Victoria–NSW Interconnector West (VNI West) – Submission

State Significant Infrastructure (SSI-72887208) | EPBC 2024/09871

Exhibition: 1–29 August 2025

Executive Summary

This submission objects to the VNI West (NSW) project on a core procedural flaw in cost disclosure and on material environmental, agricultural, social/heritage, visual and cumulative impacts.

Key grounds

• The Application Form publicly listed an Estimated Development Cost (EDC) of **$17 million**; an Application Addendum – Project Cost Correction (4 Aug 2025) admits the figure is false and states the correct EDC is **$3.75 billion**. The Application Form also names an "Estimated Development Cost Report – Final 21072025" that was not exhibited for public review.

On Friday 1st August 2025, the ABC reported in an article on the VNI West called "*VNI West transmission network costs double as Victorian farmer protests*" that the "price tag is expected to double to **$7.6 billion**, but could almost triple to **$11.4 billion**".

• Approximately **1,432 ha of native vegetation** would be impacted across the Riverina, with **risks to EPBC-listed Threatened Ecological Communities (TECs) and species** and increased fragmentation.

• **Prime agricultural operations** face ongoing constraints (easements, biosecurity, aerial/agronomic limits) with key issues deferred to post-approval plans rather than avoided by design.

• **Social impacts** include amenity change, stress and concern about property values; 194 Aboriginal sites are recorded within the study area.

• **Visual impacts** are moderate at key public road viewpoints (e.g., Cunninyeuk Rd; Cobb Hwy/Long Paddock). The EIS itself concedes vegetation screening would be out-of-character or impractical along long road sections.

• **Cumulative impacts** from overlapping mega-projects create a foreseeable 2026–2029 construction peak, stressing traffic, services, accommodation and waste capacity.

Why the 'indirect impacts' matter (proponent's own admissions).

The BDAR §9.2 / Table 9.19 sets out residual indirect impacts outside the mapped clearing—edge effects, weeds/pathogens, hydrology changes to wetlands/gilgai, dust/noise/light spill, loss of breeding habitat, line-collision/EMF—with stated frequency, duration, timing, likelihood and consequences. These are ongoing or long-term risks; they count toward EPBC significance, are not

captured by BAM offset credits, and must be addressed by design (avoidance/route change/partial undergrounding), not deferred to management plans.

Requested outcome: Publish the missing EDC report and re-exhibit with corrected cost information and a SEARs-compliant alternatives assessment (including route-specific avoidance/partial undergrounding). If compliance and a reliable economic case cannot be demonstrated, refuse the application in the public interest.

1. Introduction

Project: Victoria to NSW Interconnector West (VNI West) (NSW).

Application Number: SSI-72887208.

EPBC ID: 2024/09871.

This submission objects in principle to the proposal as unnecessary, highly destructive, and unjustifiably costly.

2. Misrepresentation of Project Cost (Lead Point)

- The Application Form (lodged 29 July 2025) lists EDC = $17,000,000.
- The Application Addendum – Project Cost Correction (4 August 2025) admits the $17 million is incorrect and states the correct EDC is $3.75 billion.
- This ≈200× discrepancy is not a clerical minor error; it misled the public during exhibition and undermines confidence in all associated economic claims.
- SEARs 2025 require the EIS to provide the EDC using the Standard-Form EDC Report; yet the EIS Main Report/Summary do not disclose the project's EDC, and the "VNI West Estimated Development Cost Report – Final 21072025" named in the Application Form is not exhibited.

Evidence note:

The Application Form (lodged 29 Jul 2025) lists **Estimated Development Cost (EDC) = $17,000,000**.

The proponent's **Application Addendum – Project Cost Correction** (letter dated **4 Aug 2025**) corrects this to **$3.75 billion**.

The Application Form also names an attachment **"VNI West Estimated Development Cost Report – Final 21072025,"** which is **not exhibited** in the public **Application** or **EIS** folders during exhibition.

SEARs 2025 required the EIS to state the EDC using the Standard Form.

I reserve the right to provide screenshots and the full EDC report (if produced) as **supplementary material** and request the Department to **re-exhibit** once the accurate cost information is publicly available.

Relief sought (cost/EDC)

- Declare the exhibition procedurally defective and require re-exhibition with the full Standard-Form EDC Report and a correct EDC clearly stated across all public-facing documents.
- Publish the "VNI West Estimated Development Cost Report – Final 21072025" (or its corrected successor) and identify the basis for the $3.75 billion figure, including scope and exclusions.
- Extend the submission period to allow community response to the accurate cost information.
- Direct the proponent to amend the EIS Main Report/Summary so the EDC is disclosed (consistent with SEARs) and to re-test all economic claims against the corrected EDC.
- If strict compliance and a reliable economic case cannot be demonstrated, refuse the application in the public interest.

3. Environmental Destruction (EPBC concerns)

- Approximately 1,432 ha of native vegetation clearing/impact area.
- Risks to Threatened Ecological Communities and EPBC-listed fauna; increased fragmentation and loss of connectivity across the Riverina.
- The project is a controlled action under the EPBC Act; on the exhibited case, residual impacts remain substantial.

3A. EPBC-listed flora — quantified impacts and indirect effects

Buloke woodlands — Endangered (EPBC)

Direct impact: 3.50 ha. Avoid mapped polygons; micro-site to prevent trimming pressure. Source: BDAR Part 1, Table ES.4.

Grey Box Grassy Woodlands — Endangered (EPBC)

Direct impact: 0.84 ha. Fragmentation risk; route adjustments required. Source: BDAR Part 1, Table ES.4.

Natural Grasslands of the Murray Valley Plains — Critically Endangered (EPBC)

Direct impact: 101.69 ha. Sensitive to compaction/hydrology change; apply avoidance hierarchy. Source: BDAR Part 1, Table ES.4.

Seasonal Herbaceous Wetlands (Freshwater) — Critically Endangered (EPBC)

Direct impact: 0.17 ha. Hydrology-dependent; avoid basins; require Construction Hydrology Plan. Source: BDAR Part 1, Table ES.4.

Weeping Myall Woodlands — Endangered (EPBC)

Direct impact: 92.65 ha. Extensive clearing/fragmentation; require route-level avoidance and edge buffers. Source: BDAR Part 1, Table ES.4.

White Box–Yellow Box–Blakely's Red Gum — Critically Endangered (EPBC)

Direct impact: 3.38 ha. Root-zone disturbance/edge effects; consider short-span partial undergrounding. Source: BDAR Part 1, Table ES.4.

Indirect impacts reference (all TECs): BDAR §9.2 / Table 9.19 lists residual indirect impacts (edge effects, weeds/pathogens, dust/noise/light spill; hydrology change) with frequency/duration/timing and assumptions.

3B. EPBC-listed fauna — significance and indirect impacts

Plains-wanderer — Critically Endangered (EPBC)

PBA concludes potential significant impact; important habitat mapped; key constraint. Indirect: long-term edge effects and weed/pathogen spread reduce grassland viability. Required: route-level avoidance; where truly unavoidable, targeted partial undergrounding and strict biosecurity.

Australasian Bittern — Endangered (EPBC & BC Act)

Unlikely significant impact only if wetlands avoided and mitigation prevents indirect effects. Indirect: sediment/erosion/polluted runoff; noise/dust/light near reedbeds. Required: no-go buffers, Construction Hydrology Plan, wildlife-safe lighting, timing outside breeding.

Southern Bell Frog / Growling Grass Frog — Vulnerable (EPBC)

Recorded within disturbance footprint. Indirect: sediment-laden runoff/spills; weeds/pathogens; hydrology changes in seasonal wetlands/gilgai. Required: buffers, erosion/sediment controls, wash-down & biosecurity, micro-siting to avoid basins/riparian edges.

3C. Relief sought (biodiversity)

- Route changes / partial undergrounding to avoid mapped TEC polygons (esp. Weeping Myall 92.65 ha; Natural Grasslands 101.69 ha) and documented Plains-wanderer habitat.
- No-go buffers and a Construction Hydrology Plan for Seasonal Herbaceous Wetlands and Bittern wetlands; codify sediment/erosion and lighting controls as design requirements.
- Re-exhibit if route refinements/undergrounding materially change biodiversity impacts.

Conditions if (and only if) approval were contemplated

- Map and fix no-go areas: all Plains-wanderer polygons, Seasonal Herbaceous Wetlands, and CE grassland polygons; no towers, pads, tracks or laydowns in these zones.
- Hydrology safeguards: pre-works hydrological baseline; traversable drains/culverts that maintain pre-development flow paths; independent verification before energisation.
- Weed/pathogen biosecurity: mandatory wash-down gates, soil-movement controls, and post-works surveillance with rectification triggers.

- Lighting & timing: wildlife-safe lighting standards; seasonal timing windows near wetlands; construction curfews where needed.
- Collision/EMF: specified marker/diverter density, raptor-safe structures, and a monitoring/trigger-action program (exceedance → immediate operational changes).
- Design hierarchy statement: certify—with transparent alternatives analysis—that avoidance was maximised; where not, justify why partial undergrounding at hotspots was rejected.

3D. Significance of Indirect Impacts (Proponent Admissions)

BDAR §9.2 / Table 9.19 documents—for each impact pathway—the extent, frequency (often daily/ongoing), duration (short- to long-term), timing (construction and operation), and consequence/likelihood with assumptions/limitations. These residual impacts occur outside clearing footprints yet count toward EPBC significance and are generally not captured by BAM offset credits.

Proponent-admitted indirect impact	**Most at risk**	**Design control required**
Edge effects (ongoing/long-term; construction & operation)	Plains-wanderer habitat; Weeping Myall & Natural Grasslands polygons	Route change; no-go buffers; short-span undergrounding at pinch-points
Weeds/pests/pathogens (long-term)	All TECs; Bell Frog sites; farm biosecurity	Vehicle wash-down; spoil controls; avoid new access through high-value patches; seasonal closures
Aquatic/hydrology impacts (frequent near water)	Bittern wetlands; Seasonal Herbaceous Wetlands; gilgai	Construction Hydrology Plan; setback buffers; trenchless crossings; no tower pads in basins
Noise/dust/light spill (construction)	Bittern; wetland-edge fauna	Wildlife-safe lighting; dust standards; timing windows outside breeding
Loss of breeding habitat (moderate consequence)	Hollow-dependent bats/birds; arboreal mammals	Avoid mature trees/logs; micro-site spans; independent ecologist sign-off
Line collision/EMF (daily; long-term)	Large birds/raptors; waterbird flyways	Marker/diverter density; raptor-safe structures;

		monitoring with enforceable triggers

4. Agricultural & Landholder Impacts

- Easement constraints—height/vegetation limits, access controls, biosecurity restrictions—reduce operational flexibility and increase ongoing costs.
- Irrigated enterprises (e.g., rice) face layout changes, dewatering risks and potential yield losses; constraints on aerial application can increase time/costs or preclude operations.
- Compulsory easements compromise landholder autonomy and enterprise viability; property-specific impacts are largely deferred to post-approval plans instead of being avoided by design.

5. Social & Heritage Impacts

- Social Impact Assessment acknowledges community stress, health and amenity concerns, including property value anxiety.
- Aboriginal cultural heritage: 194 sites recorded within the study area (including PADs).
- Visual intrusion across flat rural landscapes is material for public road users and scattered rural residences.

5.1 Visual Intrusion across Open Rural Landscapes (Public Viewpoints)

The proponent's Landscape/Visual assessment identifies moderate impacts at Cunninyeuk Rd (VP3) and Cobb Highway/Long Paddock (VP6), with additional moderate–low viewpoints along open, flat landscapes.

Mitigation limits (proponent's concession): vegetation screening would be out-of-character and would require hundreds of metres along the Cobb Hwy (Hay Plain); no screening is proposed.

Relief sought (visual/amenity)

- Require design-led avoidance at public viewpoints with moderate impacts (micro-siting, tower-height reduction, or targeted undergrounding).
- Where screening is impractical/out-of-character, avoidance—not landscaping—must be applied; re-exhibit if ratings change.

6. Economic Flaws Beyond Cost

- Claimed benefits are system-level and rely on IO modelling (upper-bound by the proponent's own description).
- Set against the corrected EDC = $3.75 b, claimed benefits require re-testing and transparent, project-specific publication.

- Alternatives (including targeted undergrounding and non-network options) are not brought forward to address high-impact hotspots.

6.1 Options & Non-network Alternatives (EIS Appendix C)

The Options Report lists 500 kV undergrounding constraints but does not test route-specific partial undergrounding at documented visual/amenity hotspots where screening is impractical.

Relief sought (alternatives)

- Require a SEARs-compliant alternatives assessment that tests partial undergrounding and design-led avoidance for high-impact segments; do not defer to post-approval plans.

7. Cumulative Impacts

Overlapping mega-projects create combined pressures on communities, land, services, traffic and the environment (study area ≈35 km; DPIE 2022 method).

Timing and staging (VNI West NSW)

Main construction expected late-2026 ~ 24 months; Dinawan substation/network augmentation late-2028; initial operation early-2029; full capacity ~end-2029.

Relevant overlapping projects

- EnergyConnect (NSW – Eastern section): interface at Dinawan; construction 2023 → mid/late-2026.
- HumeLink: approved Nov 2024; main construction from 2025 (~2.5 years); operation mid-2027.
- South West REZ projects: access rights allocated April 2025 to six projects totalling ~3.56 GW.
- VNI West (Victoria): timing differences may shift cumulative traffic/workforce profiles.

Cumulative impacts flagged by the EIS

- Amenity/traffic/noise & dust: concurrent heavy vehicle movements and haulage (including waste).
- Biodiversity: aggregate clearing/fragmentation across linear and generation projects.
- Pressure on services: accommodation, health and emergency services during peak demand.
- Inter-project compounding: shared workforces, compounds and major nodes (Dinawan, Gregadoo/Gugaa).

Waste capacity constraint (EIS evidence)

Local facilities have limited capacity; reliance on private operators and potential long-haul disposal to regional centres increases heavy-vehicle movements.

Implications

- Foreseeable 2026–2029 construction peak elevates risk for traffic, accommodation, agricultural logistics and cumulative clearing.

• If REZ schedules slip or bunch, cumulative profiles change and require re-modelling.

Relief sought (cumulative impacts)

• Revised cumulative assessment with updated schedules, staging/sensitivity scenarios, and transparent modelling of peak traffic, accommodation and waste haulage.

• Staged, non-overlapping peak works at shared nodes and on key tourist routes.

• Binding mitigation capacity tests with councils and private operators before works.

• If material cumulative harm cannot be avoided, refuse in the public interest.

8. Conclusion

Given cost misrepresentation, missing EDC report, substantial clearing, major agricultural/aviation constraints, material visual intrusion and cumulative impacts, the **application should be refused**, or **at minimum re-exhibited with corrected information** and a **SEARs-compliant alternatives assessment** including **route-specific** and **partial-underground options**.

Evidence Summary (for the record)

• **Application Form (SSI-72887208; lodged 29 Jul 2025):** EDC shown as **$17,000,000**; "Attachments" list includes **"VNI West Estimated Development Cost Report – Final 21072025."**
• **Application Addendum – Project Cost Correction (4 Aug 2025):** proponent corrects total cost to **$3.75 billion**.
• **Public exhibition folders (Application & EIS):** the **EDC report** named in the Application Form is **not present**.
• **SEARs (22 May 2025):** require the EIS to **provide the EDC** using the Standard-Form EDC report.
• **Result:** misleading/withheld cost information during exhibition → **procedural defect**; re-exhibition warranted.

Attachment List

Attachment A — Application Addendum – Project Cost Correction (4 Aug 2025)
Proponent's letter correcting the Application Form EDC to **$3.75 billion**.
File: `Attachment_A_CostCorrectionLetter_2025-08-04.pdf` *(key page: 1)*

Attachment B — Application Form (lodged 29 Jul 2025)
Shows **Estimated Development Cost (EDC) = $17,000,000** as exhibited.
File: `Attachment_B_ApplicationForm_EDC_17000000.pdf` *(key page: 1, or full form attached)*

Attachment C — SSD-SSI Issued SEARs 2025 (22 May 2025)
Extract page requiring the EIS to provide the **EDC** using the **Standard-Form EDC Report**.
File: `Attachment_C_SEARs_EDC_requirement.pdf` *(key page: requirement page)*

Notes: Attachments are true copies/extracts of exhibited documents from the NSW Planning Portal. Page references indicate the specific page demonstrating the stated point.