

29 August 2025

Mr Anthony Ko
Senior Planner
NSW Department of Planning, Housing and Infrastructure

Dear Mr Ko

RE: VICTORIA TO NSW INTERCONNECTOR WEST (VNI WEST) – SSI-72887208 – SUBMISSION ON THE ENVIRONMENTAL IMPACT STATEMENT

Wagga Wagga City Council (Council) welcomes the opportunity to comment on the Environmental Impact Statement (EIS) for the Victoria to NSW Interconnector West (VNI West) (SSI-72887208), publicly exhibited from 1 August to 29 August 2025.

Council recognises the state-wide importance of strategic electricity transmission in supporting energy security and the transition of the National Electricity Market. Within the Wagga Wagga Local Government Area (LGA), we note the EIS describes “network augmentation works between the existing Wagga 330 kV substation and the future Gugaa 500 kV substation” and identifies potential locations along the Gregadoo Road corridor for a combined temporary worker accommodation facility (and other temporary ancillary facilities).

Outlined below are our key issues and requests.

Adequacy of information and assessment pathway

Council is concerned about the lack of design detail provided for the proposed combined temporary worker accommodation facility and associated ancillary facilities (e.g. chemical/fuel stores, concrete batching plant, helipad) flagged as “optional” sites along the Gregadoo Road corridor. In our view, the consent authority cannot properly assess impacts without, at minimum, detailed information addressing:

- the final access location(s) and intersection design works within the relevant public road reserve;
- site layout (temporary structures, buildings, storage, parking, internal circulation, heavy vehicle areas);
- buffers/setbacks, drainage line protection and vegetation retention;
- dust, sediment and erosion control measures;
- stormwater management (quality and quantity);
- on-site waste management, including sewage treatment and disposal; and
- site security, fencing and boundary buffers.

The EIS suggests flexibility through post-consent refinement supported by a “rigorous level of impact assessment”. No clear process is identified for that assessment. Council’s position is that essential impact assessment should not be deferred.

Traffic and transport

With respect to the Traffic and Transport Impact Assessment, Council does not concur that a satisfactory mitigation measure for insufficient sight distance at access/egress points on Gregadoo East Road in the Wagga Wagga LGA is to implement temporary speed limits. Council requests that a condition be included in the conditions of approval that requires all access/egress points to be located such that Safe Intersection Sight Distance (SISD) in accordance with Austroads Guidelines for the prevailing speed limit be provided. If SISD cannot be provided, intersection treatments such as CHL and CHR for the prevailing speed zone must be constructed.

Livingstone Gully Road is an unsealed road. The HLW project is required to maintain and gravel resheet the road from Gregadoo East Road to the new Gugaa 500kV substation site. Council is of the opinion that the cumulative construction and operational impacts of the Gugaa substation, the VNI West project and potentially an accommodation camp on this road should require it to be sealed. It is therefore requested that condition of approval be upgrading of Livingstone Gully Road to a sealed pavement in accordance with Austroads requirements to the satisfaction of Council.

Council considers the conditioning of Dilapidation Surveys on Unsealed Roads to be an ineffective mitigation measure to manage construction impacts on unsealed roads as a simple maintenance grade of the road changes its condition dramatically. Council suggests that a more effective mitigation measure for unsealed roads is to condition that the proponent is responsible for maintenance of unsealed roads identified as Construction routes in the EIS for the period of preconstruction and construction activities associated with the project.

Requirements for temporary camps and services

To avoid displacing residents and visitors and to prevent off-site impacts on Council assets and services, any temporary workforce accommodation within the Wagga Wagga LGA must be self-sufficient, sited and designed to minimise conflict with nearby land uses and operated under enforceable, auditable management plans. Camps should not draw on existing community networks for water, wastewater or electricity unless spare capacity is clearly demonstrated, approvals are obtained and impacts are mitigated. Proposals must also include clear demobilisation and site rehabilitation arrangements.

The provision and location of any Accommodation Camp within the Wagga Wagga LGA must ensure that adequate services (such as electricity supply, on-site sewer disposal or connection to town sewer infrastructure and water supply) is available to service the facility. The use of diesel powered generators to supplement power supply or generators that produce noise must not be allowed. Transporting in of potable water should be avoided and trucking out of sewer for disposal must not be allowed. The Traffic and Transport Impact Assessment is silent on how sewer and grey water will be disposed of. Wagga Wagga does not have a bulk sewer disposal facility. The nearest bulk sewer disposal point to Wagga Wagga is at Gundagai.

Any temporary camp must demonstrate capability for:

- essential services: reliable power supply, sewage treatment/disposal, potable water and reliable mobile/telecommunications coverage;
- traffic and access: safe site access, intersection treatments, defined heavy-vehicle routes and swept paths and a Traffic & Access Management Plan approved following consultation with Council; this plan must include pre- and post-construction road dilapidation surveys and make-good obligations for impacted Council roads;
- statutory approvals: obtain approval under section 138 of the Roads Act 1993 for any works within a Council road reserve;

- amenity safeguards: noise, lighting, waste, odour and dust controls; complaints management and site security;
- emergency management and public safety: first aid capability, incident response, bushfire preparedness, muster/evacuation procedures and unobstructed emergency service access, developed in consultation with relevant agencies; and
- decommissioning and rehabilitation: a decommissioning plan with timeframes, removal of temporary services/structures and reinstatement of disturbed land to pre-existing condition or an agreed end-state.

Workforce housing, visitor economy and cumulative impacts

Wagga Wagga is a major regional service hub supporting health, education, Government, Defence and project-based FIFO workforces, as well as events and sporting programs. The city also absorbs visitor demand from neighbouring shires (Coolamon, Junee, Lockhart, Snowy Valleys) where suitable accommodation may be limited. Average commercial accommodation occupancy exceeds ~65%, with frequent spikes during events and peak periods.

A large workforce accommodated in the city's commercial tourist accommodation would displace traditional visitors and events, reduce economic yield and place additional pressure on other sectors. We are also concerned that heavy use of lower-cost hotels/motels for workforce accommodation can constrain availability for priority users including health sector clients and the Department of Communities and Justice.

Council therefore does not support large-scale use of commercial tourist accommodation or the short-term rental market for workforce housing. Purpose-built, self-contained worker accommodation camps (well-serviced, well-managed and appropriately located) are preferred to avoid displacement and amenity issues in established residential and visitor precincts.

Cumulative impacts must also explicitly include the \$1.7 billion Riverina Redevelopment Program (RAAF Base Wagga and Blamey Barracks Kapooka) and the numerous other concurrent major projects across the region that are already constraining accommodation supply.

Community Benefit Sharing

Council supports application of the NSW Government's Benefit Sharing Guidelines. We request early clarity on methodology, eligibility, governance and allocation of benefits at the LGA/community scale and seek a commitment to co-design the program with Council so it aligns with our Community Strategic Plan and local priorities (e.g., road safety near work sites, active transport links, recreational facilities, skills and training pathways).

Biodiversity impacts and offsets

Greater transparency is required on what native vegetation losses and threatened species impacts are occurring within the LGA, and where the proposed offsets required under state and commonwealth law are going to be located. This was difficult to differentiate in the document, given the project crosses multiple LGAs. If losses in the Wagga Wagga LGA exceed proposed offsets in the LGA, Council requests that additional compensatory planting or other measures occur within our boundary.

Regulatory roles and complaint handling

Please confirm whether the NSW EPA is the appropriate regulatory authority for compliance during construction and operation and specify any matters that would fall to Council (e.g. biosecurity, noise, dust,

erosion, wastewater management). As Council will likely receive public complaints in the first instance, clarity upfront will benefit all parties. Where Council is the ARA, it should be furnished with copies of the conditions of approval, mitigation actions and relevant management plans.

Community and stakeholder engagement

Council recognises the community's expectation for clear, timely and accessible information and a genuine opportunity to be heard throughout delivery.

Engagement should be early and proactive with affected landholders, community groups and First Nations representatives using culturally appropriate processes. The proponent should also transparently track and publicly report issues raised, responses provided and commitments made, with opportunities for feedback where mitigation is not effective.

Council appreciates the opportunity to comment and is available to collaborate on practical solutions that protect our communities while enabling critical State infrastructure.

Kind regards

Scott Gray
Chief Operating Officer