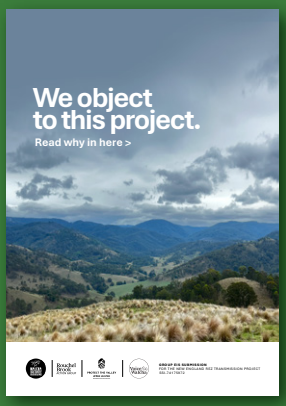
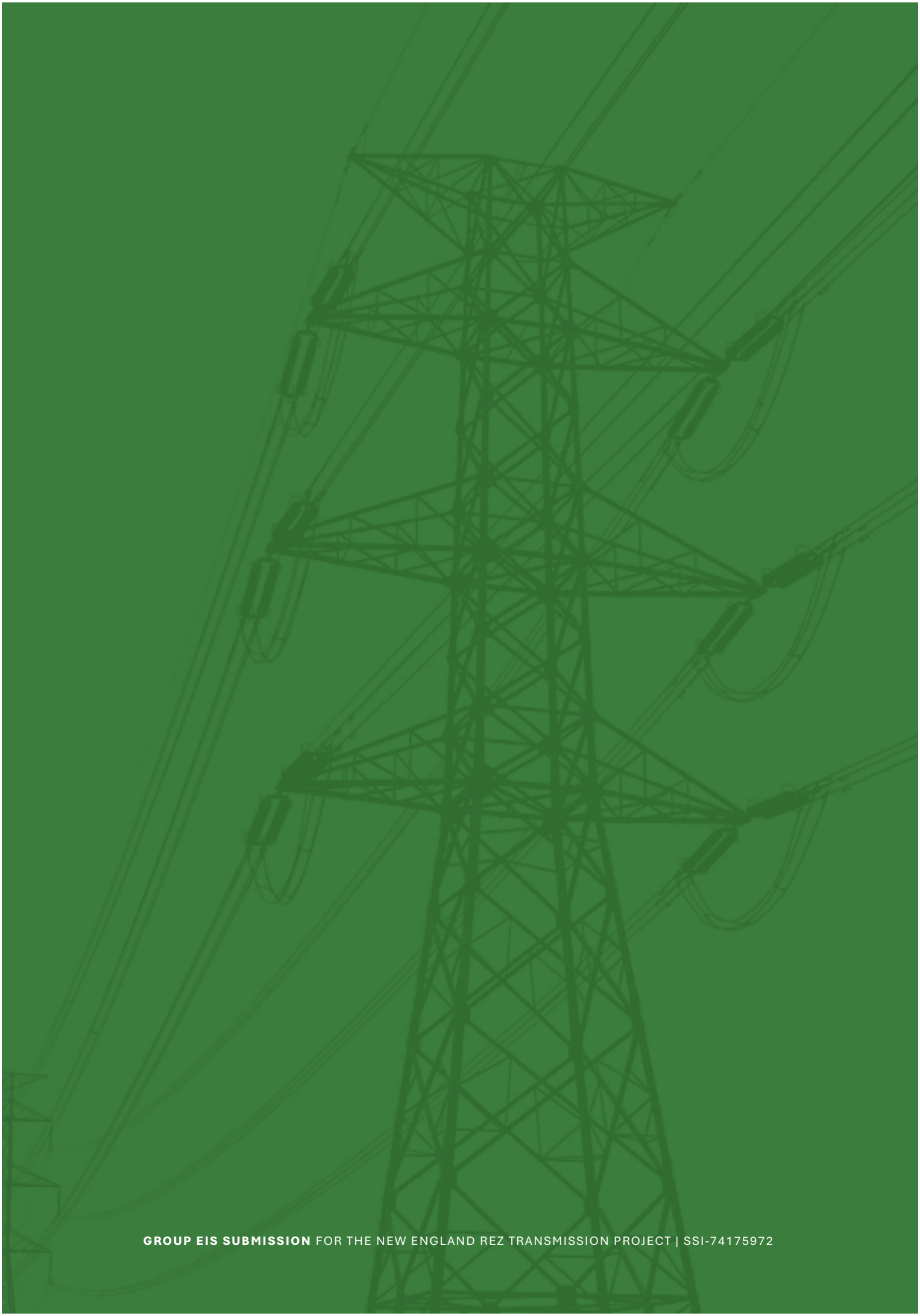
SECTION **11**

Impacts on Farming and Farming Practices

THIS IS **ONE** SECTION OF **TWENTY TWO,**
THAT FORMS PART OF A LARGER GROUP SUBMISSION
TO THE NEW ENGLAND REZ TRANSMISSION PROJECT
SSI-74175972



WALCHA HIGH COUNTRY GUARDIANS | Rouchel Brook ACTION GROUP | PROTECT THE VALLEY UPPER HUNTER RESPONSIBLE INFRASTRUCTURE GROUP | Voice for Walcha



GROUP EIS SUBMISSION FOR THE NEW ENGLAND REZ TRANSMISSION PROJECT | SSI-74175972



SECTION 11

Impacts on Farming and Farming Practices

Key issues we have found ...

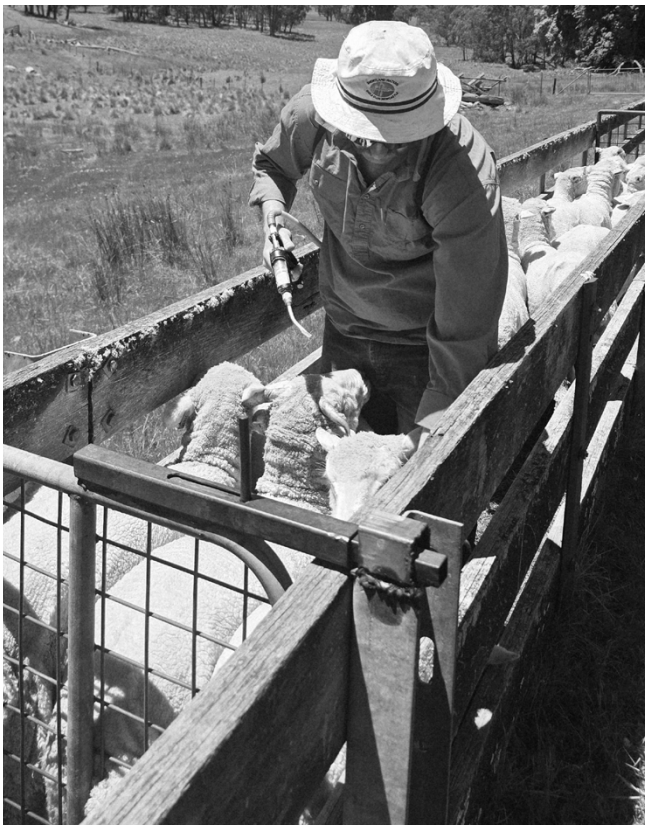
Productive grazing land is undervalued	Regional averages and hazard classifications mask actual pasture productivity, understating losses to grazing businesses and the value of affected land.
Whole farms face operational disruption	Access roads, towers and easements divide paddocks, disrupt stock movements and water access, and affect production beyond the construction footprint.
Aerial restrictions threaten pasture productivity	Restrictions on aerial fertiliser and weed control can leave steep country without practical alternatives, reducing pasture quality and carrying capacity.
Weather delays prolong farming losses	Weather allowances remain untested, leaving construction duration uncertain and risking prolonged access restrictions, production losses and biosecurity exposure for landholders.
Farm infrastructure risks remain unassessed	Fences, machinery and private communications lack a practical assessment of electrical interactions, required modifications, ongoing maintenance responsibilities and landholder costs.
Assess actual farms before approval	Two interviews in one locality cannot establish impacts across diverse farming systems; every affected holding needs assessment and binding protections.

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SECTION **11**

Impacts on Farming and Farming Practices

EXECUTIVE SUMMARY

The EIS applies a grazing value of $364/ha across the entire project easement: a regional average gross value of production across the six impacted LGAs[1].

The local agronomic figures for improved high-country grazing in the project area are $2,640–3,300/ha gross margin and $25,000–30,000/ha productive capital value. The EIS figure is roughly one seventh to one ninth of the local gross margin, because it blends our improved country with vast low-carrying-capacity holdings. Every agricultural loss figure in the EIS inherits this error. (Ch 13, pp. 528/530)

The loss is assessed as a regional rounding error rather than as damage to working properties.

The EIS reports the impact as about 0.1% of regional agricultural production. The loss total itself prices a five-year restriction against EnergyCo's own six-year construction program, and prices whole-paddock exclusion at zero. It does not assess what happens to a single holding when 580 km of access tracks, 130 creek crossings and a floating footprint of up to 10,928 ha are placed across 86% grazing country. (Ch 13 p. 530; Ch 3 §3.3.2, p. 105; Ch 3 §3.3.8, pp. 125–126; §6.3, pp. 211–212)

The EIS concedes two productivity pathways and costs neither.

It concedes that aircraft cannot operate in the easement (§12.4.2, p. 505) and that weed spread is a "moderate risk" (§13.3.5, pp. 529–533). It states no carrying-capacity loss and no $/ha consequence for either.

The construction duration, on which every temporary impact depends, has no local weather basis.

The EIS contains no local weather data, allows zero wet-weather downtime in its six-year schedule, and defers detailed scheduling to post-determination contractors. (Ch 3 §3.3.2, p. 105; Ch 12 p. 495)

The EMF study answers whether people are exposed above guideline limits, not what the lines do to a working farm.

Induced voltage is assessed for a steel gas pipeline but not for one metre of farm fencing. The radio-interference zone runs out to 426 m from the centreline, with no inventory of the farm systems sitting inside it. The remedy offered is post-determination landholder liaison. (TR13 §§1.4, 2.2.1, 7.1–7.3, 8.1)

The agricultural assessment turns a hazard rating into a land-value test.

By its own account about 96% of the project area sits in Land and Soil Capability Classes 4–7, so only 9.2 ha of the operational footprint qualifies as "high quality land". The NSW agriculture department's advice is that Class 4 land in the New England is high-quality, productive grazing country. (TR6 §§4.2.3, 6.2; NSW DPIRD, Advice on SEARs – DPIRD Agriculture, OUT24/12198)

The Agricultural Impact Assessment (TR6) rests on two interviews: both at Muscle Creek in the Upper Hunter, none on the plateau. It concedes its "limited number and geographic coverage" and that no soil survey was done across the easement. Those two interviews, plus regional averages, stand in for roughly 300 km of corridor and 580 km of access tracks through grazing country that, across six LGAs, runs 698,945 meat cattle — 17.05% of the NSW herd — at 275% of the NSW average stocking density. The proponent compiled 55 years of local rainfall for its groundwater work, yet applied no weather dataset to the six-year construction schedule. The community was given 29 days to respond to 16,000 pages. How are we supposed to complete a submission when the EIS is inconsistent, erroneous, and incomplete?

(TR6 §§1.4, 3.3.1, 3.4.1, Table 3-1, Tables 4-13/4-14, pp. 4, 27–28, 44–45; TR16 §4.1; Ch 3 §3.4.1, p. 98; Ch 26 §26.4.2, p. 836; Plevey, The Armidale Express, 15 October 2026)

What we ask:

(a) the agricultural impact assessment be redone on audited regional productivity data, presented as a range; (b) a property-level severance and carrying-capacity assessment be required before determination; (c) a locally-sourced workable-day analysis be required before any construction duration is accepted; (d) binding, property-specific protections be conditioned, not deferred to post-determination management plans; (e) a property-specific agricultural electromagnetic and communications impact assessment be required before determination, with all modification and maintenance costs borne by EnergyCo or the Network Operator; (f) LSC class not be accepted as a proxy for agricultural value, with agricultural value assessed from actual productivity and the LSC hazard data used to constrain construction.

Every one of these asks serves a single condition.

The EIS assessment is incomplete: it treats agricultural production as one blended quality, the $364/ha average applied across the entire project easement, when productive capacity varies across the land types the corridor crosses. A full investigation and analysis of productive capacity for all land types along the transmission line must be completed first. Until it is, no further assumption of loss, to the agricultural industry or to any individual agricultural business affected by this project, should be accepted.

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1 | Significant Undervaluation of Grazing Production

1.1 Evidence

EIS baseline. The Agricultural Impact Assessment values grazing at $364/ha and cropping at $756/ha, both regional averages applied across the entire project easement rather than figures for the country the corridor crosses, and applies a weighted project figure of $381/ha. It reports total production loss of $4,254,000 and describes this as about 0.1% of regional agricultural production. (Ch 13, pp. 528/530)

Local agronomic data[2] for improved high-country grazing in the project area. The yield ladder runs from 8,000 to 15,000 kg DM/ha, carrying up to 21 DSE/ha, with a market value of $1,200–1,500/DSE. The arithmetic has been checked against published DPI and MLA benchmarks by Wyoming Digital research (21 Oct 2026).

Measure	EIS baseline (page)	Local agronomic data and opinion
Grazing gross margin	$364/ha (Ch 13, pp. 528/530)	$2,640–$3,300/ha (800-1,000kg of live weight gain at $6/kg on a 55% COGS)
Cropping gross margin	$756/ha (Ch 13, pp. 528/530)	Not disputed in this section
Weighted project figure	$381/ha (Ch 13, p. 530)	Not applicable: weighting depends on the grazing figure
Pasture production	Not stated in the EIS	8,000–15,000 kg DM/ha
Carrying capacity	Not stated in the EIS	Up to 21 DSE/ha
Capital value per DSE	Not stated in the EIS	$1,200–1,500/DSE
Productive capital value	Not stated in the EIS	$25,000–30,000/ha
Scale of loss	**$4,254,000 total, "approximately 0.1 per cent" of regional production (Ch 13, p. 530)**	**Indicative restatement in Table 2**

> Table 1 - **EIS baseline against local agronomic yield ladder**

Item	EIS basis	At local agronomic range
Grazing area construction-impacted	2,136 ha (1,042 ha native + 1,094 ha modified pasture) (Ch 12 §12.3.3, p. 497)	Same area but we strongly refute that the affected area is confined to the powerline easement.
Annual grazing production loss	2,136 ha × $364 = $777,504	2,136 ha × $800–1,400 = $1.71M–$2.99M
Annual loss, all agricultural land	2,233 ha × $381 = $850,773	Cropping and residential components unchanged; grazing component as above

> Table 2 - **Indicative effect on the EIS's own area figures (Wyoming Digital arithmetic, grazing component only)**

Notes. (i) The EIS states its total of $4,254,000 is "equivalent to $850,773 per year", and that the assessment is "based on restriction of agricultural activities for a full 5 years" (Ch 13, p. 530), while its own construction program is around six years, 2028 to 2034 (Ch 3 §3.3.2, p. 105). (ii) The EIS assumes the whole disturbance footprint is unavailable for the full construction program (Ch 12, p. 495). Section 5 addresses why the program length is itself unsupported. (iii) In many instances 60-100% of the total land area per farm could be affected as a result of management operations

1.2 EIS shortcoming

- The grazing baseline is a generic figure applied across the entire project easement. The EIS does not identify a source tied to high-rainfall, improved-pasture country on the Walcha plateau. EIS source for $364/ha: the Agricultural Impact Assessment prepared by Tremain Ivey Advisory (Technical Report 6), cited Ch 13, p. 528.
- The "0.1% of regional production" statement compares a loss to a regional total. It tells the decision-maker nothing about the farms actually crossed, where the loss is a large proportion of the holding's output. The regional denominator and its source are not shown.
- The EIS states no capital value for productive pasture, so no consequence for the value of the residual holding is assessed.

1.3 Consequences

- Every downstream figure (production loss, mitigation scope, compensation framework) is anchored to the low baseline. The Strategic Benefit Payments Scheme is a fixed $200,000/km over 20 years (Ch 2, p. 19) and is not linked to the productivity of the land hosting the line.
- Decision-makers are shown a loss that is a fraction of the local agronomic range and cannot weigh it against the benefits claimed.

> POSITION SOUGHT

More work.
The Department should require the agricultural impact assessment to be re-run using audited, locally-sourced productivity data for the improved grazing country in the corridor, reported as a range with its sources, and should not accept the $364/ha easement-wide baseline or the 0.1% comparison as a basis for determining impact significance.



2 | Severance of Working Properties

2.1 Evidence

Fact	EIS figure	Citation
Project corridor (generally 250 m wide)	10,928 ha	Ch 3 §3.2, Table 3.2, pp. 65–66; Ch 6 §6.3, p. 211
Direct disturbance footprint	3,579 ha	Ch 3 §3.2, Table 3.2, pp. 65–66
Approval sought	Final siting anywhere within the 10,928 ha corridor (3.05 times the reference footprint)	Ch 6 §6.3, pp. 211–212
Corridor under RU1 Primary Production zoning	79%	Ch 12 §12.2.2, p. 471
Corridor in grazing land use	86.3% (45.0% native vegetation grazing, 4,920 ha; 41.3% modified pasture, 4,508 ha)	Ch 12 §12.2.2, p. 471, Table 12.1
Agricultural land construction-impacted	2,233 ha (1,042 ha grazing native; 1,094 ha grazing modified; 95 ha cropping; 2 ha residential and farm infrastructure)	Ch 12 §12.3.3, p. 497
Access tracks	Approximately 580 km	Ch 3 §3.3.8, p. 125
Track clearing width	Generally up to 10 m; up to 20 m for batters; up to 30 m in limited areas	Ch 3 §3.3.8, Table 3.9, p. 126
Waterway crossings (new or upgraded)	Approximately 130	Ch 3 §3.3.8.1, p. 126
Early enabling works	Permitted before CEMP approval under an operator-prepared plan	Ch 25 §25.2.1, p. 820; §3.3.4
Farming families relocated for hubs and camps	5	Ch 10 §10.3.1, Table 10.6, p. 397

> **Table 3 - Corridor and disturbance facts (all EIS figures)**

Arithmetic on EIS figures: 580 km of track at the EIS's own 10 m width is 580 ha of cleared track. At 30 m it is 1,740 ha. The EIS does not report a track-only area.

Working-property effect. A working grazing property depends on internal stock movement, water reticulation and fencing laid out around rotational paddocks. A track network with 130 creek crossings is, for those operations, 580 km of new internal barriers and open gateways. The EIS treats track degradation as a road-maintenance matter (Ch 14 §14.3.5, p. 564) and does not assess it as a loss of production.

Measure	Before (current practice)	After (corridor imposed)	Change / note
Holding	400 ha in ~10 ha paddocks, with central laneways for access and operational safety	Same holding	[DAMIEN: paddocks severed by the corridor, tracks and crossings; water points lost; stock movement routes interrupted]
Fertiliser program	Multiple applications per year: 20 kg S, 20 kg P, 150 kg N per ha (21 Oct written data). Yield ladder: 8,000 kg DM/ha unfertilised; 10,000 with S+P; 15,000 with the full program	Reduced applications, ~8 t per application	Pasture yield approximately halved
Pasture utilisation	65–70% of grown pasture, achieved through subdivision into smaller paddocks	50%	Subdivision is what drives utilisation; severance removes it
Pasture harvested	10,500 kg DM/ha	~4,000 kg DM/ha	≈ −60%
Carrying capacity	21 DSE/ha (8,400 DSE on 400 ha); 1 DSE consumes 500 kg DM/yr	8 DSE/ha (3,200 DSE)	−62%
Liveweight gain	800–1,000 kg/ha (21 Oct written data); ~600 kg/ha per 23 Oct notes	~400 kg/ha	—
Market class and price	Prime finished, ~$6/kg liveweight	Store, ~$5/kg liveweight	−17% per kg; prime to store
Gross value of trading	$6,000/ha (21 Oct basis, top of range); $3,600/ha (23 Oct basis: 600 kg × $6) [DAMIEN: CONFIRM ONE BASIS]	~$2,000/ha (400 kg × $5)	−44% (23 Oct basis) to −67% (21 Oct basis)
EIS equivalent	Not stated — the EIS contains no property-level productivity assessment (Ch 12 §12.3, Ch 13)	—	—

> Table 4 - **Worked example: one improved grazing holding, before and after the corridor**

Notes. (i) Before-column: Local agronomic data of 27 Oct 2026. After-column: his expert assessment of 23 Oct 2026, for his confirmation in this document. (ii) "Gross value of trading" is income before costs; it is not the gross margin measure in Table 1. (iii) Damien's stated cost base (~55% of income) implies a gross margin of ≈$2,700/ha on the 21 Oct basis or ≈$1,620/ha on the 23 Oct basis; reconciliation with the $800–1,400/ha local agronomic range. (iv) The EIS states no property-level equivalent for any row.

2.2 EIS shortcoming

- The EIS seeks approval for a floating footprint. Landholders cannot know where tracks, tower pads or crossings will land on their holding until post-determination detailed design (Ch 6 §6.3, pp. 211–212).
- The Agricultural Impact Assessment measures hectares removed, not holdings divided. No property-level analysis of residual paddock viability, water access or stock movement is presented.
- Measures are deferred to Property Specific Management Plans and the CEMP (Ch 12 §12.5, Measure LU1, p. 508; Ch 13 §13.7, Measure AG1, p. 543), made after determination and without a published standard.
- Enabling works, including access track construction and clearing, can start before the CEMP is approved (Ch 25 §25.2.1, p. 820).

- The justification chapter reduces landholder impacts to compensation. Its summary of community feedback states: “Land acquisition and compensation frameworks, including the Land Acquisition (Just Terms Compensation) Act 1991 and Strategic Benefit Payments Scheme apply to easement-affected landholders” (Ch 26, Table 26.1, p. 835). Compensation frameworks answer what a landholder is paid. They do not assess what the property can still do.

2.3 Consequences

- Paddocks cut below workable size or from water become uneconomic residual parcels. This is a loss of production capacity beyond the area physically occupied.
- The duration of that loss follows the construction program (Section 5), not the "few weeks to a few months" per tower.
- Compensation under the Just Terms Act 1991 addresses severance as a valuation head, but the EIS provides no productivity assessment that would let a landholder or valuer test the claim. (Ch 12 §12.3.2, p. 496)

> POSITION SOUGHT

Specific protection and more work.

- Require property-by-property severance mapping against the EIS corridor before any determination on a floating footprint, or restrict the determination to a defined alignment.
- Condition a binding standard for access-track location and crossings that protects internal stock movement and water.
- (c) Require that enabling works not proceed on a holding until a landholder-agreed PSMP is in place.



3 | Loss of Access to Aerially-Maintained Country

3.1 Evidence

The EIS concedes that the easement prohibits "flying aircraft (such as crop dusters)" and flying drones, and that easement conditions restrict agricultural aviation. (Ch 12 §12.4.2, p. 505; Ch 13 §13.4.2, p. 539; Ch 17 §17.2) Towers are up to 80 m high with 500 kV conductors. (Ch 17 §17.2)

Steep hill country on the escarpment cannot be trafficked by ground-spreading equipment. Pasture on that country is maintained by aerial fertiliser and aerial weed control applied to the whole paddock.

Measure	Before (current aerial program)	After (no aerial access)	Source
The maintenance system	Improved perennial pasture maintained from the air. Full program: 20 kg S, 20 kg P and 150 kg N per ha, multiple applications. Published benchmark for fertilised Northern Tablelands pasture: 14-18 DSE/ha (district baseline 12-16) (MLA More Beef from Pastures 2021; NSW Agriculture Agfact P2.5.34), corroborated by the 21 DSE/ha ceiling in Table 1	Aerial application is prohibited in the easement. Ground treatment is not feasible on steep or inaccessible country, in TR6's own words: "Some steep or inaccessible areas ... may not be able to be treated effectively by other methods"	Landholder program, Table 4; NSW DPI PROGRAZE (incl. Primefact 875/876) and NSW Agriculture Agfact P2.5.34 Pastures for the Northern Tablelands; MLA More Beef from Pastures (2021); Ch 12 §12.4.2, p. 505; TR6 §6.7, printed p. 64
The run-down	Not applicable	About 3 years: legume content falls from 25-35% to under 5%. 36-48 months: roughly 40-60% of carrying capacity lost. 5-7 years: full reversion to native baseline of 3-5 DSE/ha, a 65-75% loss	Northern Tablelands superphosphate cessation trials (Curll 1977a/b; Ayres et al. 1977)
The stakes	Gross margin of $2,640-3,300/ha	Any material decline is a loss the EIS prices at zero	Local agronomic range, Table 1; Ch 12 §12.4.2, p. 505
EIS assessed loss	Not stated	Not stated	Ch 12 §12.4.2, p. 505

> Table 5 - **Carrying capacity before and after loss of aerial access**

Note on Table 5. This table sets out the mechanism of loss and its timing. It does not put a dollar figure on the loss. The affected country runs along a long corridor of varying slope, soil and rainfall, so no single carrying capacity or margin represents all of it, and the Before figures are given as ranges. They are published benchmarks for fertilised perennial pasture on New England basalt and plateau country, corroborated by the landholder program in Table 4 (20 kg S, 20 kg P and 150 kg N per hectare, multiple applications). The precision in this table is in the sequence and the timing of the decline, which the cessation-trial evidence supports, not in per-hectare dollars, which depend on the holding.
Well-managed hill country in a high-rainfall environment with proper fertility and ground cover can sustain high levels of production. That is the baseline being defended here. It is not presented as typical of all hill country in the corridor.
The After column follows what the EIS itself concedes. TR6 §6.7 accepts that areas that cannot be treated from the air could in most instances be treated on the ground, but that this "would be less efficient, less timely and more costly in most cases", and that "some steep or inaccessible areas ... may not be able to be treated effectively by other methods". The decline that follows is conceded in principle and unpriced: the EIS states no assessed loss (Ch 12 §12.4.2, p. 505).
The EIS does not break the corridor down by slope. The closest measure is Land and Soil Capability: Class 5, 6 and 7 land makes up 7,031 of 10,928 hectares (64.3%) of the project area and 1,417.3 of 2,233 hectares (63.5%) of the disturbance area (TR6 Table 4-9). That is a proxy for land with significant limitations, not a measure of the area dependent on aerial access. Refinement from landholder records may follow.

3.2 EIS shortcoming

The EIS states the aviation restriction and does not translate it into an agricultural consequence. No affected area, no carrying-capacity effect and no $/ha loss are reported. The one-line coexistence assertion (that 13,000 km of NSW high-voltage lines "already successfully coexist" with grazing) addresses ground stock management and not aerial maintenance of steep country (Ch 12 §12.4.2, p. 504).

3.3 Consequences

The loss is permanent for the life of the easement. It begins at energisation and, for operations that rely on regular aerial application, compounds over several seasons.

> Footnote 1. Aerial firefighting restrictions (25 m retardant lockout near energised lines, Ch 17 §17.3, pp. 655–669) and aviation safety are addressed in the submission's bushfire and aviation sections. They are not argued here.

> POSITION SOUGHT

More work and specific protection.

- Require the proponent to map, per affected holding, the area of aerially-maintained country within the exclusion distance and to cost the loss of carrying capacity.
- Require compensation to be assessed on the productive value of the affected country, as an ongoing loss, not only as an easement valuation.
- Where an alignment can avoid ridgelines used for aerial application, require it to do so.



4 | Biosecurity and Weed Spread

4.1 Evidence

The EIS concedes a "moderate risk of weed spread" from construction, naming Chilean Needle Grass, Serrated Tussock, St John's Wort, Tropical Soda Apple and Parthenium. It also identifies livestock disease risks and the mobilisation of anthrax spores through ground disturbance in the Rouchel district. (Ch 13 §13.3.5, pp. 529–533) Its mitigation rests on contractor wash-down bays, clean-on-entry certification and biosecurity management plans (Ch 13 §13.7, Measure AG5; AG1–AG12). Construction generates an estimated 270,000 m^3 of vegetation waste. (Ch 23 §23.3.1, pp. 765–766, Table 23.2) The track network crosses an estimated 130 waterway and property-boundary crossing points. (Ch 3 §3.3.8.1, p. 126) Enabling works may begin before the CEMP is approved (Ch 25 §25.2.1, p. 820).

Species	EIS treatment (page)	Mechanism of productivity loss	$/ha consequence
Chilean Needle Grass (Nassella neesiana)	Named, "moderate risk" (Ch 13 §13.3.5, pp. 529–533)	Competes with pasture, and its sharp, awned seeds injure livestock eyes, pierce hides and contaminate fleece, downgrading wool. (NSW DPI WeedWise)	Can halve summer pasture productivity (up to 50% loss); wool downgrading and hide damage add to the loss. No $/ha figure published. (NSW DPI WeedWise)
Serrated Tussock	Named, "moderate risk" (same)	Unpalatable, fibrous tussock of negligible feed value that dominates pasture and displaces desirable feed species. (WoNS Serrated Tussock Management Guide; NSW DPI WeedWise)	Carrying capacity falls from 7–15 DSE/ha to 0.5 DSE/ha in dense infestations, a loss of over 90%. (WoNS Serrated Tussock Management Guide)
St John's Wort	Named, "moderate risk" (same)	Contains hypericin, which causes photosensitisation and poisoning in stock, and displaces productive pasture. (NSW DPI WeedWise)	Weight loss, reduced reproductive performance and milk yield, and wool downgrading from vegetable fault, with reduced carrying capacity where toxicity forces destocking. No $/ha figure published. (NSW DPI WeedWise)
Spiny Burrgrass	Not named in the EIS (checked against the full EIS text, 23 Oct 2026)	Sharply barbed seed burrs cling to fleece and skin, contaminating wool and injuring the mouths and feet of stock. (NSW DPI WeedWise)	Wool discounted for vegetable fault, and mouth and foot injury reduces grazing and stock growth. No $/ha figure published. (NSW DPI WeedWise)
Fireweed, African Love Grass, Nodding Thistle, Saffron Thistle	Not named in the EIS; identified by the local agronomic expert as major local weed issues on affected holdings.	Fireweed contains pyrrolizidine alkaloids that cause cumulative liver damage in cattle and horses; African Love Grass and the thistles outcompete desirable pasture and reduce carrying capacity. (NSW DPI WeedWise)	Reduced carrying capacity where these species dominate pasture, plus stock illness or death from fireweed; control needs recurring herbicide programs. No $/ha figure published. (NSW DPI WeedWise)
Tropical Soda Apple, Parthenium	Named (same)	Tropical Soda Apple forms dense thorny thickets that keep stock from grazing, shade and water, and cattle spread its seed in dung. Parthenium suppresses pasture growth and poisons livestock. (NSW DPI WeedWise)	Tropical Soda Apple can rapidly outcompete pasture, and stock movements from infested land are restricted under a Biosecurity Control Order. Parthenium infestations reduce pasture carrying capacity and can taint meat and milk. No $/ha figure published. (NSW DPI WeedWise)

Species	EIS treatment (page)	Mechanism of productivity loss	$/ha consequence
Anthrax spores (Rouchel district)	Disturbance risk identified (same)	Stock loss; movement restrictions. (NSW DPIRD)	Stock loss and property movement restrictions if soil disturbance exposes dormant spores; no $/ha figure applies. (NSW DPIRD)

> Table 6 - **Species, EIS treatment and productivity consequence - Control cost for context.**

4.2 EIS shortcoming

- The EIS rates the risk "moderate" and the residual risk low after wash-down, without testing wash-down effectiveness on 580 km of unsealed tr The EIS's named-species list omits weeds the local agronomic expert identifies as major local issues on affected holdings (Fireweed, African Love Grass, Nodding Thistle, Saffron Thistle), understating local weed pressure before any construction-generated spreadback in wet conditions.
- No pre-construction weed baseline is reported for individual holdings, so spread cannot later be attributed or compensated.
- Wash-down compliance depends on contractors. Enabling works can start before the CEMP is approved.
- No $/ha consequence is stated for any species.

4.3 Consequences

An infestation on a clean holding is a permanent increase in management cost and a long-term reduction in carrying capacity. It is not limited to the construction footprint. The duration of exposure follows the construction program (Section 5).

> Footnote 2. Wider biosecurity, livestock disease and anthrax risk are addressed in the submission's biosecurity section. This section covers the productivity consequence only.

> POSITION SOUGHT

Specific protection.
Require …

- a pre-construction weed and soil baseline on every affected holding, jointly recorded with the landholder;
- mandatory wash-down verification by an independent inspector;
- a funded obligation on the proponent to treat introduced infestations and compensate residual production loss;
- no enabling works on a holding before biosecurity arrangements are agreed.

5 | Weather Constructability

5.1 Why this sub-section matters

Duration is the multiplier on every impact in Sections 1 to 4. The EIS tells decision-makers that construction at each tower takes "a few weeks to a few months depending on the location, construction program and weather conditions" (Ch 12 §12.3.1, p. 495; repeated Ch 15 §15.2.2, p. 580). Weather is named as a driver of duration. It is not measured, and it is not applied.

This sub-section tests that gap against three bodies of evidence: what the EIS says about weather and schedule, what the proponent's own groundwater report records about the climate along the easement, and what the community's local weather stations show about rain and wind at working resolution. Wind is the sharpest of the three, because crane lifts and conductor stringing both operate under wind limits and the submission has not found a wind downtime allowance anywhere in the EIS bundle.

5.2 Evidence: what the EIS contains

Item	What the EIS states	Citation
Local weather data	No on-site meteorological or private weather-station time series data appears in the EIS main volume. Technical Report 16 (Groundwater) compiles 55 years of monthly and annual SILO gridded rainfall and pan-evaporation at three reference points, for groundwater recharge only (see Table 7A). The submission has not found daily-resolution weather data applied to construction in the EIS bundle.	Whole-EIS main volume review (889 pp.); TR16 §4.1, Tables 4-1 to 4-3, pp. 25–26
Weather sources actually cited	BOM continental datasets (groundwater atlas, groundwater explorer, probable maximum precipitation); ARR 2019 flood guidelines; DPHI air-quality stations at Tamworth, Armidale and Muswellbrook	ARR 2019: Ch 18, p. 684; BOM GDE Atlas: Ch 19, p. 711; DPHI air-quality stations: Ch 20 §20.2.1, p. 725; BOM source documents: References, pp. 844–845
Wind	Used only as a structural design load (AS/NZS 1170.2:2021) and as a fire-ignition factor. No time-series wind analysis for crane lifts or conductor stringing.	Ch 17 §17.3, Table 17.7, p. 667; §17.3.3.2, p. 659
Construction program	Six years, 2028 to 2034	Ch 3 §3.3.2, p. 105
Restriction basis for the agricultural loss calculation	"Restriction of agricultural activities for a full 5 years": a five-year basis against the six-year program	Ch 13, p. 530
Wet-weather downtime in the program	None. No workable-day deduction.	Ch 3 §3.3.2, p. 105
Working hours	Mon–Fri 7 am–6 pm; Sat 8 am–1 pm; out-of-hours work contemplated "to increase construction productivity and reduce overall duration"	Ch 3 §3.3.3.1–3.3.3.2, p. 107
Per-tower duration	"From a few weeks to a few months depending on the location, construction program and weather conditions"	Ch 12 §12.3.1, p. 495 = Ch 15 §15.2.2, p. 580
Weather in the management framework	A trigger within the CEMP: "Stop work and site shutdowns will be implemented as required during periods of adverse weather"	Ch 14 Table 14.7 (TT20), p. 573
Access tracks	About 500 km unsealed. Wet weather causes "increased potholing and reduced pavement integrity", managed by regrading	Ch 3 §3.3.8, p. 125; Ch 14 §14.3.5, p. 564
Flooding and access	Wet conditions may restrict access and disrupt plant; managed by "monitoring of weather conditions" and CEMP procedures	Ch 18 §18.3.4, p. 693
Detailed schedule	Set by post-determination contractors	Ch 3 §3.3.2, p. 105

> Table 7 - **EIS treatment of weather and schedule (page-cited)**

The proponent's own weather data. The EIS bundle contains long-term climate data for the corridor. Technical Report 16 selects three reference points to represent the study area from south to north and compiles 55 years (1970 to 2025) of annual and monthly rainfall and annual pan-evaporation at each (TR16 §4.1, Tables 4-1 to 4-3, pp. 25–26; Appendix B). The three points are Oaklands (Ravensworth), Glen Morrison (Branga Plains) and Armidale Airport.

TR16 uses this data to estimate aquifer recharge. The submission has not found that any construction assessment in the EIS bundle applies it to construction feasibility, crane operating limits or schedule delay. The data is monthly and annual in resolution. It contains no wind record of any kind.

Three climates, one schedule. The proponent's three reference points show that the easement does not sit in one climate (TR16 §4.1, Tables 4-1 to 4-3, pp. 25–26).

- **Southern end,** Oaklands (Ravensworth), BOM 061242, Hunter lowland. Lowest annual rainfall mean of the three (664.9 mm) and highest pan-evaporation (1,529.5 mm). Annual rainfall over 55 years ranged from 292.7 mm to 1,037.6 mm.
- Corridor midpoint, Glen Morrison (Branga Plains), BOM 056083, plateau near the corridor. Annual mean 758.8 mm and pan-evaporation 1,461.9 mm. This point has the widest annual range of the three: 295.9 mm to 1,197.7 mm.
- Northern end, Armidale Airport, BOM 056238. Highest annual rainfall mean (796.3 mm) and lowest pan-evaporation (1,227.1 mm). Annual rainfall ranged from 315.2 mm to 1,125.8 mm.

The proponent's own record therefore documents three regimes along the line, and large year-to-year swings within each. The midpoint, closest to the plateau working area, swings the most. None of this is applied to the construction schedule, which runs as a single continuous timeline.

Station (BOM ID)	Position on the easement	Annual rainfall, 55 years (mean; range)	Annual pan-evaporation (mean)	Applied to construction schedule
Oaklands, Ravensworth (061242)	South: Hunter lowland	664.9 mm; 292.7 to 1,037.6 mm	1,529.5 mm	No
Glen Morrison, Branga Plains (056083)	Midpoint: plateau near the corridor	758.8 mm; 295.9 to 1,197.7 mm	1,461.9 mm	No
Armidale Airport (056238)	North	796.3 mm; 315.2 to 1,125.8 mm	1,227.1 mm	No

> Table 7A - **Weather data compiled in the proponent's own EIS (TR16 §4.1), and whether it is applied to the construction schedule**

Source: TR16 §4.1, Tables 4-1 to 4-3, pp. 25–26; Appendix B. Period 1970 to 2025. Rainfall and evaporation are SILO gridded climate data (about 5 km by 5 km) tied to the named BOM stations. "Applied to construction schedule" records that the submission has not found any use of this data in the EIS construction assessment.

5.3 EIS shortcomings

1. **No constructability weather baseline.** While Technical Report 16 (Groundwater) compiles monthly and annual rainfall averages at locations such as Glen Morrison solely to estimate aquifer recharge, the submission has not found an operational weather dataset in the EIS bundle (daily rainfall intensity, wind speed and gust distributions, fog frequency or ground-saturation durations) applied to evaluate construction feasibility, crane operating limits or schedule delay across the plateau and escarpment. The data to build part of such a baseline was already in the proponent's hands: TR16 compiles 55 years of rainfall and evaporation at three points spanning the easement (TR16 §4.1, pp. 25–26).
2. **Wind is not assessed as a construction constraint.** The EIS main volume treats wind as a structural design load and a fire-ignition factor (Ch 17 §17.3, Table 17.7, p. 667; §17.3.3.2, p. 659). The submission has not found, in the EIS bundle, any wind time-series, gust distribution or wind downtime allowance for crane lifts or conductor stringing. TR13 contains no weather content, and TR16 contains rainfall and evaporation only.
3. **One schedule across three regimes.** The proponent's reference points differ in mean rainfall, in the range of annual rainfall and in evaporation (Table 7A). The EIS applies a single continuous construction timeline across all three.
4. **Weather appears only as a management response, never as a scheduling input.** A "stop work as required" trigger is not a workable-day calendar.
5. The proponent's own justification names weather as a defining constraint and leaves it to generic controls. Its justification chapter records that route selection and hub locations were informed by "constraints associated with terrain, geology, access and weather conditions", with "mitigation measures and construction planning controls" identified to manage residual constraints (Ch 26, Table 26.1, p. 834). A constraint material enough to shape where the corridor runs is material enough to test against how long the work takes. The EIS does the first and not the second.
6. **Duration is asserted, not derived.** The EIS describes tower times as a range ending in "months" and says the range depends on weather. It does not say how much, how often, or in which season.
7. **The decision is made before the testing.** Detailed schedules are left to contractors after determination (Ch 3 §3.3.2, p. 105). Determination is sought on a duration that no one has tested against local conditions.
8. **Inconsistent duration.** The EIS applies a five-year restriction basis (Ch 13, p. 530) against its six-year construction program (Ch 3 §3.3.2, p. 105).

5.4 Evidence: local weather station data

The community group holds the only local, multi-year, daily-resolution weather dataset placed before this assessment to evaluate constructability. The proponent's technical assessments rely on regional or interpolated monthly and annual aggregates (for example TR16 §4.1) for groundwater recharge, without analyzing daily operational weather records for the construction corridor.

The two datasets answer different questions. For annual and monthly rainfall, the proponent's 55-year record in TR16 is the longer series and this submission relies on it (Table 7A). The community data adds two things the EIS bundle does not offer, as far as the submission has found: daily rainfall resolution, and wind.

Station	Use in this section	Record	Notes
Local weather station (1)	Rainfall statistics only	1,382 daily rainfall records with data, 3 Jul 2022 – 21 Oct 2026 (87.9% of calendar days in the range)	Extracted 22 Oct 2026. Station sits at about 1,300 m elevation in a flat, protected position within 15km of Glen Morrison weather station. Rainfall gauge reliable; wind understated, not used
Local weather station (2)	Wind statistics only	1,622 daily wind records with data, 13 Oct 2021 – 21 Oct 2026 (88.4% of calendar days in the range)	Rainfall gauge unreliable, not used. Station sits at about 1,300 m elevation with open exposure on all sides, within 10km of Glen Morrison weather station. Representative of the exposed ridgeline country the alignment crosses

> Table 8 - **Source stations**

The stations are described by site type and are not named. Rainfall is taken from the local weather station on the flat, protected site only. Wind is taken from the local weather station on an exposed hilltop only. Neither station's data is presented as representative of the whole 10,928 ha corridor. Weather station sites are located within the project area and are representative of plateau/escarpment conditions.

Rainfall: the daily wet-day record

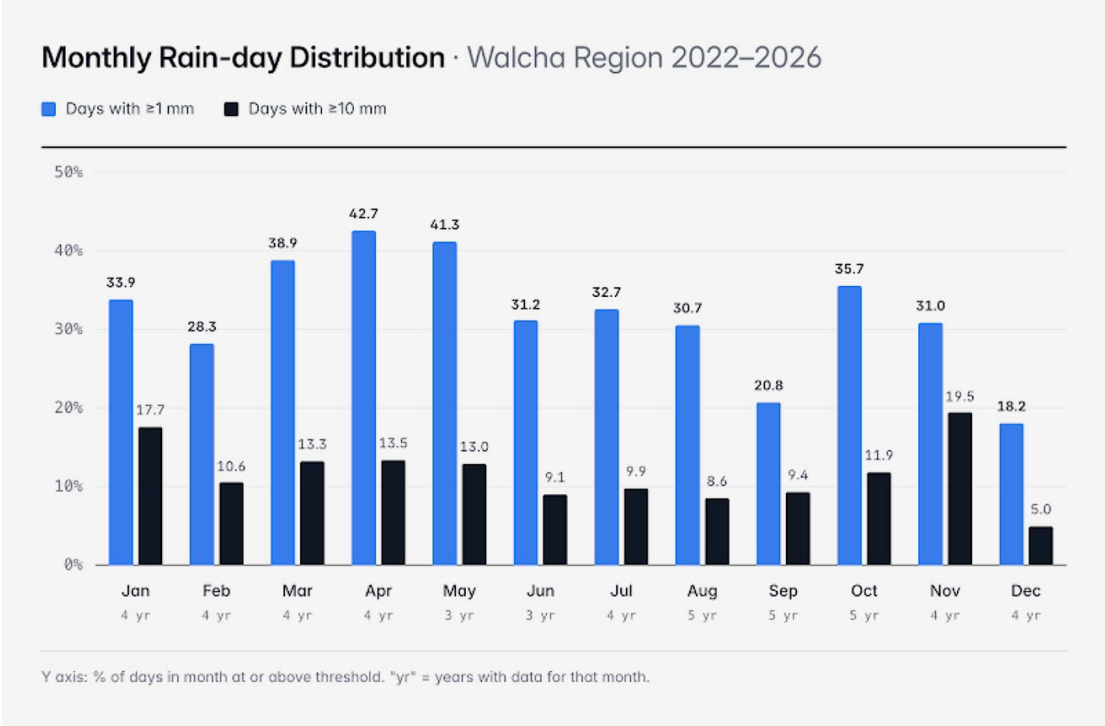
The local weather station on the flat, protected site is the only multi-year, daily-resolution rainfall record placed before this assessment. TR16 gives monthly and annual totals. It does not give rain days, consecutive wet days or wet-spell frequency, which are the figures a workable-day calendar needs. Annual totals can also hide the pattern: the same annual rainfall can fall as a few large events or as many small ones, and the two cost very different numbers of working days.

Weather Station Statistics · Walcha Region 2022-2026

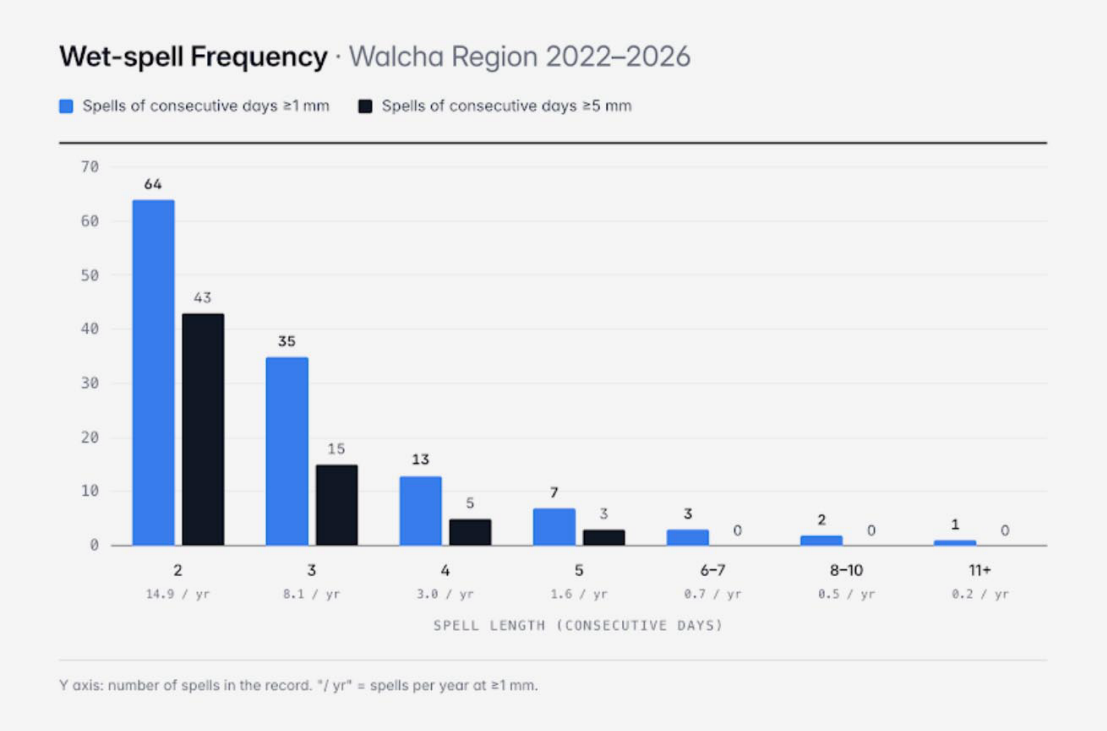
STATISTIC	VALUE
Days in record used / days with data	**1,382 days** with rainfall data, of 1,572 calendar days in the range (87.9%)
Days with ≥1 mm rain	**436 days** · 31.5%
Days with ≥5 mm rain	**252 days** · 18.2%
Days with ≥10 mm rain	**162 days** · 11.7%
Mean annual rainfall and range across years	**1,288 mm** mean across the three full years 2023–2025 (range 1,026–1,478 mm; 2022 partial from 3 Jul, 2026 partial to 21 Oct)
Wettest month, and rain-day % by month	See Chart A data
Longest run of consecutive days ≥1 mm	**12 days** (10–21 October 2026)
Wet spells of ≥3, ≥5, ≥7, ≥10 consecutive days	**61; 13; 6; 3** (full distribution in Chart B)
Maximum single-day rainfall and date	**172.7 mm**, 18 January 2025

> Table 9 - **Local Weather Station Statistics (Rainfall)**

Basis: statistics use days with a valid rainfall reading. Missing days are excluded from a statistic, not treated as dry. Wet spells are broken by missing days, which is conservative. One undatable record was excluded. Months are pooled across 3 to 5 years of data each (3 for May and Jun, 5 for Aug, Sep and Oct, 4 for the rest), so monthly percentages are indicative.



> Chart A - **Monthly rain-day distribution**



> Chart B - **Wet-spell frequency (data for rendering)**

Record ... 192 rain events ≥1 mm in 4.3 years (44.6 per year), of which 125 lasted two or more days (29 per year).

Wind: the exposed-hilltop record

Wind is the clearest gap in the EIS treatment of construction. Crane lifts and conductor stringing both carry wind limits. The EIS uses wind for structural loads and fire ignition, and the submission has not found any wind downtime allowance in the EIS bundle. The wind record from the local weather station on an exposed hilltop is the only wind time series the submission is aware of that has been placed before this assessment.

Table 10 sets that record against a ladder of thresholds. The station is exposed, so the counts describe hilltop conditions and not every tower site. They show that the thresholds are reached in practice at working elevation, which is the question the EIS does not ask.

Wind Threshold Ladder · Walcha Region 2022-2026

RUNG	THRESHOLD Daily maximum gust	OPERATIONAL LIMIT THIS RUNG REPRESENTS	DAYS / YEAR Above threshold, extrapolated from valid recordings	% OF DAYS Recorded	LONGEST RUN Consecutive days
1	≥40 km/h	Mobile slewing crane stand-down limit (11 m/s / 40 km/h), top of the general crane stand-down band 32-50 km/h (9-14 m/s) - AS 2550.5-2016 and Manitowoc wind guidelines, as cited in Australian crane industry guidance.	≈211	57.7%	26 days
2	≥60 km/h	Exceeds the entire published crane stand-down band (32-50 km/h) for every crane type in the same guidance; all lifting operations unsafe.	≈93	25.3%	8 days
3	≥80 km/h	As per Rung 2: a day at or above this rung is necessarily beyond every published crane stand-down limit. The row shows the frequency and duration of extreme events, not a different trigger.	≈29	7.9%	4 days
4	≥100 km/h	As per Rungs 2 and 3.	≈7	2.0%	4 days
Dry and Wind below Rung 2	Rain <1 mm and gust <60 km/h at weather station location	**Combined workable-day proxy.** Intersection of both conditions.	**55.3%** 336 of the 608 days both stations have valid records	—	—

> Table 10 - **Wind threshold ladder (local weather station on an exposed hilltop)**

Basis: wind readings are used from the exposed-hilltop station's valid recording periods only: October 2021 to December 2023 and March 2026 to 21 October 2026 (931 recorded days). Wind readings from 2024 and 2025 are excluded. The station was struck by flying debris and those years' readings are compromised (near-complete day coverage but collapsed gust counts). January and February 2026 was a total outage. No assumption is made that unrecorded or excluded periods were calm; annual figures are extrapolated from recorded-day rates. On this basis gusts of 40 km/h or more occur on 57.7% of recorded days (about 211 days a year). Counting the damaged-instrument years would understate this (38.3%).

Intersection row: this row combines two separate stations (rainfall from the flat, protected site; wind from the exposed hilltop) and is labelled accordingly. It is a conservative indicator, not a single-site measurement.

- Basis (Table 10): Rungs 1–2 are mapped to sourced crane stand-down limits (AS 2550.5-2016 and manufacturer guidelines). Rungs 3–4 inherit Rung 2's operational meaning a fortiori: any day ≥80 or ≥100 km/h is also a day beyond every crane limit.
- The crane limits above are expressed as wind speed at the crane (sustained); the station counts days by daily maximum gust, so rung counts are an exposure indicator: each counted day includes at least one period at or above the rung. The NSW regulator requires duty holders to confirm wind speed limits for cranes, elevated work platforms and other plant before work starts, and to stop plant and lifting operations when manufacturer limits are reached (SafeWork NSW, High winds in construction, accessed 22 Oct 2026); the EIS does neither.

5.5 Consequences

- The argument below holds whatever the final statistics show; the statistics set its size.
- A workable-day calendar is a precondition of a duration. Without one the "few weeks to a few months" per tower and the six-year program are untested.
- Any non-zero downtime lengthens the program. The EIS allows zero. Each wet spell or wind-hold day that stops heavy plant, concrete, crane lifts or stringing adds elapsed time at every tower.
- Delay is carried by landholders. Every added month extends severance (Section 2), loss of aerial access (Section 3, from energisation) and biosecurity exposure (Section 4) over the same land. The EIS appears to price construction-phase agricultural loss on a five-year multiple.
- Track damage compounds delay. The EIS accepts that about 500 km of unsealed track degrades after wet weather (Ch 14 §14.3.5, p. 564) and relies on regrading. It does not say how many days that takes or how often.
- The EIS creates a perverse incentive. Out-of-hours work and "stop work as required" triggers leave the decision to contractors. The community has no assurance of when heavy plant will be on a holding, or for how long.
- Wind sets crane and stringing days. Lifts and conductor stringing stop when wind limits are exceeded. The EIS includes no wind downtime allowance that the submission has found, so every day lost to wind is a day outside the program.
- A zero allowance cannot be the expected case. The proponent's own record shows annual rainfall swings of several hundred millimetres at each reference point (Table 7A).

> POSITION SOUGHT

More work, then specific protection.

- Before any construction duration is accepted, require the proponent to produce a workable-day analysis from multi-year daily rainfall and wind data, including wet-spell frequency and wind exceedance against sourced operational limits for crane lifts and conductor stringing. The proponent already holds the raw material for the rainfall component: TR16 compiles 55 years of rainfall and evaporation at three points spanning the easement (TR16 §4.1, pp. 25–26). It has not applied that data, or any wind data, to the construction schedule.
- Require the Agricultural Impact Assessment to be re-run on that program.
- Condition a cap on time on any one holding, with landholder compensation that scales with every extension.
- Require a binding trafficability standard: no heavy plant on unsealed tracks or paddocks within a set period after rain, set from local evidence.
- Treat the community's station records as relevant evidence and invite the proponent to respond to them.

6 | Electromagnetic Fields, Telecommunications and Agricultural Operations

6.1 Evidence

EnergyCo has modelled electric and magnetic fields extensively. The problem is what the modelling was built to answer. Technical Report 13 (TR13), *Electric and Magnetic Field Study (including Telecommunications)*, Aurecon Australasia for Energy Corporation of NSW, September 2026, answers whether people are exposed above public guideline limits. It does not answer what the lines do to a working farm. TR13's own text shows the gap.

Scope is human exposure. TR13 sets its scope as calculating fields "at one metre above ground level", assessing compliance with EMF guidelines and prudent avoidance principles, and assessing radio frequency interference (TR13 §1.4, p. 18). Fields were modelled at that height "in accordance with international standards" (TR13 Executive Summary, p. III; §3.1, p. 25).

Induced voltage is assessed for a gas pipeline. For the Queensland Hunter Gas Pipeline, TR13 concludes: "It is anticipated that impacts to the pipeline would be minimal, as the crossing is approximately perpendicular to the 500 kV transmission lines, resulting in lower induced voltages compared to a pipeline running parallel to the transmission corridor" (TR13 §8.1, p. 74). That reasoning is not applied to fences.

Nuisance shocks are acknowledged and deferred. TR13 states that high electric field strengths "can approach a level at which 'nuisance shocks' can occur and this phenomenon needs to be managed. This can be done via easement and fencing guidelines" (TR13 §2.2.1, p. 20).

Agricultural communications may degrade. "Farmers using VHF alongside GPS for agricultural machinery may experience some degradation when in vicinity of the lines or if the lines happen to be in direct line of site of their communication systems" (TR13 §7.1, pp. 72-73). The remedy is construction-stage coordination with landholders and "signal boosting equipment or antenna enhancements" offered "if any such systems are in use" (TR13 §7.1, p. 73).

Interference reaches hundreds of metres. "Under light rain conditions, the radio frequency interference limit is met at between approximately 232 m and 426 m from the transmission line centreline under the IREQ and BPA methods. Where users of the 0.15 to 300 MHz radio spectrum are located within this proximity to the Transmission Line centreline, appropriate mitigation measures may be required" (TR13 §7.1, p. 72).

Telecommunications assessment was a licensed-link desktop review. A desktop review of the ACMA licence database identified 26 point-to-point microwave links. Twenty-five were no material risk. One NSW Telco Authority 7.5 GHz link between Turkey Mountain and Uralla has a "high risk of impact due to limited horizontal and vertical clearance from a proposed transmission tower", with further assessment deferred to detailed design. TR13 expects this to be addressed "by micro-siting of the tower and/or upgrading existing telecommunications equipment" (TR13 §7.3, p. 73).

An agricultural effect is already on record. TR13 reports the Gibbs Inquiry finding that "Bees in hives under or near transmission lines are adversely affected by shocks created by currents induced by the lines but the effect can be mitigated by shielding" (TR13 §2.2.3, pp. 21-22). The same passage reports that magnetic fields do not affect the health or reproductive capacity of farm animals. This submission does not contest that. The concern is farm infrastructure and systems.

Exposure is assumed to be intermittent. TR13 relies on fields being "unlikely to be experienced by people, other than intermittently" (TR13 §4.4, p. 38) and on human interaction being "mainly intermittent and transitory in nature" (TR13 §4.4, p. 39). That suits public land, not a paddock worked year-round.

The reference design is unfinished. TR13 states that "the maximum transfer capacity on a single 330 kV circuit for the future forecast of load has not yet been confirmed", and that the conservative assumption and conductor arrangement "will need to be re-assessed during the detailed design phase" (TR13 §3.3, p. 28). If other phasings are used, "this can be compensated by increasing the ground clearance where necessary" (TR13 §3.3, p. 27). Modelling assumptions "can be updated as required when all relevant transmission line details are finalised" (TR13 §3.2, p. 26).

6.2 EIS shortcoming

TR13 establishes compliance with exposure limits. It does not assess the agricultural question: what must a landholder change to keep operating safely and efficiently once the line is there? Table 11 sets out the contrast.

Topic	What TR13 assesses	What TR13 leaves unassessed
Induced voltage	Gas pipeline (QHGP) crossing (TR13 §8.1, p. 74)	Induced currents, touch voltages and mitigation (earthing, isolation) for private rural fences, electric fences, yards, gates, troughs and pipework
Field exposure	Human exposure at 1 m above ground (TR13 §1.4, p. 18)	Interaction with machinery and large conductive plant
Shocks	Acknowledged; to be managed by "easement and fencing guidelines" (TR13 §2.2.1, p. 20)	The guidelines themselves (not provided or assessed), what they require on each holding, and at whose cost
Agricultural radio	VHF/GPS degradation acknowledged (TR13 §7.1, pp. 72-73)	Inventory of RTK, telemetry, pump control and private radio systems
RFI zone	232-426 m, 0.15-300 MHz (TR13 §7.1, p. 72)	What farm systems sit inside that zone
Microwave links	26 licensed links; obstruction mechanism set out (TR13 §7.3, p. 73)	Private or licence-exempt farm links; the high-risk link deferred to detailed design
Drones	Not addressed	Existing and foreseeable UAV operations
Design basis	Reference design (TR13 §3.2-3.3, pp. 26-28)	Effect of changed capacity, phasing or clearance on the above

> Table 11 - **What TR13 assesses and what it leaves unassessed**

The double standard. A single gas pipeline receives an induced-voltage assessment. Kilometres of fencing, electric fences, steel yards, gates, troughs, bores and metallic water pipes, the core infrastructure of a grazing enterprise, receive none (scope, §1.4, p. 18).

Fencing. Of 26 mentions of fencing in TR13, 25 are the security perimeter fences of Energy Hub switchyards. The other (p. 20) defers nuisance shocks to "easement and fencing guidelines" that TR13 neither provides nor assesses. TR13 contains no property-level or easement-level assessment of agricultural fencing, and does not quantify induced currents, touch voltages or mitigation (earthing, isolation) for private rural fences.

TR13's own exposure logic makes the gap worse: "A more stringent magnetic field limit is adopted for transmission line easements as these areas are generally unfenced and may be readily accessible to

members of public, including individuals with medical implants" (TR13, p. 23). The report assumes the corridor is unfenced open ground. On working grazing country that premise is false. The affected paddocks are crisscrossed with conductive wire fencing. EnergyCo's assumption contradicts EnergyCo's project.

Structures and external benchmarks. Transgrid's published fencing guidance (external, not part of the EIS) requires earthing and isolation panels for certain fences near transmission easements. The EnergyConnect Agricultural Impact Assessment (also external) treated electric fencing as a recognised interaction and flagged possible relocation of yards or buildings under lines. TR13 has no equivalent for New England holdings.

Machinery. A one-metre human-exposure model says nothing about tractors, headers, spray rigs and augers working beneath or beside conductors. TR13 does not address whether operating practices or exclusion distances will change.

Drones. TR13 does not assess agricultural UAV use. The EnergyConnect Agricultural Impact Assessment concluded that transmission lines and structures restrict drone flight and sensing nearby, and Transgrid maintains specific UAV requirements for its infrastructure (both external). The EIS does not establish what UAV operations occur today or what restrictions the Network Operator will impose.

Precision agriculture and private radio. TR13 does assess consumer systems, and finds them fine: "The mobile phone, National Broadband Network (NBN) and GPS operate on higher frequencies than the noise profile of transmission lines. Mobile phone coverage in Australia sits within the 300MHz to 3GHz and therefore transmission will have limited interaction and interference with the mobile phone network. GPS operates to 1 GHz to 2 GHz and NBN operates at higher frequencies 3 GHz to 30 GHz and is not expected to be impacted by the transmission lines" (TR13 §7.2, p. 73). That makes the omission more conspicuous: TR13 identifies a 232-426 m interference zone and a VHF/GPS degradation risk, then provides no inventory of the farm systems inside it: VHF, RTK, telemetry, pump control.

Microwave obstruction. For licensed links, TR13 sets out the mechanism in detail: "Transmission line towers have the potential to obstruct existing point to point microwave links. In the case of the structure being of a steel lattice construction, as per the overhead transmission towers proposed for the New England REZ transmission project, it is envisaged that degradation of the signal may result if the tower is located on the direct line of sight of the microwave links. This degradation will vary dependent on the frequency of the signal, the total path length, the distance to the nearest endpoint of the link, and the percentage of the first Fresnel zone that is impacted by the structure. Signal loss will also be dictated by the gauge and amount of steel used in the lattice structure" (TR13 §7.3, p. 73). TR13 never applies that reasoning to private farm communications.

Deferral. The remedy is consultation and signal boosting during construction (TR13 §7.1, p. 73), plus "easement and fencing guidelines" (TR13 §2.2.1, p. 20). An EIS exists to identify impacts before determination. Finding out afterwards what no longer works is not an assessment.

6.3 Consequences

These consequences fall on landholders, permanently, and none is costed in TR13.

- Fence redesign and works. Earthing, isolation panels and altered fence layouts on existing fences, and again each time a fence is replaced. Transgrid's fencing guidance (external) sets these requirements.
- Paddock-layout constraint. Temporary electric fencing, rotational grazing and subdivision become harder near structures and under conductors. Transgrid's easement authorisation requirements (external) mean yards, sheds, bores and troughs cannot be built or moved within the easement without approval. Future improvements stay constrained long after construction (see Section 2 on severance).
- Relocation of fixed infrastructure. Yards, loading facilities and water infrastructure within or near the corridor may need to move.
- Drone exclusion corridors. A linear exclusion zone can split a property's usable flight area, forcing altered paths, extra take-off points or manual work.
- Precision-ag workarounds. If VHF, RTK or telemetry links degrade within the RFI zone, the landholder faces replacement equipment, repeaters and downtime in critical operations.
- Ongoing maintenance responsibility. Earthing and isolation infrastructure must be inspected and maintained for the life of the project. The EIS does not say by whom.
- Who pays. TR13 offers equipment "if any such systems are in use" (§7.1, p. 73) but commits to no funding of fence modification, earthing, relocation or long-term upkeep. Without a commitment, these costs transfer to the landholder. The line operates for many decades (see Section 5 on the construction period), so these costs run well beyond construction.

> POSITION SOUGHT

More work, then specific protection.

The Department should require, before determination:

- A property-specific agricultural electromagnetic and communications impact assessment for each affected holding, covering fences, electric fences, machinery, drone operations and communications systems.
- Identification of all affected conductive farm assets (metallic and electric fences, yards, gates, troughs, pipes, sheds) and all farm communications systems (radio, telemetry, RTK, GPS-support) within the interference zone, including the 232-426 m RFI distance in TR13 §7.1, p. 72.
- Performance standards requiring existing farm systems and operations to continue functioning at no less than their pre-project level, including a defined process for impacts that become apparent after energisation.
- The full cost of modifications, replacement equipment and ongoing mitigation attributable to the project borne by EnergyCo or the Network Operator.
- Defined responsibility for inspection and maintenance of earthing, isolation and related mitigation over the project life.
- A requirement that final detailed design demonstrate the EIS EMF and interference assumptions remain valid before energisation, including the 330 kV capacity, phasing and clearance assumptions in TR13 §3.2-3.3, pp. 26-28.

7 | Soil Capability Is a Hazard Rating, Not a Measure of Agricultural Value

7.1 Evidence

EnergyCo's Agricultural Impact Assessment, Technical Report 6 (TR6), Tremain Ivey Advisory, 7 September 2026, relies on the NSW Land and Soil Capability (LSC) scheme to characterise the land. TR6's own description of that scheme shows it was never a measure of agricultural value.

What the scheme is. TR6 describes it as "a scheme for the assessment of the biophysical characteristics of land and the extent to which these would limit agricultural land use" (TR6 §2.2, p. 24). Later: "LSC is based on an assessment of the biophysical characteristics of the land, the extent to which they would limit a particular type of land use, and the current technology that is available for the management of the land" (TR6 §4.2.1, p. 37).

How a class is set. "These hazards include water erosion, wind erosion, soil structure decline, soil acidification, salinity, waterlogging, shallow soils and mass movement. Each hazard is given a rating between 1 (best, highest capability land) and 8 (worst, lowest capability land). The final LSC class of the land is based on the most limiting hazard" (TR6 §4.2.1, p. 38). One hazard sets the class. Land can be fertile, well watered and well grassed and still take a low class because of a single physical constraint such as erosion or mass movement.

What it is suitable for. "The LSC assessment scheme is most suitable for broad-scale assessment of land capability, particularly for assessment of lower intensity, dryland agricultural land use. It is less applicable for high intensity land use, or for irrigation (Woodward, 1988)" (TR6 §4.2.1, p. 38).

What a class tells you. "The LSC class gives an indication of the land management practices that can be applied to a parcel of land without causing degradation to the land and soil at the site and to the off-site environment" (TR6 §4.2.1, p. 38). That is a statement about management and degradation. It says nothing about pasture, carrying capacity or income.

What the class definitions say. TR6 §4.2.2 (pp. 38-39) describes Class 3 as land capable of sustaining high-impact uses such as cultivation where limitations are carefully managed, and Class 4 as land with moderate to high limitations for high-impact uses including regular cropping and high-intensity grazing. For the lower classes:

Class	TR6 definition (TR6 §4.2.2, pp. 38-39)
5	"Will largely restrict land use to grazing, some horticulture (orchards), forestry and nature conservation."
6	"Land has very high limitations for high-impact land uses. Land use restricted to low-impact land uses such as grazing, forestry and nature conservation. Careful management of limitations is required to prevent severe land and environmental degradation."

> Table 12 - **LSC class definitions are statements about limitations, not value**

Grazing is named as the appropriate use for Classes 5 and 6. "Low capability" in this scheme means a narrower range of safe land uses. It does not mean poor grazing country.

Distribution. Table 13 sets out where the project area sits across the classes (TR6 Table 4-9, "Summary of land and soil capability", §4.2.3, p. 39; the same table appears in the EIS main volume as Table 13.1). TR6's own summary of it is quoted in 7.2: the project area is predominately Classes 4 to 7, about 96 per cent, and only 2.9 per cent is Class 3 or Class 2.

LSC class	Project area (ha)	Project area (%)	Agricultural disturbance area (ha)	Agricultural disturbance area (%)
2 - Very high capability	25	0.2%	8.7	0.4%
3 - High capability	290	2.7%	31.2	1.4%
4 - Moderate capability	3,469	31.7%	774.3	34.7%
5 - Moderate–low capability	2,313	21.2%	445.0	19.9%
6 - Low capability	2,721	24.9%	585.4	26.2%
7 - Very low capability	1,997	18.3%	386.9	17.3%
8 - Extremely low capability	65	0.6%	0.3	<0.1%
Sub Total	10,880	99.6%	2,232	99.9%
Not assessed	47	0.4%	0.5	<0.1%
Total	**10,928**	**100.0%**	**2,233**	**100.0%**

Note: Spatial totals and percentages may have minor discrepancies due to rounding.

How TR6 then uses the classes. In §6.2, TR6 states: "As only 9.2 hectares of the operational footprint comprises high quality land (LSC Class 3 and above), the permanent loss of high quality agricultural land associated with the project would be limited" (TR6 §6.2, p. 61; see also §6.1.1, p. 60). On blasting: "The agricultural productivity of land where hard rock is located is often restricted by shallow soils. Consequently, most potential blasting areas are on land of a relatively low LSC class and are expected to have relatively low stocking rates and low productivity… These factors would reduce the impact of any potential disturbance by blasting" (TR6 §5.6, p. 54).

7.2 EIS shortcoming

The proponent's own stated objective for the REZ is to "protect natural and cultural resources through the planning and delivery of the REZ and minimise impacts to biodiversity, heritage, high value agricultural land and other sensitive land uses" (Ch 26 §26.1.1, p. 830). Against that objective, its agricultural assessment finds only 9.2 ha of the operational footprint qualifies as "high quality land" (TR6 §6.2, p. 61) — through the LSC filter this section shows to be a hazard rating, not a measure of agricultural value.

TR6 changes what the LSC scheme measures, in two steps.

Step one: capability becomes quality. The scheme grades land by how intensive a use it can sustain without degrading. TR6 §6.2 relabels everything at Class 3 and above as "high quality land" and counts only that as significant agricultural loss. The scheme does not use that label. TR6's own summary of the project area shows what that line dismisses: "The project area consists predominately of moderate to very low capability land within Classes 4 to 7. These comprise approximately 96 per cent of the project area. Only 2.9 per cent of the project area is located within land classified as high (Class 3) or very high (Class 2) capability land" (TR6 §4.2.3, p. 39; Table 13). By its own account, TR6's "high quality land" line dismisses about 96 per cent of the corridor. The scheme doesn't say that land is lower-quality agricultural land.

Step two: quality becomes productivity. The blasting passage (TR6 §5.6, p. 54) takes a "relatively low LSC class" and converts it into "relatively low stocking rates and low productivity", then into a reduced impact. A hazard rating has become a production forecast. TR6 itself says the scheme is "most suitable for broad-scale assessment" and "less applicable for high intensity land use" (TR6 §4.2.1, p. 38). A broad-scale hazard scheme can't tell you the carrying capacity of an individual grazing enterprise.

What TR6 says the LSC scheme is	How TR6 then uses LSC class
An assessment of biophysical characteristics and "the extent to which these would limit agricultural land use" (§2.2, p. 24)	Class 3 and above is "high quality land" (§6.2, p. 61)
Class set by "the most limiting hazard" (§4.2.1, p. 38)	A "relatively low LSC class" means "relatively low stocking rates and low productivity" (§5.6, p. 54)
Broad-scale, "less applicable for high intensity land use" (§4.2.1, p. 38)	Used to conclude that blasting impact is reduced (§5.6, p. 54)
An indication of management that avoids degradation (§4.2.1, p. 38)	Used to measure loss of agricultural value (§6.2, p. 61)

> Table 14 - **How LSC is described and how TR6 uses it**

The agriculture department disagrees. The NSW Department of Primary Industries and Regional Development advised: "A significant area of the corridor is classified by the Land and Soil Capability Assessment Scheme, Second Approximation (2012) as Class 4 land which is considered in the New England area as high-quality, productive grazing country" (NSW DPIRD, *Advice on SEARs – DPIRD Agriculture*, Reference OUT24/12198, Helen Willis, Agricultural Land Use Planning Officer, 13 August 2024, p. 1; submitted via the NSW Planning Portal for SSI-74175972). DPIRD cites the LSC scheme itself. The agriculture department and the scheme agree, and it is TR6 that departs from both.

The warning label has been read backwards. TR6's own definitions say a lower class signals that careful management is needed "to prevent severe land and environmental degradation" (TR6 §4.2.2, pp. 38-39, Class 6), and that the class indicates what practices can be applied "without causing degradation" (TR6 §4.2.1, p. 38). That is information about what happens when land is disturbed. The project proposes substantial vegetation clearing, extensive unsealed tracks, excavation, cut-and-fill, tower benches, foundation excavation, blasting, spoil handling, drainage alteration and heavy vehicle traffic. These are very different activities from grazing permanent pasture. The significance of a low class is that increasingly intensive disturbance becomes harder to carry out without degradation. TR6 treats it as a reason to value the land less. It should have treated it as a constraint on the works.

Both things are true in the New England. High rainfall supports productive pasture and also creates runoff and erosion risk. Steep slopes carry good grazing and are poor candidates for major earthworks. Permanent pasture holds soil that would deteriorate quickly if stripped, excavated and traversed by roads. Land can be valuable grazing country and highly susceptible to damage when disturbed.

7.3 Consequences

- **Agricultural** value understated. The 9.2 hectare figure counts only Class 3 and above as high quality loss. Productive grazing country on lower classes is left outside the headline impact. This compounds the undervaluation addressed in Section 1 ($364/ha, an easement-wide average): the same land is undervalued twice, once in the per-hectare figure and again in the classification used to dismiss the loss.
- Blasting impacts discounted without evidence. TR6 §5.6 reduces the assessed impact of blasting because the land is assumed to be low-producing. No stocking rate or production data supports that for the specific areas named (TR6 §5.6, p. 54).
- Construction constraints not assessed. The hazards that set the LSC classes (erosion, mass movement, waterlogging, shallow soils) identify where clearing, tracks, cut-and-fill and blasting are most likely to cause degradation. TR6 does not use them for that. The construction implications in Section 5 are therefore not tested against the land's own hazard data.

- Degradation risk carried by landholders. Erosion and mass movement caused by construction are hard to reverse on hazard-prone country. Those effects, on top of the severance addressed in Section 2, fall on the landholder long after construction.
- Approval on a misleading baseline. The Department is asked to assess impacts on agricultural land using a classification that was not designed for the purpose and that the scheme itself cautions against using for higher-intensity use.

> POSITION SOUGHT

The Department should not accept LSC class as a proxy for agricultural value.

This complements the re-run of the productivity assessment sought in Section 1. In addition, the Department should require, before determination:

- That the Agricultural Impact Assessment be corrected so that LSC class is used only for its designed purpose, identifying physical limitations and hazards, and not as a measure of agricultural quality or value. This includes withdrawing the "high quality land (LSC Class 3 and above)" characterisation in TR6 §6.2, p. 61.
- That agricultural value be assessed from the actual productivity and function of the affected land, using the audited production data sought in Section 1.
- That the LSC hazard data be used to identify where the proposed construction activities (clearing, unsealed tracks, cut-and-fill, blasting and foundations) are constrained by erosion, mass movement, waterlogging or other hazards, with the required management specified before determination. TR6 does not undertake this assessment.
- That any statement that a lower LSC class implies low stocking rates or low productivity be withdrawn, including the blasting passage in TR6 §5.6, p. 54, and the conclusion drawn from it that blasting impact would be reduced.
- That the Department take into account the NSW agriculture department's advice that Class 4 land in the New England is high-quality, productive grazing country, and require the assessment to reflect it.

8 | An Incomplete EIS

8.1 Evidence: the consultation record and the country not examined

The agricultural assessment for the project is Technical Report 6 (TR6), prepared by Tremain Ivey Advisory for EnergyCo. Its account of how it consulted landholders is short.

The consultation record. TR6 §3.3.1 states: "Only two interviews were completed for the purposes of this assessment. Additional opportunities for interviews were offered to selected landholders; however, further interviews did not proceed. Given the limited number of completed interviews, the assessment has not relied solely on information obtained through consultation. Information collected during interviews was supplemented by desktop assessment and review of publicly available data sources to characterise agricultural land use, land capability, agricultural productivity and biosecurity issues across the project area" (TR6 §3.3.1, p. 27).

Interview	Location	Pastures and cropping	Enterprises
1	Muscle Creek	Native and improved pastures, no cropping	Beef cattle breeding and purchased steers
2	Muscle Creek	Native and improved pastures, no cropping	Beef cattle breeding

> Table 15 - **The landholder interviews in TR6 (TR6 Table 3-1, §3.3.1, p. 27)**

Muscle Creek is in the Upper Hunter. Both interviews were conducted at this location. TR6 records no interviews at Niangala, Walcha, Kentucky, Uralla or Armidale, or anywhere else within the project easement. The submission does not know why the further interviews offered to selected landholders did not proceed. TR6 does not say.

TR6 says the same thing about its method. The methodology section describes landholder interviews "supplemented by desktop assessment due to the limited number and geographic coverage of completed interviews" (TR6 §1.4, p. 4). The report states the problem itself.

No soil survey. "A soil survey was not undertaken across the proposed transmission line easement. The assessment of land and soil capability therefore relies on regional-scale mapped data" (TR6 §3.4.1, p. 28). That is the same reliance on regional-scale data that Section 7 shows turning a hazard rating into a measure of agricultural value.

The scale of what was not examined. The EIS describes "a length of around 300 kilometres of transmission corridor" (EIS §26.4.2, p. 836). It breaks that into two parts: energy hub connections (50 + 14 + 15 + 30 = 109 km) and the bulk corridor to Bayswater (190 km), 299 km in total (EIS §3.2.2, p. 75). Construction also requires "approximately 580 kilometres of access tracks" (EIS §3.4.1, p. 98). Two interviews at one Upper Hunter locality are the only landholder interviews recorded for that distance.

What the country not interviewed looks like. Table 16 sets the two districts side by side: Muscle Creek, where both TR6 interviews took place, and Niangala, on the plateau the corridor crosses. Every figure is independently verified against Bureau of Meteorology, eSPADE, NSW DPI and Meat & Livestock Australia benchmarks, and the sources are listed under the table heading.

Measure	Muscle Creek (Upper Hunter): both TR6 interviews	Niangala (Southern New England): no TR6 interviews
Elevation	~150-220 m (valley floor)	~1,250-1,340 m
Long-term annual rainfall	612-645 mm	950-1,150 mm
Carrying capacity, improved pasture	3.0-5.5 DSE/ha	14-18 DSE/ha
Like-for-like, improved pasture	4.5-5.5 DSE/ha	14-18 DSE/ha: more than three times
TR6 landholder interviews	2	NIL

> Table 16 - **Where TR6 consulted and where the line crosses**

Sources: BOM Climate Data Online (Scone 061089, Muswellbrook 061053/061198, Jerrys Plains); eSPADE (Soil Landscapes of the Singleton 1:250,000 sheet, Kovac & Lawrie 1991; Tamworth and Armidale sheets); NSW DPI / Hunter LLS carrying capacity guides; NSW DPI Pastures for the Northern Tablelands; MLA More Beef from Pastures.

On improved pasture, the Southern New England plateau carries more than three times the stock of the only country TR6 examined at farm level. The gap is wider when improved plateau country is compared with unimproved or drought-affected Hunter native pasture. TR6 reaches its conclusions about agricultural impact on the plateau without having asked a single landholder there what the country does.

8.2 The corridor's agricultural significance: the proponent's own numbers

TR6 itself records how much agriculture sits in the six local government areas the project crosses (Armidale Regional, Muswellbrook, Tamworth Regional, Upper Hunter, Uralla and Walcha). The figures below come from TR6's tables, which reproduce Australian Bureau of Statistics (ABS) data for 2020-21 (*Agricultural Commodities, Australia*, Cat. 7121.0; *Value of Agricultural Commodities Produced, Australia*, Cat. 7503.0; 2021 Census). They are not recent, and they describe the six LGAs, not the corridor alone.

Measure	Figure	Source
Meat cattle	698,945 head: 17.05% of the NSW beef herd (about one in six)	TR6 Table 4-13, p. 44; ABS 7121.0
Gross value of agricultural production	$861.3 million a year	TR6 Table 4-14, p. 45; ABS 7503.0
Livestock share of that value	$756.0 million (87.8%)	TR6 Table 4-14, p. 45
Cattle and calves alone	$445.3 million a year (51.7% of total agricultural value)	TR6 Table 4-14, p. 45
Average stocking density	4.21 stock units per grazing hectare, against 1.53 for NSW: 275% of the state average	TR6 Tables 4-11 and 4-12, p. 43
Walcha LGA: share of employed workforce in agriculture	40.0%	TR6 Table 4-10, p. 42; ABS 2021 Census

> Table 17 - **Agriculture in the six project LGAs (TR6 Tables 4-10 to 4-14, pp. 42-45; ABS 2020-21)**

Taken together: the six LGAs hold more than one in six of the State's beef cattle, on grazing country carrying nearly three times the NSW average stocking density. Livestock is close to nine-tenths of their agricultural output, and cattle are just over half. In Walcha LGA, two in every five employed people work in agriculture.

This is the context for the corridor. The EIS describes a project of around 300 km crossing this country (EIS §26.4.2, p. 836). The agricultural assessment of that crossing rests on two interviews at Muscle Creek (8.1), and on the regional data above.

8.3 What the EIS never assessed

The earlier sections each identify a specific gap. Taken together, the gaps point to an assessment that was never completed.

Cumulative impact and public interest. The REZ is a large project, and the EIS describes it as such. The submission has not found in the EIS a cumulative impact cost analysis for the effect of REZ development on high-value food and fibre land. It has not found an economic analysis that tests whether the project is in the public interest. These are the two questions the EIS needs to answer:

1. **Where is the cumulative impact cost analysis, and**
2. **Where is the economic analysis demonstrating that the project is in the public interest.**

The proponent's own conclusion concedes the assessment is not settled. Its justification chapter states that other approvals "will be dependent on the final design, consultation and construction methodology outcomes for the project, which are not currently finalised" (Ch 26 §26.2, p. 832), and, under its own Precautionary Principle analysis, that "where land access has prevented field-based survey, assumed presence (biodiversity) and predictive modelling (Aboriginal heritage) has been used until survey can be completed", with operational management deferred to a CEMP, OEMP and "relevant issue-specific management plans" (Ch 26 §26.5.1, p. 838).

The public-interest balance is struck against unpriced losses. The justification concludes that "the strategic need and benefits of the project outweigh the mitigated project impacts" (Ch 26 §26.7, p. 842), and claims the ESD principle of improved valuation on the ground that, for the electricity market, "over time, current externalities are internalised into a project's economics" (Ch 26 §26.5.4, p. 840). The same chapter prices no agricultural loss, and contains no mention of severance, biosecurity or Land and Soil Capability anywhere in its sixteen pages. The externalities are internalised for the electricity market and left with the landholder.

What the wider record says about the premises. Four points bear on the cumulative and public-interest questions. They come from sources outside the EIS, and each is attributed accordingly.

- Generation forecast. AEMO's final 2026 Integrated System Plan (June 2026) forecasts 11 GW of new grid-scale wind and solar generation in the New England REZ by 2050, and classes the New England REZ Network Infrastructure Project as "anticipated", with target full capacity in January 2034 (AEMO, 2026 ISP, Section 4.1, p. 82; Table 9, p. 100). The submission has not tested which forecast the EIS assumes. The EIS's own justification anchors the project's need to that same plan, citing the project's "anticipated" status in the 2026 ISP and 6 GW of transfer capacity in the New England REZ by 2034 (Ch 26 §26.1.2, pp. 831–832). The cumulative analysis sought below should.

- Capital cost. Onshore wind capital costs are nearly three times solar per kW (CSIRO, GenCost 2025-26).
- Construction water. EnergyCo's own cumulative study puts peak construction water demand at about 400 B-double tanker movements a day into Walcha LGA (EnergyCo, Regional Water and Wastewater Cumulative Assessment Study, Table 5-11, p. 101). That figure is EnergyCo's, from outside the EIS.
- Household bills. The Policy Institute of Australia forecasts a further 25% increase in household electricity bills as network infrastructure costs escalate (Policy Institute of Australia analysis, as reported in Voice for Walcha, Reassessing the REZ, v5, July 2026, pp. 1, 10, 48). This is attributed analysis. The submission has not independently verified it.

What the other sections show is missing. Each of these gaps sits in a part of the assessment that a cumulative or public-interest analysis would draw on.

- **Value of the land (Section 1).** The EIS values affected agricultural land at $364/ha. The submission's evidence is that this is a blended figure that does not reflect productive capacity on the country the corridor crosses.
- **Severance (Section 2).** 580 km of access track with 130 creek crossings becomes new internal barriers across working paddocks. The Agricultural Impact Assessment measures hectares removed, not holdings divided, and presents no property-level analysis of residual paddock viability, water access or stock movement. Measures are deferred to post-determination management plans (Ch 12 §12.5, Measure LU1, p. 508; Ch 13 §13.7, Measure AG1, p. 543).
- **Aerial access (Table 5).** Aerial application is prohibited in the easement (EIS Ch 12 §12.4.2, p. 505). TR6 concedes that ground treatment of areas that cannot be treated from the air is "less efficient, less timely and more costly in most cases", and that some steep or inaccessible areas "may not be able to be treated effectively by other methods" (TR6 §6.7, p. 64). The EIS states no assessed loss for the pasture run-down that follows (EIS Ch 12 §12.4.2, p. 505). Table 5 sets out the staged decline.
- **Construction constraints (Section 5).** The six-year program is assessed with no operational weather dataset applied to construction feasibility or schedule delay, even though the EIS bundle itself compiles local rainfall records for groundwater work (Technical Report 16 §4.1). Tower construction duration is asserted as "a few weeks to a few months" (Ch 12 §12.3.1, p. 495) rather than derived, and detailed schedules are left to contractors after determination (Ch 3 §3.3.2, p. 105).
- **EMF and farm operations (Section 6).** The EMF study assesses human exposure, not farm fencing, machinery, drones or private communications. The radio-interference zone extends 232 to 426 m from the centreline (TR13 §7.1, p. 72).
- **Land and soil capability (Section 7).** TR6 counts only 9.2 ha of the operational footprint as "high quality land" (TR6 §6.2, p. 61). It does so by treating a hazard rating as a measure of value, although about 96% of the project area sits in Classes 4 to 7 (TR6 §4.2.3, p. 39), and NSW DPIRD advises that Class 4 land in the New England is high-quality, productive grazing country (OUT24/12198, p. 1).

Each of these is a cost that falls on a farm, the district or the State. The submission has not found a cumulative impact cost analysis in the EIS that brings them together.

8.4 The community record and the Position Sought

The community record. The community was given a short period to respond to a very large document. Anna Young, a Walcha grazier and chair of the Walcha High Country Guardians, said: "They've given us only 29 days to respond to these 16,000 pages in between all of our day jobs" (T. Plevey, "New England residents face 29-day deadline to digest 16,000-page EnergyCo document", The Armidale Express, 15 October 2026, updated 16 October 2026).

> As published context: in September 2026 Anna Young, Arnold Ham (Walcha) and George Crouch (Gundy) filed a summons in the Supreme Court of NSW against the NSW Government over the missing cost-benefit documentation for the $20 billion REZ (The Armidale Express, 7 September 2026).

> POSITION SOUGHT

The Department should not accept the agricultural assessment as it stands.

In addition to the corrections sought in Sections 1 to 7, the Department should require, before determination:

- That the Department not accept the agricultural assessment as adequate, given that it rests on two interviews at one Upper Hunter locality (TR6 §3.3.1, Table 3-1, p. 27) over a corridor of around 300 km (EIS §26.4.2, p. 836), with no consultation of landholders on the Southern New England plateau and no soil survey along the easement (TR6 §3.4.1, p. 28).
- A farm-level agricultural assessment across the Southern New England plateau, on the land the corridor actually crosses, completed before determination.
- The cumulative economic impact assessment and public-interest analysis that the EIS does not contain, reflecting AEMO's 2026 Integrated System Plan forecasts for the New England REZ.
- Consistency with the corrections sought in Sections 1 to 7.



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[1] The six impacted LGAs are Armidale, Uralla, Tamworth, Walcha, Upper Hunter and Muswellbrook. The project area spans eight LGAs, but only small, non-agricultural areas occur within the Singleton and Liverpool Plains Shires (EIS Ch 13, §13.1, p. 513).

[2] Consulting agronomist - Damien Timbs, Productive Pastoral Solutions with 25 years expertise in the New England region.

WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY
UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha