

1 October 2025

Department of Planning, Housing and Infrastructure

Locked Bag 5022
Parramatta NSW 2124

Dear Jacob Jones,

RE: CULCAIRN TO WAGGA PIPELINE MODIFICATION - MOD 1 - URANQUINTY COMPRESSOR STATION - SSI-65512969-MOD-1

Wagga Wagga City Council (Council) welcomes the opportunity to comment on the modification application and report for the Culcairn to Wagga Pipeline (SSI-65512969-Mod-1), publicly exhibited from 17 September to 1 October 2025.

Outlined below are our key issues and requests.

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).

Regulatory roles and complaint handling

Construction dust emissions are assessed as "medium risk" without mitigation. APA should have a dust suppression and monitoring program in place.

Construction noise modelling indicates several residences could experience noticeable exceedances, especially during early morning or extended-hour works. High-noise activities should be restricted to standard construction hours unless absolutely necessary. Any out-of-hours work must be accompanied by clear justification and advanced notification to affected residents.

While operational noise of this site is predicted to comply, cumulative effects with the Uranquinty Power Station look to approach recommended nighttime limits. Ongoing operational noise monitoring should be required, with results made publicly available. APA should commit to further mitigation if exceedances are detected.

The report also identifies that background PM2.5 levels already exceed national criteria, and cumulative modelling with Uranquinty Power Station indicates marginal exceedances. APA should commit to adaptive management, with real-time monitoring and transparent reporting. Clear contingency measures should be defined in advance should operational monitoring demonstrate exceedances.

Please confirm whether investigating complaints regarding any of these matters will be the jurisdiction of NSW EPA or if Council is the ARA.

Traffic and Transport

Whilst the assessment claims to be prepared generally in accordance with the Austroads Guides to Road Design Part 3 for Geometric Design and Part 4A for Unsignalised and Signalised intersections, it fails to recognise that the existing geometry of the intersection does not comply with the warrants for a basic intersection layout for such a facility, in particular that a BAR should exist.

It is therefore recommended that a bitumen sealed BAR intersection treatment in accordance with Figure 7.1 of Austroads Guide to Road Design Part 4A: Unsignalised and Signalised intersections (2023b) for a 100km/h speed environment, designed and constructed to the satisfaction of Council be a conditional requirement of the consent. Any works in the road reserve will require a Section 138 approval under the Roads Act 1993 from Council as the Roads Authority.

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

A handwritten signature in blue ink, appearing to read "Scott Gray".

Scott Gray
Chief Operating Officer