0.
2	General	Cumulative impact assessment sections of all technical reports	The Councils are concerned about the approach taken to cumulative impact assessment across the EES. The concern is twofold. First, a number of technical reports do not identify all relevant existing and proposed projects. Second, where other projects are identified, some reports then exclude them from the cumulative impact assessment on the basis that they are 'outside the zone of influence'. The Councils do not agree with how the zone of influence has been determined, particularly for traffic and transport. Projects located a significant distance from the VNI West alignment will use the same roads as VNI West construction traffic, and their impacts will combine with those of the Project. In particular, the Curyo Wind Farm and Wilkur Energy Park in BSC, and the Joel Joel BESS adjacent to the Bulgana Terminal Station in NGSC, have not been adequately considered across the reports. The Councils request that the cumulative impact assessments be revised to address the following omissions: • Appendix A Electric and magnetic fields: Joel Joel BESS is not listed despite being within the zone of influence. • Appendix B Geology and soils: Joel Joel BESS is not listed despite being within the zone of influence. • Appendix C Groundwater: Joel Joel BESS is not listed despite being within the zone of influence. Curyo Wind Farm is not listed as 'considered but screened out', despite other projects at a similar distance being considered. • Appendix D Historic heritage: Joel Joel BESS is not listed despite being within the zone of influence.

No.	Report / Chapter / Appendix	Report Section / Location	Comment
			• Appendix E Bushfire: Joel Joel BESS is not listed despite being within the zone of influence. Curyo Wind Farm is not listed as 'considered but screened out', despite other projects at a similar distance being considered. • Appendix G Surface water: Joel Joel BESS and Curyo Wind Farm are not listed despite being within the zone of influence. • Appendix I Air quality: Joel Joel BESS is not listed despite being within the zone of influence. Curyo Wind Farm is not listed as 'considered but screened out', despite other projects at a similar distance being considered. • Appendix J Landscape and visual: Joel Joel BESS is not listed despite being within the zone of influence. Curyo Wind Farm is not listed as 'considered but screened out', despite other projects at a similar distance being considered. • Appendix K Traffic and transport: Joel Joel BESS and Curyo Wind Farm are not listed, despite other projects at a similar distance being assessed. • Appendix L Noise and vibration: Joel Joel BESS and Curyo Wind Farm are not listed, despite other projects at a similar distance being assessed. • Appendix M Agriculture: Joel Joel BESS and Curyo Wind Farm are not listed, despite other projects at a similar distance being assessed. • Appendix N Aviation: Curyo Wind Farm is not listed, despite other projects at a similar distance being assessed. • Appendix O Business and economics: Joel Joel BESS and Curyo Wind Farm are not listed, despite other projects at a similar distance being assessed. • Appendix P Land use and planning: Joel Joel BESS, Curyo Wind Farm and Wilkur Energy Park are not listed, despite other projects at a similar distance being assessed. • Appendix Q Social: Joel Joel BESS and Curyo Wind Farm are not listed, despite other projects at a similar distance being assessed. • Appendix R Aboriginal cultural heritage: Joel Joel BESS and Curyo Wind Farm are not listed, despite other projects at a similar distance being assessed. • Appendix S Ecology: Joel Joel BESS is not listed. Curyo Wind Farm is mentioned but not assessed because 'insufficient information' was available. It is unclear what efforts were made to obtain this information, noting that the project is listed on the Victorian Government's renewable energy project mapping with a status of 'referred under the Environment Effects Act'. In addition to the Curyo and Wilkur projects, there are several other renewable energy projects in early development stages. These include the Corack East and Southern Mallee Wind Farms, also in Buloke Shire. Corack East and Southern Mallee Wind Farms are in their early stages and their is less

No.	Report / Chapter / Appendix	Report Section / Location	Comment
			information available, the absence of any reference of these projects highlights the Councils concerns about the adequacy of the cumulative impact assessment. It also highlights the significance of, and speed at which, the renewable energy transition is occuring, when there doesn't appear to be a full understanding of the extent of projects across the Shire. Campbells Bridge Wind Farm located in NGSC is also proposed project in the vicinity of VNI West. Watta Wella wind farm has just received planning permission and again is reliant on success of VNI West and located in proximity to Bulgana Wind Farm.

Chapter 4: Project description

No.	Report / Chapter / Appendix	Report Section / Location	Comment
3	Ch 4 Project description / Appendix K Traffic and transport	Laydown and workforce accommodation areas – redacted site-specific information. Chapter 4, sections 4.9 and 4.9.2; Appendix K, sections 8.1, 8.1.2.8 and 8.1.2.9; and related site-specific material across the EES and technical reports.	The Councils are unable to fully assess the impacts of the laydown and workforce accommodation areas in their municipalities because relevant site-specific information across the EES and technical reports has been redacted. These are Laydown Area 7 (St Arnaud North), Laydown Area 8 (St Arnaud) and Combined Laydown and Workforce Accommodation Area 9 (Greens Creek) in NGSC, and Combined Laydown and Workforce Accommodation Area 6 (Charlton) in BSC. The Councils' comments are therefore based on the information currently available. The Councils request access to the full unredacted information relevant to the assessment of these sites, subject to appropriate confidentiality arrangements where necessary, and reserve the right to provide further comments once this information has been made available.
4	Chapter 4 Project description / Chapter 28 Environmental Management Framework	Laydown and workforce accommodation areas – cumulative site impacts, operating duration and management. Chapter 4, sections 4.9 and 4.9.2; Chapter 28, section 28.3.1; relevant discipline-specific Environmental Performance Requirements (EPRs) and management plans.	The EES assesses the impacts of the laydown and workforce accommodation areas across different technical reports and relies on subsequent EPR management plans for detailed controls. The Councils consider that the impacts of each site (Laydown Areas 7 and 8 and Combined Laydown and Workforce Accommodation Area 9 in NGSC, and Combined Laydown and Workforce Accommodation Area 6 in BSC) should be brought together so their overall effect can be understood and managed, including traffic and access, noise, dust, light spill, drainage, biosecurity, surrounding land uses and rehabilitation. Each site should only remain operational for the period reasonably necessary to support the construction activities requiring that location and should be decommissioned and rehabilitated as soon as reasonably practicable once that need has passed. NGSC considers this particularly important for Laydown Area 8 at St Arnaud, given its identified sensitivity. The EES should clearly identify the anticipated operating period of each site and how this relates to the construction program. The assessment should also consider cumulative impacts with other VNI West activities and other major projects using the same roads, communities and infrastructure, with coordinated mitigation required where cumulative effects occur.

Chapter 11: Historic heritage

No.	Report / Chapter / Appendix	Report Section / Location	Comment
5	Ch 11 Historic Heritage	Throughout chapter	This comment refers to NGSC only. The redaction of the specific locations of the workforce accommodation and laydown locations makes it difficult to determine impacts on historical mining sites around St Arnaud and to determine whether the chapter's statements are correct, such as that there is low potential for historic heritage and that it is of low-level significance.
6	Ch 11 Historic Heritage	Throughout chapter	This comment refers to NGSC only. The World Heritage Bid (WHB) for the Victorian Goldfields is mentioned; however, the chapter does not state whether impacts on the wider area (other than the initial sites on the tentative list) have been assessed. The Victorian Goldfields World Heritage Master Plan lists St Arnaud as an emerging tourist town with world heritage journeys, nearby gold mining remnants and recommends interpretation, wayfinding and a future world heritage hub for this area. It is not clear if consultation has occurred with the WHB team on potential impacts on these sites and impacts on the wider WHB.
7	Ch 11 Historic Heritage	11.7 Construction impact assessment	Given it cannot be determined if there will be archaeological remains at sites, management should include the preparation of surveys prior to works commencing as not all sites are listed on the Victorian Heritage Inventory or Victorian Heritage Database.
8	Ch 11 Historic Heritage	11.10 Cumulative Impact Assessment	It is not correct to restrict consideration of cumulative impacts only to other proposed projects. All projects, whether existing or proposed, that could compound with this proposed project to create greater impacts must be identified and considered for the purposes of this cumulative impact assessment.

Chapter 12: Bushfire

No.	Report / Chapter / Appendix	Report Section / Location	Comment
9	Ch 12 Bushfire	General Comment on Bushfire Chapter	The bushfire assessment states that the potential impact on aerial bushfire suppression resources is considered unlikely. However, it has not considered that, given the inability to attack a fire in different areas of the easement, the response to a bushfire emergency will need to vary compared to historic response arrangements. The inability to respond as normal will create a different fire risk and therefore any management plans need to consider the inability to attack a fire in different scenarios. The Councils request that any fire and emergency management plans are developed in consultation with local brigades and the Municipal Fire Management Planning Committee to ensure local knowledge is considered as part of the development of any plans. Councils acknowledge that the CFA are the designated experts and have developed specific guidelines to assist project planning for renewable energy. Councils are seeking to ensure it and the

No.	Report / Chapter / Appendix	Report Section / Location	Comment
			community are given confidence by the IAC that it has heard from the CFA to address issues raised in submissions.
10	Ch 12 Bushfire	General Comment on Bushfire Chapter	The bushfire assessment refers to generalised bushfire response arrangements, but it does not consider the risks associated with CFA resources not being available to respond. CFA brigades are volunteer-based, and some volunteers have stated that they will not respond to fires in the vicinity of the easement. This creates a risk to our communities and impacts the capacity to manage a fire effectively. The Councils request that any fire and emergency management plans are developed in partnership with local brigades and municipal fire management planning committees to ensure that local knowledge is included in the planning arrangements.
11	Ch 12 Bushfire	General Comment on Bushfire Chapter	The bushfire assessment considers weather observations from Kerang and Ararat. Ararat is not part of the study area and does not give suitable observations for the central and southern ends of the study area. Stawell has been used as an alternate source, and the assessment should include observations from Charlton. Observations for Charlton date back to 2004 and would provide sufficient information to support an assessment in the central sector of the study area. The Councils are concerned that the observations used are not appropriate and therefore any fire and emergency management plans will also not be appropriate for the local conditions. The Councils request that Charlton and Stawell weather observations are assessed against conditions to ensure the appropriate management arrangements are developed to align with local conditions.
12	Ch 12 Bushfire	General Comment on Bushfire Chapter	The bushfire assessment considers the 'summer months' as the high-risk period. The assessment should consider the high-risk weather season that extends from spring through to autumn. Significant fires can occur in the landscape throughout spring prior to the cropping season throughout the study area. While fire risk is lower during this period, construction activity increases the risk, and the assessment should consider the economic impact it could create if construction causes a fire that spreads throughout crops that are yet to be harvested. The Councils are concerned that the lack of attention to the overall high-risk weather season creates a risk to the community and farming operations. Lack of fire management during spring may result in a significant economic impact on the farming community. The Councils request that any fire and emergency management plans consider the entire high-risk weather season to ensure that risks are managed throughout the entire high-risk weather season and not just the 'summer months'.
13	Ch 12 Bushfire	General Comment on Bushfire Chapter	The bushfire assessment refers to fire history up until 2022-23. Significant fires have impacted the landscape since then. These fires have had a greater impact on communities. The Councils are concerned that because the most recent fires have not been taken into account, the assessment misses the most current and critical information to ensure the assessment is undertaken to measure current conditions. The Councils request that the most recent fire events are considered as part of the

No.	Report / Chapter / Appendix	Report Section / Location	Comment
			assessment and any fire and emergency management plans. This ensures the most suitable information is considered when developing any fire and emergency management plans.
14	Ch 12 Bushfire	Insurance No reference	Chapter 12, Bushfire, and the Bushfire Appendix consider the risk of the Project causing bushfires, and describe how the risks will be avoided, minimised or managed. They identify the construction phase of the Project as creating the highest risk of bushfire. The Chapter and Appendix do not consider providing insurance or an indemnity as a means of managing bushfire risk. The Councils seek a new EPR that requires VicGrid to indemnify or provide insurance to landowners for loss and damage from any bushfire caused by the Project. The Councils submit that this is an entirely reasonable request that would place farmers in the same position they would be in without the Project.

Chapter 16: Air quality

No.	Report / Chapter	Report Section / Location	Comment
15	Ch 16 Air Quality	AQ01	NGSC residents have experienced significant dust issues from traffic related to other renewable energy projects in the Shire. Cars and trucks using unsealed roads have deposited large amounts of dust on nearby houses. For houses that use rainwater for their domestic water supply, the level of dust has rendered their rainwater supply unusable. Residents have had to either cart water to their houses for domestic use, or look for alternative water sources, such as clothes washing in town away from their homes and the dust. The Councils seek an amendment to AQ01 to include the following additional minimum measures: • Dust suppression measures to be implemented for public unsealed roads. • Provision of alternative water supplies to households whose domestic water supply is impacted by dust from the Project and Project traffic.
16	Ch 16 Air Quality	16.1	Section 16.10 seeks to identify other projects in the area that may have air quality impacts that are cumulative with the Project. The section does not identify Western Renewables Link, Watta Wella Wind Farm, or Joel Joel battery, which may be under construction near the southern end of VNI West at the same time. The Councils request that these projects be included in the cumulative impact assessment.

Chapter 18: Traffic and transport

No.	Report / Chapter	Report Section / Location	Comment
17	Ch 18 Traffic and Transport	General Comment on Traffic and Transport Chapter	The Councils own and are responsible for the local roads in the areas where the Project will be constructed. The Project's use of Council roads is an area where the Project has the potential to significantly and negatively impact Council owned assets, as well as create hazards for other road users. Due to the value and importance of the Councils' road assets and their importance to residents' daily lives, the Councils are seeking conditions on the use of their roads that will ensure the value of

No.	Report / Chapter	Report Section / Location	Comment
			their assets is protected, and that their communities can continue to use local roads during Project construction.
18	Ch 18 Traffic and Transport	General Comment on Traffic and Transport Chapter	The Councils acknowledge the work undertaken to assess traffic and transport impacts associated with the VNI West Project and note the conclusion that most impacts can be managed through mitigation measures and EPRs. However, the Councils remain concerned that many of the chapter's conclusions rely on assumptions, future investigations, future Traffic Management Plans and contractor-led assessments rather than demonstrated outcomes within the EES itself. While the Councils do not dispute that the broader regional road network may have sufficient theoretical capacity to accommodate Project traffic, the assessment places less emphasis on the functional role, durability and resilience of local roads that support agricultural production, school bus services, emergency access, freight movements and rural communities. The Councils consider that these factors are critical to understanding the true transport impacts of the Project. The Councils note that several matters raised through the TRG process, particularly in relation to workforce accommodation traffic, traffic generation assumptions, intersection assessments, haulage activities and cumulative impacts, have only been partially resolved and continue to rely on further investigation during later project phases. Accordingly, the Councils request that greater certainty be provided regarding traffic generation, road suitability, road asset impacts, cumulative project interactions and mitigation measures prior to approval, and that local road authorities play an active role in the development, review and approval of all traffic, access and road management measures affecting Council-managed infrastructure.
19	Chapter 18 Traffic and transport / Appendix K	Laydown Area 8 and Combined Laydown and Workforce Accommodation Area 9 – access, road safety and cumulative traffic. Ch 18 Traffic and transport; App K, sections 8.1, 8.1.2.8, 8.1.2.9 and 11; EPR-TT01–TT04.	This comment refers to NGSC only. The EES identifies high road-safety risks associated with potential access to Laydown Area 8 at St Arnaud and Combined Laydown and Workforce Accommodation Area 9 at Greens Creek and identifies that access points may require treatment, upgrades or new arrangements for B-double vehicles. NGSC considers these access requirements should be resolved before construction rather than left to later contractor-led assessment. NGSC seeks site-specific intersection and access assessments, pavement investigations and agreement with NGSC on final heavy-vehicle routes and any necessary road or intersection upgrades before the sites become operational. The assessment should also consider cumulative heavy-vehicle use of these roads by other major projects rather than assessing VNI West traffic in isolation.
20	Chapter 18 Traffic and transport / App K	Laydown Area 8 – construction traffic noise and amenity. Ch 18, section 18.8.8 Amenity (noise); App K traffic-noise assessment for laydown-to-easement movements.	This comment refers to NGSC only. The EES identifies Laydown Area 8 at St Arnaud as having the highest number of sensitive receptors potentially affected by construction traffic noise, including 32 receptors within 25 metres in the assessed laydown-to-easement scenario. Given the concentration of impacts associated with this site, NGSC seeks a site-specific traffic and amenity response including route and scheduling measures to minimise impacts on nearby residents, advance notification, monitoring and additional mitigation where

No.	Report / Chapter	Report Section / Location	Comment
			impacts occur. The assessment should also consider cumulative traffic from other major projects using the same roads.
21	Chapter 18 Traffic and transport	18.11 Cumulative Impact Assessment	The cumulative impact assessment concludes that no significant cumulative traffic impacts have been identified. However, the assessment also acknowledges that limited information is available regarding construction traffic routes, traffic volumes and construction timing for many nearby projects. The Councils consider that the conclusion regarding cumulative impacts should therefore be treated with caution. Further assessment should be undertaken as project construction programs become clearer, particularly where multiple renewable energy and transmission projects may utilise common local roads and access routes over extended periods.

Chapter 20: Agriculture

No.	Report / Chapter	Report Section / Location	Comment
22	Ch 20 Agriculture	Indemnity	One of the main concerns that has been raised by farmers and property owners on and near the VNI West route during the development of the Project is the impact of the Project on the potential liability of host and surrounding property owners for damage to the Project. The Project would build a very large, expensive asset in the landscape. Farming near the transmission line creates a risk that farmers could damage the transmission towers and lines and interfere with their transmission function. Landowners think that it is unfair that the construction of the Project on or near their land would increase their potential liability. While VicGrid has sought to clarify the insurance implications of VNI West, and has published some fact sheets about insurance, these have not addressed farmers' concerns. The EES does not recognise or address this issue. The Councils seek a new EPR that requires VicGrid to indemnify landowners for liability, loss or damage to the asset (including consequential loss), except where such damage is intentional. The indemnity could be provided by VicGrid itself, or VicGrid could request a statutory indemnity from the State.
23	Ch 20 Agriculture	Biosecurity & Insurance	Farmers are very concerned about biosecurity risks from the Project, and the potential damage to their businesses from a biosecurity breach. Chapter 20, Agriculture, and the Appendix discuss biosecurity risk and the Project's plans to reduce those risks at length. Nonetheless, the EES recognises biosecurity risks as having the highest residual impact for the Project. Even with EPR AG02 in place, Appendix M rates the residual consequence of a biosecurity breach as "medium to major because it can be widespread, long-lasting and have medium to major effects on farm production or the agricultural industry, depending on the type of incursion".[1] AG02 is directed to preventing and responding to a breach; neither AG01 nor AG02 provides for losses suffered by farmers if a breach

[1] VNI West EES Technical Appendix M: Agriculture, page 112, Section 7.3 (Residual impact).

No.	Report / Chapter	Report Section / Location	Comment
			occurs, beyond providing information on "compensation or claims pathways"[2] or breach responses/escalation pathways.[3] The Councils seek a new EPR that requires VicGrid to indemnify or provide insurance to landowners for loss and damage from any biosecurity breach. The Councils submit that this is an entirely reasonable request to place farmers in the same position they would be in without the Project.
24	Ch 20 Agriculture and App M Agriculture	Section 20.7.1; App M Section 7.2	The EES assesses the loss of agricultural production at a regional scale only. It estimates the loss at approximately $2.77 million, or 0.3% of the value of agricultural activity in the study area, and concludes that the impact is minor. The Councils do not accept that the regional figure shows the impact on farmers is acceptable. The estimate uses regional average farmgate values per hectare from 2020–21 data, which "does not imply anything about the profitability of the enterprise, nor of any individual business".[4] It assumes one year of lost production, although Chapter 20 acknowledges that, after construction, "rehabilitation and re-establishment of pasture and crops can take from one to two further years", and up to two years for dryland pasture in low rainfall conditions[5] – which describes much of the affected land in Northern Grampians and Buloke. It does not quantify lost productive time, and a range of matters, for example, access tracks on private land "are not being assessed in this EES".[6] In Northern Grampians, 702 ha across 76 properties is affected, with an estimated loss of $493,847; in Buloke, 401 ha across 49 properties, with an estimated loss of $227,951.[7] Appendix M accepts it is possible that "there will be a small number of properties where any reduction in production or increase in costs, may present a significant challenge to the farm business", but states that estimating this "would require detailed analyses of these few individual businesses which is beyond the scope of this assessment".[8] The EES therefore leaves the material impacts on individual farm businesses to the compensation process under the Land Acquisition and Compensation Act 1986, where the onus falls on each farmer to establish their loss. The Councils request that the EES identify the farm businesses likely to be significantly affected and assess the impact on those businesses, so that the adequacy of the proposed mitigation can be tested through the Inquiry.
25	Ch 20 Agriculture and Ch 28 EMF	EPR AG01	EPR AG01 requires a Property Management Plan for each directly affected property, prepared "in consultation with the landholder",[9] including a pre-condition baseline assessment, rehabilitation and reinstatement "to previous level of agricultural use" and post-reinstatement inspection.[10] However, the plan is prepared by the Principal Contractor and accepted by VicGrid. Where agreement cannot be

[2] VNI West EES Chapter 28: Environmental Management Framework, page 28-79, EPR AG01.
[3] VNI West EES Chapter 28: Environmental Management Framework, page 28-79, EPR AG02.
[4] VNI West EES Technical Appendix M: Agriculture, page 36, Section 5.4.4.
[5] VNI West EES Chapter 20: Agriculture, page 20-27, Section 20.7.1.
[6] VNI West EES Technical Appendix M: Agriculture, page 46, Section 5.7.
[7] VNI West EES Chapter 20: Agriculture, page 20-30, Table 20-9.
[8] VNI West EES Technical Appendix M: Agriculture, page 90, Section 7.2.
[9] VNI West EES Chapter 28: Environmental Management Framework, page 28-76, EPR AG01.
[10] VNI West EES Chapter 28: Environmental Management Framework, page 28-78, EPR AG01.

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			reached, the plan only records the matters raised by the landholder and the Project's response. Post-construction monitoring "may be undertaken by landholders as part of normal farming activities".[11] Farmers are left to judge the adequacy of the baseline assessment, the proposed measures and the reinstatement criteria, and later to prove their losses for compensation, without the expertise or resources to do so. Consistent with comment 41, the Councils request that AG01 be amended to require VicGrid to fund independent agronomic and farm business advice, and legal advice where needed, from an adviser chosen by the landholder, to: (a) review the draft Property Management Plan, including the baseline assessment and reinstatement criteria, before it is finalised; and (b) undertake a post-construction assessment of soil condition, productivity and reinstatement against the baseline, after the first full growing season following reinstatement, with remedial works required where the criteria are not met. The post-construction assessment should be provided to the landholder for use in the compensation process. Doing this properly is logical – it will reduce compensation if plans are prepared properly. While there may be an argument that these costs are the natural and direct consequence of an acquisition and therefore fundable – there is no reason to leave this to debate.

Chapter 22: Business and economics

No.	Report / Chapter	Report Section / Location	Comment
26	Ch 22 Business and Economics	22.7.1 and 22.7.2	Chapter 22 shows the stark gap between the benefits to the State from the Project and benefits to the local area. Section 22.7.2 shows the construction phase of the Project would contribute $1.3 billion to Gross State Product and support an increase of over 720 workers. By contrast, section 22.7.1 shows that the Project would contribute a net $10.68 million to the four shires on the VNI West route, and support around 30 full-time equivalent jobs across the four shires each year of construction. In June 2026, the Victorian Government announced the Victorian Energy Jobs Plan with the headline “Our $18 Billion Energy Jobs Guarantee to Regional Victoria”. The EES belies this claim, and illustrates why locals are deeply sceptical about the benefits of the energy transition for them and their communities. Section 7.2.4 of Chapter 7, Stakeholder and Community Engagement, acknowledges community opposition to the Project and seeks to explain this. Absent from the explanation is the fact that the benefits to the community (as distinct from the State) from the Project are hard to identify, whereas the Project's negative impacts are more apparent. This difference in the place where a project is built and where the project’s benefits are experienced is a feature of energy transmission and renewable energy projects. The Wimmera Mallee is attractive for renewable energy projects for its large land area, relatively sparse population, land already cleared for agriculture, and wind and solar resources. Transmission and renewable energy projects have large, shorter-term construction workforces that need to be brought in from out of the region, and small operational workforces. VNI West fits this description. As a result, the disbenefits of the Project are obvious, whereas the benefits are less so.

[11] VNI West EES Chapter 20: Agriculture, page 43, Section 20.7.5 (soil impacts – EPRs).

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			The EES provides VicGrid with the opportunity to acknowledge the disbenefits and address them. The EES Scoping Requirements require VicGrid to identify negative impacts and propose "clear, active measures for avoiding, minimising, managing and monitoring effects".[12] The Councils' experience of the EES process has been that VicGrid has sought to downplay the Councils' concerns and has not taken the opportunity to mitigate them. Chapter 22 of the EES illustrates clearly how the benefits of the Project accrue disproportionately to Victorians outside the Project area.
27	Ch 22 Business and Economics, Ch 28 EMF	22.8.4 and SC01	Chapter 22, Business and Economics, illustrates VicGrid's misunderstanding of the Councils' position on labour for the Project, despite repeated explanations. If the Project proceeds, the Councils want there to be maximum opportunities for local workers and businesses. Given the low unemployment rate in the Shires, if the Project sources workers locally, this will draw workers away from existing businesses and will increase the overall demand for labour in the Shires. This overall increased labour demand will be hard to meet, as there is an acute housing shortage in the Shires and the region. An effective response to this situation would be for the Project to invest in increasing the stock of housing in the region, not just building dedicated accommodation for workers from outside the region. The Councils have repeatedly advocated for this to VicGrid throughout the development of the EES and the Social Value Strategy. Despite the importance of this issue to the Councils, the EES and EPR SC01 make no commitment to provide additional housing in the region. Section 7.3.3 in Chapter 7 states that "the goal of the Social Value Strategy is to drive a transformational and measurable positive impact on the social, economic and environmental outcomes that are most important to the regional Victorian communities affected by the Project".[13] The lack of any material commitments in the Social Value Strategy (SC01) belies the "transformational" ambition of this measure. Chapter 22 describes the impact on labour demand as "temporary"; [14] for many businesses, 3.5 years is a very long "temporary" impact. The only reference to additional housing (other than accommodation for Project workers) in the EMF is in SC01 which refers to "exploration of opportunities to relocate and transfer construction workforce accommodation assets for community use as part of the accommodation decommissioning process." [15] This will be of no benefit during the Project. And since VicGrid has failed to recognise and address the impact on housing in the Shires until now, it has severely reduced the opportunity to do so; house building has long lead times. The EES Scoping Requirements require VicGrid to prepare an EES with "clear, active measures for avoiding, minimising, managing and monitoring effects, including a statement of commitment to implement these measures." [16] The EES contains no clear, active measures for avoiding the negative effects on the local housing market from the Project. The Councils request that the EMF include a new

[12] Scoping Requirements for the Victoria to New South Wales Interconnector West EES (February 2025), page 11, section 3.2.
[13] EES Chapter 7: Stakeholder and community engagement, page 7-12, 'Social Value Reference Group'.
[14] EES Chapter 22: Business and economics, page 22-30, section 22.8.4.
[15] EES Chapter 28: Environmental Management Framework, page 28-183, EPR SC01.
[16] Scoping Requirements for the Victoria to New South Wales Interconnector West EES (February 2025), page 11, section 3.2.

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			EPR that requires VicGrid to deliver a measurable net increase in permanent housing in the Council areas, with targets and timeframes agreed with the Councils before construction begins. The Councils are seeking housing outcomes rather than another strategy. Any new permanent housing should be in suitable locations within or adjoining towns, on land that is not subject to flooding.
28	Ch 22 Business and Economics	22.11 Cumulative Impact Assessment	Chapter 22 seeks to assess the cumulative impact of other projects in the Project area. The EES responds to the cumulative impact by referring to the Project's proposal to provide accommodation for its workers. The Councils refer to the cover letter of this submission that describes their concerns about the Project's impact on housing in the region. Amongst other projects, it identifies Watta Wella Wind Farm, and its potential cumulative impact on accommodation demand. The Watta Wella Wind Farm will be located in NGSC. NGSC asked the Minister for Planning to provide a condition on the wind farm's planning permit that it provide worker accommodation. The Minister refused this request. As a result, the Watta Wella Wind Farm will exacerbate the housing shortage as it does not provide dedicated worker accommodation. The EES Scoping Requirements require VicGrid to assess "cumulative impacts with other existing and proposed developments in the region."[17] In relation to the accommodation impacts of Watta Wella, the EES fails to do this. The Councils request that the EMF include an EPR that requires VicGrid to fulfil the Scoping Requirements, and develop, in collaboration with the Councils, an accommodation strategy that identifies all the projects in the region and their cumulative effect on housing availability.
29	Ch 22 Business and Economics	Section 22.8.2	There is an opportunity to advocate and align the Southern Wimmera Northeast Pyrenees Water Supply project with the VicGrid Project to provide a lasting water solution in the Shire while the project is being actioned. This would increase workforce opportunities in the Shire and provide a legacy and important infrastructure outcome for the agriculture land impacted by the project. To link water and transmission line would increase the economic benefit of the project.

Chapter 23: Land use and planning

No.	Report / Chapter / Appendix	Report Section / Location	Comment
30	Ch 23 Land Use and Planning	Figures in Chapter 23	Laydown and workforce accommodation areas in Chapter 23 figures have been redacted, so the maps and legend are not clear.
31	Ch 23 Land Use and Planning	23.9.2 Municipal Planning Strategies	The chapter states that the project is generally consistent with existing and future strategic land use objectives in the Municipal Planning Strategy (MPS). This is not correct for the following reasons. The NGSC MPS directs housing to townships, primarily Stawell and St Arnaud. The MPS position is supported by Cl 02.03-1 ("Encourage the growth of Stawell as the Shire's largest town"; "Encourage residential development within current township boundaries…", pages 8–9), Cl 02.03-6 ("Accommodate additional residential growth in Stawell", page 11), and Cl 11.01-1L-02 St

[17] Scoping Requirements for the Victoria to New South Wales Interconnector West EES (February 2025), pages 11–12, section 3.2.

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			Arnaud (C64ngra, page 27): "Encourage infill residential development, and redevelopment of vacant sites, including for medium density housing, retirement villages and workers' accommodation that meet the needs of existing and future residents." This directly supports locating workforce accommodation within St Arnaud as legacy housing rather than out of town. The Buloke MPS directs housing to the main townships that reticulated infrastructure including Birchip, Charlton, Donald, Sea Lake and Wycheproof. Cl 02.03-1 It discourages ribbon development along highways.
32	Ch 23 Land Use and Planning	23.9.2.5 Economic Development	The chapter states that the project provides economic benefit and employment to townships. It is unclear how this can be so if local employment during construction is only around 30 full-time equivalent jobs per year and all worker housing is temporary and not in townships.
33	Ch 23 Land Use and Planning	23.9.2.6 Transport	The chapter states that the project will minimise impacts on local roads as much as possible and be in accordance with clause 18 (Transport) but does not explain how this will be achieved.
34	Ch 23 Land Use and Planning	23.9.2.7 Infrastructure	The chapter states that the project will improve energy supply to promote economic growth. There is no evidence that the Project will improve the energy supply in the Council areas. The transmission line will serve energy users elsewhere in the State but will make no difference to energy security and reliability in the Council areas.
35	Ch 23 Land Use and Planning	23.10.3 - Temporary workforce accommodation facilities	The chapter acknowledges housing supply as a key concern in the region but states that temporary workforce accommodation will address this concern. Whilst it will reduce demand on already stretched housing, it does nothing to address long-term housing shortages or provide for legacy housing. It also requires new infrastructure (water, sewer/septic, diesel power). This is not consistent with Clause 16 (Housing) as purported in the report. Clause 16 (Housing) seeks to provide housing in existing townships with good access to services and infrastructure and provide for housing diversity and affordability. Workforce accommodation does not address these strategies at all and is a highly inefficient use of infrastructure with no long-term benefits for communities.
36	Ch 23 Land Use and Planning	23.13 Cumulative Impact Assessment	The chapter states that having six construction projects in the zone of influence (1 km of the easement) would not have significant impact as construction activities are temporary. The report states that works will be staged over 3.5 years. Whilst this is temporary, it is a long time and given the scale of the projects is significant. Leaving it up to individual companies to address does not address cumulative impacts.

Chapter 24: Social

No.	Report / Chapter / Appendix	Report Section / Location	Comment
37	Ch 24 Social	Section 24.4.1 Stakeholder engagement	Concerns remain about how the Councils' feedback resulted in meaningful changes throughout the stakeholder engagement process. Chapter 24 describes extensive engagement activity but does not clearly show how the Councils' and community feedback changed the exhibited EES, impact conclusions or proposed mitigation. There is a need for a consolidated issue-closure register

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			identifying every Council comment, the proponent response, the location of any amendment and final status.
38	Ch 24 Social	Section 24.5 – Existing social environment: Social baseline and vulnerability	Chapter 24 identifies that some communities already have limited housing, stretched services, an ageing population and existing disadvantage. The issue is that it does not clearly show how those existing pressures change the way project impacts are assessed or managed. A community with very limited rental housing, workforce shortages or already stretched health and community services has less capacity to absorb additional workers and demand than a community without those pressures. The Councils consider the assessment should identify where communities are already under pressure, explain how this has affected the significance of each impact, and then provide stronger mitigation in those locations. This could include earlier intervention, additional service or housing support, and clear triggers for action where existing pressures worsen during construction.
39	Ch 24 Social	Section 24.8	The Councils have previously raised regional housing and workforce-accommodation constraints, including the risk of cumulative demand. Chapter 24 places substantial reliance on workforce accommodation facilities to manage housing impacts. This does not address indirect and replacement demand, pressure on commercial accommodation, or the loss of local housing to workers associated with VNI West and concurrent projects. The Councils consider that there should be enforceable commitments to a regularly updated regional workforce and accommodation assessment, alignment with a regional Worker Housing Plan, defined intervention triggers and delivery of a measurable increase in permanent housing within or adjoining towns, with agreed targets and timeframes, rather than reliance solely on temporary camps.
40	Ch 24 Social	Section 24.8 SC05	The Councils have previously raised constrained regional labour supply and the risk of competition with existing employers and essential services. Chapter 24 recognises competition for labour, but reliance on workers sourced from outside the region does not remove the resulting social impacts. Imported labour may increase housing and service pressure, while project recruitment may still displace workers from agriculture, construction, health, care, education and other local employers. While SC05 provides for workforce planning, the Councils consider that the EES should provide sufficient detail on the Local Workforce Development Strategy, including its timing, measurable local workforce and training outcomes, monitoring and implementation arrangements, to demonstrate how the identified workforce impacts will actually be managed. Key mitigation measures should not be deferred to later project planning without sufficient detail to allow their effectiveness to be assessed through the EES process.
41	Ch 24 Social	Section 24.8 SC06	The Councils have previously raised the additional workload that major projects place on small rural councils. Chapter 24 recognises this impact, but SC06 does not provide enough certainty that the Councils will be resourced for the additional work generated by the project. This includes technical review, planning, community engagement and enquiries, asset management, monitoring and compliance. The Councils consider there should be a clear and funded arrangement to cover reasonable project-related costs and provide access to specialist expertise or additional staff where

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			needed. This support should be additional to the Councils' existing resources, rather than expecting the project workload to be absorbed as business as usual.
42	Ch 24 Social	Section 24.8	The material refers to the project affecting wellbeing and social cohesion, potentially with long-term consequences. The Councils have previously raised concerns about community division, trust and whether project impacts and benefits are being shared fairly. Chapter 24 acknowledges these issues, including concerns about compensation and benefits, but the proposed response relies heavily on ongoing engagement. Engagement is important, but on its own it does not address the causes of community division or perceptions of unfairness. The Councils consider the mitigation needs to go further, with practical measures to address inequity, clearer and more coordinated community benefit arrangements, and measurable indicators for community cohesion, trust and wellbeing. There should also be clear triggers for further action if these indicators worsen, particularly where communities are experiencing impacts from multiple major projects.
43	Ch 24 Social	Section 24.8	Chapter 24 acknowledges that the project may contribute to stress, anxiety and mental-health impacts. The proposed funded mental health pilot is positive, but providing a clinical service after people are already experiencing harm is not, on its own, adequate mitigation. Where distress is being caused or worsened by the project, the first response should be to address the source of that distress wherever possible. This includes reducing uncertainty, resolving landholder and community issues quickly and making sure people receive clear and timely answers. The mental health pilot should provide an additional safety net, not substitute for preventing or reducing project-related harm in the first place.
44	Ch 24 Social	Section 24.8	The Councils have previously raised that agricultural impacts extend well beyond land take. For farmers, the practical impacts can include disruption to normal farm operations, changes to property access and farming practices, additional time and cost, and increased competition for workers and contractors. These pressures ultimately affect the farm household as well as the business. Chapter 24 does not yet clearly show how these broader impacts will be managed. The Councils consider affected farmers should have access to project-funded independent advice, with cumulative pressure on agricultural labour, contractors and other critical inputs actively monitored and addressed.
45	Ch 24 Social	Section 24.8	Chapter 24 identifies potential pressure on social infrastructure and services but does not set sufficiently clear monitoring or intervention requirements. The Councils consider that there should be enforceable monitoring of community access and essential-service workforce capacity throughout construction, with defined thresholds and mitigation where project demand contributes to reduced access, longer wait times, recruitment difficulties or deterioration in service availability.
46	Ch 24 Social	Section 24.8 SC01 – Social Value Strategy	Developing the Social Value Strategy later means there is no certainty about what benefits communities will actually receive. The EES should commit to measurable outcomes such as local procurement, workforce skills that remain in the region, investment in identified infrastructure or service gaps, and community assets with an ongoing use. Reporting should show what was committed, where it was delivered and what difference it made.

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47	Ch 24 Social	Section 24.8; SC07 Social Impact Management Plan	SC07 does not prescribe indicators, thresholds or mandatory responses. Developing it after the EES is problematic. The Councils consider that SC07 should specify baseline indicators, monitoring frequency, public reporting, decision thresholds and corrective actions.
48	Ch 24 Social	Section 24.8 (redaction at Social 24-42)	Part of page 24-42 of Chapter 24 is redacted. The Councils cannot comment on the impact.
49	Ch 24 Social	Section 24.9	Decommissioning is not sufficiently addressed.
50	Ch 24 Social	Section 24.10	The Councils have previously raised the need for cumulative assessment of the concurrent transmission, renewable energy and mining pipeline. Chapter 24 acknowledges cumulative social impacts but continues to assess and manage VNI West largely as an individual project. This understates the combined pressure from the concurrent transmission, renewable energy and mining pipeline on housing, labour, services, infrastructure and Council capacity. There is a need for a regional coordination mechanism.

Chapter 28: Environmental Management Framework

No.	Report / Chapter / Appendix	Report Section / Location	Comment
51	Ch 28 EMF	TT01	TT01 requires Traffic Management Plans to be developed in consultation with the responsible road authorities but does not require any independent review of the Traffic Management Plans, either before they are implemented or during construction. The Traffic Management Plans may be prepared in stages, according to the location of works and the roads used, and will govern haulage routes, access points, road closures, interactions with school buses and emergency services, and the protection of road assets across a construction period of approximately 3.5 years. They are prepared by the Principal Contractor, whose commercial interest lies in minimising the cost and time of construction traffic management. The Councils do not have the resources to scrutinise every staged plan and its implementation in detail. The Councils request that TT01 be amended to require each Traffic Management Plan to be reviewed by the Independent Environmental Auditor before it is implemented, and to be reviewed by the Independent Environmental Auditor at least every six months during construction, with the Auditor's findings, and the Principal Contractor's response, provided to the relevant Council and published with the Traffic Management Plan.
52	Ch 28 EMF	TT04	TT04, Road condition, dilapidation and reinstatement, dot point 4, proposes that the Delivery Partner / Principal Contractor identify "any upgrades or treatments to roads or road infrastructure required to safely accommodate Project traffic..."[18] TT04 also provides "Where a pavement failure has occurred, or any road, bridge or culvert has been damaged or degraded as a result of Project construction traffic, the Principal Contractor will reinstate

[18] EES Chapter 28: Environmental Management Framework, page 28-207, EPR TT04, dot point 4.

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			the asset to its pre-construction condition in accordance with Clause 12 of Schedule 7 to the Road Management Act 2004 and in consultation with the relevant road authority."[19] The Councils are concerned that the Traffic and Transport EPRs allow the contractor to use Council roads in a manner that may damage them or leave them unserviceable for local traffic and reinstate the road later. Although TT04 refers to "timely rectification throughout construction…",[20] it does not specify any timeframe for rectification or reinstatement, or any standard against which timeliness will be measured. Some of the local roads that the Project will use to access land to build transmission towers are small, unsealed roads. The Councils submit that, to meet the mitigation hierarchy of the EES Scoping Requirements, the contractor must seek to avoid creating adverse effects from the outset, rather than damaging then fixing roads. TT04 provides for a pre-construction dilapidation survey and the "identification of any required upgrades or rectification prior to use by Project traffic…",[21] but leaves it to the contractor to identify those upgrades, with the road authority only consulted. To achieve this, the Councils seek amendments to TT04 that require: (a) the contractor and each of the responsible road authorities to agree on which roads need to be upgraded or constructed to a suitable standard prior to use by Project traffic; (b) the pre-construction dilapidation survey, including the scope of any pavement testing, to be agreed with the responsible road authority and to form the agreed baseline for determining Project-related damage; and (c) rectification of Project-related damage within a specified timeframe after it is identified, with a shorter timeframe where the damage affects road safety or the serviceability of the road for local traffic. The Councils would accept a dispute resolution mechanism to apply to this EPR to overcome any disagreement with the contractor. The Councils also seek an amendment to TT04 requiring damage caused by Project traffic to be repaired as it occurs, within a timeframe agreed with the relevant road authority, and giving the Councils authority to require urgent repairs where a road, bridge or culvert becomes unsafe or unserviceable.
53	Ch 28 EMF	TT	The Councils seek an additional EPR that requires the contractor to provide a bank guarantee as security for its performance of its obligations under the TT EPRs. The bank guarantee should be provided before construction begins and remain in place until council roads, bridges and culverts have been reinstated to the satisfaction of the relevant Council. As roads are valuable assets, the Councils and their ratepayers are exposed to potential liability to pay for damage to Council roads if the Principal Contractor does not fulfil its obligations under the EPRs. The provision of bank security is a common means of providing security for potential liability in construction projects. For example, the Minister for Planning's Planning Permit No.: PA2000877-1 for

[19] EES Chapter 28: Environmental Management Framework, page [28-208 – to be confirmed], EPR TT04.
[20] EES Chapter 28: Environmental Management Framework, page 28-207, EPR TT04.
[21] VNI West EES Chapter 18: Traffic and transport, page [18-64 – to be confirmed], Table 18-11, EPR TT04.

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			the Wimmera Plains Wind Farm requires the project proponent to provide the relevant Council with a bank guarantee as security for fulfilling the requirements in the permit to restore Council's roads.
54	Ch 28 EMF	SC06	SC06 provides that where mutually agreeable, VicGrid is to "provide funding to assist with resourcing for matters that are a direct result of the Project." [22] The Councils making this submission have already spent considerable resources engaging with VicGrid in relation to the Project, including engaging on the EES. For small councils, the Project (and other projects in the area) place significant demands on Council staff, and on Council budgets to engage specialist resources to scrutinise the Project and its effects on their communities. In addition to the Project, there are many other energy projects being developed in the Council areas that demand the Councils' time, resources and attention. The Councils seek an amendment to SC06 to require VicGrid not to "assist" with resourcing, but to provide funds to the Councils sufficient to cover the reasonable costs of the Councils' engagement in the EES implementation. This should include the full cost of the Councils' monitoring and oversight of Project works on council assets. The Councils also seek a suitable dispute resolution mechanism where what constitutes reasonable costs cannot be agreed.
55	Ch 28 EMF	LV01	LV01 states "Prior to the commencement of construction of laydown areas and workforce accommodation sites, Delivery Partner/Principal Contractor will offer perimeter landscape screening or other suitable visual screening treatment, where practicable, to reduce visual impacts from public viewpoints and surrounding public-facing locations". It is unclear to whom this offer will be made, how it will be communicated and which properties it will be available to. If the offer is to the landowner of the laydown or workforce accommodation site, it is not appropriate for screening intended to reduce off-site visual impacts to be at the discretion of that landowner.

Technical Appendix E: Bushfire

No.	Report / Chapter / Appendix	Report Section / Location	Comment
56	App E Bushfire	Municipal fire management planning	This comment refers to NGSC only. Technical Appendix E: Bushfire refers to the old NGSC Municipal Fire Management Plan. An updated version has been adopted by the Municipal Emergency Management Planning Committee and should be incorporated into the assessment. A copy can be found at https://www.ngshire.vic.gov.au/files/assets/public/v/2/document-resources/emergency-management/ngs-municipal-emergency-management-plan-2026-29-v6-june-2026.pdf

[22] EES Chapter 28: Environmental Management Framework, page 28-189, EPR SC06.

Technical Appendix G: Surface water

No.	Report / Chapter / Appendix	Report Section / Location	Comment
57	App G Surface Water	5.7.1	Given the extensive flooding that occurs across the Shires, and the flood studies and associated planning scheme amendments being progressed by both Councils, this Appendix should be updated to refer to take into account current flood studies and proposed planning scheme amendments.
58	App G Surface Water	5.7.1	This comment refers to BSC only. The report does not outline any consultation with emergency services. BSC and a number of other agencies play a key role in emergency events. In Charlton the extent of flooding has often required the evacuation of homes. No consideration appears to have been given to the placement of approximately 200 people in a workforce accommodation site that is subject to flooding (BSC can confirm that this site flooded in the 2022 flood event).
59	App G Surface Water	Figure 6-5 and 6-10	These figures show the extent of the LSIO and FO through the Council areas. These maps appear to be based on the extents in the planning schemes at the time of the study, and do not take into account amendments that are underway (or since gazetted). The Councils request that consideration is had to these amendments. These are: • Amendment C47blok seeks to implement updated flood mapping in Donald and Charlton (approved, not yet gazetted). • Amendment C72ngra seeks to implement updated flood mapping in Marnoo, St Arnaud and Stawell (exhibition closed 6 October 2026).
60	App G Surface Water	7.1.3	This comment refers to BSC only. States that "For some sites, such as the proposed laydown and/or workforce accommodation areas at Capels Crossing, Charlton and the Tragowel Terminal Station, relocating construction activities outside the 1% AEP flood extent is impractical". [23] BSC disagrees with this statement. The workforce accommodation site in Charlton is on a site subject to flooding; the Council does not see how locating outside a flood-prone area is impractical.
61	App G Surface Water	7.2.2	The report states that "Where possible, all structures would be placed outside of local overland flow paths and setback from designated waterways".[24] Chapter 14 and EPR SW04 go further, committing to "minimum 50 m setbacks from designated waterways" where possible,[25] but this commitment is qualified and the EES does not identify which structures cannot meet it. The report provides no mapping to show the location of the tower platforms in relation to wetlands, creeks and land within the LSIO/FO. Given the tower locations are known and are shown in other reports, it is unclear why this mapping is not provided.

[23] EES Technical Appendix G: Surface water, page 75, section 7.1.3.
[24] EES Technical Appendix G: Surface water, page 77, section 7.2.2.
[25] EES Chapter 14: Surface water, page 14-30, section 14.8.2; see also EES Chapter 28: Environmental Management Framework, page 28-198, EPR SW04.

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			The next section of this comment refers to BSC only. Through Charlton there is significant overlap between the 100-year ARI and the VNI West alignment. This overlap occurs for a length of 12 km. The report does not address this. As noted in the report this area is subject to frequent flooding events. Along the length of this alignment through this area there appear to be approximately 35 tower platforms within the 100-year ARI. The report notes a number of significant flood events including 2011 where the flood level reached 8.60m on the town gauge, and 2022 where it reached 7.87m. There is no discussion about the impact of the tower platforms or workforce accommodation on floodwater movement. Nor is there any discussion about impacts on the transmission infrastructure, specifically the towers and platforms, or analysis of the depth of floodwater in the proposed siting locations.
62	App G Surface Water	Table 7-1	This table lists and considers other projects in relation to cumulative impacts. It fails to consider the following projects: • Joel Joel BESS • Curyo Wind Farm
63	App G Surface Water and App P Land Use and planning	Section 7.1.3	This comment refers to BSC only. The land use and planning technical report states that "The construction of the workforce accommodation in this location may change floodplain storage and conveyance, which can contribute to increased flood depths around the structures. This, and other EPRs, are discussed in Technical Appendix G: Surface water".[26] There is limited assessment of the extent of flooding as it relates to the proposed Charlton workforce accommodation site. There is also no assessment of the extent to which development of this site would impact the movement of flood water. This site (in its entirety) is subject to an LSIO and adjacent to the FO. It is known to flood and was subject to flooding in the 2022 flood event. BSC can provide mapping of the 2022 flood event which shows the extent of flooding on this site. It has not been provided within this submission as it would identify the site. The report states "site-specific EPRs will be implemented to avoid altering flood risk or characteristics. These measures include flood modelling to determine existing flood characteristics (where potential risks are identified), site optimisation during the detailed design phase to minimise works within the floodplain and placing soil stockpiles, equipment laydown areas, and non-essential plant and equipment outside areas prone to flooding".[27] The Charlton combined laydown workforce accommodation site is approx. 5.3ha (although the report states it is 6ha). This is below the VicGrid's site selection criteria requirement of a minimum of 5.45ha. Given the undersize and narrow shape of the site, it is unclear how the above site optimisation can occur. This should be determined now and not pushed back to stormwater EPRs. Given the extent of development proposed on the site, and high likelihood that the works will impact the flow of water, it is

[26] EES Technical Appendix P: Land use and planning, section 7.2.5.
[27] EES Technical Appendix G: Surface water, page 75, section 7.1.3.

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			concerning that the site has been redacted and that neighbouring landowners are not aware of this proposal. A full assessment of flood risk, including impacts on adjoining properties should be undertaken at this stage. BSC also requests that alternative sites outside flood-prone land be considered for the Charlton workforce accommodation, and that emergency management arrangements, including evacuation, be prepared in consultation with BSC and emergency services, before any approval is granted.

Technical Appendix K: Traffic and transport

No.	Report / Chapter / Appendix	Report Section / Location	Comment
64	VNI West App K Traffic and Transport - Part 1	Section 5 Methodology	The traffic assessment notes that traffic count information was available for approximately 67 of the 150 roads assessed (~45% of the study network). Given the scale and duration of the Project, the Councils consider this level of measured data inadequate. The majority of local roads expected to be used during construction rely on estimated traffic volumes. The Councils request further traffic surveys be undertaken to verify assumptions used in the modelling and to establish a more reliable baseline for future road condition and reinstatement assessments.
65	VNI West App K Traffic and Transport - Part 1	Section 5 Methodology	Road condition assessments are based primarily on visual inspections. No pavement strength testing, structural pavement investigations or remaining pavement life assessments have been undertaken. The Councils do not consider that visual assessment alone is sufficient to demonstrate that the nominated haulage routes can accommodate the forecast heavy vehicle demand over the duration of the Project. Detailed pavement investigations should be undertaken prior to finalisation of haulage routes and road management responsibilities.
66	VNI West App K Traffic and Transport - Part 1	Section 5 Methodology	The study area extent for the traffic and transport assessment provided a 2-kilometre buffer of the proposed easement and along likely transport routes that will be used to access the proposed easement and laydown areas. The study area does not appear to have given consideration to haulage routes associated with delivery of materials from local sources, i.e. gravel, concrete batching etc. It is reasonable to assume haulage of these types of materials will be made outside of the assessed study areas and therefore have not been considered in transport impacts and vehicle count increase assumptions.
67	VNI West App K Traffic and Transport - Part 1	Section 5 Methodology, Table 5-6 Assumptions	Assumption Number 2 states an “An allowance of 20 vehicle movements per day for each workforce accommodation area, in addition to construction traffic accounted for elsewhere in the assessment has been made”. There is no rationale that details how an extra 20 vehicle movements per has been determined from workforce accommodation areas. It is reasonable that the traffic assessment could draw on traffic generation from other like projects to provide the rationale for what traffic generation has actually been found to be associated with workforce accommodation areas. In the absence of using previous project information and data, the assessment would benefit in outlining what traffic type would be associated with the additional 20 vehicle movements.

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			It is assumed workforce personal vehicle movements are accounted for in the overall project traffic generation (being 562 vehicles per day for transmission lines and 267 vehicles per day for terminal station sites). If workforce accommodation areas are assumed to cater for 250 personal, the traffic generation from workforce movement to site would conservatively account for 250 vehicle movements per day – this assumes workers from the accommodation sites have two personal in each vehicle and only conduct one single trip to the work site and one single trip away from the work site each day. This consideration brings into question that traffic generation assumptions have been made for the 562 and 267 increased vehicle movements on the road network, as it is reasonable to consider this assessment is significantly under estimated, especially when considered during harvest period and peak construction periods. It also doesn't appear to take into account movements associated with managing the workforce accommodation site such as deliveries, support staff including clearing, cooks, maintenance, and servicing of infrastructure, rubbish removal etc. Assumption Number 5 states "This impact assessment has adopted the highest expected traffic volume on the declared and local road network during construction of the Project, between laydown areas and Project towers". The traffic assumptions and determinations are based on an average daily traffic count that does not take into account peak traffic volume fluctuations that are experienced during harvest periods each year. The adoption of the traffic volumes within this report are flawed due to this lack of consideration. Assumption Number 7 states "19 metre semi-trailers and smaller vehicles are nominated to be utilised between laydown areas and the Proposed Easement". The limitation of vehicle configuration to assume 19m B-Double will be the largest vehicle combination used is an unreasonable assumption. The report in general details the limitations to road requirements, intersection treatment upgrade requirements, entry point configurations etc due to limited information that will be available at this stage of the project, with the report stipulating that further detail, assessments and investigations will need to be undertaken once the contractor is engaged and they have been able to apply their construction methodology. Therefore the assumption that vehicle confirmation lengths that have been considered for this report may create misleading assumptions of road configuration suitability, road improvement requirements, and road capacity determinations to be incorrectly assumed.
68	VNI West App K Traffic and Transport - Part 1	Section 6 Existing Conditions	The Existing Conditions assessment focuses primarily on traffic volumes, road capacity and physical road characteristics. While these factors are important, the Councils consider insufficient weight has been given to the existing function and role of roads within the local transport network. Many local roads provide important agricultural, freight, school bus, emergency access and property access functions despite carrying low traffic volumes. The assessment should include a clearer evaluation of

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			road function and strategic importance, as traffic impacts on these roads may be more significant than suggested by traffic volume and capacity assessments alone.
69	VNI West App K Traffic and Transport - Part 1	Section 6 Existing Conditions	There seems to be no consideration for Road Safety Analysis within the 'existing conditions assessment key attributes.
70	VNI West App K Traffic and Transport - Part 1	Section 6.3.2 Traffic data	This comment refers to BSC only. The report outlines that significant areas within Buloke Shire were not inspected or assessed due to identified safety concerns. This raises questions of the completeness of existing condition assessments and road condition suitability for the project. There does not appear to be rationale provided for how these areas which were not assessed have been accounted for. There are a very small number of local roads within Buloke Shire that have had traffic count assessment completed. It is not noted anywhere within the traffic consideration that seasonal traffic volume increases occur across Buloke Shire during harvest periods (generally between October – December) and therefore is assumed this is not considered when assessing projected traffic volumes and capacity of roads. Also assessments undertaken as part of this project have been undertaken outside of peak harvest periods and therefore present a real gap in road condition assessment and understanding of road usage.
71	VNI West App K Traffic and Transport - Part 1	Section 6.7 Buses	The report identifies School Bus Routes, however there is limited information of how this has factored into any road network assessments, and considerations to existing road conditions for suitability for additional traffic generated by this project.
72	VNI West App K Traffic and Transport - Part 1	Section 7 Impact Pathways	The assessment identifies the rural and agricultural function of the local road network and considers project traffic interactions generally. However, the Councils were unable to identify any detailed assessment of seasonal agricultural traffic patterns such as harvest traffic, grain haulage periods, livestock transport movements or oversized agricultural machinery. Given the agricultural nature of the study area, further clarification is requested regarding whether these traffic movements have been specifically considered within the traffic modelling and impact assessment.
73	VNI West App K Traffic and Transport - Part 1	Section 8 Construction Traffic	Previous TRG comments sought clarification regarding the movement of bulk construction materials including fill, gravel, water, fuel and concrete from source locations to project sites. The Councils consider that the transport impacts associated with these material supply chains are not adequately assessed. Further information should be provided regarding material source locations, haul routes and associated local road impacts, particularly where project construction relies on significant importation of materials.
74	VNI West App K Traffic and Transport - Part 1	Section 8.1.2.6 Laydown Areas 6, Appendix G Table 3	This comment refers to BSC only. There is limited ability to comment or review the assessment of Laydown Area 6 due to redacted information. Table 3: Laydown area access sight distance assessment (Appendix G) lists LDA# 6 as having the proposed entrance located on Calder Highway service lane with no existing property gate. The table

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			identifies no sight distance restrictions, and the recommendation/compliance states the site access will be managed by a full TMP with traffic controllers, and temporary speed limit reduction etc. Laydown Area 6 is also identified for workforce accommodation. The recommendation and compliance controlled identified within this table are completely unreasonable and impractical due to the high access movements to and from the site for both materials and workforce. Assuming the daily traffic generation applied for this assessment being 562 vehicles per day, plus additional 20 vehicle movements per day due to it being a workforce accommodation site, this means there will be 582 average daily vehicle movements turning into and out of the site off an unidentified access road off the Calder Highway on the edge of the Charlton township. There is no consideration within the report to other intersections in the immediate vicinity of the site, consideration to other land use within the immediate vicinity and in close proximity (i.e. cattle feedlots, chicken farms, grain receival sites), and therefore the recommendations identified in Table 3 of Appendix G are baseless and meaningless. The access road off Calder Highway is a gravel single lane access road, and the report does not identify any upgrade requirements for this road, nor does it identify intersection treatment with Calder Highway or access construction requirements for the site. The general area the laydown area will be positioned is subject to flooding, and properties in this area have planning overlays for Land Subject to Inundation Overlay and Flood Overlay. Therefore any roads in this vicinity will also be impacted by accessibility restrictions when floods occur. This has not been addressed within this report. The traffic turning movements onto the site and from the site do not seem to be considered, and therefore there is no ability to assess what turning lanes are required to enable safe access and egress from this site. Limited to no consideration to site development requirements including stormwater management, runoff and discharge and what impacts this may have to flood plains in the area.
75	VNI West App K Traffic and Transport - Part 1	8.2 Workforce Accommodation	The Project identifies a peak workforce of approximately 720 workers, with up to three workforce accommodation facilities proposed. However, the EES does not identify anticipated occupancy levels for each accommodation site, nor clearly explain how workforce accommodation traffic has been incorporated into the traffic forecasts. The Councils are unable to determine whether accommodation-related traffic impacts have been adequately assessed. Further information should be provided regarding camp occupancy, worker transport arrangements, bus movements and shift change traffic.
76	VNI West App K Traffic and Transport - Part 1	8.2 Workforce Accommodation	Workforce accommodation traffic was a recurring issue raised through the TRG process. While the revised assessment includes an allowance of 20 vehicle movements per day for each workforce accommodation facility, previous TRG comments concluded that this assumption was insufficiently justified and potentially understates accommodation-related traffic. Given the Project may accommodate approximately 720 workers across three accommodation facilities, the Councils consider the methodology and assumptions used to derive accommodation-related traffic should be

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			more clearly demonstrated, including worker transport, shift changes, servicing, deliveries, wastewater management and other ancillary vehicle movements.
77	VNI West App K Traffic and Transport - Part 1	Section 9 Impact Assessment	The Councils note that a number of concerns raised during the TRG process related to traffic generation assumptions, road-capacity assumptions, intersection assessments and the reliance on future investigations. While the assessment methodology has been revised, several key conclusions continue to rely on theoretical capacity assessments, future Traffic Management Plans and future route-specific investigations. The Councils consider that greater confidence would be provided if critical assumptions regarding road suitability, pavement durability and access requirements were demonstrated within the EES rather than being deferred to post-approval processes.
78	VNI West App K Traffic and Transport - Part 1	Section 9 Safe Road Performance and Design	The Councils note that previous TRG comments requested site-specific turn-warrant assessments at major access locations servicing laydown areas, workforce accommodation facilities and terminal station infrastructure. The final assessment continues to rely on representative Class A and Class B intersection assessments rather than detailed assessment of all major project access points. The Councils request that site-specific turn-lane and intersection assessments be undertaken for major construction access locations where substantial heavy vehicle turning movements are expected.
79	VNI West App K Traffic and Transport - Part 1	Section 10 Cumulative Impact Assessment	The cumulative impact assessment primarily considers traffic volume and road capacity impacts. The Councils consider that greater consideration should be given to the cumulative effect of multiple major infrastructure projects on the function of local roads, including agricultural freight routes, school bus routes, emergency access routes and roads relied upon by local communities. Whilst individual project impacts may be assessed as temporary, the overlap of multiple large construction projects over several years may result in sustained impacts to local roads and road users that are not fully reflected through capacity-based assessments alone.
80	VNI West App K Traffic and Transport - Part 4	Appendix G – Sight Distance Analysis	Table 1 within Appendix G identifies recommendations to assist with the management of traffic movement and safety. The reliance on road speed restriction reduction to mitigate potential road safety issues is not appropriate. Intersection improvements, upgrades and/or reconstruction should be considered as a primary mitigation measure before speed restrictions are introduced.

Technical Appendix L: Noise and vibration

No.	Report / Chapter / Appendix	Report Section / Location	Comment
81	App L Noise and Vibration	Executive Summary – Existing conditions	States that “There are five dwellings located within 300 m of the Proposed Easement. The proponent is engaged with four of these sensitive uses to reach a purchase agreement or to provide compensation. The fifth is located within 300 m of the existing 220 kV transmission line”. The report does not disclose the receptor (“R”) numbers, so the location of these five dwellings is unclear. It is also unclear why the proponent is not engaged with the fifth dwelling, or why its location within 300 m of the existing 220 kV line means it is not being engaged with.

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			The implications, or pathway, should agreement not be reached are also unclear. If a landowner does not wish the proponent to purchase their dwelling, what noise measures are proposed?
82	App L Noise and Vibration	6.1	Refers to the Project being designed to be located at least 300 m from sensitive receptors. The community cannot confirm the accuracy of this when the locations of the workforce accommodation and laydown areas are redacted.
83	App L Noise and Vibration	Figure 6-1	This comment refers to BSC only. The map is at a scale that makes it impossible to identify the location of sensitive receptors at Charlton in relation to the combined laydown and workforce accommodation site. In addition, text overlays the dot showing the location of the sensitive receptor.
84	App L Noise and Vibration	6.2	This comment refers to BSC only. Tables 6-1 and 6-2 list details of noise monitoring. Noise catchment area NCA12 is shown on Figure 6-1 as being near the Charlton combined laydown and workforce accommodation site, but is not listed in either table.
85	App L Noise and Vibration	Appendix F	Appendix F ONWH Assessment – The laydown areas are redacted in their entirety, with the exception of two pages, and cannot be reviewed. The EES does not consider noise from the accommodation areas apart from construction noise. The accommodation areas will house 200-300 workers each, and noise from them outside normal working hours may include traffic, music, recreation, pumps and generators. These impacts and their effects on surrounding sensitive uses should be assessed and monitored and included in the EPRs for noise.

Technical Appendix P: Land use and planning

No.	Report / Chapter	Report Section / Location	Comment
86	App P Land Use and Planning	Table 10	References Amendment C64ngra as being within the Gannawarra Planning Scheme. This Amendment is to the Northern Grampians Planning Scheme.
87	App P Land Use and Planning	Table 12	Table 12 Proposed large-scale developments is not a comprehensive list of projects within BSC and NGSC. The following projects should be listed and considered. This information is publicly available and listed on the State Government's renewable energy project interactive mapping. • Curyo Wind Farm • Wilkur Energy Park • Campbells Bridge Wind Farm • Navarre Wind Farm • There are several other renewable energy projects in early development stages. These include the Corack East and Southern Mallee Wind Farms, in Buloke Shire.

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88	App P Land Use and Planning	Table 15	Engagement with the Councils was undertaken in October 2024, two years ago. This was at the start of the TRG process, when limited information was available and known about the project. The workforce accommodation sites had not been selected, and key reports such as traffic and transport had not been prepared. This engagement reflects the Councils' knowledge, at an early point in the project.
89	App P Land Use and Planning	Figure 6-10 and Figure 6-11	These figures are stated to include locations of renewable energy projects within the region. The maps do not show the Curyo and Wilkur projects.
90	App P Land Use and Planning	Table 17	This comment refers to BSC only. Like the other laydown and workforce accommodation sites, the level of redaction means that BSC cannot determine the location of the Area 5 Laydown. It appears to be on the boundary of Gannawarra and Buloke Shire (but assumed to be Gannawarra Shire). BSC cannot provide any meaningful assessment or feedback without knowledge of the site's location.
91	App P Land Use and Planning	Table 17	The level of redaction in Table 17 means that the location of the Workforce Accommodation and Laydown are not disclosed. These areas can't be adequately assessed, if their location is not known.
92	App P Land Use and Planning	Table 22	In relation to the listed regional plans, the Councils understand that the Regional Growth Plans were replaced by Plan Melbourne. These should not be listed. The Readiness Strategy is a regional study and should be included.
93	App P Land Use and Planning	Table 22	This comment refers to BSC only. This table lists the relevant BSC policy, and states that "The Project supports the renewable energy transition, which is supported by Council". Buloke's Municipal Planning Strategy includes the strategic direction "Encouraging renewable energy production to locate in the Shire" [28]. Encouraging renewable energy production does not amount to support for VNI West, which is a transmission project. Table 22 cites only the three strategies/plans and not the MPS.
94	App P Land Use and Planning	7.1.3 Municipal Planning Strategies	Section 7.1.3 states "The Project is generally consistent with, and is supported by, existing and future strategic land use objectives identified in the Municipal Planning Strategies of relevant Planning Schemes associated with the Project." This is incorrect. Clause 02.03-1: In Buloke Shire, the relevant strategic directions for settlement and housing are: • "Encouraging residential and economic development in the main townships that have reticulated infrastructure including Birchip, Charlton, Donald, Sea Lake and Wycheproof • Directing subdivision development to locations on the established road network • Providing accommodation, services and independent living for older residents."[29]

[28] Buloke Planning Scheme, page 10, Clause 02.03-6

[29] EES Technical Appendix P: Land use and planning, page 138, section 7.1.3.

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			Clause 02.03-1: In Northern Grampians Shire, the relevant strategic directions for settlement and housing are: • "Encourage the growth of Stawell as the Shire's largest town • Encourage development that supports the role of St Arnaud as a district town that services smaller rural settlements • Limit rural living to areas where such development currently exists and on the periphery of Stawell."[30] The current clause also seeks to "Encourage residential development within current township boundaries and particularly within the respective townships' centres and in proximity to the towns' sewerage schemes", which temporary workforce accommodation located outside townships does not achieve.
95	App P Land Use and Planning	7.2.6	States that "Economic modelling in Technical Appendix O: Business and economics indicates that approximately 38 workers may be locally sourced". [31] Whilst the Councils support the creation of employment opportunities for locals, the Councils have very low unemployment rates (NGSC 3.7%, Buloke 3.5%, this compares with Victoria 5.1%). The implication of this is that when locals are employed, this will take employees away from local businesses who have difficulty replacing staff due to low unemployment rates, and a lack of housing to attract skilled workers from outside of the region. The Councils support local employment, but without measures to grow the local workforce and housing supply, local recruitment will largely displace workers from existing businesses rather than create additional employment.
96	App P Land Use and Planning	7.2.6.1.1	The assessment of impacts of the workforce accommodation sites states that "The proposed use of the Kerang, Tragowel, Charlton and Greens Creek workforce accommodation areas may result in temporary land use impacts, including additional traffic, movement and access and/or amenity impacts (e.g. noise, dust)". [32] There are continued references to 'may' throughout this section. It is fanciful to suggest that a workforce accommodation site of 200+ people, for a period of up to 3.5 years, and located in a farming zone, 'may' result in impacts.
97	App P Land Use and Planning	7.2.6.1.1	The assessment of impacts of the Charlton workforce accommodation site states that "The proximity to the township means that supporting a workforce of this scale may place additional pressure on existing infrastructure and local services". [33] No further discussion is provided in relation to this, nor are the types of infrastructure or local services outlined. Further information must be provided on the nature of these impacts, and how they will be mitigated.

[30] EES Technical Appendix P: Land use and planning, page 139, section 7.1.3.
[31] EES Technical Appendix P: Land use and planning, page 152, section 7.2.6.
[32] EES Technical Appendix P: Land use and planning, page 153, section 7.2.6.1.1.
[33] EES Technical Appendix P: Land use and planning, page 153, section 7.2.6.1.1 (Charlton).

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98	App P Land Use and Planning	7.2.6.1.2	The report notes that impacts will be mitigated through the Workforce Accommodation Plans submitted to the Minister for Planning for endorsement, including a Workforce Accommodation OEMP, prior to the use commencing. These are secondary approvals to which neither the Councils nor the community are party. The Councils and the community cannot determine the suitability of the mitigation, if it is not yet known as part of the EES process.
99	App P Land Use and Planning	Table 24	This table lists other projects within 'the zone of influence'. Curyo Wind Farm and Joel Joel BESS are not included. The Councils request that they be included. Joel Joel BESS is located immediately adjacent to the Bulgana Terminal Station. The Councils also disagree with the identification of whether a project is within 'the zone of influence'. Whilst projects such as Curyo, Wilkur and Donald Mineral Sands might not be in immediate proximity to the VNI West alignment, the associated traffic movements of these projects run through the VNI West alignment and overlap with VNI West traffic.

Technical Appendix Q: Social

No.	Report / Chapter	Report Section / Location	Comment
100	App Q: Social	Section 8.3	The Councils have previously raised the need to look at the combined impact of the transmission, renewable energy and mining projects planned across the region. Appendix Q recognises other projects, but does not go far enough in showing what happens when construction periods overlap. The assessment should use the project pipeline identified in the Readiness Strategy to test the combined demand for workers, housing, services and Council resources, and clearly identify when pressures would become a problem, who would be affected and who is responsible for responding.
101	App Q: Social	Section 8.1	The Councils have previously raised the shortage of housing and workforce accommodation across the region and the risk of several projects adding to demand at the same time. Appendix Q needs to look beyond the direct accommodation provided for VNI West workers and consider the flow-on demand for rentals, commercial accommodation and replacement workers who also need somewhere to live. The assessment should use the evidence in the Readiness Strategy, including the very low rental vacancy rates identified in key regional towns, test different workforce and accommodation scenarios, and consider whether some project investment could leave useful permanent or adaptable housing rather than relying only on temporary accommodation.
102	App Q: Social	Section 8.1	The Councils have previously raised the limited regional labour pool and the risk of major projects competing with existing employers and essential services. Appendix Q needs to look at VNI West workforce demand alongside the other projects planned for the region, rather than in isolation. This should show where workers are expected to come from, which occupations are most likely to be in demand, and whether recruitment could pull people away from agriculture, construction, health, care, education and other local employers. It should also consider the extra housing needed for replacement workers and what happens during peak construction periods.
103	App Q: Social	Section 8.1.2	Community cohesion and wellbeing: The EES identifies a high residual impact (likely, major) even with EPR-EM08, EPR-EM09, EPR-SC01, EPR-SC02 and EPR-SC03 in place. These measures focus largely on communication, complaints management, social value initiatives, mental health support and

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			worker behaviour, rather than reducing the underlying Project impacts that are driving community disruption. The Councils are seeking stronger preventative measures that reduce these impacts at their source, rather than relying mainly on measures that manage their consequences.
104	App Q: Social	Section 9.2 SC06	The Councils have previously raised the extra workload major projects place on small rural councils. Appendix Q recognises pressure on Council capacity but does not clearly set out what additional work will be required, when it will occur or what it is likely to cost. The assessment should identify the extra planning, technical review, engagement, asset, community enquiry, monitoring and compliance work generated by the project, separate this from the Councils' normal business, and provide a clear basis for additional staffing, specialist support and cost recovery.
105	App Q: Social	Section 8.1	The Councils have previously raised concerns about community division, trust and whether project impacts and benefits are being shared fairly. Appendix Q records concerns about trust, fairness, compensation and community division, but it is not clear enough how these concerns have changed the impact ratings or the proposed response. The assessment should identify which communities or groups are most exposed to these pressures and set a baseline so changes in trust, cohesion and perceptions of fairness can actually be tracked over time. It should also draw on the evidence in the Readiness Strategy about uncertainty, mental health and how benefits are distributed across affected communities.
106	App Q: Social	Section 8.1	The project's own social material acknowledges that impacts on people and properties may increase anxiety and affect mental health. Appendix Q needs to go further by looking at what may cause project-related stress, including prolonged uncertainty, landholder negotiations, impacts on livelihoods and the pressure of several major projects occurring at once. It should identify who may be most affected, what support is actually available locally and where there are gaps. Most importantly, the assessment should focus on preventing or reducing the causes of distress where possible, rather than relying mainly on referral to mental health services after people are already experiencing harm.
107	App Q: Social	Section 8.1.3.2	The technical report cites the Readiness Strategy as identifying 4 transmission projects and 35 electricity generation or storage projects, which is inconsistent with the figures in the Readiness Strategy itself.
108	App Q: Social	Section 7.1.2.9	The EES appears to incorrectly identify a Federation University campus in Stawell as part of the existing social and education environment. Federation University’s current campus information does not identify Stawell as an operating campus. This claim also contradicts the statement at 7.3.2.1 that identifies Gannawarra as the only LGA with tertiary facilities. The Federation University building in Stawell has been empty/non-operational for years.
109	App Q: Social	Section 7	Appendix Q sets out the social baseline, but it should be checked against the more recent evidence in the Readiness Strategy on housing, labour shortages, infrastructure, essential services and Council capacity. The important point is not just to describe which communities are already under pressure, but to show how that changes the assessment. Communities with very limited housing or already stretched services have less capacity to absorb additional project demand. Appendix Q should clearly show

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			where those vulnerabilities exist and how they have affected the impact ratings and the level of mitigation proposed.
110	App Q: Social	Section 7	Appendix Q needs to make the link between the incoming workforce, housing availability and existing pressure on services such as childcare, health and education much clearer. The assessment should show what capacity these services currently have, whether they can attract the workers they need, and what happens when project demand is added during peak construction. Where services already have limited capacity, the assessment should identify the point at which additional project demand would require action rather than relying on a broad conclusion that the impact can be managed.
111	App Q: Social	Section 7	Appendix Q needs to be clearer about how community benefits will be chosen and what difference they are expected to make. Benefits should respond to the impacts communities are actually experiencing and to known local and regional gaps, rather than being a separate list of initiatives. The assessment should explain how affected communities will help set priorities, where benefits will go, what will remain after construction, and how the project will show that the investment has delivered something additional and useful rather than duplicating existing programs or other major-project investment.
112	App Q: Social	Section 9.3	Appendix Q needs to be much clearer about how social impacts will be monitored once the project moves into delivery. For each major issue, it should identify what will be measured, the starting point, how often it will be checked, who is responsible and what level of change will trigger action. It should also explain how VNI West impacts will be considered alongside the effects of other major projects. A three-year review cycle on its own is too slow to pick up and respond to problems that could emerge quickly during peak construction.
113	App Q: Social	Section 8.2	Appendix Q says there is limited certainty about decommissioning, but some of the likely social issues can still be planned for now. These include what happens to the workforce and local businesses when project activity reduces, future land use and rehabilitation, infrastructure that is no longer needed, and responsibility for any assets left behind. Appendix Q should set out when this work will be revisited, what information will be required and how Council, landholders and communities will be involved well before closure becomes an immediate issue.

Attachment 1: PSA Planning Report

No.	Report / Chapter	Report Section / Location	Comment
114	Att 1 PSA Planning Report	5.2.2	This comment refers to BSC only. Section outlines the feedback provided from consultation with Buloke Shire. The feedback notes that the Shire is under significant housing pressure, with no houses available for rent across the entire Shire. BSC notes that there would ideally be legacy benefits if workforce accommodation was to be built in the Shire e.g. ability for housing to be reused for emergency accommodation, social housing and temporary housing in Council managed caravan parks. BSC also expressed a need for net community benefit with an example being provided of the Charlton substation which suffers from

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			unreliable power and power outages. Despite the provision of a temporary workforce accommodation site in Charlton and a critical shortage of housing within the Shire, the project makes no commitment to reuse of this housing to address these shortages. Furthermore, the example of power outages in Charlton, highlights BSC's and the community's frustration with the expectation that BSC will host electricity infrastructure that does not provide benefits to the Shire, nor addresses existing electricity blackspots.
115	Att 1 PSA Planning Report	Incorporated Document – General	The Incorporated Document would benefit from a glossary that defines frequently used terms. While it is understood that a glossary is not standard in incorporated documents, this is a large document with a number of defined terms. Given the number of plans requiring approval, a nesting diagram or similar would also assist readability.
116	Att 1 PSA Planning Report	Incorporated Document – General	The Incorporated Document details the entitlements relating to the Project but does not detail or explain any restrictions or limitations on existing agricultural or other uses of residual land within the Project area. It is acknowledged that restrictions on agricultural practices will be applied through individual landowner agreements. Including limitations (in addition to permissions) within the Incorporated Document would provide clarity for users of the planning scheme who are not party to these agreements. It could also lead to better outcomes by providing transparency and ensuring non-compliant planning proposals do not advance.
117	Att 1 PSA Planning Report	2.3	Notes that the Councils have shown support for the use of an integrated planning approval mechanism that ensures consistency in how the Project is assessed and how delivery is regulated under a single planning control. Whilst this is correct, support for an integrated planning approval mechanism should not be taken as support for the project, nor support for the specifics of the mechanism.
118	Att 1 PSA Planning Report	3.4.2	Lists the relevant State and Regional policies. These policies are predominantly state-wide, with the lack of identification of regional policies, highlighting the State's removal of regional policies such as the regional growth plans. Several regional policies are not listed; these include: • Urban Enterprise, *Resource Ready: North-Western Victoria Energy and Mining Impact and Readiness Strategy* (16 February 2026) (the Readiness Strategy) Wimmera Southern Mallee Regional Economic Development Strategy • Mallee Regional Catchment Management Strategy 2022-2028 • North Central Regional Catchment Management Strategy 2021-2027 • Dja Dja Wurrung Country Plan 2014-2034 (Dja Dja Wurrung Clans Aboriginal Corporation, 2014) • Growing what is Good Country Plan (Barengi Gajin Land Council, 2017).
119	Att 1 PSA Planning Report	3.5.2.2	This comment refers to BSC only. Lists strategies in the Buloke Municipal Planning Strategy and Local Planning Policies and outlines how the project supports these strategies. Many of the linkages identified are factually incorrect. • Reference to the following strategy "Encouraging housing development and investment suitable to community needs, including social and affordable housing, worker and professional

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			housing and housing for older residents" [34] should be removed. The proposed workforce accommodation is specifically for VNI West and will not provide for any social or affordable housing, nor will it address critical worker housing needs, other than the project's own needs. • Reference to the following strategy "Providing and facilitating transport infrastructure to maintain and enhance connectivity and minimise travel times" [35] should be removed. The project does not provide or facilitate any transport infrastructure. • The amendment will not "address the need for improved housing availability". It will provide housing for VNI West project workers. The existing critical shortage of housing within Buloke Shire will remain unchanged.
120	Att 1 PSA Planning Report	3.5.2.4	This comment refers to NGSC only. Lists strategies in the Northern Grampians Municipal Planning Strategy and Local Planning Policies and outlines how the project supports these strategies. Many of the linkages identified are factually incorrect. • References strategies that seek to encourage growth in Stawell and St Arnaud. The project actively works against these strategies by providing significant housing outside of these towns. These are not relevant strategies if these strategies seek to provide housing in these towns, and the project does not provide any housing in these towns.
121	Att 1 PSA Planning Report and App P Land Use Planning	Table 3-14 and Table 10	A number of relevant amendments were underway when the report was drafted and are not listed. It is assumed that they have not been taken into account. • Amendment C47blok seeks to implement updated flood mapping in Donald and Charlton (approved, not yet gazetted). • Amendment C71ngra, which implements the recommendations of the Northern Grampians Planning Scheme Review 2025, is now in effect (the Schedule to Clause 74.01 was amended by C71ngra on 30 September 2026). • Amendment C72ngra seeks to implement updated flood mapping in Marnoo, St Arnaud and Stawell.
122	Att 1 PSA Planning Report	Table 4-1, pg81	This table states that "Positive outcomes could be enhanced, and negative impacts mitigated, through a range of measures. These include the formalisation of community partnerships, development of a Workforce Housing and Accommodation Strategy, Social Value Strategy, community benefit sharing program, establishment of community funds, and implementation of education and awareness campaigns". With the exception of the Social Value Strategy, none of these measures are linked in the EPRs. It is inappropriate for these to be listed as mitigating measures if there is no requirement within the documentation to undertake these measures. Without the necessary security through the EPRs, the Councils and the community cannot be assured that these will be undertaken.

[34] Buloke Planning Scheme, page 8, Clause 02.03-1 (Settlement and housing).
[35] Buloke Planning Scheme, page 11, Clause 02.03-7 (Transport).

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123	Att 1 PSA Planning Report	Table 4-1, p88 and Explanatory Report p122	The explanatory report requires the proponent to consider "how does the amendment address the views of any relevant agency?". The explanatory report template provides instruction on how to answer this question which is "What were the views of the relevant agencies and how were they addressed? Include which agencies were consulted prior to exhibition and, if appropriate their preliminary views". This question has not been answered, with the response simply noting that 'the views of stakeholders have been considered'. This response does not answer the question as to whether any agencies' views have been addressed. In the case of the Councils, the Councils submit that their views have not been addressed. When the Councils submit planning scheme authorisation requests, they have been subject to frequent review of this question and have been asked to undertake further work to answer this question. It is frustrating that Councils are held to different levels of accountability in completing planning scheme amendment documentation when compared to VicGrid.
124	Att 1 PSA Planning Report	Table 4-1, p89 and Explanatory Report p124	The explanatory report requires the proponent to "assess the impact of the new planning provision on the resources and administration costs of the responsible authority". The explanatory report template provides instruction on how to answer this question which is "What are the cost implications for a responsible authority in implementing and administrating the new planning provisions including: • The estimated increase in number of planning permit applications • Planning staff resources • Other miscellaneous costs including legal or other professional advice, for example, heritage advisers • Capacity to consider the new applications within the prescribed time". This question has not been answered, with the response simply noting that the Councils "are likely to incur resource and administrative costs as a result of ongoing review obligations and providing advice on matters referred by the Minister for Planning". There is a lack of consideration of the staff resourcing and cost implications of this, particularly on councils with limited planning staff, and small budgets.
125	Att 1 PSA Planning Report	Explanatory Report, page 7	The Explanatory Report states that “In most instances, these conditions must be satisfied prior to the commencement of development (excluding preparatory buildings and works) and require the approval of the Minister for Planning or, in the case of native vegetation offsets, must be to the satisfaction of the Secretary to the DEECA”. As noted in the Councils’ comments on the Incorporated Document, the Councils do not support the exclusion of preparatory buildings and works.
126	Att 1 PSA Planning Report	4.3.5	The Councils disagree with the statement that the amendment will have minimal impacts on the transport system. The Project will rely heavily on the Councils’ local road network for construction access, haulage and workforce movements over a construction period of approximately 3.5 years. As set out in the Councils’ comments on Chapter 18 and Technical Appendix K, measured traffic data is available for only about 45% of the roads assessed, road condition has been assessed visually without pavement testing, workforce accommodation traffic and bulk material haulage have not been adequately

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			demonstrated, and cumulative traffic from other major projects using the same roads has not been fully assessed. Many of the local roads to be used are low-volume and unsealed, and support agricultural freight, school bus services and emergency access. The Councils consider that the Project has the potential to significantly affect the condition and function of local roads and the safety of other road users, and that these impacts have been deferred to future Traffic Management Plans and contractor-led investigations rather than resolved through the EES. The Councils' requested amendments to EPR TT04, and an additional EPR requiring a bank guarantee, are set out in their comments on Chapter 28.
127	Att 1 PSA Planning Report	4.3.6	States that "The Amendment has considered the potential of economic benefits provided to the local region during construction of the Project. These benefits include the creation of job roles directly related to the Project as well as additional employment opportunities created within the supply chain and through local businesses benefiting from increased consumer spending. Households will be provided significant financial benefits resulting from increased income and wage growth". The Economic Report shows that there will be limited benefits to the Councils, with the construction phase of the Project contributing a net $10.68 million to the four Shires on the VNI West route (if evenly distributed, this is $2.67 million each, or approximately $0.76 million per year of construction). Similarly, it suggests that the project would support around 30 full-time equivalent jobs in the four shires each year of construction. For a project that is estimated to contribute $1.3 billion to Gross State Product and support an increase of over 700 workers, the economic benefits to the Shires are minimal.
128	Att 1 PSA Planning Report	5.2.5	States that "Throughout the TRG process, all the TRG representatives were given the opportunity to provide feedback to the VicGrid VNI West Project Team in the form of email correspondence and/or ad-hoc meetings". The reference to emails and ad hoc meetings is at odds with the TRG process, which almost entirely consisted of multiple rounds of review of chapters, technical reports and planning scheme amendment documents.
129	Att 1 PSA Planning Report	Incorporated Document, Clause 4.1	It is unclear why the commencement by, and completion by, years have not been provided (marked as XX). The Councils require these dates to consider their suitability, as part of reviewing the documents and forming a position.
130	Att 1 PSA Planning Report	Incorporated Document, Clause 6.1	Clause 6.1 says each Project Document must be 'approved', and Clause 6.3 assumes the Minister approves them, but the Native Vegetation Removal Report under Clause 7.9 is only prepared 'to the satisfaction of' the Secretary of DEECA and is never approved by anyone. Clause 7.11 also lets the Secretary vary offset timing. The approval mechanism, the decision-maker and the Council consultation requirement should line up across Clauses 6.1, 6.3 and 7.9 to 7.13.
131	Att 1 PSA Planning Report	Incorporated Document, Clause 6.3	This section should be reworded as follows: "Prior to deciding whether to endorse or amend any of the Detailed Development Documents and other documents required under Clause 7.0, the Minister for Planning must seek and consider the views of each relevant Council and may seek the views of any other relevant authority"

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132	Att 1 PSA Planning Report	Incorporated Document, Clause 7.1	The control does not expressly require the approval/endorsement of the detailed development plans prior to the development commencing. They are only required to be 'submitted for endorsement'. Request the following rewording “Prior to the commencement of development or any stage or component of the Project (excluding Preparatory Buildings and Works under Clause 7.29 and workforce accommodation, which must instead comply with Clauses 7.18 to 7.26), Development Plans must be submitted to and approved by the Minister for Planning”. This change would ensure consistency with the Department's model drafting conventions of the model conditions.
133	Att 1 PSA Planning Report	Incorporated Document, Clause 7.2	Clarify that the plans may not be approved until a Cultural Heritage Management Plan (CHMP) has been prepared and approved.
134	Att 1 PSA Planning Report	Incorporated Document, Clause 7.4	The control does not expressly require the approval/endorsement of the EMF prior to the development commencing. They are only required to be 'submitted'. Request the following rewording “Prior to the commencement of development or any stage or component of the Project, an EMF must be submitted to and approved by the Minister for Planning” This change would ensure consistency with the Department's model drafting conventions of the model conditions. The Councils do not support the exclusion of Preparatory Buildings and Works. These should be subject to the EMF.
135	Att 1 PSA Planning Report	Incorporated Document, Clause 7.9	The reference to ‘excluding native vegetation removed as part of the Preparatory Buildings and Works’ should be removed. Native vegetation removal as part of preparatory buildings and works could be significant and should be subject to this clause. The Councils should be consulted on any proposed native vegetation removal on Council land. Clause 7.9a has a typo and should state “destruction or lopping”.
136	Att 1 PSA Planning Report	Incorporated Document, Clause 7.12 and 7.13	Clause 7.12 allows offsets for the whole Project, including preparatory works, to be reconciled only when construction is complete, and Clause 7.13 allows them to be secured and amended in stages. Taken together, vegetation could be removed years before offsets are secured. The Councils may wish to seek a requirement that offsets for each stage are secured before removal in that stage.
137	Att 1 PSA Planning Report	Incorporated Document, Clause 7.14	The control does not expressly require the approval/endorsement prior to the development commencing. Request the following rewording “Prior to the commencement of development or any stage or component of the Project (excluding Preparatory Buildings and Works under Clause 7.29, and workforce accommodation, which must instead comply with Clauses 7.18 to 7.26), a Construction Bushfire Mitigation and Management Plan and a Construction Fire Emergency Management Plan must be submitted to and approved by the Minister for Planning”.

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138	Att 1 PSA Planning Report	Incorporated Document, Clause 7.18	Request that Clause 7.18 be deleted. It is not clear why the use and development of workforce accommodation should be allowed to commence prior to the conditions in Clause 7.1 and 7.14 to 7.17 being satisfied.
139	Att 1 PSA Planning Report	Incorporated Document, Clause 7.19	Request the following changes. “The following Workforce Accommodation Plans must be submitted to and approved by the Minister for Planning, after consultation with the relevant Council for approval, unless otherwise agreed in writing by the Minister for Planning”
140	Att 1 PSA Planning Report	Incorporated Document, Clause 7.20	Request the following minor rewording. “The Workforce Accommodation Site Plans and Elevation Plans must include the following”
141	Att 1 PSA Planning Report	Incorporated Document, Clause 7.26	The Councils are concerned that the Incorporated Document contains no requirement to rehabilitate the workforce accommodation sites. Clause 7.26 requires the Workforce Accommodation Decommissioning Environmental Management Plan to address the environmental risks of decommissioning activities, but it does not require the sites to be returned to their pre-Project condition or to a condition suitable for agriculture, does not set a timeframe for rehabilitation, and does not require the outcome to be verified or agreed with the landholder or the relevant Council. The EES describes decommissioning of the transmission infrastructure as returning land to pre-Project conditions, but makes no equivalent commitment for the workforce accommodation sites, which will involve earthworks, concrete works, services trenching and new access roads on farming land. The Councils request that clause 7.26 be amended to require: a rehabilitation plan for each site, prepared in consultation with the landholder and the relevant Council; removal of all buildings, hardstand, footings and services not to be retained for an agreed community or housing use; reinstatement of topsoil and the land to its pre-Project condition or a condition suitable for its zoned use; completion of rehabilitation within a specified period (for example, 12 months) after the site ceases to be used; and sign-off by the Minister for Planning, after consultation with the relevant Council, before the SCO is removed from the site. The EPRs do not fill this gap. EPR-EM05 requires a Decommissioning Environmental Management Plan that includes "rehabilitation, reinstatement and review requirements", but it is directed to decommissioning of the Project at the end of its operational life, is to be prepared having regard to good practice "applicable at the time of decommissioning” and requires consultation only "where required" by other EPRs or approvals. The workforce accommodation sites will be decommissioned at the end of construction, decades earlier. Chapter 20 states that, through the CEMP, the Principal Contractor would be responsible for "Rehabilitation of construction areas, including the removal of foreign gravel and base materials, and reinstatement of the soil profile, particularly the topsoil", but this is not expressed as a standalone EPR, sets no completion standard or timeframe, and leaves post-construction monitoring to landholders "as part of normal farming activities". EPR-LV01 provides for screening only "for the duration of use" of each site and does not address its removal or retention. By contrast, EPR-TT04 requires post-construction surveys, remediation and asset hand-back agreements for roads, with the relevant Council to accept or agree. The Councils request a new EPR for the rehabilitation of laydown and workforce accommodation sites, modelled on EPR-TT04, that requires a

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			pre-construction site condition survey, a site-specific rehabilitation plan prepared in consultation with the landholder and the relevant Council, completion of rehabilitation within a specified period after the site ceases to be used, post-rehabilitation monitoring by the Principal Contractor for at least two years, and written sign-off by the landholder and the relevant Council. Requested wording is as follows – new Clause 7.26(g) "Measures for the removal of all buildings, works and services and the rehabilitation of each workforce accommodation site to its pre-existing condition, or to another condition agreed in writing with the relevant Council and landowner (including any agreed reuse of infrastructure for community or housing purposes), and the timeframe within which rehabilitation must be completed".
142	Att 1 PSA Planning Report	Incorporated Document, Clause 7.27 and 7.28	Request that these be amended to refer to the SCO extent applying to the workforce accommodation and laydown sites. The Councils request that these SCO extents be removed from these sites in full, once the sites are decommissioned.
143	Att 1 PSA Planning Report	Incorporated Document, Clause 7.29	Request the following changes. "The following buildings and works may be undertaken for the Project, or a component or stage of the Project if applicable, before approval of the Project Documents, provided that the relevant Council is given at least 10 business days' written notice before the works commence and any works within or affecting a road for which a Council is the coordinating road authority are carried out with that Council's written consent" Edit Clause 7.29(d)" Creation, development and use of temporary access points, access tracks and working platforms" Edit Clause 7.29(e) "Site establishment works including temporary site fencing and hoarding, site offices, and hardstand and laydown areas, but excluding workforce accommodation"
144	Att 1 PSA Planning Report	Incorporated Document, Clause 7.32	Approved project documents should be made available for the duration of the project, not at least two years following commencement. Request the following edits "A current version of any approved Project Documents must be made available on a clearly identifiable Project website from the date of approval and before the commencement of the use or development to which it relates, and must remain available on such website for the life of the Project, including decommissioning".
145	Att 1 PSA Planning Report	Planning Scheme Amendment Maps	Due to the extent of redaction, the Councils are not able to adequately review these maps, both on their own, but also having regard to the provisions of the Incorporated Document. The Councils request an unredacted version.
146	Att 1 PSA Planning Report	Planning Scheme Amendment Schedules	A number of schedules to the Northern Grampians Planning Scheme are not the latest version of these schedules. The following schedules were amended by GC209, which is now in effect (the schedules were amended on 30 September 2026). The Schedule to Clause 45.12 now also includes the Western Renewables Link Incorporated Document (August 2026) as SCO9, which should be reflected in the numbering of any new Specific Controls Overlay. • Schedule to Clause 45.12 Specific Controls Overlay

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			• Schedule to Clause 66.06 Notice of Permit Applications • Schedule to Clause 72.01 Responsible Authority • Schedule to Clause 72.04 Incorporated Documents

Attachment 2: Stakeholder and Community Engagement Report

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147	Att 2 Stakeholder and Community Engagement	3.5.4	The report acknowledges consultation fatigue, but fails to acknowledge the significant impost that these overlapping consultations have had on the Councils, agencies, stakeholders and community. The consultation and engagement on VNI West at the same time as the release of policy by the State Government has resulted in significant pressure and unnecessary stress on those stakeholders. It has limited the Councils' ability to engage in the consultations, alongside diverting resources away from core Council business, including projects, that are directly of benefit to the community.
148	Att 2 Stakeholder and Community Engagement	3.5.4	The report acknowledges challenges in accessing properties, however fails to acknowledge the absence of consideration of the nature of farming and ensuring access in a manner that does not impact on farming operations. Farmers repeatedly called for requests for access to be provided with adequate warning, timing to avoid key periods such as lambing and harvest, and the need for OHS and biosecurity considerations.
149	Att 2 Stakeholder and Community Engagement	4.2	This attachment references the TRG but fails to outline concerns raised by the Councils regarding the function of this group. The Councils repeatedly raised concerns about the conduct of the TRG, including the timeframes provided for review of technical reports and chapters, overlapping and cumulative review requests (as many as 9 reports out for review at the same time), poor quality of the reports, and incomplete reports provided for review. In addition, substantive feedback provided by the Councils was largely ignored, with feedback and edits mostly limited to grammatical errors and minor (inconsequential) changes to the reports. The Councils' concerns with the TRG process ultimately led to the Councils' withdrawal from the TRG. A key reason for the withdrawal was the Councils' concern that their participation would be relied upon, by the proponent, as evidence that the Councils have been consulted on the project, or that the Councils accept the EES or the mitigation measures proposed in it. The Councils' experience was that they repeatedly raised concerns, including effects on roads, housing and employment, and that their input did not lead to material change in the proponent's approach. Demonstration of where material change was made as a result of TRG feedback should be requested by the IAC to understand the impact of the TRG.
150	Att 2 Stakeholder and Community Engagement	4.3.2	This report states that "A Social Value Reference Group (SVRG) was convened to lead the development of the VNI West Social Value Strategy". Both the Councils participated in this group. Whilst the Councils were supportive of the formation of the group and the co-design process used, it is important to note that the Councils have not yet seen a draft of the Social Value Strategy, and can't

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			comment on the extent to which their feedback and inputs were taken on board, and the extent to which they are supportive of the Strategy, It is important to note that the Social Value Strategy was always advertised as an additional piece of work looking at how social value could be maximised across the Shires. The Councils were repeatedly told that the Strategy was not a mitigation measure. A key issue with the group was that key questions regarding funding for social value initiatives, including the total budget allocation, and methodology for calculating investment were not answered. It is difficult for the Councils to measure the impact the proposed social value initiatives will have without knowing the value.
151	Att 2 Stakeholder and Community Engagement	4.3.2 and Figure 6.	Section 4.3.2 suggests three meetings were held with the Social Value Reference Group, whilst Figure 6 suggests this was five.
152	Att 2 Stakeholder and Community Engagement	10.4.11	This section notes that feedback was received outlining concern and interest about the location of the laydown areas and workforce accommodation sites. It states that VicGrid's response was to undertake a public expression of interest process. This section fails to note that the Councils' feedback was repeatedly ignored. The Councils were consulted on the site selection criteria, prior to the EOI process. The Councils provided feedback on their strong preference for workforce accommodation sites to be located near or adjoining existing towns, noting the severe shortage of housing, to enable the reuse of infrastructure and/or site impacts to assist in the provision of permanent housing, following decommissioning of the sites. VicGrid then proceeded with an EOI process. Following the process, VicGrid shortlisted these EOI sites. The Councils requested a list of the shortlisted sites, so they could provide local knowledge and feedback to VicGrid on the suitability of the sites. VicGrid refused to provide the Councils with a copy of this shortlist, citing landowner confidentiality. Once the sites were selected, VicGrid still did not notify the Councils of the selected sites, with Council staff finding out the location of these sites when reviewing later versions of the technical reports, via the TRG process.
153	Att 2 Stakeholder and Community Engagement	10.4.11	States that EES Chapter 4: Project description outlines the selection and location of the laydown and workforce accommodation sites. This is not outlined in EES Chapter 4. Chapter 4 refers the reader to Chapter 3: Project development and alternatives for information on this process.
154	Att 2 Stakeholder and Community Engagement	10.4.11	In response to concerns raised about impacts to residents and businesses during construction, the report states that "Engagement activities planned for mid to late 2026 will further provide opportunities to ask questions in relation to construction activities and potential impact". It is November 2026 and the Councils are not aware of this consultation. This consultation should have been undertaken before the EES exhibition for it to be able to influence the technical reports and EPRs.

Attachment 4: EES Map Book

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155	Att 4 EES Map Book	Map page 74/146	This comment refers to BSC only.

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			The transmission line alignment crosses the Kulwin Rail line at Teddywaddy. This line is used by freight and tourist trains. It is unclear from the reports if VicTrack has been consulted. BSC requests that VicTrack's views are sought.

Attachment 6: Detailed Project Development and Alternatives

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156	Att 6 Detailed project development and alternatives	1.5	The document notes that there was limited to no private land access from south of Teddywaddy through to Bulgana. Geographically this represents most of the alignment through BSC and NGSC. The attachment identifies properties in the southern portion of the alignment as a high priority for access due to the likely presence of ecological values. Section 1.5.2 highlights that lack of access most significantly impacted ecological and Aboriginal cultural heritage investigations, along with geotechnical investigations, access track verification, agricultural land use assessments and confirmation of other land use constraints. The Councils hold the view that that the adequacy of the assessments has been compromised by this lack of access, and that consideration of this should be made by the IAC. As a result, the ecological assessment for most of the alignment through the Councils' municipalities relies on limited field surveys. The Councils are concerned that the conclusions of Chapter 26 and Technical Appendix S: Ecology may not accurately reflect the ecological values present in this area, noting also that overlays such as the Environmental Significance and Vegetation Protection Overlays have limited application in the Councils' planning schemes (see the Councils' comment on sensitive overlays below). The Councils request that targeted field surveys be completed and the ecological assessment updated before the Project is approved, rather than deferred to post-approval processes.
157	Att 6 Detailed project development and alternatives	1.5.2	The document states that traffic volume data was available for 67 roads, representing approximately 45% of roads. The Councils consider this percentage inadequate for a project of this scale and duration. Further commentary notes that access constraints and safety concerns, again in the southern portion of the alignment limited, and in some cases prevented, completion of road surveys, intersection assessment and pavement investigations. It is unclear to the Councils how access to public roads was limited. The Councils reject assertions that safety concerns limited access to surveys and inspections to the extent stated. Through the process, the Councils were never advised of limitations to public roads due to safety concerns. The Councils note a lack of surveys, with surveys needing to be repeated when the Councils raised concerns through the TRG process. This suggests that the proponent ran out of time.
158	Att 6 Detailed project development and alternatives	Table 2-1	States that the evaluation framework sought to avoid 'sensitive zones' being rural living, general residential, low density residential, residential growth, neighbourhood residential, and township zone'. No further commentary is provided; however it is assumed whilst this could appropriately be applied to the transmission line and laydown, avoidance of these zones has been applied to the project in its entirety. The Councils submit that a more nuanced approach should have been applied to workforce accommodation. Given the residential nature of workforce accommodation, the residential areas may

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			have been more suitable than rural areas, on which the VPPs seek to avoid the establishment of accommodation.
159	Att 6 Detailed project development and alternatives	General	Through the Attachment there is reference to avoiding sensitive overlays. This avoidance works on the assumption of the utilisation and application of these overlays. The Councils are small rural Councils, with limited strategic planning staff, and a significant backlog of strategic planning work. With particular regard to the Heritage Overlays, and Land Subject to Inundation Overlays, these overlays have not been applied to the necessary extent, with the strategic work either not yet undertaken, or undertaken but not yet implemented via a planning scheme amendment. Other overlays such as the Environmental Significance, Vegetation Protection and Significant Landscape are limited in their application. In the case of Buloke, the Significant Landscape Overlay is not applied within the planning scheme. This does not indicate of a lack of significance, but the inability of the Councils to undertake the strategic work required to justify and implement these overlays. The continued reference to, and assessment of decisions based on the presence, or lack of, these overlays is flawed.
160	Att 6 Detailed project development and alternatives	8.1	The identification of workforce accommodation sites is flawed and was based on the application of the assessment criteria to sites submitted through the EOI process, rather than consideration of the most suitable sites along the alignment. This resulted in a significantly narrowed field of 'suitable sites'. The attachment correctly identified that the Councils were consulted to provide assessment criteria. During a meeting with the Councils, and following this meeting in writing, the Councils advised of their strong preference for the identification of workforce accommodation sites, within or adjacent to existing townships, highlighting the significant shortage of housing and infrastructure within the Shires, along with the ability for the sites to be reused for housing following completion of construction. This view was not shared by VicGrid whose preference was for sites located away from towns. The cost of developing these sites for workforce accommodation, including the provision of services is enormous, and the Councils had advocated for infrastructure that would provide lasting, legacy benefits to the towns, rather than throwaway, redundant infrastructure.
161	Att 6 Detailed project development and alternatives	8.1	The Councils have concerns with the identification of the workforce accommodation sites, noting the assessment criteria. In many instances the sites selected are not consistent with VicGrid's own assessment criteria, set out in Table 8-1 (Laydown area and workforce accommodation assessment criteria) and applied in Table 8-2 (Summary of assessment of proposed laydown and workforce accommodation areas).[36]
162	Att 6 Detailed project development and alternatives	8.1	This comment refers to BSC only. Of the 15 criteria, the Charlton accommodation site is consistent with 5 of these criteria. The site is located on the edge of Charlton which on face value would provide opportunity for reuse of the site. It is however located within the Farming Zone and is subject to flooding. The site was under water in the October 2022 floods.

[36] EES Attachment VI: Detailed Project development and alternatives, pages 111–115, section 8.2 (Table 8-1) and section 8.3 (Table 8-2).

No.	Report / Chapter	Report Section / Location	Comment
			Council acknowledges the need to provide accommodation to support major projects and house the temporary workforce. However as outlined in this submission and communicated to VicGrid key towns within the Shire have no rental vacancy taking into account natural vacancy and handover periods. The rental vacancy rate in Charlton where the temporary workforce accommodation site is, has a vacancy rate of 0.4%. Businesses within the Shire are unable to attract workers because of this shortage of housing. Given the significant investment (both infrastructure and cost) required to establish a temporary workforce housing site, Council had requested that this site be provided in a suitable location, within or on the edge of town where it could be designed, similar to a subdivision or permanent housing development, that could be left in the town post construction of VNI West. This housing could have provided a real legacy in the towns, and contribute significantly to the economic, social and community development of the towns, by addressing critical housing shortages. Instead, a site has been selected on the basis that it can be packed up and removed post construction. The site is subject to flooding, narrow, lends itself to poor design outcomes, and adjacent the Calder Highway with access constraints. The site cannot viably be transitioned into permanent housing following the construction phase. In the absence of VicGrid reconsidering the location of the temporary workforce accommodation site, Councils requests that VicGrid develop a plan for how the housing, and associated infrastructure can be repurposed to provide community benefit post construction. This would include planning at the design stage, considering design, longevity and reuse of the structures, and engagement with key employers, housing providers, Council and community groups regarding reuse interest and options. Any such reuse must be on land that is safe from flooding. BSC does not support housing remaining on the current flood-prone site without a full flood assessment and appropriate protections in place.
1163	Att 6 Detailed project development and alternatives	8.1	This comment refers to NGSC only. Of the 15 criteria, the Greens Creek accommodation site is consistent with 5 of these criteria. Given its Farming Zone location, bushfire considerations and distance from established townships and services, NGSC considers that further justification is required as to why this site has been selected over other potential locations. This should include consideration of servicing and infrastructure requirements, impacts on surrounding agricultural land uses, and whether alternative locations could provide greater long-term community or legacy benefits following completion of the project. Given the significant investment (both infrastructure and cost) required to establish a temporary workforce housing site, Council had requested that this site be provided in a suitable location, within or on the edge of town where it could be designed, similar to a subdivision or permanent housing development, that could be left in the town post construction of VNI West. This housing could have provided a real legacy in the towns, and contribute significantly to the economic, social and community development of the towns, by addressing critical housing shortages.