

28 August 2025

Anthony Ko

Department of Planning, Housing and Infrastructure

Subject: Request for advice on the Environmental Impact Statement – VNI West
Application Number: SSI-72887208
EPBC ID number: 2024/09871

Dear Anthony,

Murray River Council (MRC) appreciates the opportunity to provide feedback on the Environmental Impact Statement (EIS) for the proposed VNI West Project, located within the Edward River Council and Murray River Council areas.

Council acknowledges the potential benefits of renewable energy development and principally supports the project and mitigation measures (including management protocols) proposed for the construction and operation of this infrastructure. However, Council wishes to raise several concerns and provide recommendations to ensure that the project is delivered in a manner that is environmentally responsible, socially equitable, and regionally coordinated. Of specific relevance to the determination and conditions of consent are:

- the need to undertake surveys of the transportation routes
- identify details of any necessary upgrade in consultation with us, and
- for any damages and/or added maintenance demands (i.e. that were not anticipated for this locality without this project) to be funded by the applicant.

Furthermore, Council wishes to raise the following items for consideration.

1. Assessment Boundaries and Impact Zones

The Environmental Impact Statement (EIS) identifies approximately 235km of new 500kv (high voltage) double-circuit overhead transmission line, one substation expansion, one new substation, as well as ancillary infrastructure development (i.e. Telecommunication facilities and operational access tracks). All will impact on the Edward River and Murray

River Council areas. Given the vertical scale and extent of the proposed infrastructure, it is standard practice and strongly recommended that the most conservative (i.e., the shortest and least impactful) distance be adopted to ensure minimal disruption to land and development, as well as visual impacts, within both Council areas.

2. Murray River Council Roads - Road Infrastructure, Transport Routes and Traffic Management

Council requests that the entire transport route from port to site, not just local access roads, is given consideration in relation to maintenance and upgrading requirements. This includes assessing and mitigating impacts on regional road infrastructure, particularly where Oversize and/or Overmass vehicles (OSOM) will travel through.

Detailed plans are required addressing traffic management and protection of local infrastructure. The plans should include assessment of cumulative traffic impacts from other concurrent projects within the region. The level of detailed engineering assessment should include:

- Traffic load calculations based on projected vehicle volumes and axle loads.
- Pavement design comparisons showing how existing road structures will withstand the increased traffic.
- Quantitative analysis of asset life degradation and maintenance requirements. This should include identifying the cumulative increase in single axle loads over both the construction and future operational periods.

The following roads within Murray River Council are identified in the report as forming part of the construction traffic routes:

- **Local Roads:**
 - Cobramunga Road.
 - Murrabit Road.
 - Noorong Road.
 - Cunninyeuk Road.
 - Wood Lane.
 - Berrambong Railway Road (Keri Keri Road).
 - Robb Road.
 - Tchelery Road (Baldon Road).
 - Fisher Lane.

- Kaylock Road.
- **Regional Roads:**
 - Swan Hill Road.
 - Balranald Road.
- **State Roads:**
 - Cobb Highway (shared with Edward River LGA).

a) Road Condition, Widths & Suitability

Council notes that many of the local roads listed above are unsealed or partially sealed and not designed for sustained heavy vehicle use. Specific concerns include:

- Insufficient road widths for safe two-way heavy vehicle movement.
- Surface degradation from increased traffic volumes and axle loads.
- Existing infrastructure constraints, such as cattle grids and drainage.

Council supports the proposed mitigation measures and requests that:

- A schedule of unsealed road upgrades be developed in consultation with Council, including:
 - Minimum width standards for safe two-way heavy vehicle movement.
 - Resheeting specifications and materials suited to expected traffic loads.
 - Drainage and structural improvements where required.
- These upgrades be completed prior to the commencement of construction traffic.
- The inspection and maintenance schedule for unsealed roads include trigger thresholds for additional grading or resheeting based on observed wear.
- All costs associated with these upgrades and maintenance works be fully funded by the proponent. Murray River Council will not contribute financially to any aspect of these works.

b) Heavy Vehicle & OSOM Access

Several Murray River Council roads are not currently gazetted for Restricted Access Vehicles (RAVs) or Over Size Over Mass (OSOM) vehicles. Council requests:

- Early engagement on OSOM route assessments and NHVR permit applications.
- Joint inspections of bridges and culverts on non-gazetted roads.

- Inclusion of Council in the development and review of Traffic Control Plans for OSOM movements.
- All costs associated with route assessments, upgrades, and traffic control measures be covered by the proponent.

c) Intersection & Access Upgrades

For any intersections requiring upgrades Council requests:

- Strategic intersection designs be reviewed and approved by Council.
- Funding responsibilities for upgrades be confirmed prior to construction.
- No financial contribution from Council toward intersection upgrades or associated works.

d) Construction Traffic Volumes & Monitoring

Council notes that actual construction traffic volumes may exceed those forecast due to changes in staging or logistics. To manage this risk, Council requests:

- The Traffic and Transport Management Sub-Plan include contingency thresholds for traffic volumes.
- A real-time traffic monitoring program be implemented, with regular reporting to Council.
- The proponent commit to adaptive traffic management, including the ability to revise access routes and maintenance schedules in response to observed impacts.
- Any additional mitigation measures triggered by increased traffic volumes be fully funded by the proponent.

e) Wet Weather Access & Road Use Restrictions

Council notes that several local roads proposed for construction traffic, including unsealed roads, are vulnerable to damage during wet weather and may be unsuitable for heavy vehicle use under such conditions. Some roads are designated as dry-weather access only, and their use during or after rainfall events poses a significant risk to road integrity and safety.

To manage this, Council requests that:

- The Traffic and Transport Management Sub-Plan include wet weather protocols, including:
 - Real-time weather monitoring and road closure triggers.
 - Alternative route planning for wet weather conditions.
 - Clear responsibilities for damage repair if roads are used contrary to access restrictions.
- The proponent commits to not using dry-weather-only roads during wet conditions, and to fully fund any repairs resulting from unauthorised or inappropriate use.
- Council be consulted in the development of wet weather access maps and road signage to ensure local knowledge is incorporated.

f) Erosion & Sediment Control

Council is concerned about the potential for construction traffic to mobilise sediment and debris, particularly from unsealed roads, which may be deposited onto sealed roads, intersections, and drainage infrastructure. This poses risks to road safety, stormwater quality, and maintenance costs.

To mitigate these risks, Council requests that:

- The Traffic and Transport Management Sub-Plan include erosion and sediment control protocols for all construction traffic routes, including:
 - Wheel and undercarriage cleaning stations at key access points.
 - Regular sweeping and inspection of sealed roads used by construction traffic.
 - Drainage protection measures, including sediment traps and erosion-resistant surfaces at access points.
- All sediment control measures be maintained throughout the construction period and monitored for effectiveness.
- Any sediment-related damage or clean-up requirements be fully funded by the proponent.
- Council be consulted in the development of sediment control plans and inspection schedules.

g) Coordination with Other Infrastructure Projects During OSOM Movements

Council notes that the movement of Over Size Over Mass (OSOM) vehicles to the Dinawan substation site will occur along designated OSOM-approved routes. Given the scale of regional infrastructure development, including other energy and transport projects, there is potential for overlapping construction activities that may affect road and rail access.

To manage this, Council requests that:

- The Traffic and Transport Management Sub-Plan include a requirement to identify and assess the implications of any road or rail projects that may be under construction during the indicative schedule for OSOM movements.
- The proponent engage in early coordination with Transport for NSW, ARTC, and neighbouring councils to avoid conflicts and ensure safe and efficient OSOM transport.
- Any delays, detours, or traffic control measures required due to overlapping projects be fully funded and managed by the proponent, with no cost to Council.
- Council be provided with advance notice of OSOM movements, including route details, timing, and contingency plans.

h) SISD Assessment Accuracy & Verification

Council notes that the Safe Intersection Sight Distance (SISD) assessments documented in the Traffic and Transport Impact Assessment were completed using a combination of desktop analysis and site inspection. However, the report does not specify which intersections were physically inspected.

Given the limitations of desktop methods—particularly in rural areas with unsealed roads, vegetation, and variable terrain—Council requests that:

- All SISD assessments for intersections and access points within Murray River Council be verified through onsite measurement prior to construction, with photographic evidence provided of the SISD view.
- SISD compliance determinations be based on actual field conditions, not solely on aerial imagery or assumed geometry.
- Any intersections found to be non-compliant during site verification be subject to mitigation measures, including relocation of proposed access point, vegetation clearing, or geometric upgrades. Speed reductions are not preferred due to non-

compliance by local drivers, enforcement challenges, inconsistent speed environments, impacts on traffic flow, etc.

- Council be consulted during site inspections and provided with SISD verification results for review.

Additionally, Council notes that while the report proposes temporary speed limits to facilitate SISD compliance, the preferred approach is to maintain existing posted speed limits and instead locate access points where SISD can be achieved under current conditions. This is particularly important on high-speed rural roads where temporary speed reductions may not be practical or enforceable.

Therefore, Council requests that:

- All new access points be located where SISD compliance is achievable under existing speed limits.
- Temporary speed limits be considered only as a last resort and subject to Council approval.
- SISD verification include confirmation that access point locations do not rely on speed limit reductions to meet safety requirements.

i) Access Track Location & Agricultural Impact Mitigation

Council notes that access tracks will be created to connect construction compounds and transmission line easements to the public road network. To ensure safe access and minimise impacts to road users, biodiversity and agricultural operations, Council requests that:

- All new access tracks connecting to public roads within Murray River Council be located on straight sections of road, not on bends or near curves, to maximise visibility and turning safety.
- SISD compliance be verified for each proposed access point, with preference given to locations that allow safe deceleration and turning movements.
- Access track locations be reviewed in consultation with Council prior to finalisation, and any access points proposed near bends be subject to detailed safety assessment and justification.
- Access tracks be designed and located to minimise disruption to biodiversity and cropping areas, including:

- Avoiding placement through active or high-value biodiversity and agricultural crop zones.
 - Minimising fragmentation of paddocks and access to irrigation infrastructure.
 - Consulting with affected landowners to determine preferred access locations.
- All costs associated with access track design, construction, and any required mitigation measures be fully funded by the proponent.

j) Seasonal Traffic Considerations

Council notes that the traffic surveys used to inform the Traffic and Transport Impact Assessment were conducted over a short period in late November 2024. While this meets minimum technical standards, it does not reflect **seasonal variations** in traffic volumes that are typical in the Murray River Council area.

These seasonal fluctuations include:

- Increased agricultural traffic during harvest and planting seasons, including heavy machinery and freight movements.
- Increased tourism traffic during school holidays, long weekends, and summer months, particularly around river towns and recreational areas.
- Variable freight patterns linked to regional produce and livestock transport.

To ensure a more accurate understanding of traffic impacts, Council requests that:

- The Traffic and Transport Management Sub-Plan include seasonal traffic modelling to account for peak agricultural and tourism periods.
- Construction scheduling and traffic mitigation measures be adjusted to avoid peak seasonal traffic periods where feasible.
- Council be consulted on local traffic patterns and seasonal risks to inform route planning and timing of high-impact activities such as OSOM movements and material deliveries.

k) Alignment with Best Practice

Council supports the use of the following guidelines in the assessment and mitigation of traffic impacts:

- Transport for NSW Guide to Transport Impact Assessment (2024)
- Austroads Guide to Traffic Management and Road Design
- Traffic Control at Work Sites – Technical Manual (TfNSW, 2022)

We request that all mitigation and monitoring measures be benchmarked against these standards to ensure consistency and safety.

3. Decommissioning and Waste Management

The EIS lacks clarity regarding the end-of-life waste strategy. Council seeks confirmation on approval relating to the intended disposal location for waste at the time of decommissioning. This information is essential to assess any potential impact on Council-managed landfills due to increased demand at the end of the infrastructure's lifespan.

4. Potable Water Supply and Infrastructure Impacts

The Environmental Impact Statement (EIS) identifies the source of potable water for the proposed development from Murray River Council at approximately 18ML per year, which would equate to approximately 49KL of potable water per day (for 365 days). Murray River Council notes that potable water availability at Council-managed standpipes is limited, and access is subject to an application process to ensure there are no adverse impacts on rural communities. Additionally, the Moulmein treatment plant cannot produce enough water to meet the demand required for the development as well as the town supply.

Council requests that any upgrades required to its infrastructure as a result of increased demand from the development be fully funded by the proponent. This includes impacts arising from third-party services, such as water carting to the development and sewer carting from the site.

Given the number of developments proposed in the region with similar resource requirements, Council further requests that the proponent ensures sufficient water supply is secured for the development. If necessary, the scale of the development should be adjusted to align with the available water resources.

Please note the proponent is required to obtain the necessary water licences for the development.

5. Worker Accommodation During Construction

Council emphasises the critical importance of addressing worker accommodation during the construction phase. It is imperative that detailed plans for temporary accommodation

are provided, with facilities strategically located to minimise disruption to local communities. These plans must as a minimum include:

- Robust traffic management strategies
- Noise reduction measures
- Protection of resident well-being

6. Agricultural, Biodiversity and Environmental Impact Mitigation

Council requests the application of stringent environmental safeguards, including comprehensive waste management protocols, water conservation efforts and biodiversity management measures to ensure accommodation does not negatively impact local wildlife or ecosystems.

The project will also cause disruption to farming enterprises through land loss, biosecurity risks, livestock restrictions, and reduced productivity. While regional impacts may be small, the effects on individual landholders are significant. Council expects tailored Property Management Plans, strict biosecurity controls, and fair compensation mechanisms to be implemented.

7. Health and Safety Provisions

The health and safety of workers must be prioritised. This includes:

- Adequate medical facilities and services
- Disease prevention measures
- Independent provision of health services by the proponent, to avoid burdening already strained local health services

8. Workforce Accommodation

Council emphasises the critical importance of adequate planning for temporary worker accommodation during construction. With up to 1,100 workers onsite during peak periods, reliance on existing local housing or short-term accommodation is unacceptable given current housing shortages. Ongoing accommodation needs for the workforce, once the development is operational, must be addressed. Given the severe housing shortage in local communities, the proponent must:

- Provide dedicated worker accommodation facilities for their workers, including on-site medical services to prevent undue pressure on existing local housing markets, health, and emergency services, and;
- Develop an Accommodation Strategy and consult the respective Councils (including Murray River Council) during the creation of the strategy.

9. Housing and Rental Pressures

Our communities are experiencing significant housing shortages. Council insists that worker housing is fully self-contained and independent of the existing housing supply. Measures must be included to mitigate rental market impacts, especially on vulnerable community members.

10. Workforce Development Strategy

Council requests that the proponent prepare a Workforce Development Strategy, with Council input prior to its finalisation. The Strategy should prioritise training, apprenticeships, and employment pathways for locals, ensuring long-term economic benefits remain in the region wherever possible, thereby enhancing local skillsets and delivering long-term economic benefits to the community. It should also include targeted support for Aboriginal and/or Torres Strait Islander communities, in alignment with the First Nations Guidelines referenced in the SIA.

11. Long-Term Employment and Local Business Engagement

Council is concerned about potential labour shortages for existing industries, particularly agriculture and hospitality. Proponents should create long-term employment opportunities for local residents, both during construction and in ongoing operational roles. Additionally, they should engage with and support local businesses to source materials and services locally where possible.

12. Community Consultation and Engagement

Ongoing community consultation / transparent communication is essential throughout the project to address community concerns and keep residents informed. Council highlights the importance of procedural fairness and expects meaningful engagement with all directly and indirectly affected stakeholders, including landholders not directly hosting infrastructure. Council recommends a centralised and coordinated engagement approach across multiple projects would be beneficial to reduce consultation fatigue.

13. Social Impacts and Community Cohesion

Council acknowledges community concerns about mental health, land values, visual amenity, and loss of sense of place. It is essential that the project maintains transparent, ongoing community consultation and ensures impacts and benefits are fairly distributed across affected communities.

14. Developer Contributions and Benefit-Sharing

Council acknowledges that benefit sharing for this project will occur under the NSW Government's Strategic Benefit Payments Scheme and in line with the National Guidelines for Community Engagement and Benefits for Electricity Transmission Projects. While these frameworks provide regulated benefits to landholders and communities, they do not address all local infrastructure and service impacts.

Council expects proponents to negotiate contributions, including the establishment of Voluntary Planning Agreements with the eligible councils. These contributions should reflect the scale of the project and its cumulative impact on local infrastructure, services, and amenity. Council also requests that benefit-sharing programs be co-designed with local government to ensure alignment with community priorities and maximum local impact.

15. Local Services / Infrastructure, Cumulative Impact Assessment and Voluntary Planning Agreements (VPAs)

Council is particularly concerned about the cumulative impacts of this project alongside other large-scale renewable energy and transmission developments in the region. These overlapping projects place additional pressure on local housing, roads, health services, and community infrastructure.

Accordingly, Council expects the proponent to negotiate a Voluntary Planning Agreement (VPA) with Council to deliver targeted local benefits that respond to these cumulative pressures. Such an agreement should complement, not duplicate, the regulated Strategic Benefit Payments, and may include contributions toward road upgrades, housing and accommodation measures, health and emergency service support, and community infrastructure.

Proponents must conduct comprehensive assessments of the cumulative impacts of their proposals, considering:

- Combined effects with other existing or proposed major projects in the region

- Overall environmental, social, and infrastructure impacts evaluation to ensure sustainable development

Council is particularly concerned about the cumulative impacts and compounding effects on housing, emergency services, road infrastructure, and community cohesion. The project must provide or fund supplementary health services, contribute to road upgrades, and implement robust traffic management plans.

Additionally, in the presence of existing or approved wind farms in the surrounding area, such as Tchelery Wind Farm, Keri Keri Wind Farm, Baldon Wind Farm, and Wilan Wind Farm etc (refer to page 12 of EIS) proponents must also assess the cumulative impact on bushfire aerial firefighting capacity. This assessment should be conducted within a 100 km radius of any proposed development area, in accordance with the *Cumulative Impact Guidelines for State Significant Projects*.

16. Balanced Development Approach

While Council recognises the potential economic benefits of these projects, we stress the need for a balanced approach. Adhering to the outlined requirements and strategies will help ensure the project is delivered safely, sustainably and with minimal impact on the environment and local townships of Murray River Council.

Council looks forward to continued engagement with the Department and the proponent/developer to ensure these matters are addressed.

Should you require further information, please contact Mitchell Mackenzie on during business hours on 0461465404 / 1300 087 004 or email mmackenzie@murrayriver.nsw.gov.au.

Yours sincerely

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