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To Whom It May Concern

Submission to Victoria's draft 30-Year Infrastructure Strategy

Northern Grampians Shire Council welcomes the opportunity to comment on Victoria's Draft 30-Year Infrastructure Strategy.

Northern Grampians Shire is located in Western Victoria and is home to more than 11,900 people. The Shire's major towns are Stawell in the south and St Arnaud in the north, both service centres for their surrounding rural communities. The Shire is home to outstanding natural environments, including the Grampians National Park. The economy is based on agriculture, gold mining, tourism, wine production and manufacturing.

Northern Grampians Shire faces a critical housing shortage, significantly impacting businesses' ability to attract and retain workers, particularly in sectors like healthcare, manufacturing, and agriculture. The region's low housing vacancy rate (0.17%) forces many workers to commute from neighbouring areas, hindering economic and population growth and contributing to an aging demographic and limiting regional economic growth. Increasing housing supply and diversifying housing stock are essential to making the Shire an attractive place to live and work.

It is essential that the draft Strategy places increased focus on the infrastructure needs of regional Victoria. Continued focus on metropolitan Melbourne will only further entrench the divide between metro and regional and rural areas. Regional Victoria requires significant investment in key community and built infrastructure to meet existing and future challenges.

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Access to Housing, Jobs, Services and Opportunities

Recommendation 1: Build More Social Housing

Social housing remains a significant regional issue, with unmet demand for social and affordable homes scarcest for young families and individuals.¹ In September 2024, Northern Grampians Shire scored 92 on the Rental Pain Index, noting that average rents had increased by 8% over 12 months and the average renter spending 27% of household income on rent, with low vacancy rates of 1% and limited housing options available intensifying competition for housing.² This scarcity places further pressure on low-income households and contributes to increasing rates of housing vulnerability and reducing rates of secure tenure, which alongside domestic and family violence, is often the first step on the pathway into homelessness.³

Demand for crisis housing within the region regularly outstrips supply, exacerbating challenges in a housing support services environment that is fractured, complex, dispersed and difficult to navigate.⁴ Family violence incidents reported to police are proportionally higher in Northern Grampians Shire than across Victoria, with local support service providers noting that limited housing supply, especially for renting, means that few housing options are available for people in crisis.⁵ In recent years, service providers have turned to motels and other short-stay accommodation options to provide emergency accommodation for people experiencing homelessness and those in crisis, often competing with demand from tourists and major employers who rely on motels and other short-stay accommodation to house workers.⁶ **Council supports the recommendation for the Victorian Government to address shortages by building more Social Housing, and advocate that regional need for housing is given greater emphasis in the strategy.**

Recommendation 4: Expand TAFE in Melbourne's Growth Areas and Some Large Regional Centres

Significant barriers to accessing TAFE are contributing to shortages for workers in key industries and services including health and construction across the region, resulting in longer wait times for residents to access the health and aged care they need, and increased cost and difficulty in building homes. A significant portion (47%) of TAFE students in regional Victoria reported barriers to access with public transport not available to provide access to their TAFE campus.⁷ Across the Wimmera Southern Mallee and Mallee regions, approximately 63,000 people do not have access to Construction courses, 94,000 to English or Foundational Skills courses, and 76,000 to Health courses, within 60 minutes of their home.⁸ **Council supports the expansion of TAFE in regional centres.** Council also submits that consideration should be had to satellite campus' in other regional towns, including options for the provision of multi-use learning hubs, hybrid workspaces, and mobile student support centre in regional towns to assist in addressing barriers to transport. Support should also be provided for large employers to offer certificate level training.

Recommendation 5: Build Libraries and Aquatic Centres for Melbourne's Growing Communities

The current proposed recommendation is metro-centric and should include investment in existing libraries and sport and aquatic facilities, including those in regional Victoria. Operating in a regional environment is not sustainable, with Council investing over \$700,000 per year to operate our aquatic and library services. Most rural local government areas are facing uncertainty of future service delivery with ageing infrastructure expected to cost millions to rejuvenate to bring in line with best practice design principles and community expectations. Library services in Stawell and St Arnaud face challenges from a dynamic technological environment, increasing pressures on financial and staffing resources, and changing demographic and social trends.⁹ Capped state

¹ Wimmera Development Association (2021) *The Housing Blueprint* (Accessed March 2025).

² SuburbTrends (2024) *Rental Pain Index September 2024* (Accessed April 2025).

³ Parliament of Victoria (2021) *Inquiry into homelessness in Victoria* (Accessed March 2025).

⁴ Regional Partnerships Wimmera Southern Mallee (2019) *Our Outcomes Roadmap* (Accessed April 2025).

⁵ Northern Grampians Shire Council (2021) *Municipal Public Health and Wellbeing Plan 2021-25* (Accessed March 2025).

⁶ Walter, A. The Weekly Advertiser, 18 January 2023, *Motels Could Ease Housing Pressure – Grampians Community Health Project* (Accessed April 2025).

⁷ Quantum Market Research (2024) *Access to Social Infrastructure Consumer Research* (Accessed March 2025).

⁸ ARUP (2024) *Social Infrastructure Accessibility Mapping - TAFEs* (Accessed March 2025).

⁹ Northern Grampians Shire (2021) *Library Service Review 2021* (Accessed March 2025).

funding puts added financial pressures on running libraries as the gap continues to grow with non-financially viable councils expected to increase investment each year to keep up with inflation.

Recommendation 7: Rezone Locations Near Existing Infrastructure for More Home Choices

The recommendation to focus housing growth on locations with access to public transport effectively excludes a large number of townships and regional areas across the state from opportunities for housing and population growth, despite their relatively compact urban forms and access to other key infrastructure, services and amenities.

The Regional Australia Index shows an increased number of people have been relocating to regional Victoria in recent years. Regional Victoria has and continues to be a desirable destination to live.¹⁰ Focusing housing growth to areas surrounding regional towns, will improve access to employment opportunities, and to existing key services, amenities and social infrastructure. Many regional and rural communities have strong social and community cohesion and have existing community infrastructure that could easily be expanded with residential and population growth.

The Wimmera Southern Mallee rental stock is on average 6.2% lower than the statewide average and presents a barrier to new and potential employers in the region.¹¹ Vacancy rates are 0.17%, significantly lower than other localities such as Hamilton (0.29%), Ararat (0.57%), and Horsham (0.45%),¹² leaving a scarce number of housing options available for workers in the region. Currently, 434 people work in Northern Grampians Shire, but reside in Ararat, another 82 workers live in Horsham, and 52 in Ballarat, suggesting the lack of housing in Northern Grampians Shire is causing people to reside outside their Shire of employment and to have to travel for work.¹³ The current supply and variety of housing stock is a significant barrier to fulfilling the need for additional workers in the Shire, with local businesses reporting that finding employees is a significant challenge, and barrier to economic growth.¹⁴

Northern Grampians is significantly hampered by lack of supply in the housing market in terms of quantity and diversity of housing stock, rather than a lack of demand. The lack of suitable housing negatively impacts on the Shire's employers to attract working age residents, contributing to the skewing of regional populations to more older residents. Further consideration must be given to the systemic barriers to housing development and increasing construction costs. The current compact cities approach will constrain the growth of industries in regional Victoria, further entrenching employment inequality between Melbourne and Victoria's regional cities and townships.¹⁵

Recommendation 12: Run More Bus and Coach Services in Regional Victoria

Existing public transport connections must be improved. Existing intertown routes do not have services that align to work or school times, such as the V/Line coach service between Stawell and Halls Gap. The first V/Line train/coach from Melbourne does not arrive in Stawell until 10.57am, while the last coach/train to depart Stawell each weekday is at 4.27pm. There are no V/Line coach or town bus service in St Arnaud or between St Arnaud and other towns that meet employee journey-to-work needs. Further, the Northern Grampians, and broader Wimmera-Southern Mallee region, is not serviced by V/Line passenger rail significantly inhibiting journey flow into and out of the region for tourists, specialists and residents.¹⁶ Existing town bus services do not provide a meaningful alternative to walking or driving and do not reach key destinations including large employers like

¹⁰ Regional Australia Index (2024) Regional Movers Index – March Quarter 2024

<https://regionalaustralia.org.au/common/Uploaded%20files/Files/2024/Regional%20Movers%20Index/RMI%20March%202024.pdf>

¹¹ Regional Partnerships Wimmera Southern Mallee (2019) *Our Outcomes Roadmap* (Accessed March 2025).

¹² Northern Grampians Shire Council (2024) St Arnaud, Halls Gap and Great Western Housing Supply Mapping (Draft) (Accessed March 2025).

¹³ OPAN Transport (2022) Access Review & Access Plan (Accessed March 2025).

¹⁴ Northern Grampians Shire Council (2021) Economic Development Strategy and Action Plan 2021-31 (Accessed March 2025).

¹⁵ Centre for International Economics (2023) Economic, Social and Environmental Impacts of Alternative Urban Development Scenarios for Victoria (Accessed March 2025).

¹⁶ Regional Partnerships Wimmera Southern Mallee (2019) *Our Outcomes Roadmap* (Accessed March 2025).

Thomas Foods, Grampians Health and the Stawell Gold Mine. Poor operational frequency and timetabling of services means that many existing services are not operating at times that are useful for journey to work trips.

Health and Safety

Recommendation 17: Invest in Maintenance, Upgrades and Expansions of Community Health Facilities

Two in five people living in the Northern Grampians are aged 60+ years, and the number of persons aged over 65+ years expected to increase by nearly +30% by 2031.¹⁷ As our population grows and ages, there will be growing demand for services, with the rate of disability around 50% for people aged 65+ years, and older persons being more likely to be living with more than one chronic health condition.¹⁷ Young people in Northern Grampians are more likely to have a mental health condition and face higher mortality rates than the Victorian average.¹⁷ Just over half of injury-related deaths among 15-24 year olds result from intentional injuries, with suicide being the leading cause of death for this age group.¹⁷ A lack of bulk billing meant that the only options for many are private practitioners, and the cost of this is seen as prohibitive to many, leading to poor health outcomes and exacerbating chronic disease.¹⁷ Regional health needs greater integration and partnerships to increase capability through workforce, infrastructure and equipment to strengthen workforce training opportunities and improve access to medical specialists and medical equipment.¹⁸ **There is an opportunity to invest in our region's community health facilities to expand the workforce, improving health outcomes and access to specialists** to ensure support for people facing daily impacts of detriments of health beyond their control, such as chronic health conditions, living with the effects of violence, isolation, insecure housing and food security.^{18,18}

Recommendation 19: Invest in Digital Healthcare

Health and digital literacy are issues for some people navigating and accessing the health system, particularly for people aged 60+ years.¹⁷ The lack of integration between care providers results in insufficient sharing of information, and a lack of telehealth capability to support providers in smaller towns.¹⁸ The need to travel to services is a significant issue for many across the region, with public transport often unavailable or unable to support attending appointments, and the cost of fuel and taxis posing a barrier.¹⁷ Further, there is significant divide between regional users compared to metropolitan users of digital services. Regional areas often face significant barriers to access, including limited 5G mobile network coverage and 219 blackspots throughout the Wimmera Southern Mallee identified as part of the Commonwealth's Black Spot Funding program.¹⁹ In order to ensure that the divide in access to healthcare is not further exacerbated, it is essential that a move to **digital is accompanied by investment in telecommunications and internet access in regional areas.**

Building Resilience to Climate Change and Other Future Risks

Recommendation 28: Use New Flood Maps to Revise Planning Schemes

The current approach to addressing flooding within the Victorian Planning System is shared by water authorities and local government. The preparation of flood studies, and progression of planning scheme amendments to implement these studies are costly, lengthy and resource intensive for Councils. Particularly noting that these amendments are often subject to a high level of community interest and opposition. Further the assessment of flooding occurs at the localised level, however flooding occurs across local government and catchment/water authority boundaries, creating opportunity for inconsistent methodologies and approaches to flood risk assessment. The above often results in Councils with incomplete or out of date flood hazard mapping. **Council is seeking that the State Government implement a similar approach to flooding that has been implemented for Bushfire.** The Bushfire Management Overlay is introduced into planning schemes by the State Government, based on a single consistent methodology. In contrast, flood overlays are being implemented in a piecemeal fashion, resulting in inconsistent methodology and controls.

¹⁷ Primary Health Network Western Victoria (2025) *Health Needs Assessment 2025-28* (Accessed March 2025).

¹⁸ Grampians Health (2023) *Grampians Regional Health Plan 2023-29* (accessed March 2025).

¹⁹ Regional Partnerships Wimmera Southern Mallee (2019) *Regional Digital Summary* (Accessed March 2025).

Recommendation 29: Coordinate Faster Delivery of Key Energy Infrastructure

There are currently 12 renewable energy projects with the Shire. Of these, five are approved and seven are proposed. Of the seven proposed, three are running concurrent EES process, these being the Western Renewables Link, VNI West, and the Navarre Green Power Hub Wind Farm and Battery. These projects are having a significant impact on the community, particularly the farming community. This impact has been exacerbated by inadequate consultation and engagement with the community, and the cumulative impact of multiple projects. **Council does not support any recommendation that would seek to increase pathways for fast tracking of approvals process, reduce or remove consultation, or reduce the time made available for Councils and the review technical reports and planning documentation.**

Recommendation 30: Improve Environmental Assessments and Site Selection for Energy Projects

Council supports the recommendation that Victorian Government should give industry clearer information on environmental conditions and good sites. However, whilst the draft Strategy notes that this would assist in avoiding biodiversity loss and project delays, Council notes that this would also reduce project speculation and reduce stress to communities subjected to proposals that are ill-conceived or not suitable to the land.

For the reasons noted above (in Recommendation 29) Council does not support any recommendation to speed up Environmental Effects Statement processes. Council does however support improved consistency, including greater consistency of EES scoping requirements, and technical reports requirements.

Victoria and a High Productivity and Circular Economy

Recommendation 35: Prepare and publish Infrastructure Sector Plans to shape Victoria's cities

Council supports the development of infrastructure sector plans. The recent development of a Victorian Recycling Infrastructure Plan is a good example of a sector plan, which has set clear direction for government and industry. Further discussion regarding recycling and waste infrastructure is outlined in Recommendation 38 below.

Recommendation 38: Prepare for more recycling and waste infrastructure

There is a diversity of waste, recycling, and resource recovery infrastructure that is required to manage waste from collection point, to reprocessing, and treatment for reuse. This infrastructure ultimately underpins the effectiveness of the larger circular economy but even more so the regions' ability to transition to a circular economy. In Councils experience a circular economy is best achieved at a local level where materials are sourced directly from their disposal to be reused in practical and effective ways.

There are no Materials Recycling Facility (MRF) in the Grampians Central West or Barwon South West region. This means that sorting and separation of glass, plastics, paper and cardboard material must be sent to metropolitan Melbourne to be sorted before processing. This regional limitation ultimately increases the cost of recycling so much so that it is comparable to sending the materials to landfill and removes any ability to be processed regionally, removing any ability for circular economy to be seen as a legitimate alternative for local industries and supply chains. Infrastructure Victoria identified Ballarat as a potential location for a MRF with mechanical separation and optical sorting technology. A regionally available MRF would not only significantly reduce Council costs of processing collected municipal materials, but it will support innovation and strengthen circular economy industries, opening local markets, allowing industries and consumers to see and realise the potential of circular economy.

Establishing organic processing facilities across the region would support the agriculture industry and Council managed municipal FOGO materials. Ballarat has been identified as a potential location for in-vessel composting, but if organic processing is expected to have an agricultural application, it is submitted that additional locations will be required, located closer to the source of the organic material at a smaller scale and reasonable cost.

A further economic opportunity for the region is to strengthen the renewable energy and waste management industries. Co-locating renewable energy infrastructure with resource recovery and manufacturing processes to support cost effective operation of facilities with low environmental impact (unique recycling facilities including renewable energy infrastructure recycling, concrete, blades, electrical components, etc.).

Council supports the draft Strategies acknowledgement of the need for more waste and recycling infrastructure, but **submits that greater focus is placed on the development of regional facilities, particularly given the lack of facilities such as MDF is the Grampians, along with greater focus on the need for regional facilities that capture regional specification with industries such as agriculture and renewable energy.**

Recommendation 41: Make rail freight competitive, reliable and efficient

Currently rail freight is not a viable option for many businesses, particularly those in rural and regional areas.

Council supports the development of a rail freight network plan, including consideration of how rail freight viability can be improved. Rail freight must become more reliable and accessible, in order for it to be a viable alternative for business.